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Jim Ferrell, Mayor

June 27, 2017

Mr. Eric LaBrie  
ESM Consulting Engineers, LLC  
33400 8<sup>th</sup> Avenue South, Suite 205  
Federal Way, WA 98003  
[eric.labrie@esmcivil.com](mailto:eric.labrie@esmcivil.com)

**Re: File #16-102947-UP & File #16-102948-SE; 3<sup>rd</sup> ROUND TECHNICAL REVIEW COMMENTS  
Greenline Warehouse "A"; 337XX Weyerhaeuser Way South, Federal Way**

Dear Mr. LaBrie:

City departments/divisions have the following comments in response to your April 2017 resubmittal. The project has been revised in several areas, and as a result, there are further technical review comments. Comments in this letter need to be addressed prior to issuance of a SEPA threshold determination and land use application decision, or as otherwise noted. Questions regarding technical review comments should be addressed to the referenced staff representative.

**Stacey Welsh – Planning Division, (253) 835-2634, [stacey.welsh@cityoffederalway.com](mailto:stacey.welsh@cityoffederalway.com)**

**Use Process III (File #16-102947-UP)**

1. *Plan Set*– Please address the following comments:
  - a. Scaled elevation drawings have not been provided. The proposed height varies according to submitted documentation, with the highest building height number shown on the site plan drawing at 44 feet. It is not possible to determine compliance with *Federal Way City Code* (FWCC) Section 22-1564(u) (screening of blank walls) without scaled elevations drawings.
  - b. No south elevation is provided on Sheet A1.0.
  - c. On Sheet ST-01, the MFB should extend into additional areas per the Concomitant Zoning Agreement (CZA) (entire perimeter of the CP-1 zoned property).
  - d. Need more clarity on the location and height at different locations of the proposed retaining walls on the site plan and/or elevation drawings.
  - e. On Sheet LA-01, there should be parking lot landscape islands at the ends of the rows of parking adjacent to the loading area, where none are shown now (FWCC Section 22-1567[c][1] & [2]).
  - f. On Sheet LA-02, vines for the fences are shown. The project resubmittal letter states that chain link fencing will not be used. Please clarify the plan for the fencing.
  - g. What is the difference between the on-site mitigation plan prepared by Talasaea, and the landscape drawing from the regular plan set (LA Sheets)?

