November 9, 2018

Ms. Stacey Walsh
Senior Planner
City of Federal Way
PO Box 599
Federal Way, Washington

RE: Greenline Warehouse A. File #16-102948-SE Response to Environmental Mitigated Determination of Nonsignificance

Dear Ms. Walsh:

I, Lori Sechrist, and Save Weyerhaeuser Campus are providing the following comments with respect to the MDNS for the Greenline Warehouse A.

The documents I have reviewed for this are as follows:

1. SEPA Checklist. 3/13/18. Matthew Reider.Planner, City of Federal Way
2. Environmental Threshold Determination Greenline Warehouse "A". 337XX Weyerhaeuser Way South, Federal Way. 10/26/18. City of Federal Way.
3. Notice of Environmental Mitigated Determination of Non-significance (MDNS) Greenline Warehouse "A". (no date). City of Federal Way.
4. Mitigated Determination of Non-significance (MDNS) Greenline Warehouse "A". (10/26/18). City of Federal Way.
5. Staff Evaluation for Environmental Checklist Greenline Warehouse "A". 337XX Weyerhaeuser Way South, Federal Way. 10/24/18. Stacey Welsh, City of Federal Way.
6. Site Plan. Greenline Warehouse "A". 337XX Weyerhaeuser Way South, Federal Way. (4/3/18). ESM Consutling Engineers
7. JARPA. 10/19/17 Talasaea.
8. Tree Retention Plan Sheet TR-01, ESM Consutling Engineers LLC, Resubmitted 7/10/18
9. Wetland Delineation and Mitigation report. 10/27/17. Talasaea.
10. Geotechnical Report. 9/19/17. GeoEngineers.
11. Impervious Surface Area. ESM Consulting Engineers.
12. Preliminary technical Information Report Addressing Relevance of 9 Core and 5 Special Requirements of the 2016 King County Surface Water Design Manual. 9/20/17. ESM Consulting Engineers
13. Transportation Impact Analysis. 4/27/18. TENT
14. Evaluation of Trees. 9/20/17. Gilles Consulting.
15. Response to the Letter of Completeness. 4/30/2018. ESM Consulting Engineers.

The Save Weyerhaeuser Campus has reviewed the Notice of Mitigated Determination of Nonsignificance (MDNS) prepared by the City of Federal Way. We ask that the city rescind the MDNS and require an Environment Impact Statement for the following reasons:

General comments on the SEPA checklist and comments from staff.

- The SEPA checklist is only for the Greenline Building A, whereas the entire Federal Way Campus project incudes Building B and the Business Park. This is not a complete SEPA as all three projects are proposed by a single owner/developer that includes three separate development applications on the same land under the same zoning. These 3 development projects are not independent of each other. Building A is ±638,000SF, Building B is ±282,500SF and Building C is ±147,500Sf for a total of 1,068,000Sf of impervious surface (±1,393,920 SF or ±21% of the site NOT counting the all additional associated activities listed above). This may or may not include parking, "frontage improvements" impervious landscaping (walkways, etc.), new stormwater ponds, and access roads. Additionally ±308,200 $yrds^3$ of cut and ±275,700 $yrds^3$ of fill are proposed. The stormwater pond will be on the adjacent parcel that will be part of the other two projects that are not being evaluated at this time, but which are part of this overall development. The stormwater collected from all three projects will be combined and discharged to the Hylebos downstream system. The groundwater intercepted from all three systems will be collected and added to the stormwater system and discharged to the Hylebos at one discharge point. The water from all three projects will be discharged to the Hylebos system. Cumulatively the amount of water to be discharged will most certainly overwhelm the Hylebos. The argument will be made that the stormwater ponds are sized according to the current stormwater manual. But no manual will be able to accommodate a cumulative 2 million SF of impervious surface and groundwater collection systems that will add water at one discharge point to a very sensitive watershed (Hylebos).
- The road system will be used to access all three projects. The noise and air impacts will be cumulative for all three projects. Obviously the timeline discussed for activities to occur during the summer of 2018 and fall of 2018 are wrong. This should be updated.
- They are mentioning earthwork as including only the Stripping (20,500YRD^3), Cut (68,200 $YRD^{3),}$ Fill (55,600 YRD^3) but are not talking about the coaction of the entire footprint of the building. This will certainly affect the groundwater regime and should be considered.
- They are talking about air quality as though there is no existing forest that currently treats CO2 and particulates in the air. There needs to be a discussion of the impact of losing that amount of trees on the air quality of Federal Way.
- The proposal does not include any stormwater from going into the existing wetlands that will be retained. How are these wetlands to maintain their hydrology if the project is cutting off their natural drainage and potentially lowering the groundwater (through interception and compaction of soils)? This needs to be evaluated and monitored and the project would need to build into it the ability to retrofit drainage from the roof into the wetlands should it be deemed

