



CITY OF PUYALLUP

Development Services Department

Puyallup City Hall
333 S. Meridian
Puyallup WA 98371

December 31, 2014

Marcia Lucero
Project Manager
Planning & Land Services, Pierce County
2401 South 35th Street
Tacoma, WA 98409-7460

Re: Knutson Farms Short Plat/PDD/SEPA/Shoreline SDP (ADR63-14/SD36-14), Notice of Application

Dear Marcia:

Thank you for your recent Notice of Application transmittal of the aforementioned application for the Knutson Farms industrial project. The City of Puyallup is strongly interested in this proposed land use action both given the project's scope, as well as its location within the City's Urban Growth Area and utility service areas. We would request that the City be forwarded copies of all forthcoming County notices and related material generated for the project, including condition letters, SEPA determinations, public hearing notices, staff reports, etc.

The City of Puyallup has not yet had an opportunity to review more detailed plans and studies pertaining to this proposed project. The following initial comments are intended both to raise key issues about this proposal which we see potentially affecting the City, as well as to request additional information so that we can continue our assessment of this major project:

1. Agricultural preservation

There is a well-documented record regarding City-County dealings as to agricultural preservation in this project site/vicinity over the past decade. Attached to these City comments are two Pierce County letters from 2008 (12/12/08 from then-County Executive John Ladenburg and 8/13/08 from County planner Sean Gaffney) which emphasized the County's strong intent to ensure that adequate acreage in this UGA vicinity is "set-aside" for permanent agricultural/open space usage, per prior policy documents. This matter was heightened in 2011, when Pierce County invoked jurisdiction at the Boundary Review Board on the then-proposed annexation into the City of Puyallup (aka Van Lierop annexation) of 114 acres which adjoins this Knutson Farms site, under the contention that further agricultural preservation safeguards were needed for that annexation area. As an associated

action at that time, the County Council initiated an amendment to remove the entire Van Lierop and Knutson Farms area from the City's UGA. Those County actions eventually led to a Preservation Covenant, crafted by City and County legal staff, being placed upon major portions of Mr. Van Lierop's property (over and above the base City zoning which provides for agriculture use), thus allowing the UGA amendment/BRB appeal to be dropped and that annexation to be finalized.

As Mr. Knutson's subject property also was a centerpiece of those agricultural preservation discussions over the past decade, we would expect the County to rigorously enforce permanent agricultural set-asides on this current Knutson Farms development proposal as occurred with Mr. Van Lierop's land during the recent annexation. In our preliminary review of the Notice of Application material, we did not see this agricultural preservation issue addressed relative to the proposed development plans; we question why this was deemed a complete application given this noteworthy omission. Given its direct impact upon the potential scope and configuration of proposed uses on the Knutson Farms site, we request that the details of this set-aside be satisfactorily addressed – in coordination with the City and **early** in the pending project review process - prior to any finalization of project conditioning, issuance of a SEPA determination and/or Hearing Examiner consideration. Finally, it is the City's expectation that floodway and related acreage on the project site which cannot support urban development not be deemed suitable for the requisite agricultural set-aside.

2. Traffic mitigation

Obviously, an industrial project of this scale has the potential to impact City transportation facilities over a wide radius, as well as points of regional importance (e.g. SR-410 interchange). The City is assuming that all project roadway improvements shown on the Knutson Farms Preliminary PDD Site Plan (e.g. expanded 134th Avenue East [33rd Street in the City], new "B Street" accessing the Shaw Road overpass, etc.) are parts of the project and would be fully constructed by the applicant. City Traffic Engineer Sanjeev Tandle requests the following information regarding the project traffic analysis:

- a. Please submit a copy of the project traffic study to the City Traffic Engineer as soon as possible to allow City review of that material prior to finalization of County conditioning or generation of SEPA findings. We request that the traffic study analyze impacts to all intersections in the greater project vicinity which would be impacted by 25 or more AM/PM peak hour trips from this project. Additionally, the traffic study should include an analysis of the nearby Shaw Road corridor between 39th Avenue SE and East Pioneer. The traffic study should further identify associated mitigation, as warranted, for the intersections/roadway segments under review.
- b. The traffic study's trip generation should be based on the warehouse category in the ITE Trip Generation manual.
- c. The traffic study should use a 5% background growth rate for any study intersections along Shaw Road (based on recent trend) and also include pipeline projects on the southwest, southeast, and northeast corners of the intersection of Shaw Road/Pioneer.