2. *Design Narrative* – The submitted design narrative states that onsite impacts to wetlands will be mitigated by a fee-in-lieu program administered by the Federal Way Parks and Recreation Department. This is not proposed in the submitted wetland report/mitigation plan and the Parks Department does not administer such a program; please explain the submitted statement.
3. *Wetlands*– Please address the following comments:
  - a. Review and address the enclosed June 21, 2017, review letter from the city’s wetland consultant, ESA.
  - b. The following October 7, 2016, technical comment letter item has not been addressed: “All site plans and associated grading and site development plans and drawings need to accurately depict all non-exempt regulated wetlands and applicable wetland buffers (setbacks).” This should include Wetlands DP, EC, DT, DR, DQ, and Stream EA.
  - c. Please provide further explanation and code support for the “temporary construction impacts” to Wetlands DT, DR, and DQ, and Stream EA. These areas are not included in the project’s total wetland impacts amount covered by the CZA’s 10,000 square foot wetland exemption. If not exempt by the code or CZA, stream setback intrusions and improvements/land surface modifications in wetland setbacks require Use Process II (now Use Process IV) review and approval per 1994 code (FWCC Sections 22-1312[c] & 22-1359[d]).
  - d. Why are the proposed temporary construction impacts to the Wetlands DR and DQ buffers not incorporated into the planned buffer averaging?
  - e. The proposed off site wetland mitigation intended to fulfill federal requirements requires review and approval by the City of Federal Way. This new component of the Greenline Warehouse “A” project cannot be reviewed as part of this Use Process III application and SEPA checklist currently under review as it is on a completely separate piece of property.
4. *Managed Forest Buffer* – Please address the following comments:
  - a. The General Maintenance Plan (GMP) lists a recommended plant palette, including vines for the fencing for extra screening. The project resubmittal letter states that chain link fencing will not be used as part of Warehouse “A.” Please clarify what type of wall or fence will be used and note that the use of non-native vines is discouraged.
  - b. The GMP lists tree protection measures, including signage. The proposed text advises that Federal Way Code Compliance should be contacted with any concerns. This contact should be revised to the list the site superintendent’s contact information, as this would be an active construction site under their direct supervision. If permanent signage is to be installed on site, it should list the Forester as the contact for any concerns.
  - c. CZA Exhibit C, Section IV discusses the Managed Forest Buffer (MFB) and the designation of a qualified Forester whose responsibility it is to maintain and preserve the MFB. The applicant has submitted materials in support of the application, including a “Managed Forest Buffer Management Plan,” tree counts, and a “Review of Construction Impact on the Managed Forest Buffer,” which were prepared by an arborist. The CZA specifically identifies a “Forester” rather than an arborist. The property owner must designate a qualified Forester to fulfill the role outlined in the CZA and have them attest to the sufficiency of the materials submitted by the arborist, or turn in their own work product for the three items listed above.
  - d. The “Review of Construction Impact on the Managed Forest Buffer” document describes a considerable increase made in the width of the MFB to reduce construction impacts. Attachment 1, “Existing Tree Plan,” is a reduced version of Sheet SR-06. Sheet SR-06 is provided nowhere else in the submittal and the extended buffer line shown on the drawing is not reflected in other project

documents, including the project site plan. Please clarify this discrepancy and update the documents as necessary. The document also describes weekly updates to be provided to the city; this should be changed to monthly. The Forester is responsible for managing the on-site activity; a monthly report as construction progresses is more appropriate.

- e. FWCC Section 22-1568(c)(6), "Significant Trees," describes management practices that shall be observed on sites containing significant trees to provide protection. Without code citations or an explanation that the proposal meets the (f) alternative protection methods, it is not clear that these measures have been incorporated.
  - f. The following October 7, 2016, technical comment letter item has not been addressed: "On the site plan, show the distance from the proposed new southern property line of the Preferred Freezer site to Highway 18, and demonstrate compliance with the managed forest buffer requirement from the state highway pursuant to Exhibit C, Section III(B)(1)." The MFB needs to be shown on both parcels involved with the project, especially given the revised location of the proposed storm pond.
5. *Significant Trees* – Please address the following comments:
- a. Sheet TR-01: Does the 15.16 acres listed in the Significant Tree Retention Calculations section include the area for the stormwater pond? This area needs to be addressed.
  - b. Tree Count Letter: Provide the FWCC citation and a description for how significant trees were determined. On page 2, under Data for Parcel 1572F, there are discrepancies between several of the numbers listed in the table and the text provided below the table.

#### **SEPA Checklist (File #16-102948-SE)**

6. *Project Description & Location* – As stated above, the off-site wetland mitigation requires separate review and approval (checklist item #11). The warehouse project is taking place on two parcels; the location information provided is missing one of them (checklist item #12).
7. *Air* – Section 3.2 of the submitted report, indicates that, "a traffic study for the proposed warehouse was not available for review at the time of this analysis.... If the traffic study indicates the facility would not cause the level of service (LOS) at project-affected intersections to degrade to LOS D or worse, than no additional analysis is required to determine that significant adverse air quality impacts are unlikely to result from traffic emissions." A traffic study was provided with the April 2017 project resubmittal. The Air Quality Technical report must be revised to take into consideration the contents of the Traffic Impact Analysis to address the above statement.
8. *Water* – Please address the following:
  - a. Review comments are provided under comment #3 above; review and revise the plans and submittal materials as necessary.
  - b. Responses provided for checklist items #3a and 4b have not been updated to reflect the revised proposal.
9. *Energy and Natural Resources* – Response provided for checklist item #6b has not been updated to reflect the revised proposal.
10. *Historic Preservation* – Review and address the enclosed April 24, 2017, letter from the Washington State Department of Archaeology and Historic Preservation (DAHP).
11. *Transportation* – Review the Public Works review comments, below, and revise the SEPA checklist and site plan as necessary to ensure accurate information is included.