necessary because the wetlands are drier than baseline (which must be evaluated prior to the construction of the project).

- Where is the downstream analysis required? The downstream drainage is the Hylebos, one of the most sensitive drainages in the State. There are many bogs and Category I wetlands in this system. It was known in March that it was required. It is still not available in the file. How can any agency make "an informed decision" on SEPA and the MDNS without these studies? This is particularly important in light of the Special requirement No 1 "Other Adopted Area-Specific requirements in SEPA. The SEPA document says there are no basin plans but there are. The **Hylebos Basin Plan issued by King County in 1990.** There is also a **2016 Puyallup Tribe Climate Change Report** that covers the Hylebos Basin as well as a **Puyallup Tribe Salmon Restoration Plan** for the Hylebos.

  "King County SWM
  1.3.1 SPECIAL REQUIREMENT #1: OTHER ADOPTED AREA-SPECIFIC REQUIREMENTS This manual is one of several adopted regulations in King County that apply requirements for controlling drainage on an area-specific basis. The areal clearing restrictions for RA-zoned parcels in KCC 16.82.150 (see Reference Section 3-A) is an example of zoning and land use restrictions used to reduce drainage impacts in certain areas of the County. Other adopted area-specific regulations include requirements that have a more direct bearing on the drainage design of a proposed project. These regulations include the following:
  • Critical Drainage Areas (CDAs): DNRP establishes CDAs in areas where flooding and/or erosion conditions present an imminent likelihood of harm to the welfare and safety of the surrounding community. The special requirements in CDAs typically include more restrictive flow control and clearing standards. Maps showing CDA boundaries are available from DNRP or DPER.
  • Master Drainage Plans (MDPs): MDPs are comprehensive drainage plans prepared for urban planned developments (UPDs) or other large, complex projects (described in Section 1.1.2.5). Projects covered by a MDP must meet any adopted requirements specific to that plan.
  - Basin Plans: The King County Council adopts basin plans t provide comprehensive assessment of resources and to accommodate growth while controlling adverse impacts to the environment. A basin plan may recommend specific land uses, regional capital projects, and special drainage requirements for future development within the basin area it covers.
  - Salmon Conservation Plans: Salmon Conservation Plans are comprehensive, ecosystem-based plans intended to identify and assess the means to protect and restore salmon habitat through mechanisms such as habitat improvements, regulations, incentives, BMP's, land acquisition, and public education activities. These plan are developed in collaboration with other jurisdictions within a water resource inventory (WRIA) designated byt eh State under WAC 173-500-040.

- Stormwater Compliance Plans (SWCPs): Stormwater compliance plans are a sub basin or outfall specific assessment of the quantity and/or quality of King County's municipal separate storm sewer system discharges to determine actions necessary for compliance with the National Pollutant Discharge Elimination System (NPDES) General Municipal Stormwater Permit issued by the state Department of Ecology pursuant to the federal Clean Water Act. These plans/studies may recommend capital projects, flow control standards, water quality controls, public education activities, or other actions deemed necessary for compliance with the Clean Water Act and RCW 90.48, Water Pollution Control. • Lake Management Plans (LMPs): The King County Council adopts lake management plans to provide for comprehensive assessment of resources and to accommodate growth while controlling
- There is a **Threshold requirement** IF a proposed project is designated a "Critical Drainage Area, or in an area included in an adopted master drainage plan, basin plan, salmon conservation plan, stormwater compliance plan, flood hazard management plan, lake management plan, or shared facility drainage plan (most of which have been designated for the Hylebos). If these plan exist, then the proposed project shall comply with the drainage requirements of the Critical Drainage Area, master drainage plan, basin plan, salmon conservation plan, stormwater compliance plan, flood hazard management plan, lake management plan, or shared facility drainage plan, respectively.

