

Exhibit A

Findings for Project Approval

Federal Way Revised Code (FWRC) Chapter 19.65, “Process III Project Approval” Greenline Warehouse “A” Project, File #16-102947-UP

The Director of Community Development hereby makes the following findings pursuant to content requirements of the Process III written decision as set forth in *Federal Way Revised Code (FWRC) 19.65.100(4)*. These findings are based on review of city documents and items submitted by the applicant and received June 17, 2016, July 8, 2016, July 14, 2016, July 19, 2016, July 26, 2016, August 10, 2016, August 12, 2016, April 3, 2017, August 25, 2017, October 5, 2017, March 13, 2018, May 8, 2018, and July 10, 2018.

For reference: FWRC=*Federal Way Revised Code* (current code); FWCC=*Federal Way City Code* (1994 code); CZA=Concomitant Zoning Agreement; CZA Exhibit C=CP-1 regulations.

1. *Proposal* – The proposal has been revised since the original June 2016 submittal of the Preferred Freezer application, which included a warehouse with office and food processing space. The revised proposal is Greenline Warehouse “A,” construction of a 45-foot-tall, 225,950 square-foot general commodity warehouse with 287¹ parking spaces (257 vehicle and 30 trailer), and associated site work, including wetland fill, on a 15.46 acre site (parcel 6142600005). A stormwater pond and associated site work, including wetland fill, is proposed on the adjacent 16.85 acre parcel to the south (parcel 6142600200) and is part of the proposed action. Since the original submittal, two Boundary Line Adjustments (BLAs) have been recorded (city files 16-102886-SU & 17-101484-SU), altering lot lines of the subject property. Future submittals related to this project must contain the most current legal description. This will be made a condition of approval.
2. *Zoning and Comprehensive Plan Designation* –The proposal is subject to the provisions of the 1994 Weyerhaeuser Company Concomitant Pre-Annexation Development Agreement (CZA) and zoning regulations in effect on August 23, 1994 (FWCC). Any procedural requirements must meet current code (FWRC). Zoning for the subject property is Corporate Park (CP-1). Warehousing and distribution; and corporate offices are permitted uses in the CP-1 zone pursuant to CZA Exhibit C, Section VII, “Permitted Uses on Those Portions of the CP-1 Zoned Property Lying Outside the Managed Forest Buffer.” The CZA states that warehousing and distribution are allowed, subject to Process IV, Hearing Examiner review (FWRC Chapter 19.70), when such facility is within 200 feet of a single-family zone or use. There is a single-family zone (RS 9.6) to the northeast; however, the proposed building is more than 200 feet from this zone. The *Federal Way Comprehensive Plan (FWCP)* designation for the subject property is Corporate Park.

¹ The submitted site plan (Sheet ST-01) prepared by ESM, March 12, 2018 (resubmitted March 13, 2018), states “Parking: 255 car stalls (7 ADA accessible), 30 trailers,” however, the drawing shows 250 spaces, plus 7 ADA, and 30 trailer for a total of 287 parking spaces.

The proposal was reviewed as a general commodity warehouse with an associated office. A future change in the type of use and/or occupancy shall require review for compliance with applicable requirements, and to determine any impacts, including revisiting the SEPA threshold determination and Use Process III decision, as needed. This will be made a condition of approval.

3. *Site Plan Review Process* – The project requires review under Process III, *Project Approval*. The Director of Community Development makes a written decision on the application based on the criteria listed under FWRC 19.65.100.
4. *State Environmental Policy Act (SEPA)* – The proposed improvements exceed categorical exemption levels pursuant to *Washington Administrative Code (WAC) 197-11-800*. The city issued a Mitigated Determination of Nonsignificance (MDNS) on October 26, 2018 (city file 16-102948-SE). The threshold determination comment period ended November 9, 2018, and the appeal period ended November 30, 2018. The city received comments during the public comment period on the MDNS. The city considered all comments received and in response, modified the MDNS. The Modified MDNS was issued on November 30, 2018, pursuant to WAC 197-11-340(2)(f). Modifications, including a new finding of fact and SEPA mitigation measure, relate to comments received from the Washington State Department of Transportation (WSDOT). Prior to MDNS issuance, WSDOT did not identify or request mitigation for the proposed project. However, after the MDNS was issued, WSDOT identified and requested mitigation for the westbound SR-18 off-ramp right turn storage. A SEPA appeal was filed on November 30, 2018. The SEPA appeal hearing will occur after issuance of this Use Process III decision and expiration of its associated appeal period.
5. *Public Notice* – Pursuant to Process III regulations, a Notice of Application (NOA) was published in the *Federal Way Mirror*, posted on the subject property, posted on each of the official notification boards of the city and public libraries located within the city, and mailed to the persons receiving the property tax statements for all property within 300 feet of each boundary of the subject property on August 5, 2016. Approximately 300 written comments were received on the application. Pursuant to SEPA regulations, notice of the MDNS was published in the *Federal Way Mirror*, posted on the subject property, posted on each of the official public notification boards of the city and public libraries, mailed to all owners of real property as shown in the records of the county assessor located within 300 feet of the site, emailed to agencies, and sent to people who provided comments in response to the NOA, on October 26, 2018. Approximately 66 written comments were received on the MDNS. A Modified MDNS was issued on November 30, 2018, and was sent to agencies with jurisdiction and interested parties.
6. *Public Comments* – Approximately 300 written comments were received on the application. The comments generally relate to alleged environmental impacts, traffic, zoning, design, process, infrastructure & utilities, pollution, noise, odor, economic impacts, public health & safety, quality of life, property values, neighborhood character, historic preservation, and green space. Approximately 66 written comments were received on the MDNS. The MDNS comments generally relate to alleged environmental impacts, transportation, stormwater, wetlands, tree removal, noise, economics, quality of life, historic preservation, and green space. Several MDNS comments also discuss the separate Greenline Warehouse “B,” Greenline Business Park, and DaVita projects currently under review by the city. In relation to these separate projects, the comments received by the city variously assert that cumulative SEPA review, a master plan, and/or an Environmental Impact Statement (EIS) are required.

The city has carefully and thoroughly considered each of the comments received as part of the city’s review of the application. All of these comments will be included within the administrative record for this proposal and will accompany the application throughout the city’s project review process.

Based upon these comments, the city modified the MDNS and has required the following additional mitigation as condition of project approval: prior to the issuance of a certificate of occupancy, the applicant shall construct right-turn storage for the westbound SR-18 off-ramp to mitigate for the impact to the westbound off-ramp to the satisfaction and with approval of WSDOT. (Also see the finding above regarding the “State Environmental Policy Act (SEPA).”)

The city also provides the following response with respect to the comments requesting a master plan, cumulative SEPA review, and/or an EIS for the project. A master plan was not proposed or otherwise requested by the applicant, and no applicable statutory or local code provision allows the city to unilaterally require preparation of a master plan. The applicant has also elected to submit separate complete application submittals for projects on the Greenline Campus, which the city is required by law to process. (Also see the finding below regarding “cumulative impacts analysis.”) And unless there are significant adverse environmental impacts that cannot be mitigated, a SEPA Determination of Significance requiring preparation of an EIS is inappropriate. The city’s SEPA Responsible Official has determined that this standard has not been met with respect to the project. Finally, the city is generally prohibited from requiring an applicant to provide mitigation of a project to an extent that exceeds the project’s anticipated impacts. The city accordingly cannot require the Greenline Warehouse “A” project to mitigate an impact that it does not cause or otherwise contribute to.

7. *Bulk & Dimensional Requirements* – Per Section III.B of the CP-1 regulations, no building setbacks are specified in the CP-1 zone except for the continuous Managed Forest Buffer (MFB), which states that a continuous MFB shall be provided around the entire perimeter of the CP-1 property. Please see section 9, *Managed Forest Buffer (MFB)*, below for further information regarding the MFB.

Section III of the CP-1 regulations states that, “The aggregate impervious surface coverage by all permitted uses, primary and accessory, shall not exceed 70 percent of the total CP-1 zoned property.” The applicant submitted an “Impervious Area Exhibit.” prepared by ESM, March 9, 2018, which shows the existing impervious coverage in the CP-1 zone is 11.6 percent and the construction of the proposed project would increase it to 13.5 percent.

Per Section IX of the CP-1 regulations, maximum building height is six stories. The tallest proposed component of the project is the building at 45 feet in height, which is less than six stories.

8. *Parking Requirements* – Off-street parking shall comply with the 1994 zoning code as modified by the provisions of Section XIII of the CP-1 regulations. Required parking is one parking space per 300 square feet of gross floor area (gfa) for office and one for every 1,000 square feet of gfa for warehouse. No floor plan has been submitted, so the exact breakdown of office and warehouse space has not been determined. As an example, *if* 10 percent of the building is office, then required parking would be: for office ($22,595/300=74$) and for warehouse ($203,355/1000=204$), for a total of 278 parking spaces. For reference, the site plan depicts 287 parking spaces (257 vehicle and 30 trailer). A condition of approval will require the building permit application plan set to include a section on a parking analysis that demonstrates compliance with the required parking ratios and consistency with the 287 spaces proposed on the Use Process III site plan (Sheet ST-01).
9. *Managed Forest Buffer (MFB)* – Section III.B of the CP-1 regulations states, “A continuous Managed Forest Buffer shall be provided around the entire perimeter of the CP-1 property.” The depth of the setback is 50 feet where the perimeter abuts a city road and 100 feet where abutting a state highway. A 50-foot buffer is shown along Weyerhaeuser Way along the subject property, which is the perimeter of the CP-1 property in that area. A 100-foot buffer is shown along State Route 18 (SR-18), which is the perimeter of the CP-1 property in that area.

Planned activities in the MFB include managed forest, a pedestrian path, fencing, a driveway, and signage, which are allowed pursuant to CZA Exhibit C, Section VIII, “Uses on Those Portions of the Property Lying Within the Managed Forest Buffer.”