- d. Given the scale of this project, the proposed access point along Shaw Road (i.e. with "B Street") needs to be in place prior to project occupancy. If a full access is needed there, then that new intersection would need to be signalized and interconnected with adjacent signals at Pioneer and East Main.
- e. 33rd Street SE (aka 134th Avenue East in Pierce County) is a commercial collector in the City, consisting of a 36' street with curb, gutter, 8' sidewalks, 3.5' planter strips, and street lights. The improvements shall be from street centerline. Assuming a symmetrical cross section, additional right-of-way (ROW) on 33rd Street SE would need to be dedicated to the city.
- f. Additional widening along East Pioneer between Shaw Road and 33rd St SE AND improvements to Shaw Road/East Pioneer may also be needed if those improvements are not in place prior to occupancy.
- g. Over the past year, Puyallup staff has been coordinating with the City of Sumner, WSDOT and other parties regarding potential future upgrades to the East Main/Traffic Avenue interchange with SR-410. Though that interchange is located within the City of Sumner, it provides freeway access for a larger area, including this project vicinity. We would request that the project traffic study adequately assess current conditions, project impacts and potential mitigation for that SR-410 interchange.

Sanjeev may be reached at (253) 841-5591 if you have any questions about these comments.

3. City Water Service

The Knutson Farms project site located west of the 134th Avenue East roadway is located within the City of Puyallup Water Service Area. We have the following comments relative to this topic:

- a. We are not aware that the City has yet been approached about a water availability letter for that portion of the proposed development within our water service area. Wouldn't an availability letter typically be a requirement for deeming a short plat application complete for processing?
- b. Also, the City has an existing water line within the northern 134th Avenue East right-of-way, which would appear to be displaced by proposed Building 6 and adjacent development. Please verify how this existing City water line is to be accommodated in the project plans.
- c. That portion of the proposed development east of 134th Avenue East is located in the Valley Water Service area. Given that there have been past discussions regarding possible future interties between the City and Valley Water systems, we are interested in knowing the status of a water availability determination (accounting for fire flow requirements) from Valley Water for a project of this scale.

Please contact City Public Works Director Rob Andreotti at (253) 841-5513 if you have any questions about City water service.

4. City Sanitary Sewer Service

The entire Knutson Farms project site is located within the City's Sanitary Sewer Service area. Similar to the water notes, above, we are not aware that the City has yet been contacted about a sewer availability letter for this proposed development. As extending City sewer service to this site will involve extensive new infrastructure, including lift station(s), we would request the applicant coordinate with - and receive approval from - the City for said sewer service prior to any finalization of conditions or SEPA findings for this project. Please contact City Public Works Director Rob Andreotti at (253) 841-5513 if you have any questions about City sewer service.

5. Floodplain/storm drainage

We understand that the project is located outside of the City corporate limits relative to stormwater impacts. We request, however, that attention be given during project review both to maintaining any pre-existing drainage from City lands to the Puyallup River, as well as to ensure that no new floodplain impacts adversely affect any nearby/downstream property within the City. Please be aware that the City's Stormwater Comprehensive Plan contemplates a potential direct discharge stormwater line through this portion of the City's UGA to provide enhanced drainage for this Knutson property as well as the nearby properties within the City's corporate limits. We request that this regional approach be recognized in reviewing proposed stormwater infrastructure for the Knutson Farms project.

6. Public Trails

Given that this site could tie-into the existing City/regional public trail network, we are interested in specifics of future trail facilities. The SEPA Checklist (pg. 14) notes an "extension of the Puyallup River Trail is proposed...". The specific alignment of that extension is difficult to discern from the provided copy of the PDD site plan, however. In particular, it is not clear if this "trail extension" would fully connect, along the River, from the Foothills Trail-80th Avenue East to the existing terminus of the Riverwalk Trail near East Main, as well as if public access opportunities are being created consistent with the Shoreline Act. Please clarify the specific trail component of this project description.

Again, we appreciate the opportunity to provide input on this initial Notice of Application transmittal. As noted earlier, the City looks forward to coordinating closely with your staff during the pending review of this project application. Please let me (or the listed City contact) know if you have any further questions or comments about any aspect of this letter.