- There is a statement about groundwater withdrawals from the perspective of drinking water. This is not an issue ecologically. What is important is the fact that SEPA barely mentions groundwater withdrawals and losses do to the massive amount of impervious surface that will not infiltrate into the stormwater system which is critical and will result in impacts to the downstream basin hydrology (base-flow for the streams and wetlands in both onsite and in the Hylebos basin).
- To state the project will have "no affect the drainage patterns in the vicinity of the site" is abjectly false. You cannot construct a 638,000SF building, compact till, fill, cut, and grade, collect groundwater and not impact natural drainage. Water may flow in the same approximate direction but water will no longer infiltrate to groundwater and recharge the regional aquifer. You may have minimal impact to visible current surface drainage but rainfall that currently falls throughout the site that flows just sub-surface in the soil will absolutely be impacted. It will be necessary to monitor any remaining wetlands pre-development and post-development to be sure the hydrologic regime is maintained. It will also be crucial to monitor wetlands and streams in the northern part of the Hylebos drainage to see if the development will impact their flows and wetland characteristics.
- The assumption throughout SEPA is that the Stormwater ponds will solve all the drainage problems. Nothing could be further from the truth. Once the ponds are full, any additional drainage will then be directly discharged into the Hylebos at one discharge point and as surface water. This shows a total lack of

understanding of a basin water budget that includes infiltration to groundwater and shallow subsurface flows.

- When discussing the amount of "vegetation to be removed and altered" only the wetland vegetation removal is mentioned. Nothing about the area that is currently forested but which will be cleared is mentioned as if it wasn't going to happen? The total area is 638,000SF! How is this not significant?
- The *Critical Areas Report – Greenline Warehouse B* document does not meet the requirements stated in Section 22-1356 (b) of the 1994 Federal Way Code and does not include wetland descriptions or an analysis of wetland functions. It includes impacts and mitigation over plan sheets (Sheet 1.1), but does not include a description of the impacts and mitigation in the report.
- It is unclear why the size of three wetlands (Wetlands DQ, DX, and DZ) are different between the Management Plan and the previously reviewed *Critical Areas Report and Conceptual Mitigation Plan: Greenline Warehouse A* (see Table 1 in both documents). During our June 2017 review and associated site visit, ESA agreed with the wetland delineation boundaries. Using the originally reported sizes in critical areas report, the total proposed fill to is 10,092 SF and surpasses the allowed 10,000 SF of exempt impacts. This discrepancy is no discussed in SEPA.
- Where is the TIR analysis required by King County? The cultural resources Report? The transportation Analysis, The Noise and Air technical reports? These are not in the file.
- In the SEPA checklist the question is asked "Does the Proposal alter or otherwise affect drainage patterns in the vicinity of the site? The response is "No-discharge will occur at the "natural location"! This statement as absolutely false. First, drainage is not just surface water and dumping 32 acres worth of water into one "natural drainage where it was never received before. This is a HUGE issue. Second, there is no way that draining 32 acres of buildings into one location mimics pre-development drainage patterns from the 32 acres. Of course there were multiple drainage points pre-development over that amount of area. Third, infiltration to groundwater and then discharge of groundwater at a lower elevation where it becomes surface water has not even been considered. There will be a HUGE change in natural drainage patterns from pre-development conditions. The only thing discussed is water quality issues from the large amount of surface water being treated. Additionally, the JARPA asks " Name each species listed under the federal Endangered Species Act that occurs in the vicinity of the project area or might be affected by the proposed work." The answer "was again oriented towards water quality with no mention of potential impacts from the change in hydrologic regime (both surface and groundwater).

General comments on the MDNS and comments from staff.

We find it difficult to understand how removal of an entire forest, grading, scraping, and compacting the soils of that forest, filling all or parts of 16 wetlands and constructing a massive cement warehouse and parking will "not have a probable significant adverse impact on the environment". There will be no environment left after this project is installed. The historic drainage patterns of both surface and ground water will be altered as well. There will literally be nothing left of the current environment. Not air quality, not vegetation, not soils, not hydrologic regime. This is magnified when you consider the three projects being permitted individually, but concurrently throughout the entire Campus area. More than 2,000,000 FT2 of warehouse and associated parking, roads, and infrastructure to serve the proposed facilities is being proposed.

