



## King County

### Water and Land Resources Division

Department of Natural Resources and Parks

King Street Center

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TTY Relay: 711

November 9, 2018

Brian Davis  
Community Development Director  
City of Federal Way  
33325 8th Ave. South  
Federal Way, WA 98003

### Re: MDNS determination for Warehouse A (16-102948-SE)

Dear Mr. Davis,

On behalf of King County, I offer the following comments in regard to Federal Way's State Environmental Policy Act (SEPA) Mitigated Determination of Nonsignificance (MDNS) for Warehouse A (16-102948-SE). While we recognized the proposal is fully within the jurisdiction of the City, the development site is just upstream from unincorporated King County so we share a joint interest in ensuring that all impacts to surface water have been fully considered.

The County and City both work to improve water quality through implementation of the King County 2016 Surface Water Design Manual (SWDM). As part of the SEPA evaluation, we offer the following specific comments for your consideration:

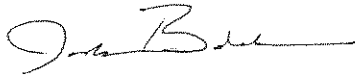
- To address Special Requirement #1 of the 2016 SWDM, the technical information report (TIR) should explicitly address how the project's stormwater design is meeting or exceeding the standards (recommendations BW-2 and BW-3 on page 3-6) in the Executive Proposed Basin Plan/Hylebos Creek and Lower Puget Sound.
- The Offsite Analysis (Section 3) of subject project's TIR should also be clarified. Compliance with the SWDM states that: "The downstream analysis must consider the existing conveyance system(s) for a **minimum flowpath distance downstream** of one-quarter mile and beyond that, as needed, to reach a point where the *project site* area

constitutes less than 15% of the tributary area.” Currently, the TIR only states that the ¼ mile distance was addressed.

- The TIR should also demonstrate compliance with Task 2 of a Level 1 downstream analysis by reviewing all available information on the downstream area to fully identify existing drainage and water quality problems. Per the SWDM, “*In all cases, this information review shall extend one mile downstream of the project site.*” The existence of flooding or erosion problems further downstream may extend the one-quarter mile/15% minimum distance for other tasks to allow evaluation of impacts from the proposed development upon the identified flooding or erosion problems.”
- Finally, as the Hylebos basin is within the WRIA 10 salmon recovery jurisdiction, we trust that Federal Way is working with recovery forum and the Puyallup Tribe to ensure this environmental review is consistent with that plan.

Thank you for the opportunity to comment on this SEPA determination.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Baldi", written in a cursive style.

Josh Baldi  
Director