Sincerely,



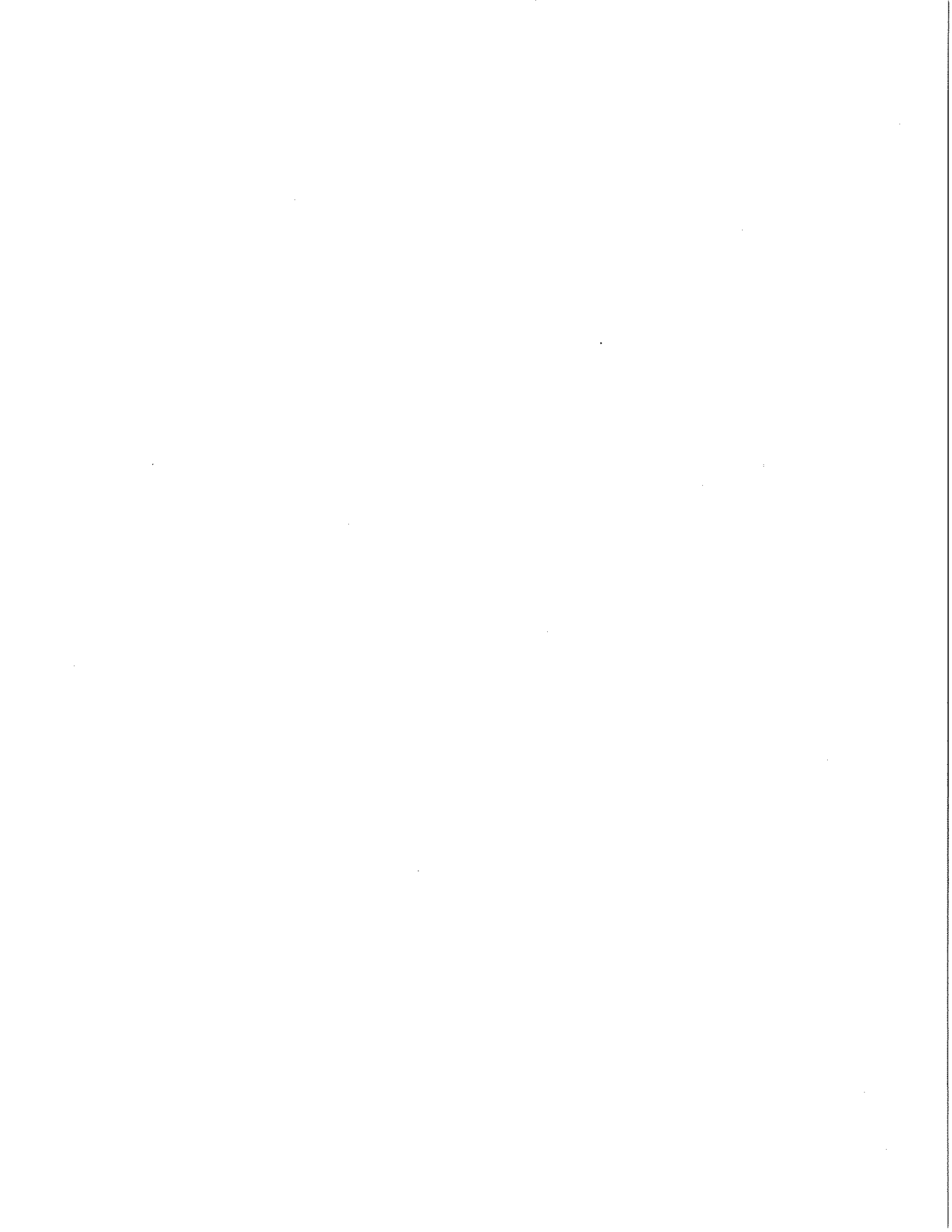
THOMAS C. UTTERBACK
Development Services Director

Attachments:

Correspondence from John Ladenburg, Pierce County, 12/12/08

Correspondence from Sean Gaffney, Pierce County, 8/13/08

cc: Sean Gaffney, Pierce County PALS
Kevin Yamamoto, City of Puyallup
Rob Andreotti, City of Puyallup
Mark Palmer, City of Puyallup
Chris Beale, City of Puyallup
Ray Cockerham, City of Puyallup
Sanjeev Tandle, City of Puyallup
Colleen Harris, City of Puyallup
Mark Higginson, City of Puyallup





Pierce County

Office of the County Executive

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JOHN W. LADENBURG

Executive
jladenb@co.pierce.wa.us

LYLE QUASIM

Chief of Staff
lquasim@co.pierce.wa.us

December 12, 2008

Mayor Don Malloy
City of Puyallup
333 S. Meridian
Puyallup WA 98371

Dear Mayor Malloy:

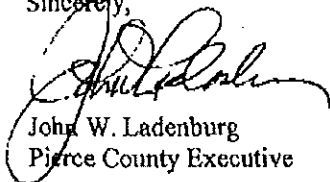
Re: Shaw Road/Pioneer Way Neighborhood Plan

It has been brought to my attention that the future annexation of approximately 365 acres in the Shaw Road/Pioneer Way neighborhood is being discussed at the City. I am pleased to note that the discussions include reference to City of Puyallup Resolution No. 1903 as well as previous correspondences from County planning staff to City of Puyallup Planning Director, Tom Utterback. Pierce County continues to view the Resolution as the expression of the compromise reached between our jurisdictions in 2004 only after considerable negotiation.