The conditions of approval are not related to the maintenance of the environment because the few wetlands that will remain will, by the nature of what will occur be altered irreparably. The conditions of approval are only related to the construction and operation of the warehouse.

Cumulative Review of all 3 of IRG's Phased Projects

a. The three IRG vested applications—Warehouse A, Warehouse B and Greenline Business Park--are connected as they are part of a **phased project** as defined under SEPA regulation:

> "Because of the background of the 3 land use proposals (Warehouse A, B and Greenline Business Park), the City is required to conduct consolidated land use and environmental review of the pending applications, not segmenting or bifurcating review. This is based on the following.
>
> A. ONE OWNER: The entire 426-acre Weyerhaeuser Campus was purchased in 2016 by IRG, a California developer of warehouses and business parks.
> B. THREE CURRENTLY PENDING APPLICATIONS: IRG has filed applications for use of significant portions of the Weyerhaeuser Campus, including the Greenline Business Park, Warehouse A and Warehouse B, which have been deemed complete by the City. These three applications will be referenced herein as the "IRG Applications."
> C. SAME ZONE FOR ALL PARCELS: The IRG Applications are all in the CP-1 zone. That zone is <u>only</u> applicable to the Weyerhaeuser Campus parcels and not to any other properties in the city.
> D. UNDER SEPA, THE THREE PENDING APPLICATIONS MUST BE CONSIDERED IN A SINGLE ENVIRONMENTAL DOCUMENT: The City of Federal Way has adopted most of the Washington State SEPA Rules, WAC Chapter 197-11 into Federal Way's code including WAC 197-11-060 Subsection (b). This section provides as follows:
>
> > (b.) Proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action shall be evaluated in the same environmental document (Phased review is allowed under subsection (5).). Proposals or parts of proposals are closely related, and they shall be discussed in the same environmental document, if they:
> >
> > (i) Cannot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them; or
> >
> > (ii) Are interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation.

In addition, WAC 197-11-060(c) provides as follows:

> (c) (Optional) Agencies may wish to analyze "similar actions" in a single environmental document.
>
> (i) Proposals are similar if, when viewed with other reasonable foreseeable actions, they have common aspects that provide a basis for evaluating their environmental consequences together, such as common timing, types of impacts, alternatives, or geography. This section does not require agencies or applicants to analyze similar actions in a single environmental document or require applicants to prepare environmental documents on proposals other than their own.
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> (ii) When preparing environmental documents on similar actions, agencies may find it useful to define the proposals in one of the following ways: (A) Geographically, which may include actions occurring in the same general location, such as a body of water, region, or metropolitan area; or (B) generically, which may include actions which have relevant similarities, such as common timing, impacts, alternatives, methods of implementation, environmental media or subject matter.

Warehouse A and the 3 IRG projects cumulatively:

1. Wetlands Impacts. We have reviewed each of the 13 delineations in the report by Talasaea of the campus wetland delineations on paper but not checked them in the field There is no reason to believe from the topography and their description that the boundaries are inaccurate.

   It is difficult to separate potential wetland impacts from potential stream impacts because both will be affected by changes in surface and groundwater changes resulting in the massive change to the basin from 2,000,000SF of forest removal, grading and impervious surface made from cement (which will alter the water chemistry). Warehouse A is proposing fill in parts of 7 wetlands (DU,DW,DX,DZ,EB,ED,and EE) with indirect impacts to another 3 wetlands (DQ,EC, and EF). This doesn't even begin to identify the true impacts to these wetlands and their habitats and functions. Cutting off the wetland from the surrounding forest will decrease the ability of the wetlands to provide a total habitat for wildlife and will certainly decrease the ability of the wetland to provide that function (so a functional decrease will occur). Filling and grading within the seven wetlands almost always impacts the remaining portion of a wetland. None of these issues was covered or considered in the MDNS.