**Ann Dower – PW Development Services Division, (253) 835-2732, [ann.dower@cityoffederalway.com](mailto:ann.dower@cityoffederalway.com)**

12. Since the detention pond is located on a lot that is in process of being divided, per section 1.2.3.2 of the *2016 King County Surface Water Design Manual (KCSWDM)*, it is required to be a shared facility serving both lots. With this project, the pond must be sized and built to serve both lots. Alternatively, the applicant must provide the following information at this time:
  - a. Through design calculations, show that there is adequate space set aside to make the pond large enough to serve both parcels, assuming full-buildout; and
  - b. Assuming Warehouse “A” will be completed prior to permitting for the adjacent lot, provide a plan as to how the Warehouse “A” detention and water quality requirements will be met during reconstruction of the pond to serve both lots.
13. An agreement and necessary easements shall be recorded for the two parcels indicating access and maintenance responsibilities.
14. Because several wetlands will be displaced to create this offsite pond and the onsite development, refer to Section 3.3.7 of the KCSWDM for additional design requirements. Additional storage volume may be required and the point of compliance may shift.
15. Please address Core Requirement #1 requirements for this situation; where no conveyance system exists at the abutting downstream property line and the existing discharge is unconcentrated.
16. Verify that the existing ditch that is proposed as a discharge point is large enough to handle discharge from the shared facility.
17. On the plans, provide two cross sections and the volume of the pond.
18. Section 4 of the TIR states that the native growth retention credit cannot be used as a BMP because runoff cannot be discharged uphill to the vegetated area. However, the manual also gives an option to use a perforated pipe connection without discharging to a vegetated area. Does that make this BMP viable?

**Rob Van Orsow– PW Solid Waste Division, (253) 835-2770, [Rob.VanOrsow@cityoffederalway.com](mailto:Rob.VanOrsow@cityoffederalway.com)**

19. Large-scale solid waste and recycling compactors would typically be used at a facility of this size. However, it appears five trash enclosures are positioned side-by-side in the southeast corner of the site. Is this intended to allow several tenants to arrange for individual, smaller-scale trash services?
20. Will occupants access trash compactor(s) as well? If so, where would compactor(s) be located on site?
21. If needed, here is contact information for several trash compactor vendors:
  - GK Industrial Refuse, (253) 666-9523
  - Solid Waste Systems, (360) 561-2905
  - Blankenship Equipment, (253) 288-8131

**Sarady Long – Public Works Traffic Division (253) 835-2743, [sarady.long@cityoffederalway.com](mailto:sarady.long@cityoffederalway.com)**

**TIA Review Comments**

22. The TIA specified that the project is estimated to generate approximately 994 total daily trips, with 199 truck trips (20% trucks). However, the SEPA checklist specified that the project will generate

approximately 109 daily truck trips. The data in the TIA and SEPA checklist should be consistent. Please clarify.