Per CZA Exhibit C, Section X.B.2, within the MFB, natural materials are preferred for fencing. Fencing is required around wetland buffers. In addition, stormwater conveyance infrastructure is planned within the MFB west of Stream EA. Such activity is permitted within the MFB per CZA Exhibit C, Section VIII.D.2, which allows minor grading or filling associated with permitted uses within forested areas not requiring review or approval under Section XII (“Environmentally Sensitive Areas”). The activity must be supervised by the Forester.

Per Section IV.B of the CP-1 Zoning Regulations, the property owner shall designate a qualified Forester and prepare a General Maintenance Plan (GMP). The property owner has designated Brian Gilles of Gilles Consulting as the Forester and a GMP has been submitted for review. The *Managed Forest Buffer Management Plan at the Greenline Building A Site*, July 5, 2018, is approved with the following condition:

- Work is not allowed within Wetlands DP, DQ, DR, DT, Stream EA, and associated buffers, as stream setback intrusions and improvements/land surface modifications in non-CZA exempt wetland setbacks require Use Process IV application review and approval per FWCC Sections 22-1312(c) and 22-1359(d).

Plan set Sheet SR-07 shows existing trees within the MFB. A condition of approval will require Sheet SR-07 to be attached to the final landscaping plan submitted with the building permit.

10. *Landscaping* –Section XI of the CP-1 regulations states that, “The provisions of this section shall modify application of Chapter 22, Article XVII (Landscaping), of the FWC[C] in the CP-1 zone.” This modification language states in part, “All portions of the Property not used for buildings, future buildings, parking, storage or accessory uses, and proposed landscaping areas shall be retained in a “native” or pre-developed state.” The preliminary landscape plan (Sheet LA-01) shows portions of the property outside of areas for buildings, future buildings, parking, storage or accessory uses, and proposed landscaping areas to be retained in a “native” or pre-developed state.

Per FWCC Section 22-1564(w), “All loading areas shall be fully screened from public right of way or non-industrial/manufacturing uses with Type I landscaping.” The project contains a loading area on the east side of the building facing Weyerhaeuser Way. The preliminary landscape plan (Sheet LA-02) shows that there is existing vegetation to remain inside and outside of the MFB, along with supplemental planting if necessary to screen the loading area from Weyerhaeuser Way. There are notes on Sheet LA-02 that reference Type I and Type II landscaping for additional, supplemental, and replanting purposes. A condition of approval will require installation of all additional, supplemental, and replanted Type I and II landscaping, as indicated on Sheet LA-01, prior to building final inspection.

Section XI.D of the CP-1 regulations states, “New parking areas shall comply with minimum standards of the FWC[C]; except that selection and distribution of plant material conforming to existing development shall be preferred.” Per FWCC Section 22-1567(b)(1)(a)(ii), interior parking lot landscaping is required at the rate of 22 square feet of Type IV landscaping per parking stall, when 50 or more parking stalls are provided. As 287 parking stalls are provided, 6,314 square feet of

parking lot landscaping is required ($287 \times 22 = 6,314$). Plan Sheet LA-01² shows 7,986 square feet of proposed parking lot landscaping. If the number of parking spaces increases such that the required parking lot landscaping exceeds the 7,986 square feet shown, then additional parking lot landscaping will be required.

FWCC Section 22-1567(c) contains requirements for the location and size of parking lot landscape islands. Sheet LA-01 of the plan set shows that all parking lot landscape islands meet the criteria, with the exception of what appears to be deficient width of the two islands located on either side of the trash enclosure near the trailer parking area. A condition of approval will require the building permit application plan set landscaping plan to ensure the required six-foot width is met for the parking lot islands adjacent to the trash enclosure.

FWCC Section 22-1567(e)(1) requires parking areas adjacent to public right-of-way to incorporate berms at least three feet in height within perimeter landscape areas, or through other means as listed in the code section to reduce the visual impact of parking areas and screen automobiles. Plan Sheet LA-01 shows that the 50-foot wide MFB, along with other existing vegetation that will remain, will substitute for the berm to screen parking areas near Weyerhaeuser Way. The applicant also provided a March 15, 2017, "Greenline Warehouse A Tree Buffer Photographic Study." The document states, "This real life example demonstrates that 50-feet of native vegetation provide[s] a significant portion of screening needed to block the view of buildings from the existing right-of-way."

Section XI.A.3 of the CZA states, "Selection and installation of plant material in all forested areas shall be the responsibility of the designated Forester." In the MFB Management Plan, the Forester has identified a recommended plant palette. On landscaping plan set Sheet LA-02, it lists species to be used within the MFB.

11. *Tree Retention/Replacement* – Pursuant to FWCC 22-1568, the development must retain or replace 25 percent of the existing significant trees on site. According to the submittal, the Warehouse "A" property contains approximately 820 significant trees. The stormwater pond parcel contains approximately 607 significant trees. Both parcels will retain significant trees in the MFB and other areas proposed to remain undisturbed. Plan set Sheet TR-01 (Tree Retention Plan) shows that approximately 26 percent of the significant trees on the Warehouse "A" site will be retained and 29 percent on the pond parcel. This requirement is satisfied. A condition of approval will require all significant trees to be retained within the MFB and within areas planned to remain undisturbed according to the submitted plan set (Sheets TR-01 & GR-01) to the maximum extent feasible. A condition of approval will require clearing/grading on the pond parcel to be limited to the areas necessary for the stormwater pond and associated stormwater conveyance infrastructure only, as shown on Sheet GR-01.
12. *Forest Practices* – A Forest Practices Class IV-General Application is required as more than 5,000 board feet of merchantable timber will be harvested from the property in conjunction with the development activity. Per FWRC 19.120.200(1)(a), "A Class IV – General Application shall be approved based on an approved clearing and grading plan and tree and vegetation retention plan and

² The submitted preliminary landscape plan (Sheet LA-01) states 245 parking stalls are proposed and that the total square feet of interior parking lot landscaping proposed equals 9,142 total square feet and 7,595 square feet if only counting 350 square feet for areas larger than 350 square feet. FWCC Section 22-1567(c) limits the size of parking lot landscape islands to a maximum of 305 square feet, not 350 square feet. The site plan drawing shows 287 parking stalls are being provided, not 245 stalls, which requires 6,314 square feet of parking lot landscaping ($287 \times 22 = 6,314$). On Sheet LA-01, 7,986 square feet of parking lot landscaping is shown, counting only 305 square feet for areas larger than 305 square feet.

prior to conducting forest practices on the project site.” A condition of approval will require the applicant to obtain Forest Practices approval prior to issuance of the building permit.

13. *Critical Areas* – Section 12 of the CZA addresses environmentally sensitive areas. The project site contains wetlands and a stream. The applicant submitted a critical areas report prepared by Talasaea, which has subsequently been revised and submitted for review several times. The most recent version is “Critical Areas Report and Buffer Averaging Plan Greenline – Warehouse A,” revised March 2, 2018. The report was sent to the city’s consultant, ESA, for a peer review. Over the course of reviews ESA completed site visits and reviewed relevant documents. In their April 3, 2018 memorandum, they state the following recommendations, which the city will require as conditions of approval:

“According to the Critical Areas Report and Buffer Averaging Plan (and hereinafter referred to as the Report), 13 wetlands and one stream were identified on or adjacent to the proposed location of the Warehouse A Project (the Project). All 13 wetlands were rated as Category III wetlands using the Washington State Wetland Rating System for Western Washington – 2014 Update (Ecology, 2014). The total area of the 13 wetlands is 16,595 square feet (SF). Construction of the Project will impact nine of the wetlands (DU, DW, DX, DZ, EB, EC, ED, EE, and EF) for a total of 9,922 SF. Though not directly impacted, Wetlands EC and EF are being considered as wetland fill because they will be insufficiently buffered post-construction. According to the Concomitant Agreement, ‘development affecting wetlands which are individually smaller than 2,500 square feet and/or cumulatively smaller than 10,000 square feet in size in any 20-acre section of property’ is exempt from sensitive areas regulations. Therefore, the proposed impacts to the nine wetlands are considered exempt by the City and no mitigation is required.

“Per the 1994 FWC[C] (Section 22-1357), all regulated wetlands have a standard 100-foot buffer. The Project proposes to impact approximately 16,233 SF of wetland buffer around Wetlands DQ, DR, and DT. The buffer will be reduced to no less than 50 feet. The applicant proposes approximately 16,504 SF of wetland buffer replacement to mitigate for wetland buffer impacts. The 1994 FWC (Section 22 –1306) also requires minor regulated streams to have a standard 50-foot buffer. The project would also impact the buffer of Stream EA for which stream buffer averaging is proposed. The buffer will be reduced to no less than 25 feet. However, the exact square footage of stream buffer impact is inconsistent between the text in the Report and on Figure W1.2 in the Report.

“Based on the document review for consistency with the City of Federal Way requirements and regulations, we have the following comments and recommendations:

- “We agree with the wetland delineation boundaries, rating forms, and rating classifications established by Talasaea for wetlands occurring on the proposed project site.
- “The amount of impact to the buffer of Stream EA is inconsistent between the text in the Report and on Figure W1.2 in the Report. Section 7.2.3 – Stream Buffer Averaging of the report states that 1,944 SF of the buffer area will be reduced and 2,235 SF of buffer area will be replaced. However, Figure W1.2 shows a reduction of 1,695 SF of stream buffer and a replacement of 2,359 SF. We recommend the Figure and the Report be revised to show the correct quantities of reduction and replacement.

- “We agree that the proposed buffer averaging plan would suffice as compensation for buffer impacts and meets the requirements of the Concomitant Agreement and Chapter 22, Article XIV of the 1994 FWC[C]. However, we recommend the applicant consider enhancing the areas of buffer replacement with native vegetation, as necessary, to ensure buffer function continues post-development.
- “Existing buffers for all wetlands are correctly included on the Existing Conditions sheet of the Site Plan (Sheet 2 of 11). However, sheets that contain the proposed development should only show the buffers post-development, including averaged wetland and stream buffers.
- “According to the Buffer Averaging Plan in the Report (Sheet W1.2) only the northwest portion of the buffer of Wetland DT is being impacted. However, several sheets in the Site Plan show the entire wetland buffer being reduced to 50 feet. We recommend the Report and plan sheets be revised as necessary to show the correct buffer impact.”