   The statement "the filling of the (7) wetlands will have no long-term impacts on the surrounding hydrology) is abjectly false. You cannot fill, grade, compact 638,000SF of land in and adjacent to wetlands and not impact the groundwater. You cannot create 39 percent impervious surface and not alter the hydrologic regime that feeds the wetlands and the streams and downstream receiving waters. See the discussion below (part b) or an explanation of how this works.

2. Downstream Impacts. Downstream impacts will be seen from both direct and indirect impacts on this site and on the cumulative impacts from the three projects proposed (Warehouse A, Warehouse B, and the Business Park). It is obviously easier to track the direct impacts. Loss of x amount of forest plus

creation of Y amount of impervious forest. Loss of parts of 16 different wetlands overall on the three parcels, impacts to North lake, Impacts to the Hylebos through altering the hydrologic regime and adding water at one discharge point by adding the water that comes off the impervious surface, and is withdrawn from the groundwater that fills the stormwater pond and then discharges. All this can be modeled. What can't be modeled is the impacts resulting from groundwater losses through grading and compaction of the soils for these large warehouse spaces, as well as loss of infiltration to the shallow subsurface flows and to groundwater. This will affect baseflows to the Hylebos stream and wetlands system because withdrawals from the groundwater will be put into the surface water and this will flow through the system quickly rather than stay in the system for longer periods. In terms of water quality, the stormwater ponds will be designed to Best Available Science (BAS), but these ponds cannot treat stormwater traveling over this large amount of cement (which will change the water chemistry and alter its buffering capacity).

The maintenance of the water treatment systems for petroleum hydrocarbons, heavy metals and toxic organics, that normally would be treated through infiltration through soils and gravels in the soil profile will be high because of the high proposed amount of traffic. Since the amount of water that will be directly discharged into the Hylebos system, especially when you add all three projects is a large percentage (which needs to be assessed) of the overall amount of water that currently flows in the Hylebos streams.

There are existing barriers to fish passage from Hylebos Creek though this has not been investigated. The Washington Department of Fish and Wildlife should require a salmonid survey for resident fish prior to issuing a Hydraulic Permit Approval (HPA) for the overall project. The TESC plan should be verified and there should be an inspector on site whenever there is work being done near a water body to be sure erosion control measures are being implemented. Especially at the southern end where the project dumps into the Hylebos system where there are salmonids.

3. Hydrologic Regime. The percent of this site covered with impervious surface is proposed to be 39.61% (261,679 SF). Research performed by Brian Taylor, Loren Reinelt, and Rich Horner for the Puget Sound Wetlands and Stormwater Research Program (*Azous and Horner. 2001. Wetlands and Urbanization. Implications for the Future*) has shown us that any exceedance past 5% impervious surface increases the water level fluctuations (WLF) in the basin by 50 percent and past 20% impervious surface increases the water level fluctuation four fold. The water level fluctuation in receiving wetlands and streams results in significant changes to the vegetation, soils, water quality, and wildlife. Therefore, increased impervious surface has significant consequences to the downstream receiving waters when even small amounts of impervious surface are proposed. This amount of reduction in infiltration capacity is likely to cause wetland (and stream) water depths to rise more rapidly following storm events. Diminished infiltration in wetland watersheds (which becomes more problematic when you add the Warehouse B and Business Park projects) can also reduce stream baseflows and groundwater supplies to wetlands, lengthening dry periods

and impacting species dependent on the water column. These are all of critical interest in the downstream receiving basin – the Hylebos, which has had millions of dollars spent on it over the years to preserve the delicate ecosystem. The Azous and Horner study found that the recommended stormwater ponds be sized a minimum of five percent of the total impervious acreage. This means stormwater ponds for even just this warehouse would have to be massive. The argument will be made that the stormwater design will be utilizing current stormwater manual guidelines, but he manual typically is used for for small impervious surfaces.