One component of the Resolution involves a pre-annexation agreement between the City of Puyallup and land owners within the area that focuses on the preservation of farm lands. The Resolution ensures that approximately 160 acres of land within the proposed annexation area continue to be utilized as commercially viable farm land and may include some open space recreation areas associated the Puyallup River Trail system. Pierce County does maintain the intent of the agreement is for the preservation of farm lands. Furthermore, any open space and recreational opportunities should be designed in a manner that is compatible with existing and future agricultural lands within the annexation area.

I urge the City to continue in its adherence to Resolution No. 1903. Our jurisdictions' cooperation in 2004 will serve us well as we continue to provide a proactive approach in improving the community's quality of life through the preservation of agriculture and open space.

Sincerely,



John W. Ladenburg
Pierce County Executive

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- cc: Councilmember Kathy Turner
- Councilmember George Dill
- Councilmember John D. Knutsen
- Councilmember Rick Hansen
- Councilmember Tami Brouillet
- Councilmember Mike Deal
- Gary McLean, City Manager
- Chuck Kleeberg, Director, Pierce County Planning and Land Services
- ✓ Sean Gaffney, Interim Principal Planner, Pierce County Planning and Land Services







2401 South 35th Street
Tacoma, Washington 98403-7460
(253) 798-7210 • FAX (253) 798-7425

August 13, 2008

Mr. Tom Utterback, Planning Director
City of Puyallup
Puyallup City Hall
333 South Meridian
Puyallup, WA 98371

Dear Mr. Utterback:

Re: Shaw/Pioneer Neighborhood Plan

In a letter dated July 22, 2008, Dan Cardwell forwarded Pierce County's understanding of the 2004 Shaw Road/Pioneer Avenue agricultural preservation agreement to the City of Puyallup. The basis of the County's position was formulated through past discussions with individuals who participated in the original discussions that lead to the agreement. Unfortunately, there was not an opportunity to communicate with the Pierce County Executive's office on the issues associated with the oral agreement and provide a written response in the timeframe requested. As such, a July 30, 2008 meeting between City of Puyallup staff, Pierce County Planning and Land Services staff, and a representative from the Executive's office was conducted to clarify the County's position on the matter.

The items of discussion at the July 30 meeting focused on two issues: 1) what type of lands may be included within the 160 acres of set-aside lands; and 2) the type of mechanism that would bind the agreement. Pierce County's modified position, as stated below, should enable the City to pursue the acquisition of its desired open space. It is our understanding that Puyallup staff is researching alternative approaches to bind the City and property owners with the overall open space obligations.

As stated in the July 22 letter, it was our interpretation that the 2004 oral agreement assured 160 acres within the neighborhood plan area would be preserved as agricultural lands. The City's interpretation as stated through Resolution No. 1903 expanded the 160 acres to include a more generic term, "open space," in addition to agricultural lands. While Pierce County maintains the original understanding was for the preservation of agricultural lands, the County supports the City in expanding recreational opportunities to this area. More specifically, a 40 acre active/passive park connected to the countywide trail system would be acceptable as a component of the 160 acres of preserved lands. The City should ensure that the location and design of the recreational facility is compatible with existing and future agricultural lands. With this concession, Pierce County maintains its position of excluding road right-of-way



Mr. Tom Utterback, Planning Director
City of Puyallup
August 13, 2008
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associated with the Shaw Road extension and narrow bands of trail segments from meeting the 160 acres of preserved lands.

The Shaw Road/Pioneer Avenue Neighborhood Plan provides a proactive approach in improving the community's quality of life in the present and future. It is refreshing that through this compromise, the overall community gains some valuable open space. This has not been my experience in past county projects.

If you have further questions, please contact Dan Cardwell at (253) 798-7039. He will continue to be Pierce County's liaison for this project.

Sincerely,



Sean Gaffney
Interim Principal Planner

DC:vll

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- c. Nancy Eklund, Senior Planner, City of Puyallup
- Hudson Stansbury, Special Assistant to the Executive
- Councilmember Calvin Goings, Pierce County Council District #2
- Dan Cardwell, Senior Planner, Planning and Land Services