The above consultant recommendations from ESA will be made conditions of approval. The CZA allows wetland buffer averaging with limitations, and the applicant is proposing buffer averaging for several wetlands as detailed above. For reference, CZA Sections XII.F and XII.G address wetland and stream setback (buffer) averaging. The proposed Stream EA buffer averaging involves three locations where the buffer is reduced to no less than 25 feet and two locations where the buffer is to be replaced. The area to be averaged does not extend beyond the boundaries of the site plan. The proposed Wetlands DQ, DR, and DT buffer averaging involves one location for each wetland where the buffer is reduced to no less than 50 feet and one location where the buffer is to be replaced, except for Wetland DQ which has two buffer replacement areas. The areas to be averaged do not extend beyond the boundaries of the site plan. For clarity, in addition to the required revisions to the critical areas report detailed above, the applicant, as a condition of approval, shall show/label on Figure W1.2 the size of each area of buffer reduction and replacement to demonstrate that each reduction is compensated for at the location of the critical area where that reduction occurs. Adjustments shall be made if necessary.

Sheet W1.1 “Wetland Exemption Exhibit” of Appendix C of the report by Talasaea shows a 20-acre section and the remaining area of the project site is identified as a “non-exempt” portion. This exhibit relates to CZA Section 12.H.3, which states, “H. Exemption. The following shall be exempt from the provisions of Section 22, Article XIV of the FWC and requirements of this Agreement: 3. Development affecting wetlands which are individually smaller than 2,500 square feet and/or cumulatively smaller than 10,000 square feet in size in any 20-acre section of this property;”.

For clarity, the “property” referenced in the CZA citation is all property subject to the CZA, not an individual development site. As the project site exceeds 20 acres, the entire site should be allocated into more than one 20-acre section. Future projects need to allocate their entire site area into one or more 20-acre sections. All wetlands located within the 20-acre area shown on Sheet W1.1 are not exempt, as their cumulative size exceeds the 10,000 square foot provision in the CZA. Non-exempt Wetlands DP, DQ, DR, and DT are subject to applicable provisions of the CZA and FWCC.

Per FWCC Section 22-1270, “The city may require other construction techniques, conditions and restrictions on development in order to minimize adverse impacts on steep slopes, wells, streams, regulated lakes or regulated wetlands.” To protect the function of the wetlands, a condition of approval will require permanent fencing at the outer edge of the wetland buffers for Wetlands DQ,

DR, and DT. Fencing around Wetland DP's buffer is not appropriate as it is located within the buffer of Stream EA. The boundary between the wetland buffers and contiguous land shall be identified with permanent signs. Permanent signs shall be a city-approved type designed for high durability. Signs must be posted at an interval of one per every 150 feet and maintained by the property owner in perpetuity. Public Works has a standard detail for the wetland sign. The wetland sign must meet the standard detail required by Public Works.

While wetland impacts are exempt from city mitigation requirements as permissible in the CZA, the Talasaea report describes federal and state regulations as follows, "Wetland impacts on the Project Site are subject to applicable State and Federal regulations. Wetland impacts are regulated on the Federal level by Sections 404 and 401 of the Clean Water Act. The US Army Corps of Engineers (Corps) is responsible for administering compliance with Section 404 via the issuance of Nationwide or Individual Permits for any fill or dredging activities within wetlands. Any project that is subject to Section 404 permitting is also subject to requirements of Section 401 of the Clean Water Act (CWA), administered by the Department of Ecology (DOE). Because direct wetland impacts are proposed on the Project Site, the project would be required to comply with all Section 404 and 401 permitting requirements prior to any construction-related activities that would affect 'waters of the US.' The project was previously permitted by the Corps (NWP-2016-443, issued 31 October 2016), but with the current site plan changes, a permit revision will be requested."

In January 2018, the city conducted a preapplication meeting for construction of Corps required compensatory mitigation at an off-site location on parcel 152104-9178, for wetland impacts associated with Greenline Buildings A & B. As was stated in the June 9, 2016, Preapplication Conference Summary for the Preferred Freezer project, "In addition, as noted in the Major Issues Section, the city will not issue any approvals to fill wetlands until all state, federal, or other agency permits as may be required to fill the wetlands have been obtained and verification provided to the city." In recognition of FWCC Section 22-1224, this will be made a condition of approval.

14. *Tacoma Smelter Plume* – The former Asarco copper smelter in Tacoma caused widespread soil contamination with lead and arsenic in parts of King, Pierce, Kitsap, and Thurston counties. This 1,000 square mile area is known as the Tacoma Smelter Plume. The state cleanup level for arsenic is 20 parts per million (ppm). According to Department of Ecology mapping checked in 2018, the subject property is located in the Tacoma Smelter Plume detect area containing under 20 ppm arsenic; therefore, testing of site soils is not applicable.
15. *Clearing & Grading* – There is a 40 foot elevation change across the building site, generally falling from the northwest to the southeast. The preliminary cut/fill analysis is: 20,500 cubic yards (stripping), 68,200 cubic yards (cut), 55,600 cubic yards (fill), and 12,600 cubic yards (net cut). The applicant submitted a geotechnical report, "Geotechnical Engineering Services Report, Proposed Greenline Building A Project Federal Way, Washington," March 9, 2017, prepared by GeoEngineers. The report states, "The final floor slab will be at about Elevation 403 feet. This will require cuts of up to 10 feet in height on the west side and up to 11 feet of fill in the southeast corner of the building pad. Cuts and fills will also be required for the parking areas. We understand that 2H:1V (horizontal: vertical) cut slopes will be used to establish planned grade along the west site boundary. Similarly inclined fill slopes are planned for the east perimeter of the site. Structural retaining walls (maximum height of 8 feet) for fills are planned for the site entrance at the southeast project corner." Clearing and grading will also occur on the adjacent parcel to the south to create a stormwater pond intended to eventually serve both sites. Land surface modification activities will be reviewed for consistency with applicable standards set forth in FWCC Division 7 and Chapter 19.120 FWRC as part of construction permitting.

16. *Design Guidelines* – Section X of the CP-1 regulations states that, “Provisions of the FWCC relating to façade measurement, modulation, distance between structures, or materials, other than those specified herein, shall not apply to this zone.” The FWCC states that one of the purposes of site plan review is, “To encourage proposals that embody good design principles that will result in high quality development on the Subject property.” The city adopted non-residential community design guidelines in 1996, after the effective date of the CZA. In the June 9, 2016, Preapplication Summary Letter for the Preferred Freezer project, the applicant was encouraged to meet the city’s design guidelines in order to complement the other buildings in the area.

On Sheet A1.0 of the plan set, the architect provides a design narrative:

“This design has been envisioned with a clear mindset of the surrounding landscape and regional materials. Sourcing materials and design elements from the Pacific Northwest aesthetic allows this warehouse building to blend in with the surrounding character of Federal Way. Located on a well-known site, we have included timber accents and artistic reveal patterns to emphasize the history and character of the area. Entry nodes, visible to the public streets, are comprised of large expanses of glass, glue laminated timber framing, façade modulation, large canopies and arcades. Building signage will be provided with non-traditional methods including regional materials and forms, strong composition with the building design and unique signage elements. Altogether, the proposed approach to the building is of superior design quality and deep appreciation for the character and history of the chosen site and the region”.

Sheet A1.0 explains incorporation of a selection of current FWRC design guidelines (FWRC Chapter 19.115), including façade modulation; use of a canopy and arcade at the building entries; recessed windows and panels; artistic reveal patterns; paint scheme; indentations; overhangs; emphasizing the building entrances with transparent glass; timber beams; and large overhangs.

FWCC Section 22-1564(u) requires building walls which are uninterrupted by a window, door, or other architectural feature, that are 240 square feet or greater in area, and not located on a property line, to be screened by landscaping. On Sheet A1.0, the architect states that, “no blank walls exist on the elevations with an uninterrupted area greater than 240 s.f. A combination of vertical banding, mountain reveal patterns, varying window shapes, trellis features and main entry design demonstrates compliance with FWCC 22-1564(u).” Sheet A1.1 states, “applicant acknowledges in final building permit elevations no blank wall surfaces greater than 240 s.f. will be proposed.”

17. *Rooftop Mechanical Equipment* –The submittal does not provide detail on the location and screening for rooftop and ground mounted mechanical equipment. A condition of approval will require the building permit submittal to address these items:
 - a. For rooftop mechanical equipment, per FWCC Section 22-960(a), vents, mechanical penthouses, elevator equipment, and similar appurtenances that extend above the roofline must be surrounded by a solid sight-obscuring screen that meets the following criteria: (a) the screen must be integrated into the architecture of the building; and (b) the screen must obscure the view of the appurtenances from adjacent streets and properties.
 - b. For ground mounted mechanical equipment, per FWCC Section 22-1565(a)(1), Type I landscaping is intended to provide a solid sight barrier to totally separate incompatible land uses. This landscaping is typically found around mechanical or electrical equipment and utility installations.

18. *Garbage/Recycling* – FWCC Section 22-949 provides requirements for garbage receptacle and dumpster placement and screening. The project will have two interior recycling collection areas within the building and a recycling dumpster enclosure across from the truck court. A solid waste enclosure is also proposed across from the truck court. The enclosures will not be located within a required yard or buffer area. The enclosures are proposed to have concrete tilt-up panels with metal deck clad gate doors, with all metals painted. Per FWCC Section 22-1564(d), “All trash enclosures shall be screened from abutting properties and/or public rights of way by a 100 percent sight-obscuring fence or wall and appropriate landscape screen.” Per FWCC Section 22-1564(b), “All outside storage areas shall be fully screened by Type I landscaping a minimum of five feet in width, as described in section 22-1565(a), unless determined by the community development review committee (CDRC) that such screening is not necessary because stored materials are not visually obtrusive.” Sheet LA-01 shows some landscaping adjacent to the enclosure area. A condition of approval will require the building permit landscaping plan to provide Type I landscaping a minimum of five feet in width on the north and south sides of the combined enclosure area.