4. Tree loss. The massive loss of forest as proposed here has many implications on the functioning of a watershed. These can be best split into ecological impacts and hydrologic/water quality impacts.
    - The buffers assigned for tree retention are so narrow that it is unlikely that many of the trees to be retained will survive since they are going from a state of being included within a forest to existing in a narrow strip with no protection from prevailing winds. We know that trees that grow within a forest often have very little tensile strength and often cannot withstand any elevated wind velocities once the surrounding forest is gone. Expect significant wind damage and downed trees in this narrow belt over time.
    - Water quality impacts. Horner, Reinelt and Tayor also examined the effects of tree loss on a hydrologic regimes. There is an inverse relationship between forested coverage and water level fluctuation. "Forests store rainwater in the canopy, return water to the atmosphere through evapotranspiration- both of which reduce stormwater runoff volumes and reduce the delivery to receiving waters". There is a two to four-fold increase in water level fluctuating (WLF) with loss of forest coverage. The loss of even 20 percent forest covers can result in a WLF increase to two fold and when you take the forest out completely, the WLF can increase more than four times. Again, WLF is tied to impacts to the ecosystems as described above which will impact the Hylebos.

    - Habitat loss. When you cut down a forest- the last large tract of forest in the region; you lose habitat for mammals, birds, amphibians and reptiles. The downstream watershed- the Hylebos will be the last remaining remnant of habitat in the region. If the suspected losses to habitat resulting from this project occur, where will the animals go? What's more, there has been no mention of what the effects will be on the loss of the forest on the local climate. The amount of evapotranspiration on rainfall, humidity, air quality and noise impact though loss of buffering.

    - The three projects will impact the overall ecology of the region and the downstream basin cumulatively. Piece-mealing this project because the owner will be selling them individually is only a real estate separation. The impacts will be experienced cumulatively. The drainage off of this 32.31 acres (both the proposed 15.46 acre parcel and the stormwater pond parcel- 16.85 acres) will be added to the HUGE amount of water being

collected from Warehouse B and Business Park and their associated parking and roads that will be added to the surface flows of the Hylebos system. How on any impact analysis could this be anything other than catastrophic to the Hylebos system that has not historically carried this amount of surface water? It does not matter that the stormwater calculations for the Warehouse A project state it will accommodate the surface flows. This is only what will enter the stormwater ponds, not what happens once those ponds are full to capacity and there is another storm event, which is typically the condition we encounter in the PNW. This is not counting the stormwater that will be collected off of the Warehouse B site and the Business park site. The cumulative amount of water will absolutely overwhelm the Hylebos drainage where it will be conveyed and discharged. This absolutely needs to be assessed.

- Of the 146 acres that constitute the Business Park, there are 63 wetlands (according to the SEPA checklist- ESM) and 57 Wetlands (according to the JARPA–Talasaea). North lake abuts the eastern edge of the site, there is one man-made fish-bearing stream. All these wetlands discharge to the Hylebos system downstream either by surface of groundwater connections. The project stats that 0.421-acre o(18,340 SF) of all or parts of 16 different wetlands will be directly impacted but there is no mention of what 24.1% (SEPA checklist is wrong- the impervious figure states it is 24.1% and SEPA 21%) impervious surface and grading with the significant amounts of cut and fill mentioned above will do to the surface flows and groundwater of the Hylebos system.
- Groundwater removal is discussed in the SEPA checklist but no mention is made of what will happen to the loss of recharge to groundwater through infiltration as a result of the 32 acres of buildings and the compaction of the soil to make for foundations for buildings and roads. Then magnify this to include the impervious surface and loss to infiltration from Warehouse B and the Business park. It will be discharged as surface water to the downstream Hylebos system. That is all three projects worth of water that will not recharge but will remain as surface water flows. This is just for Warehouse A. When you add the same withdrawals from the Warehouse B and The Business Park projects you will have a significant withdrawal from the groundwater which will impact the baseflows of the downstream Hylebos system. There are no documents in the file that show that this has been evaluated, considered, and mitigated. This analysis must be done and conditions to mitigation for this withdrawal must be added to the MDNS
- Bald eagles are known to forage at North lake. What is going to be the impact of a HUGE business Park and 2,000,000 FT2 of warehouse and parking are in the region, on that activity? This was not discussed in any of the documents.

Thank you for the opportunity to review and comment. Please, if you have any questions, please feel free to contact me, Lori Sechrist, on behalf of Save Weyerhaeuser Campus.

Sincerely,

Lori Sechrist
President
Save Weyerhaeuser Campus
lasechrist@comcast.net
253-381-2612