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**Subject:** City of Federal Way SEPA Determination MDNS Greenline Warehouse 'A' (File No:16-102948-SE)  
**Importance:** High

November 9, 2018

TO: Stacey Welsh, Senior Planner, Federal Way

FR: Rose LeSmith, P.E., County Traffic Engineer, King County Road Services Division

RE: [City of Federal Way SEPA Determination MDNS Greenline Warehouse 'A' \(File No:16-102948-SE\)](#)

Thank you for the opportunity to comment on Federal Way's Mitigated Determination of Nonsignificance (MDNS) for the proposed Greenline Warehouse 'A' Project (File No:16-102948-SE). The proposed project, reviewed through this SEPA action, will result in the construction of a 45-foot tall, 225,950 square foot warehouse with 287 parking spaces.

The proposed Greenline Warehouse 'A' is one of five significantly-sized warehouses proposed to be built on the former Weyerhaeuser site. Cumulatively, these five warehouses will result in over 1.5 million square feet of industrial warehouse space, yet the city has yet to complete a SEPA review of the entire five warehouse development project. It appears that the Greenline Warehouse 'A' project level SEPA determination is an incremental project-level approach to SEPA compliance and is insufficient to address anticipated increases to traffic volumes and congestion on already congested local, regional and state roads.

King County Road Services Division reviewed the Greenline Warehouse 'A' threshold determination package and has concerns regarding the MDNS, given the limited scope of its Traffic Impact Analysis (TIA), which was limited to city intersections, ingress/egress from the property, pavement condition of Weyerhaeuser Way South and the two nearby WSDOT interchanges. The TIA did not assess the proposed development's contribution of additional traffic volumes to already congested local and state roads. We concur with the City of Federal Way's findings that the SEPA threshold determination's traffic study does not demonstrate how the applicant will prevent the alternative truck route (I-5/South 320<sup>th</sup> Street interchange, South 336<sup>th</sup> Street and Weyerhaeuser Way South) from being utilized. We also concur that the applicant has not demonstrated mitigation of additional truck traffic onto the non-designated truck routes mentioned above.

King County is also concerned for the potential impacts of increased congestion in the following locations: the I-5/South 320<sup>th</sup> Street interchange, South 320<sup>th</sup> Street from Weyerhaeuser Way South to I-5, and east of the South 320<sup>th</sup> Street and Military Road South intersection. Increased

traffic volumes and congestion along South 320<sup>th</sup> Street and at the I-5/South 320<sup>th</sup> Street interchange could result in drivers seeking alternate routes to I-5, such as to the route north on Military Road South to South 272<sup>nd</sup> Street to the I-5/South 272<sup>nd</sup> Street interchange. The TIA did not address these scenarios.

Please accept this email communication as a formal comment regarding Federal Way's threshold determination. The project scale MDNS associated with the proposed Greenline Warehouse 'A' Project does not sufficiently address anticipated traffic impacts to the overall roadway system surrounding the proposed development. King County requests that Federal Way conduct additional traffic evaluation to better understand and address these anticipated impacts and recommend appropriately scaled mitigation measures.

King County also requests that the five warehouses proposed to be built on the former Weyerhaeuser property, be reviewed together under SEPA, to ensure that cumulative traffic volume and congestion impacts to the regional road network are understood and appropriately mitigated.

We look forward to working with you to scope out an expanded traffic impact analysis that produces mitigation measures commensurate with the scope of this proposed warehouse development project.