Regarding sizing of facilities, referencing “Sheet No. A1.0” March 13, 2018, the proponent acknowledges that code requires provision of a minimum of 679 square feet in area for recycling storage space. “Solid waste” includes both garbage and recycling. The code sets minimums for recycling space, but in practice space set aside for garbage storage typically more than doubles the minimums set for recycling alone.

In addition to one exterior recycling enclosure, the applicant states they are providing two interior recycling collection areas of 275 square feet each within the building. Setting aside designated space is a first step, and as a condition of approval future plans must demonstrate: 1) how occupant use of these designated areas will integrate with service access; and 2) how the storage and collection of other garbage generated on site complies with FWCC Section 22-949(e)(1), which states the recycling storage area and garbage storage area shall be adjacent to each other.

As noted above, while a total area of 710 square feet has been designated for recycling receptacles, this only satisfies the minimum required area for storage space for recyclables. The smaller area designated for garbage storage (approximately 160 square feet) does not conform with the first clause of FWCC Section 22-949, which states *storage areas for garbage and recyclables shall be required to be incorporated into the design*. In practice, garbage storage space typically more than doubles the designated space for storage of recyclables. As such, the garbage enclosure may be inadequate for the proposed building due to its size. Plans do not accommodate a realistic level of service for a site occupant. Therefore, as a condition of approval, future plans must demonstrate: that the garbage and recycling storage needs have been incorporated into the design and planned for in ways that will serve occupants over time.

For purposes of general guidance: if the applicant’s design objective is to minimize the area designated for solid waste storage, consider designing to accommodate waste compaction equipment. The current enclosure design is incompatible with use of large-scale compaction equipment, which may be the most economical long-term management option for a facility this large. For these reasons, the plans could designate interior access point(s) leading to the loading dock area where compaction equipment would be stationed. Based on facility size, a tenant may require more than one compactor (one for garbage and one for recyclables) so the design could show how it would accommodate two compactors adjacent to each other. Another form of compaction is balers (typically used for compacting waste cardboard). Accommodations for compaction equipment could be specified within the interior recycling storage space areas. Planning for this equipment would require a reconfigured enclosure design. It is possible for the two exterior enclosures to be eliminated if plans are revised to

indicate placement and access to adequate compaction equipment. To further accommodate compaction equipment, revised plans should factor in overhead clearances, power access, drainage management, and similar site needs.

19. *Lighting* – The proposal will include outdoor lighting. Per FWCC 22-9549(c), “The applicant shall select, place and direct light sources both directable and nondirectable so that glare produced by any light source, to the maximum extent possible, does not extend to adjacent properties or to the right-of-way.” A condition of approval will require submittal of a lighting plan prior to issuance of a building permit for verification that this code criterion will be met.

20. *Open Space* – Section 13 of the CZA states:

“The Property has significant open space currently used for running, walking, kite flying and other recreational activities. These uses may continue at Weyerhaeuser’s discretion. The City agrees not to require any dedication or conveyance of the Property or any portion for public purposes, provided, that in connection with any new development applications within 200 feet of State shorelines, the City may require public trails, water access or open space as may be required by adopted City codes.”

The parcels involved with this development proposal contain trails. According to the applicant’s submittal, the trails will be removed from the site by the proposed development. The subject property is not within 200 feet of state shorelines; therefore, the city cannot require the applicant to provide public trails.

21. *Noise* – The applicant was requested to provide a noise report prepared by a qualified expert to verify that the noise generated by the site operation would not exceed the city’s thresholds for noise set forth in FWRC 7.10. The applicant submitted an environmental noise report (“Greenline Building “A” Development, Federal Way Washington Environmental Noise Report, revised March 2018, by Ramboll Environ) that concluded, “The assessment found that noise associated with the proposed Project would result in negligible to very minor increases in ambient noise and would be within compliance of all applicable noise limits. An evaluation of the actual facility design, once submitted, should be completed to ensure that the equipment to be installed at the warehouse, as well as warehouse activities, are consistent or similar to those identified in this report.” This shall be made a condition of approval (a SEPA mitigation measure).

Regarding construction related noise, the report states, “The following may help to reduce the potential for high levels of noise from construction equipment or activities, as may be received at existing noise-sensitive land uses, and therefore would help to reduce the potential for perceived impact:

- “Require that all equipment be fitted with properly sized mufflers, and if necessary, engine intake silencers
- “Require that all equipment be in good working order
- “Use quieter construction equipment models if available, and whenever possible use pneumatic tools rather than diesel or gas-powered tools.
- “Place portable stationary equipment as far as possible from existing residential and noise-sensitive commercial areas, and if necessary, place temporary barriers around stationary equipment.

- “For mobile equipment that routinely operate near residential areas (i.e., within approximately 200 feet to the north of the Project site), consider placement of typical fixed pure-tone backup alarms with ambient-sensing and/or broadband backup alarms.”

Regarding operation of the project, the report states, “Noise mitigation measures are not warranted at this time.” Under the conclusions section it states, “A detailed review of final operating conditions should be completed to ensure that this noise study accurately and conservatively reflects future Project operation.” Conditions of approval will implement the above listed items (SEPA mitigation measures).

22. *Air Quality* – The applicant was requested to provide information related to emissions associated with the operation of the facility, and a detailed study by a qualified expert about the effect of particulate matter from diesel trucks on the environment and on downwind properties. The applicant submitted an air quality report (“Greenline Building “A” Development, Federal Way Washington Air Quality Report,” revised March 2018, by Ramboll Environ) that concluded, “At the time of this analysis, the exact use of the warehouse had not been established. However it is anticipated that the warehouse will be used for general commodities that do not require cold storage. Furthermore, the warehouse will not include processing or manufacturing facilities. Sources of air pollution typical of a general commodities warehouse include emergency generators and vehicles used by employee commuter trips and truck deliveries.” A condition of approval (a SEPA mitigation measure) will require the air quality analysis to be revised and the SEPA threshold determination revisited if the proposed use of the building includes cold storage, processing, or manufacturing.

The report also states, “With implementation of required measures to provide reasonable controls of dust and odors, construction of the proposed project would not be expected to result in significant air quality impacts.”

Regarding air quality impacts during construction, the report states, “The following is a list of possible mitigation measures that could be implemented to reduce potential air quality impacts during construction of the project.

- “Use only equipment and trucks that are maintained in optimal operational condition
- “Require all off road equipment to be retrofit with emission reduction equipment (i.e., require participation in Puget Sound region Diesel Solutions by project sponsors and contractors), including particulate matter traps and oxidation catalysts to reduce MSATs
- “Use biodiesel or other lower-emission fuels for vehicles and equipment
- “Use carpooling or other trip reduction strategies for construction workers when possible
- “Stage construction to minimize overall transportation system congestion and delays to reduce regional emissions of pollutants during construction
- “Implement restrictions on construction truck idling (e.g., limit idling to a maximum of 5 minutes)
- “Locate construction equipment away from sensitive receptors such as fresh air intakes to buildings, air conditioners, and sensitive populations
- “Locate construction staging zones where diesel emissions won't be noticeable to the public or near sensitive populations such as the elderly and the young

- “Spray exposed soil with water or other suppressant to reduce emissions of PM₁₀ and deposition of particulate matter
- “Pave or use gravel on staging areas and roads that would be exposed for long periods
- “Cover all trucks transporting materials, wet materials in trucks, or provide adequate freeboard (space from the top of the material to the top of the truck bed), to reduce PM₁₀ emissions and deposition during transport
- “Provide wheel washers to remove particulate matter that would otherwise be carried off site by vehicles to decrease deposition of particulate matter on area roadways
- “Remove particulate matter deposited on paved, public roads, sidewalks, and bicycle and pedestrian paths to reduce mud and dust; sweep and wash streets continuously to reduce emissions
- “Cover dirt, gravel, and debris piles as needed to reduce dust and wind blown debris
- “Route and schedule construction trucks to reduce delays to traffic during peak travel times to reduce air quality impacts caused by a reduction in traffic speeds”

A condition of approval will implement the above listed items (a SEPA mitigation measure).

Regarding operation of the project, the report states, “The analyses described above indicate[s] the proposed project would be unlikely to result in any significant adverse air quality impacts. Consequently, no operational mitigation measures are warranted or proposed.”

23. *Historic and Cultural Preservation* – The city received an August 23, 2016, letter from the Washington State Department of Archaeology and Historic Preservation (DAHP). Following receipt of that letter, the city asked the applicant to submit a Historic Property Inventory sheet to DAHP for an official determination of eligibility on the Weyerhaeuser corporate headquarters building and campus. The applicant was also asked to provide an inventory of the project site and surrounding Weyerhaeuser campus, conducted by a qualified cultural resource professional, to evaluate the property for its historical and architectural significance.

In the applicant’s April 5, 2017, resubmittal response letter, they stated, “The former Weyerhaeuser corporate headquarters building is not part of this project. We do not question whether the building would be eligible for listing, but assert that listing this building is not necessary for the proposed project. Included with the revised Process III materials, is a copy of a letter from DAHP to the United States Army Corps of Engineers (USACE) dated August 10, 2016. In this letter DAHP concurs with the USACE determination that no historic properties are affected.” The applicant submitted reports regarding archaeological resources in the project area (“Project #TAL-1593,” by Tetra Tech, undated & Project #TAL-1572F,” by Tetra Tech, undated). These materials were sent to DAHP by the city.

DAHP provided an April 24, 2017, letter to the city in response stating, “We concur with the findings of the two Tetra Tech reports regarding archaeological resources in the project area of potential effect (APE) for the first and revised project areas. While addressing archaeological resources in the two project areas, the reviewed materials are not responsive to our recommendations to conduct a comprehensive survey and inventory of the former Weyerhaeuser headquarters campus. As clearly stated in our letter, we request and recommend that the campus be surveyed and recorded by professionals with expertise in architectural history as well as cultural resources to document historic and cultural resources on the entire campus.”

The letter further states, “As a clarification, DAHP’s recommendation is **not a** request for listing of the Weyerhaeuser building or associated resources in the National Register of Historic Places. Rather, we are recommending that the property be **surveyed and inventoried** in order to document the historical and architectural significance of the site for future planning purposes. A National Register listing is an honorary recognition that follows a defined nomination process; whereas a survey and inventory of cultural and historic resources is a planning tool and database for informed design-making.”