23. Revise the LOS analysis results in Table 2 to include volume to capacity ration (v/c). The LOS results should be compared to the applicable adopted LOS standards. The city adopted LOS standard is volume/capacity ratio less than 1.20 for signalized intersections (except in City Center, where the standard is an area average of 1.10) or a volume/capacity ratio of less than 1.00 for unsignalized intersections. Please refer to the *Federal Way Comprehensive Plan* (FWCP) policy TP1.2.
24. The cycle length used in the LOS analysis for the SR 18 ramps should be reflective of the field condition.
25. The proposed location for the crosswalk is acceptable. However, there should be signage directing pedestrians from the existing building on the east side of the street to increase usage and compliance.
26. The proposal to relocate the bus stops to the new crosswalk location is reasonable. However, this proposal must be reviewed and approved by the applicable transit agencies. Please note, transit amenities improvements such as bus pad, bus shelter, etc. will be required as identified by the transit agencies.
27. Discuss the 95th-percentile queue for the existing condition and the 2018 With-Project AM and PM Peak Hour queue.
28. Peak hour factors for signalized intersections for exiting conditions may use either actual existing PHFs by approach, or use the peak 15 minute period for the entire intersection and multiply those volumes by 4. For future year analysis, a default PHF of 0.95 for the entire intersection may be used, or if the existing intersection PHF based on total entering volume is higher than 0.95, the existing value may be used. For unsignalized intersections, existing approach PHFs shall be used. This will not likely change any LOS results and therefore it is for reference only.
29. WSDOT provided technical review comments on the previous TIA; please forward the revised TIA to WSDOT for comment.

### Plans Comments

30. Frontage improvements on Weyerhaeuser Way South (sidewalk, street lighting, and planter strip) shall be consistent with the approved right-of-way modification. The Public Works Director has reviewed and approved a right-of-way modification for the proposed 314,424 square foot warehouse building. Since this is a resubmittal, the approved right-of-way modification is still valid. The applicant may submit another right-of-way modification with the appropriate fee to the Public Works Director.
31. Pavement upgrade may be necessary between the truck access driveway and the SR 18 interchange to accommodate the expected truck traffic generated by the warehouse. The applicant will need to perform a detailed AASHTO pavement analysis. Per the East Campus Parcel 3 road improvement plan, the Weyerhaeuser Way South section south of the roundabout consists of the following:
  - Middle Three Lanes: 2½" asphalt conc. overlay CL. 'A' over pavement geotextile fabric. Prior to asphalt overlay, all alligatored areas marked in filed by engineer will be sawcut, removed, and asphalt patched with 4" asphalt concrete class 'E.'
  - Outside 11' lane and 5' bike lane (west side of street): 4" asphalt concrete CL. 'A,' 2" asphalt concrete CL. 'E,' 2" crushed surfacing top course and compact subgrade.
  - Outside 11' lane, 5' bike lane and right turn lane (east side of street): 4" asphalt concrete CL. 'A,' 2" asphalt concrete CL. 'E,' 2" crushed surfacing top course and compact subgrade.

32. Based on the resubmittal, the applicant is proposing to utilize the private loop road for access onto Weyerhaeuser Way. Per FWCC Section 22-1496, the applicant will need to construct improvements along the loop road to city standards as determined by the Public Works Director. However, Section 14.1 of the Weyerhaeuser Company Concomitant Pre-Annexation Agreement (CZA) excludes this improvement requirement. See applicable CZA below:

*"It is agreed that this system not in a public right of way may remain private and shall be maintained by Weyerhaeuser, and system need not meet City standards provided it meets good engineering practices and safety standards of the engineering professional for private roads, pedestrian facilities and bike trails."*

33. ADA compliant pedestrian facilities should be provided from the warehouse building to the bus stops on Weyerhaeuser Way South.
34. The proposed right-of-way dedication along Weyerhaeuser Way South to accommodate a minor arterial street classification (66' paved in 100' right-of-way) is reasonable. The city has no objection to the right-of-way dedication.
35. The proposed 30-foot wide driveway on Weyerhaeuser Way South is acceptable. Please specify whether the site will be gated at the driveway on Weyerhaeuser Way South.

### **Illumination Plan and Pavement Marking & Signing Plan**

Below are general technical review comments for land use approval. The Public Works staff will perform in depth review of the submitted plans at the engineering stage.

