

Upon touring the Weyerhaeuser Campus yesterday with COE staff and consultants, the Tribe continues to be concerned about the significant impacts the proposed Greenline Warehouses and Commercial Business Park are going to have on the hydrology of Hylebos Creek and the fishery. As a consequence of this, we are requesting to set up a technical meeting with staff at Federal Way to further discuss our technical concerns about these proposals.

These proposals, in their totality, encompass almost 2 million square feet of new warehouses and commercial buildings, located on 6 contiguous parcels under common ownership. It continues to allude us why the agencies and city are bifurcating these development proposals, other than to circumvent environmental review and analysis of impacts. We strongly disagree with the decisions to review these proposals separately. As we have stated, a sufficient and complete assessment of impacts cannot be completed based on the available information. This is not only inconsistent with SEPA requirements, but City Ordinance 94-219, adopted in 1994, as part of the annexation of the Weyerhaeuser Campus. The intent of the Ordinance, as stated, is to “preserve and protect” the “unusual” environmental features of the campus. It goes on to say that “any development in the corporate headquarters area shall be low density characterized by large expanses of open space.

Given that the footprints of these developments and associated infrastructure comprise most of the campus, ensuing impacts to natural resources, most notably hydrology and wetlands, as well as forestry impacts will be significant. With a peak of 7,000 trucks per day anticipated, traffic impacts at an already busy interchange at I-5 and Highway 18 will be almost insurmountable! Given these impacts, we are requesting that an EIS be conducted to address site as well as cumulative impacts.

The filling of wetlands in the Building A and Building B footprints and adjacent parking areas not only will permanently impact site wetland hydrology, but will also impact downstream flows to Hylebos Creek. ESA species, including steelhead, chinook and bull trout utilize the Hylebos system and the Tribe and others have spent millions of dollars to restore over the last several decades. A 1956 USGS topographic map shows surface flows that were once connected to the north fork of the Hylebos in the designated project site area where warehouses A and B are planned. The continued fragmentation of site hydrology will adversely affect Hylebos Creek. Preservation of base flows to the creek and moderation of stream temperature are of paramount importance to the Tribe. As such, the Tribe requests a closer look at additional opportunities to infiltrate roof water on-site so that creek base flows are maintained and natural filtration of the solids and metals leaching off the roof are captured before discharging to the creek. As we understand it, a zinc-coated roof will be used for the developments. The coating leaches over time. Runoff emanating from the roof will contain zinc. It will be important to treat the zinc prior to discharge to the creek.

It is a very complex site hydrologically both with the divide and the alteration of wetlands previously. For these reasons, we are requesting a master drainage plan that shows runoff quantities and treatment. We understand that the developer will be complying with the King County Manual and 2017 City Addendum, but we want to know the details of how they intend to manage stormwater at the site.

It isn't clear how the mitigation is divided between the proposed developments. What is the wetland creation, enhancement, and buffer footprints calculated for each of developments proposed? What are the mitigation ratios proposed? Where is the buffer averaging proposed?

At your earliest convenience, it would be helpful to meet with you to discuss your thoughts and understanding of this project so that we can do a more thorough review. Thank you for the consideration.

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