The city asked the applicant to address the April 24, 2017, letter from DAHP. In the applicant’s August 25, 2017, resubmittal response letter they stated, “As stated in their letter, DAHP agrees that the Warehouse A project will not impact the Headquarters Building. We recognize that DAHP has recommended a full survey of the Weyerhaeuser Campus. The completion is not required for approval of this project; however, it is underway and will be provided to the City upon completion.”

The city received an October 31, 2017, letter from DAHP. The letter was in response to a citizen requesting a “Determination of Eligibility” for the National Register for the headquarters building and its landscape. The DAHP letter stated, “While not yet 50 years old the Weyerhaeuser Headquarters would easily qualify for listing on the National Register of Historic Places (under criteria A & C) as a ground breaking design that has been studied by generations of architects, architectural historians, landscape architects and historians.” Further, “Specific details as to the boundaries of a listing would need to be defined after further study but most likely includes the full 260 acres as initially developed by Sasaki, Waller & Associates.” Also, “We would welcome a National Register application for the building anytime. However keep in mind that per federal regulations, National Register listing requires owner consent.”

The city followed up with the applicant regarding the status of the campus survey. In the applicant’s March 13, 2018, resubmittal response letter they stated, “The report is still underway. So far there is nothing on the Building A site that is of historical significance.”

24. *Additional Permitting* – Additional permitting, such as engineering review and a building permit are required for site development; none of which have been applied for at this time. It is the applicant’s responsibility to identify and obtain all required state, federal, or other agency permits as may be required.
25. *Transportation* – As a component of the Use Process III application, projects undergo traffic concurrency analysis pursuant to the state *Growth Management Act* (GMA); goals and policies of the FWCP; and Chapter 19.90 FWRC, “Transportation Concurrency Management.” A Capacity Reserve Certificate was issued in July 2016 for the Preferred Freezer project. The number of new PM peak hour vehicle trips generated by that project was 99. A transportation impact fee is required and will be calculated based on the fee schedule in effect at the time a building permit application is filed, and must be paid prior to permit issuance. A traffic study was submitted for review, IRG Greenline Buildings A and B Federal Way, WA Transportation Impact Study, TENW Transportation Engineering NorthWest, March 6, 2018. Additional transportation related matters are addressed in sections below.
26. *Right-of-Way Modification* – The Deputy Public Works Director issued a right-of-way modification for Greenline Warehouse “A” outlining required frontage improvements for both Warehouse “A” and Warehouse “B,” with timing and bonding requirements (city file #18-102212-SM). See the enclosed June 22, 2018, decision document. The building permit site plan shall reflect the requirements outlined in this letter; this shall be made a condition of approval. Construction plans shall be included in the building permit submittal for review and approval.

27. *Northbound Left-Turn Lane* – Prior to the issuance of a certificate of occupancy, the applicant shall construct a northbound left-turn lane on Weyerhaeuser Way South at the southerly driveway (truck access) to provide safer and more efficient access into the site. The northbound left turn lane storage shall be designed to accommodate the 95th Percentile queues length ensuring left turn queues will not block the through traffic lane. The channelization plan must be reviewed and approved by the city and WSDOT. This shall be made a condition of approval (a SEPA mitigation measure).
28. *Trucks* – The traffic study stated that all truck trips are expected to utilize the primary driveway on Weyerhaeuser Way South. It is expected that all truck trips will be traveling to and from the south using the Weyerhaeuser Way South/SR-18 interchange and therefore study, mitigation, or improvements were not required for other road segments. The traffic study does not, however, demonstrate how the applicant will prevent trucks entering or exiting the facility from allowing this travel. Without adequate supporting documentation/planning, there is nothing prohibiting trucks from utilizing the South 320th Street/SR-5 interchange, South 336th Street, and Weyerhaeuser Way South as an alternate route to the site. Based on the above, the applicant has not demonstrated mitigation of additional truck traffic onto non-designated truck routes such as Weyerhaeuser Way South north of the site, including impacts to the pavement.
- i. Prior to building permit issuance, the applicant shall install weight limit signs on Weyerhaeuser Way South from South 320th Street to the project driveway, and South 336th Street from 20th Avenue South to Weyerhaeuser Way South. (A SEPA mitigation measure.)
 - ii. The applicant submitted a traffic study, *IRG Greenline Buildings A and B Federal Way, WA Transportation Impact Study*, TENW Transportation Engineering NorthWest, March 6, 2018. The development is estimated to generate 994 daily trips consisting of 795 passenger vehicle trips and 199 truck trips. These trips will be served by two driveways (private loop road driveway north of the site and truck access driveway next to SR 18) on Weyerhaeuser Way. According to the traffic study, all truck trips would utilize the proposed truck access driveway on Weyerhaeuser Way South and will be traveling to and from the south using the Weyerhaeuser Way South/SR-18 interchange. On a daily basis, I-5 southbound congestion routinely occurs between SR 18 and South 320th Street interchange. In order to avoid traffic congestion and reduce travel time due to shorter distance, truck trips with origin and destination from the north could utilize South 320th Street/SR-5 interchange, South 336th Street, and Weyerhaeuser Way South as an alternate route to the site. The traffic study has not demonstrated how the applicant will prevent this alternative truck route (South 320th Street/SR-5 interchange, South 336th Street, and Weyerhaeuser Way South) to the site. Weyerhaeuser Way South from South 320th Street and SR 18 is not a designated truck route and therefore, the roadway cannot support heavy vehicle weights. In general, heavier vehicles cause more damage to the road than light vehicles. The federal government estimated that an 18-wheel truck causes the same damage to the road as 9,600 cars. Based on the above, the applicant has not demonstrated mitigation of additional truck traffic onto non-designated truck routes such as Weyerhaeuser Way South north of the site, including impacts to the pavement.

As such, prior to a certificate of occupancy issuance, the applicant shall provide a fully executed bond for 120 percent of the engineer's estimate for design and construction costs to upgrade the existing pavement on Weyerhaeuser Way South, from the proposed truck entrance to South 320th Street. The bond term shall be for a period of three years from the time of notification by applicant of full occupancy and use of the facility, unless a shorter term is mutually agreed to in the implementation agreement discussed below. The applicant shall provide the engineer's estimate.

Should the truck trips generated by the project traveling north of the site (to or from the site) exceed 28 truck trips per week as set forth in the implementation agreement discussed below, the city will use the bond for design and construction costs to upgrade the existing pavement on Weyerhaeuser Way South, from the proposed truck entrance to South 320th Street, and/or from the proposed truck entrance to SR-99 via South 336th Street, to the city's required design standards. In the alternative, the applicant may choose to design and construct the implicated roadway(s) identified by the city. For the purposes of this condition, a "truck" shall mean a vehicle rated in excess of 30,000 pounds gross weight as discussed in Chapter 8.40 FWRC.

Prior to building permit issuance, the applicant and the city shall enter into an implementation agreement to set forth the conditions by which the city will monitor the truck trips; how the city will make its determination that the applicant has exceeded the 28 or more truck trips per week; how notice will be provided to the applicant; the cure period for the applicant to remedy the excess truck trips described in the above condition; when the city will call the bond or require the applicant to construct the implicated roadways; the bond conditions; and all other requirements deemed necessary by the city.

29. *WSDOT* – The SR-18 ramp terminal intersections are under the Washington State Department of Transportation (WSDOT) control and are subject to WSDOT's established standards. The traffic study prepared by TENW was revised to address WSDOT comments pertaining to LOS and queuing analysis at the SR-18 ramp terminal intersections. Prior to MDNS issuance, WSDOT did not identify or request mitigation for the proposed project. However, after the MDNS was issued, WSDOT identified and requested mitigation for the westbound SR-18 off-ramp right turn storage. Due to additional trips generated by the project impacting this intersection, the 95th percentile queues length for the AM peak hour would exceed the available right turn storage. As such, WSDOT requested that the westbound SR-18 off-ramp right turn storage be extended from the existing 100 feet to 300 feet.

The city received comments during the public comment period on the MDNS, which ran from October 26, 2018, to November 9, 2018. The city considered all comments received and, in response, modified the MDNS that was issued on October 26, 2018. The Modified MDNS was issued pursuant to WAC 197-11-340(2)(f). Modifications, including a new finding of fact and SEPA mitigation measure, relate to comments received from WSDOT. Prior to the issuance of a certificate of occupancy, the applicant shall construct right-turn storage for the westbound SR-18 off-ramp to mitigate for the impact to the westbound off-ramp to the satisfaction and with approval of WSDOT (a SEPA mitigation measure). Prior to engineering plans approval, WSDOT approval of the traffic study and channelization plans shall be provided. This shall be made a condition of approval.

30. *Pavement* – A pavement analysis for Weyerhaeuser Way South was performed by GeoEngineers ("Geotechnical Engineering Services Report Weyerhaeuser Way South, 320th Street to SR 18 Weyerhaeuser Campus Property Federal Way, Washington," August 29, 2017). Per the pavement analysis, the development is expected to nearly triple the loading on the existing pavement (EASLs) along the truck route on Weyerhaeuser Way South. Furthermore, the pavement in the project area is approaching the end of its useable life. The Street Division has reviewed the pavement analysis and determined that the existing pavement on Weyerhaeuser Way South, south of the site, from the proposed truck entrance to the SR-18 interchange must be fully reconstructed (subgrade soils and new pavement) to accommodate the expected truck traffic load. The applicant shall provide pavement design for city review and approval prior to engineering plans submittal. Once the pavement design is approved by the city, the development shall perform full depth reconstruction of the roadway segment impacted by the truck traffic. This shall be made a condition of approval (a SEPA mitigation measure).