36. *Sheet IL-01*: Verify conduit fill for the existing 1.5" conduit to ensure adequate capacity to accommodate additional wires.
37. The existing HPS streetlight south of the driveway at STA 106+05 should be upgraded to an LED light fixture.
38. The proposed 6063-T6 tapered round aluminum streetlight pole is not consistent with the CZA. Per the CZA, materials and designs for lighting standards should have dark finishes and shall conform in character to the intent of those areas. Please revise pole and foundation accordingly.
39. The existing HPS cobra head fixture north of the roundabout should be upgraded to an LED light fixture.
40. *PM-01*: Increase left-turn lane storage at driveways on Weyerhaeuser Way South to 100' minimum consistent with WSDOT Standard Plan and WSDOT Design Manual.
41. *PM-01*: Provide call out for the existing crosswalk marking removal.
42. *PM-01*: Install R1-5a (36 x 48) sign at the yield line per Federal Way Drawing 3-58.
43. *PM-01*: Precast dual face mountable curb shall be per Federal Way Drawing 3-4.
44. *PM-01*: Use Type D plastic double yellow center line at the crosswalk island instead of the proposed white plastic edge line.
45. *PM-01*: Add Federal Way Drawing 3-20 to Construction Notes #5.
46. *PM-01*: Delete reference to Standard Drawing No. 3-52 in General Notes #4. Drawing No. 3-52 has been deleted.
47. *PM-01*: Revise General Notes #3 to read, "Contractor shall remove existing conflicting striping/signage as necessary or as directed by the city to accommodate new striping."

### **SEPA Checklist – Transportation**

48. *Transportation 14(c)* – Revise to include right-of-way dedication.
49. *Transportation 14(e)* – Traffic generated by the project, including truck trips, should be consistent with the TIA. Per the TIA, the project is estimated to generate 994 total new trips (795 passenger vehicles and 199 trucks) and 100 PM trips (80 passenger vehicles and 20 trucks). Revise this section to be consistent with the submitted April 4, 2017, TIA.

### **Summary of Public Comments**

Please review and address all public comments related to traffic. Below are concerns that were not adequately addressed.

50. Address comments provided by WSDOT.
  - All ramp terminal intersections must meet WSDOT LOS standard. The TIA must identify whether the LOS results meet WSDOT LOS standard.
  - Perform SimTraffic to model the queuing on the ramps and along Weyerhaeuser Way at the ramp terminal intersections using average of five SimTraffic runs. The 95<sup>th</sup> percentile queues from the analysis should be used to identify changes as result of the project trips. Specify if adequate storage exists to accommodate the 95<sup>th</sup> percentile queues as provided in Table 3.
51. The existing traffic around the site (Weyerhaeuser Way South and SR 18 ramp terminal intersections) is already congested. These roads were not designed to handle the amount and types of traffic generated by the proposed development. Provide a capacity analysis for the roadway segment and intersection LOS to address these concerns during the AM, PM, and Weekend Peaks.
52. The revised TIA must discuss whether the LOS results for stop controlled and signalized intersections meet the applicable LOS standard (Federal Way and WSDOT). Furthermore, the capacity analysis for the roadway segment and weekend peak was not addressed in the revised study.

### **Brian Asbury – Lakehaven Water & Sewer District, (253) 946-5407, [basbury@lakehaven.org](mailto:basbury@lakehaven.org)**

53. The existing Developer Extension Agreement (DEA) that was executed for the previously proposed Preferred Freezer project is still valid as-is for this revised proposal; the DEA expires June 29, 2021. The applicant has not yet submitted revised water or sewer plans to Lakehaven for review. The alignments and layout of the water and sewer mains indicated on the proposed Warehouse “A” site plan received by the city on March 31, 2017 appear to generally meet Lakehaven’s requirements for development of the underlying parcel. Once the water and sewer plans have been approved by Lakehaven, the applicant will need to complete any necessary water and sewer system facility construction, and subsequently submit applications to Lakehaven for any necessary water and/or sewer service connections.