31. *Transit* – The following are comments provided by Pierce Transit to the city on July 19, 2016, regarding the Preferred Freezer project:

“There are currently 2 bus stops located in the vicinity of the Preferred Freezer/Orca Bay project site, which are currently served by Pierce Transit’s Route 501. Pierce Transit assumes between 1-3% of the 750 projected new average daily trips will be on transit. In the case of the Preferred Freezer project, that equates to between 8 and 23 new trips on transit. When average daily ridership reaches 5 or more, the bus stop qualifies for a bench. When it reaches 10 or more, it qualifies for a shelter. Normally with a project of this size, Pierce Transit would request the installation of bus stop foundations, in addition to the purchase of bus stop shelters. Since these existing bus stops already have concrete foundations in place, we will only request that the developer be required to provide a shelter for each of these bus stops. These shelters may be purchased directly from Pierce Transit at a cost of \$3,691.71 each, for a total of \$7,383.42, which includes the shelter structure and shelter glass, and all associated taxes. The existing bus stops already have benches so there will be no need for the developer to purchase any. Once the funds have been received, Pierce Transit will install the shelters and will be responsible for all the maintenance of these shelters in the future.”

The project proposes to relocate the existing crosswalk and affiliated bus stops. Due to bus stop and crosswalk relocation, the project will install new foundations, relocate existing benches and signs, and provide new shelters. ESM indicated in their March 13, 2018, comment response letter, “Coordination with Pierce Transit is going well, and the transit authority is receptive to our locations.” Details on the relocated bus stops and transit related improvements will need to be shown on the engineering submittal, which shall be made a condition of approval.

32. *Stormwater* – The project will be required to meet the requirements of the *2016 King County Surface Water Design Manual* (KCSWDM) and the City of Federal Way Addendum to that manual. Conservation flow control and enhanced basic water quality requirements apply. Stormwater improvements are required. This is considered a high-use site requiring oil control per Special Requirement #5 in the KCSWDM. Best Management Practices (BMPs) must be implemented to augment flow control. Flow control and water quality requirements may apply to required public right-of-way improvements. Based on a review of the submitted documents, the following shall be made conditions of approval:

- a) The Right-of-Way Modification issued on June 22, 2018 includes widening of Weyerhaeuser Way South. As a part of building permit approval, water quality treatment shall be provided for new pollution-generating surfaces within the public right-of-way. Flow control shall also be provided. All stormwater treatment and flow control requirements shall meet the regulations in place at the time a building permit application is received.
- b) The applicant has discussed but not committed to any particular BMPs required by the KCSWDM. The applicant shall incorporate BMPs into the building permit plan set as outlined in the KCSWDM.
- c) The applicant states that this project drains to an offsite wetland on parcel 2121049014; however, no detail has been provided concerning the wetland. Therefore, KCSWDM Chapter 3.3.5 through 3.3.7 may apply. If the amount of impervious surface area proposed by the project is greater than or equal to 10 percent of the 100-year water surface area of a closed depression, then a point of compliance analysis must be done to verify that the water surface levels are not increasing for the return frequencies at which flooding occurs, up to

and including the 100-year frequency. The applicant has not provided a comparison of the proposed impervious surface area to the surface area of the wetland or closed depression, nor have they provided a minor floodplain analysis to establish an assumed base flood elevation. Conservation Flow Control (Level 2) must therefore be considered a minimum standard, and the applicant will be required to provide additional flow control if the site's impervious area meets or exceeds the 10 percent threshold or a flooding problem will be created or exacerbated. The applicant shall provide necessary documentation and mitigation prior to building permit issuance.

- d) As stated in the KCSWDM Section 1.2.2.1, the applicant shall submit a critical areas report for the offsite wetland on parcel 2121049014. The critical areas report shall be completed as outlined in FWRC 19.145.080, reviewed by an outside peer reviewer at the developer's expense, and approved prior to approval of the final Technical Information Report (TIR) and prior to building permit issuance.
- e) Prior to building permit approval, WSDOT approval of the project's impacts on storm drainage conveyance within WSDOT right-of-way shall be provided.
- f) The critical areas report referenced in the preliminary TIR is not the most recent version. The reference will need to be updated in the final TIR.
- g) Prior to engineering plan approval, the applicant shall record easements to allow storm water conveyance, treatment, and detention for Warehouse A on and across the adjacent Warehouse B property. Easements shall be reviewed and approved by the City of Federal Way prior to recording, and a copy shall be provided to the city upon recording.

33. *Water/Sewer* – Lakehaven Water & Sewer District is the water and sewer service provider. Lakehaven issued certificates of water and sewer availability in May 2016; certificates are valid for one-year from the date of issuance. Prior to issuance of a building permit, updated certificates of water and sewer availability shall be submitted. This shall be made a condition of approval.

The applicant has a current Developer Extension Agreement with Lakehaven (Lakehaven Project 6316012). However, the applicant has not yet submitted plans to Lakehaven for the proposed Warehouse "A" site. The general layout of proposed onsite water mains/system and fire hydrants appear consistent with the site's development requirements and Lakehaven standards. 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. The applicant is advised to complete any necessary new water system facilities work in Weyerhaeuser Way South (extend from existing water main into subject property) prior to the start of the proposed asphalt overlay of this right-of-way area.

Lakehaven addressed public comments received during the Notice of Application comment period; see the enclosed September 27, 2016, letter from Lakehaven,.

34. *South King Fire & Rescue* – South King Fire & Rescue (SKF&R) reviewed the application and has the following comments, listed here as information and to be addressed at building permit submittal.
- 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, including a hydraulic fire flow model, shall be requested from the water district and provided at the time of building permit application.

- This project will require at least three fire hydrants if IIA, or four fire hydrants if IIB, in approved* locations.
- Existing fire hydrants on adjacent properties shall not be considered, unless fire apparatus access roads extended between the properties and easements are established to prevent obstructions of such roads.
- *Hydrant spacing along access roads and location in relationship to buildings and sprinkler FDC shall be approved by Fire Marshal's Office.
- Fire hydrants shall be in service prior to and during the time of construction.
- Fire apparatus access roads shall comply with all requirements of Fire Access Policy 10.006.
- The site plan did not provide detail to verify the following requirements:
 - Turning radius.
 - Maximum grades.
 - Angles of approach, departure, and minimum ground clearance.
- Designated and marked fire lanes may be required for emergency access. This may be done during the plans check or prior to building final. Requirements and marking options can be found in Title 8 of the FWRC.
- Fire apparatus access roads shall be installed and made serviceable prior to and during the time of construction.
- All vehicle access gates, if any, shall comply with the SKF&R Gate Policy.
- A recessed fire department "Knox" brand key box shall be installed on the building near the front entrance. Location(s) will be approved by the plan reviewer or Deputy Fire Marshal onsite.
- An NFPA 13 fire sprinkler system is required.
- 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.
- 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.
- A fire alarm system is required.
- City code requires an automatic fire detection system in all buildings exceeding 3,000 square feet gross floor area. The fire alarm system is required to monitor the sprinkler system, including water flow. Provide full notification as required by NFPA 72. Complete coverage smoke detection is not required for this project. This fire detection system shall be monitored by an approved central and/or remote station.
- All buildings shall have approved radio coverage for emergency responders within the building based upon the existing coverage levels of the public safety communication system at the exterior of the building. A DAS system may be required.

- The building shall be designed for High Piled Combustible Storage in accordance with chapter 32 of the 2015 IFC. This code offers options for fire protection based on the intended use of the building. Some options will limit the commodity and height of storage in the warehouse.

35. *Cumulative Impacts Analysis* – Greenline Warehouse “A” is proposed on two adjacent parcels (6142600005 and 6142600200). A separate project, Greenline Warehouse “B” was submitted in September 2017 for parcel 6142600200. The city evaluated the projects for cumulative impacts on Warehouse “A” and identified and analyzed those parts of the projects that implicate such impacts in this determination. The two warehouse projects will utilize a common driveway access off of Weyerhaeuser Way. In addition, for both projects there are additional access points proposed off of the private loop road. Both projects will utilize the same stormwater pond on parcel 6142600200; although, the addition of Warehouse “B” will require the pond to be enlarged from its size if it only served Warehouse “A.” The analysis of these cumulative impacts for Greenline Warehouse “A” is reflected throughout this determination. There are no other cumulative impacts on the Greenline Warehouse “A” project. The city has not received indication from the applicant that the two warehouse projects will be constructed simultaneously; therefore, there is no cumulative impacts analysis regarding construction.

With regard to a cumulative impacts analysis for both warehouse projects, many of the project submittal documents for Greenline Warehouse “A” reference Greenline Warehouse “B.” In particular the traffic study, IRG Greenline Buildings A and B Federal Way, WA Transportation Impact Study, TENW Transportation Engineering NorthWest, March 6, 2018, addresses both projects. In addition, regarding WAC 197-11-060(3)(b), Greenline Warehouse “A” can proceed without Greenline Warehouse “B” and is not reliant upon Greenline Warehouse “B” taking place in order to proceed. Greenline Warehouse “A” does not depend on Greenline Warehouse “B” as justification for its implementation and the projects are not interdependent parts of a larger proposal. In other words, Greenline Warehouse “A” and Greenline Warehouse “B” do not meet the WAC 197-11-060(3)(b) threshold to require evaluation of the two projects in the same environmental document.

Another separate project, the Greenline Business Park (GBP), was submitted in November 2017. The GBP is proposed on other parcels within the former Weyerhaeuser Campus. The GBP does not propose to share a common parcel, access point, or utility facilities with Greenline Warehouses “A” or “B.” Regarding WAC 197-11-060(3)(b), Greenline Warehouses “A” and “B” can proceed without the GBP and are not reliant upon the GBP taking place in order to proceed themselves. Greenline Warehouses “A” and “B” are not interdependent parts of the GBP and do not depend on the GBP as justification for their implementation. The GBP does not meet the WAC 197-11-060(3)(b) threshold to require the evaluation of the other projects in the same environmental document.

36. *Director’s Decision Criteria* – The Director of Community Development makes a written decision on the application based on the criteria listed under FWRC 19.65.100(2)(a):

a. The proposal is consistent with the comprehensive plan;

- i. The *Federal Way Comprehensive Plan* (FWCP) designation for the subject property is Corporate Park. The FWCP (revised 2015) contains the following goals and policies:
 - o *LUG8: Create office and corporate park development that is known regionally, nationally, and internationally for its design and function.*

- According to the applicant, “Craft Architects has considered the natural surroundings and existing built structures on the Federal Way Campus, LLC property.” In their design, Craft Architects has, “included timber accents and artistic reveal patterns to emphasize the history and character of the area. Entry node, visible to the public streets, are comprised of large expanses of glass, glue laminated timber framing, façade modulation, large canopies and arcades.”

For clarification, regarding the building’s entry node, the loop road is a private road, not a public street.

- *LUG9: Work collaboratively to evaluate and realize the potential of the (former) Weyerhaeuser properties in East Campus.*
 - The former Weyerhaeuser properties in the East Campus are privately owned. According to the applicant, “East Campus has been developed. This process III application to develop Warehouse ‘A’ is a collaboration of City approved code and the property owner’s plans to revitalize this area of Federal Way through development as permitted by the Concomitant Agreement.”
- *LUP 49: In the East Campus Corporate Park area, encourage quality development that will complement existing uses and take advantage of good access to I-5, Highway 18 and future light rail as well as proximity to the City Center.*
 - According to the applicant, “Warehouse ‘A’ shares the same quality of development as the building located in the East Campus. Furthermore, the proposed access to Warehouse ‘A’ takes advantage of its proximity to Highway 18. Pedestrian vehicles may travel east or west on Weyerhaeuser Way S. and may access future light rail stations.”
- *NEP10: The City may continue to require environmental studies by qualified professionals to assess the impact and recommend appropriate mitigation of proposed development on environmentally critical areas and areas that may be contaminated or development that may potentially cause contamination.*
 - See the “Critical Areas,” “Air Quality,” and “Noise” sections of this report.
- *NEP86: Support state and federal air quality standards and the regulation of activities that emit air pollutants.*
 - See the “Air Quality” section of this report.
- *NEP87: Utilize building design, construction, and technology techniques to mitigate the negative effects of air pollution on indoor air quality for uses near sources of pollution such as Interstate-5.*
 - See the “Air Quality” section of this report.
- *NEP102: The City will evaluate potential noise impacts associated with non-residential uses and activities located in residential areas as part of the site plan review process.*
 - See the “Noise” section of this report.

b. The proposal is consistent with all applicable provisions of Federal Way Revised Code (FWRC);

- i. As conditioned, the proposal is consistent with applicable zoning regulations in effect on August 23, 1994 (FWCC), and procedural requirements of current code (FWRC), as detailed in this report.

c. The proposal is consistent with the public health, safety, and welfare;

- i. The Community Development and Public Works Departments, along with Lakehaven Water & Sewer District and South King Fire & Rescue, have reviewed the project for conformance with codes designed to protect the public health, safety, and welfare. Additional details will be reviewed at the building/engineering permit stage.

d. The streets and utilities in the area of the subject property are adequate to serve the anticipated demand from the proposal;

- i. See the “Transportation,” “Water & Sewer,” “Stormwater,” and “Conditions of Approval” related sections of this report.

e. The proposed access to the subject property is at the optimal location and configuration; and

- i. Access to the site will be provided via Weyerhaeuser Way and a loop road (private road). See the “Transportation” and “Conditions of Approval” sections of this report.

f. Traffic safety impacts for all modes of transportation, both on and off site, are adequately mitigated.

- i. See the “Transportation” and “Conditions of Approval” sections of this report.

37. *Conditions of Approval* – The following conditions of approval are attached to the Process III decision:

1. Future submittals related to this project shall contain the properties’ most current legal descriptions.
2. The proposal was reviewed as a general commodity warehouse with an associated office. A future change in the type of use and/or occupancy shall require review for compliance with applicable requirements and to determine any impacts, including revisiting the SEPA threshold determination and Use Process III decision, as needed.
3. The building permit application plan set shall include a section on parking analysis that demonstrates compliance with required parking ratios and consistency with the 287 spaces proposed on the Use Process III site plan (Sheet ST-01).
4. Work is not allowed within Wetlands DP, DQ, DR, DT, Stream EA, and associated buffers, as stream setback intrusions and improvements/land surface modifications in non-CZA exempt wetland setbacks require Use Process IV application review and approval per FWCC Sections 22-1312(c) and 22-1359(d).

5. The Use Process III 'Existing Tree Plan' (Sheet SR-07) shall be attached to the final landscaping plan submitted with the building permit.
6. Prior to building final inspection, all additional, supplemental and replanted Type I and II landscaping, as indicated on the Use Process III preliminary landscaping plan (Sheet LA-01), shall be installed.
7. The building permit landscaping plan shall show the required six-foot width for parking lot islands adjacent to the trash enclosure.
8. All significant trees shall be retained within the Managed Forest Buffer and within areas planned to remain undisturbed as indicated on the Use Process III tree/vegetation retention plan and clearing and grading plan (Sheets TR-01 & GR-01) to the maximum extent feasible.
9. Clearing/grading on the pond parcel (parcel 6142600200) shall be limited to the areas necessary for the stormwater pond and associated stormwater conveyance infrastructure only as shown on the Use Process III clearing and grading plan (Sheet GR-01).
10. The applicant shall obtain Forest Practices approval prior to issuance of a building permit.
11. The following amendments shall be made to the critical area report prior to issuance of a building permit:
 - a) The amount of impact to the buffer of Stream EA is inconsistent between the text in the report and on Figure W1.2 in the report. Section 7.2.3 – *Stream Buffer Averaging* of the report states that 1,944 square feet of the buffer area will be reduced and 2,235 square feet of buffer area will be replaced. However, Figure W1.2 shows a reduction of 1,695 square feet of stream buffer and a replacement of 2,359 square feet. The figure and the report shall be revised to show correct quantities of reduction and replacement.
 - b) According to the Buffer Averaging Plan in the report (Sheet W1.2) only the northwest portion of the buffer of Wetland DT is being impacted. However, several sheets in the site plan show the entire wetland buffer being reduced to 50 feet. The report and all subsequently submitted development plans sheets shall be revised, as necessary, to show the correct buffer impact.
 - c) The applicant shall show/label on Figure W1.2 the size of each area of buffer reduction and replacement to demonstrate that each reduction is compensated for at the location of the critical area where that reduction occurs. Adjustments shall be made if necessary.
12. Areas of wetland and stream buffer replacement shall be enhanced with native vegetation, as necessary, to ensure buffer function continues post-development. Planting details shall be shown on the landscape plan submitted with the building permit.
13. All subsequently submitted building and engineering plans shall show averaged critical area buffers, including buffer replacement areas, and only buffers for critical areas that will remain after development.
14. Installation of permanent signs and split rail fencing is required at the outer edge of the wetland buffers for Wetlands DQ, DR, and DT, and shall be completed prior to final inspection for the building permit.

15. The boundary between the wetland buffers and contiguous land shall be identified with permanent signs, which shall be a city-approved type designed for high durability. Signs must be posted at an interval of one per every 150 feet and maintained by the property owner in perpetuity.
16. The city shall not issue any approvals to fill wetlands until all state, federal, or other agency permits as may be required to fill the wetlands have been obtained and verification provided to the city.
17. The building permit submittal shall address the following:
 - a) Rooftop mechanical equipment, including vents, mechanical penthouses, elevator equipment, and similar appurtenances that extend above the roofline must be surrounded by a solid sight-obscuring screen that meets the following criteria: (a) the screen must be integrated into the architecture of the building; and (b) the screen must obscure the view of the appurtenances from adjacent streets and properties.
 - b) Type I landscaping is required around ground level mechanical and electrical equipment and utility installations, unless precluded for safety and access reasons.
18. The building permit landscaping plan shall provide Type I landscaping a minimum of five feet in width on the north and south sides of the combined trash/recycling enclosure area.
19. Prior to building permit issuance, plans shall demonstrate: 1) how occupant use of the designated garbage/recycling areas will integrate with service access; and 2) how the storage and collection of other garbage generated on site complies with FWCC Section 22-949(e)(1), which states the recycling storage area and garbage storage area shall be adjacent to each other.
20. Prior to building permit issuance, plans shall demonstrate that the garbage and recycling storage needs have been incorporated into the design and planned for in ways that will serve occupants over time.
21. Prior to issuance of a building permit, a lighting plan shall be submitted for verification of compliance with FWCC Section 22-954(c).
22. Prior to building permit issuance, the applicant shall submit an evaluation of the facility design by a qualified professional to ensure that the equipment to be installed at the warehouse, as well as warehouse activities, are consistent or similar to those identified in the noise report ("Greenline Building "A" Development, Federal Way Washington Environmental Noise Report, Ramboll Environ, revised March 2018). (A SEPA mitigation measure.)
23. The following measures shall be implemented during project construction with quarterly reports submitted by the applicant to the city documenting compliance starting from the issuance of the building permit and concluding at issuance of a certificate of occupancy:
 - a) All equipment shall be fitted with properly sized mufflers, and if necessary, engine intake silencers.
 - b) All equipment shall be in good working order.
 - c) Use quieter construction equipment models if available and whenever possible, use pneumatic tools rather than diesel or gas-powered tools.