**Chris Cahan – South King Fire & Rescue, (253) 946-7243, [chris.cahan@southkingfire.org](mailto:chris.cahan@southkingfire.org)**

54. The required fire flow for this project is 3000 gallons per minute for IIA construction, or 4000 gallons per minute for IIB construction. A Certificate of Water Availability shall be provided indicating the fire flow available at the site. A hydraulic fire flow model shall be requested from the water district.

### **Fire Hydrants**

55. This project will require three fire hydrants if IIA, or four fire hydrants if IIB.
56. Fire hydrants shall be in service prior to and during the time of construction.

### **Fire Access Roads**

57. Fire apparatus access roads shall be provided when any portion of the facility or any portion of an exterior wall of the first story of the building is located more than 150 feet from fire apparatus access as measured by an approved route around the exterior of the building or facility.

EXCEPTION: When buildings are completely protected with an approved automatic fire sprinkler system, the distance can be increase 20 percent.

58. Fire apparatus access roads:
- a. Shall have an unobstructed width of not less than 20 feet and an unobstructed vertical clearance of not less than 13 feet 6 inches.
  - b. Shall be designed and maintained to support the imposed load of a 75,000 pound fire apparatus, and shall be provided with a surface so as to provide all-weather driving capabilities.
  - c. Shall be not less than a 32 foot inside turning radius and not less than a 40 foot outside turning radius.
  - d. A dead-end in excess of 150 feet in length shall be provided with a cul-de-sac, **or** Fire Department approved alternative at the dead end. All such cul-de-sacs shall be not less than 80 feet in diameter.
  - e. Gradient shall not exceed 12 percent.
59. Designated fire lanes may be required for emergency access. This may be done during the plans check, or prior to building final.
60. Fire apparatus access roads shall be installed and made serviceable prior to and during the time of construction.

### **Fire Sprinkler System**

61. An automatic fire sprinkler system shall be installed in all occupancies where the total floor area included within the surrounding exterior walls on all floor levels, including basements, exceeds 5,000 square feet. Fire walls shall not be considered to separate a building to enable deletion of the required automatic fire-extinguishing system.
62. The system demand pressure (to the source) required in a hydraulically designed automatic fire sprinkler system shall be at least 10 percent less than the correlative water supply curve pressure.



### Fire Alarm

63. A fire alarm system is required. An automatic fire detection system shall be installed in all buildings exceeding 3,000 square feet gross floor area. This fire detection system shall be monitored by a central and/or remote station conforming to the current requirements of the National Fire Protection Association standards and/or the fire chief or designee.

### Fire Department Lock Box

64. A **recessed** fire department “Knox” brand key box shall be installed on each building.

### Vehicle Access Gates

65. All vehicle access gates shall be provided with a “Knox” brand key cylinder for fire department access.

### CLOSING

Please be aware that this review does not preclude the city from requesting additional information related to any of the topics discussed above. Please submit revised application materials as appropriate, accompanied by the completed “Resubmittal Information Form” (enclosed). Pursuant to FWRC 19.15.050, if an applicant fails to provide additional information to the city within 180 days of being notified that such information is requested, the application shall be deemed null and void and the city shall have no duty to process, review, or issue any decisions with respect to such an application.

If you have any questions regarding this letter, please contact me at [stacey.welsh@cityoffederalway.com](mailto:stacey.welsh@cityoffederalway.com), 253 835-2634.

Sincerely,



Stacey Welsh, AICP  
Senior Planner

enc: June 21, 2017, Memo from ESA  
April 24, 2017, Letter From DAHP  
Resubmittal Information Form

c: Brian Davis, Community Development Director  
Jim Harris, Planner  
Peter Lawrence, Plans Examiner  
Ann Dower, Senior Engineering Plans Reviewer  
Rob Van Orsow, Solid Waste & Recycling Coordinator  
Sarady Long, Senior Transportation Planning Engineer  
Brian Asbury, Lakehaven Water & Sewer District  
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