- d) Place portable stationary equipment as far as possible from existing residential and noise-sensitive commercial areas, and if necessary, place temporary barriers around stationary equipment.
 - e) For mobile equipment that routinely operate near residential areas (i.e., within approximately 200 feet to the north of the project site), consider placement of typical fixed pure-tone backup alarms with ambient-sensing and/or broadband backup alarms.
(SEPA mitigation measures.)
24. A detailed review of final operating conditions shall be completed to ensure that the noise study accurately and conservatively reflects future project operation. A report documenting the assessment prepared by a qualified professional shall be submitted to the city six months after the certificate of occupancy is issued. (A SEPA mitigation measure.)
25. If the proposed use of the building includes cold storage, processing, or manufacturing, the air quality analysis (“Greenline Building “A” Development, Federal Way Washington Air Quality Report”, Ramboll Environ, revised March 2018) must be revised and SEPA threshold determination revisited prior to the building permit issuance, or if no building permit is required, then prior to business license issuance. (A SEPA mitigation measure.)
26. The following measures shall be implemented during project construction with quarterly reports submitted by the applicant to the city documenting compliance starting from the issuance of the building permit and concluding at issuance of the certificate of occupancy:
- a) Use only equipment and trucks that are maintained in optimal operational condition.
 - b) Require all off road equipment to be retrofit with emission reduction equipment (i.e., require participation in Puget Sound region Diesel Solutions by project sponsors and contractors), including particulate matter traps and oxidation catalysts to reduce MSATs.
 - c) Use biodiesel or other lower-emission fuels for vehicles and equipment.
 - d) Use carpooling or other trip reduction strategies for construction workers when possible.
 - e) Stage construction to minimize overall transportation system congestion and delays to reduce regional emissions of pollutants during construction.
 - f) Implement restrictions on construction truck idling (e.g., limit idling to a maximum of five minutes).
 - g) Locate construction equipment away from sensitive receptors such as fresh air intakes to buildings, air conditioners, and sensitive populations.
 - h) Locate construction staging zones where diesel emissions won't be noticeable to the public, or near sensitive populations such as the elderly and the young.
 - i) Spray exposed soil with water or other suppressant to reduce emissions of PM₁₀ and deposition of particulate matter.
 - j) Pave or use gravel on staging areas and roads that would be exposed for long periods.
 - k) Cover all trucks transporting materials, wet materials in trucks, or provide adequate freeboard (space from the top of the material to the top of the truck bed), to reduce PM₁₀ emissions and deposition during transport.

- l) Provide wheel washers to remove particulate matter that would otherwise be carried off site by vehicles to decrease deposition of particulate matter on area roadways.
 - m) Remove particulate matter deposited on paved, public roads, sidewalks, and bicycle and pedestrian paths to reduce mud and dust; sweep and wash streets continuously to reduce emissions.
 - n) Cover dirt, gravel, and debris piles as needed to reduce dust and wind-blown debris.
 - o) Route and schedule construction trucks to reduce delays to traffic during peak travel times to reduce air quality impacts caused by a reduction in traffic speeds.
(SEPA mitigation measures.)
27. Prior to issuance of a certificate of occupancy, the applicant shall construct a northbound left-turn lane on Weyerhaeuser Way South at the southerly driveway (truck access) to provide safer and more efficient access into the site. The northbound left-turn lane storage shall be designed to accommodate the 95th Percentile queues length ensuring left-turn queues will not block the through traffic lane. The channelization plan must be reviewed and approved by the city and WSDOT. (A SEPA mitigation measure.)
28. Prior to building permit issuance, the applicant shall install weight limit signs on Weyerhaeuser Way South from South 320th Street to the project driveway, and South 336th Street from 20th Avenue South to Weyerhaeuser Way South. (A SEPA mitigation measure.)
29. The applicant submitted a traffic study, *IRG Greenline Buildings A and B Federal Way, WA Transportation Impact Study*, TENW Transportation Engineering NorthWest, March 6, 2018. The development is estimated to generate 994 daily trips consisting of 795 passenger vehicle trips and 199 truck trips. These trips will be served by two driveways (private loop road driveway north of the site and truck access driveway next to SR 18) on Weyerhaeuser Way. According to the traffic study, all truck trips would utilize the proposed truck access driveway on Weyerhaeuser Way South and will be traveling to and from the south using the Weyerhaeuser Way South/SR-18 interchange. On a daily basis, I-5 southbound congestion routinely occurs between SR 18 and South 320th Street interchange. In order to avoid traffic congestion and reduce travel time due to a shorter distance, truck trips with origin and destination from the north could utilize South 320th Street/SR-5 interchange, South 336th Street, and Weyerhaeuser Way South as an alternate route to the site. The traffic study has not demonstrated how the applicant will prevent this alternative truck route (South 320th Street/SR-5 interchange, South 336th Street, and Weyerhaeuser Way South) to the site. Weyerhaeuser Way South from South 320th Street and SR 18 is not a designated truck route and therefore, the roadway cannot support heavy vehicle weights. In general, heavier vehicles cause more damaged to the road than light vehicles. The federal government estimated that an 18-wheel truck causes the same damage to the road as 9,600 cars. Based on the above, the applicant has not demonstrated mitigation of additional truck traffic onto non-designated truck routes such as Weyerhaeuser Way South north of the site, including impacts to the pavement.

As such, prior to certificate of occupancy issuance, the applicant shall provide a fully executed bond for 120 percent of the engineer's estimate for design and construction costs to upgrade the existing pavement on Weyerhaeuser Way South, from the proposed truck entrance to South 320th Street. The bond term shall be for a period of three years from the time of notification by applicant of full occupancy and use of the facility, unless a shorter term is mutually agreed to in the implementation agreement discussed below. The applicant shall provide the engineer's estimate.

Should the truck trips generated by the project traveling north of the site (to or from the site) exceed 28 truck trips per week as set forth in the implementation agreement discussed below, the city will use the bond for design and construction costs to upgrade the existing pavement on Weyerhaeuser Way South, from the proposed truck entrance to South 320th Street, and/or from the proposed truck entrance to SR-99 via South 336th Street, to the city's required design standards. In the alternative, the applicant may choose to design and construct the implicated roadway(s) identified by the city. For the purposes of this condition, a "truck" shall mean a vehicle rated in excess of 30,000 pounds gross weight as discussed in Chapter 8.40 FWRC.

Prior to building permit issuance, the applicant and the city shall enter into an implementation agreement to set forth the conditions by which the city will monitor the truck trips; how the city will make its determination that the applicant has exceeded the 28 or more truck trips per week; how notice will be provided to the applicant; the cure period for the applicant to remedy the excess truck trips described in the above condition; when the city will call the bond or require the applicant to construct the implicated roadways; the bond conditions; and all other requirements deemed necessary by the city. (A SEPA mitigation measure.)

30. Prior to engineering plans approval, WSDOT approval of the traffic study and channelization plans shall be provided.
31. The existing pavement on Weyerhaeuser Way South (south of the site), from the proposed truck entrance to the SR-18 interchange must be fully reconstructed (subgrade soils and new pavement) to accommodate the expected truck traffic load. The applicant shall provide the pavement design for city review and approval prior to engineering plans submittal. Once the pavement design is approved by the city, the development shall perform full depth reconstruction of the roadway segment impacted by the truck traffic. (A SEPA mitigation measure.)
32. Prior to issuance of a certificate of occupancy, the applicant shall construct right-turn storage for the westbound SR-18 off-ramp to mitigate for the impact to the westbound off-ramp to the satisfaction and with approval of WSDOT. (A SEPA mitigation measure.)
33. Details on the relocated bus stops and transit related improvements shall be shown on the engineering submittal.
34. A Right-of-Way Modification was issued on June 22, 2018, outlining required frontage improvements for both Warehouse A and Warehouse B, with timing and bonding requirements. The building permit site plan shall reflect the requirements outlined in this letter. Construction plans shall be included in the building permit submittal for review and approval.
35. The Right-of-Way Modification issued on June 22, 2018, includes widening of Weyerhaeuser Way South. As a part of building permit approval, water quality treatment shall be provided for new pollution-generating surfaces within the public right-of-way. Flow control shall also be provided. All stormwater treatment and flow control requirements shall meet the regulations in place at the time a building permit application is received.
36. The applicant has discussed but not committed to any particular BMPs required by the KCSWDM. The applicant shall incorporate BMPs into the building permit plan set as outlined in the KCSWDM.
37. The applicant states that this project drains to an offsite wetland on parcel 2121049014; however, no detail has been provided concerning the wetland. Therefore KCSWDM Chapter 3.3.5 through 3.3.7 may apply. If the amount of impervious surface area proposed by the project is greater than

or equal to 10 percent of the 100-year water surface area of a closed depression, then a point of compliance analysis must be done to verify that the water surface levels are not increasing for the return frequencies at which flooding occurs, up to and including the 100-year frequency. The applicant has not provided a comparison of the proposed impervious surface area to the surface area of the wetland or closed depression, nor have they provided a minor floodplain analysis to establish an assumed base flood elevation. Conservation Flow Control (Level 2) must therefore be considered a minimum standard, and the applicant will be required to provide additional flow control if the site's impervious area meets or exceeds the 10 percent threshold or a flooding problem will be created or exacerbated. The applicant shall provide necessary documentation and mitigation prior to building permit issuance.

38. As stated in the KCSWDM Section 1.2.2.1, the applicant shall submit a critical areas report for the offsite wetland on parcel 2121049014. The critical areas report shall be completed as outlined in FWRC 19.145.080; reviewed by an outside peer reviewer at the developer's expense; and approved prior to approval of the final TIR and prior to building permit issuance.
39. Prior to building permit approval, WSDOT approval of the project's impacts on storm drainage conveyance within WSDOT right-of-way shall be provided.
40. The reference to the Critical Areas Report in the preliminary TIR shall be updated to the most recent version in the final TIR.
41. Prior to engineering plan approval, the applicant shall record easements to allow stormwater conveyance, treatment, and detention for Warehouse A on and across the adjacent Warehouse B property. Easements shall be reviewed and approved by the City of Federal Way prior to recording, and a copy shall be provided to the city upon recording.
42. Prior to issuance of a building permit, updated certificates of water and sewer availability shall be submitted.

CONCLUSION

As conditioned, the proposed site plan application has been determined to be consistent with the FWCP; with all applicable provisions of the FWCC and FWRC; and with the public health, safety, and welfare. The streets and utilities in the area of the subject property are adequate to serve the anticipated demand from the proposal, and the proposed access to the subject property is at the optimal location and configuration for access. The proposed development is consistent with Process III, *Project Approval*, decisional criteria required under Chapter 19.65 FWRC.

The proposed site plan and application attachments have been reviewed for compliance with the FWCP, pertinent zoning regulations, and all other applicable city regulations. Final construction drawings will be reviewed for compliance with specific regulations, conditions of approval, and other applicable city requirements. This decision shall not waive compliance with future City of Federal Way codes, policies, and standards relating to this development.

Prepared by: Stacey Welsh, Senior Planner

Date: January 22, 2019