



Knutson Farms Industrial Park Project Draft Environmental Impact Statement (DEIS)



Knutson Farms Project Site

DEIS Issued - December, 2023

FACT SHEET

Proposal Name

Knutson Farms Industrial Park Project

Proposed Project

Knutson Farms, Inc. (Applicant) is seeking to develop up to 2.6 million square feet of building area in a warehouse complex (Project) on the approximately 188-acre Knutson Farms property (Project site) located within unincorporated Pierce County, Washington, and the City of Puyallup’s Urban Growth Area. Pierce County Code classifies the site as an Employment Center (EC) zone, which primarily allows industrial uses. The City of Puyallup’s Comprehensive Plan designates the area for a mix of future land uses, including warehousing, manufacturing, business park, auto oriented commercial, and rural buffer residential.

The Applicant and the City of Puyallup recorded a Declaration of Restrictive Covenant in August 2022 that establishes a stated intent to develop the Project as an “Industrial Park” consistent with the Institute for Traffic Engineers (ITE) Land Use Code (LUC) 130 (ITE manual, 11th edition). According to ITE LUC 130, “(a)n industrial park contains several individual industrial or related facilities. It is characterized by a mix of manufacturing, service, and warehouse facilities with a wide variation in the proportion of each type of use from one location to another.” As of the preparation of this document, the Applicant has yet to make a binding commitment on the final end user(s) of the proposed facilities. The restrictive covenant does establish that no “high cube fulfillment center” uses will be occupying the structures on site.

Based on the several uses allowed under the EC zone, and information provided by the Applicant, the Project could consist of the following possible uses: basic manufacturing, contractor yards, food and related products, industrial services and repairs, intermediate manufacturing and intermediate/final assembly, off-site hazardous waste treatment and storage facilities, recycling collection and processing facilities, salvage yards/vehicle storage, and warehousing distribution and freight movement.

The proposed Project would include construction of seven warehouse buildings. Site work activities would include grading;

paving of parking and truck maneuvering areas; landscaping; water and sanitary sewer extensions; construction of stormwater facilities; franchise utility improvements; and roadway improvements, including establishment of new access to and use of City roads.

Alternatives

Two build alternatives and a No Action alternative were studied. Under Alternative 1, the facility constructed would be the same as described for the Proposed Project; however, rail lines would also be constructed to facilitate movement of materials into and out of the proposed facility. The proposed rail lines would be constructed to enable rail access to the seven proposed warehouses from the existing Meeker Southern rail line, which is located south of the Project site.

Alternative 2 considers the potential impacts that would result if the mitigation measures that reduce the site footprint of the facility, as outlined in this Draft Environmental Impact Statement (EIS) for the Proposed Project, were adopted by the Applicant. The total footprint of the Alternative 2 facilities would be reduced from about 2.6 million square feet to about 1.8 million square feet.

Under the No Action Alternative, none of the proposed facilities would be constructed.

Location

The 188-acre site is situated east of Shaw Road East and East Main Avenue, north of East Pioneer and 88th Street East, and west of the Puyallup River within Sections 25 and 26, Township 20 North, Range 4 East in the Willamette Meridian baseline.

Proponent/Applicant

Knutson Farms, Inc.

Lead Agency

City of Puyallup

Responsible Official

Jeff Wilson, Development Services Director, City of Puyallup

Lead Agency Contact

Chris Beale, Senior Planner
City of Puyallup
333 S. Meridian
Puyallup, WA 98371
253.841.5418
cbeale@puyallupwa.gov

Required Approvals and/or Permits

United States Army Corps of Engineers (USACE)
Nationwide Permit

Washington Department of Ecology (Ecology)

National Pollutant Discharge Elimination System Permit
Construction Stormwater General Permit
Industrial Stormwater General Permit
Water Quality Certification

Washington Department of Fish and Wildlife (WDFW)

Hydraulic Permit Approval

Pierce County Planning

Site Development Permit
Preliminary Short Plat Permit
Administrative Design Review
Administrative Use Permit
Shoreline Substantial Development Permit
Wetland Development Permit
Clearing and Grading Permit
Building Permit

Pierce County Public Works

Right-of-Way Permit
Plumbing/Electrical/Mechanical Permits

City of Puyallup

Utility Permit (sewer and water)

City of Puyallup Public Works

Street Right-of-Way (civil) Permit

Valley Water District

Water connection authorization/permit

Williams Northwest Pipeline

Encroachment Agreement

Puget Sound Energy

Natural Gas and Power Utility Extension Permit/Agreements

EIS Authors and Principal Contributors EIS Project Manager, Primary Author

HDR

600 University Street, Suite 500

Seattle, WA 98101

Natural Resources Analysis (Surface Water, Plants and Animals and Groundwater)

SCJ Alliance

8730 Tallon Lane NE, Suite 200

Lacey, WA 98516

Cultural Resources Analysis

HRA

1904 Third Avenue, Suite 240

Seattle, WA 98101

Pavement Conditions Analysis

HWA GeoSciences

21312 30th Drive SE, Suite 110

Bothell, WA 98021

Public Involvement

EnviroIssues

101 Stewart Street, Suite 1200

Seattle 98101

Location of Background Information

Background material and supporting documents are located:

City of Puyallup

333 S. Meridian

Puyallup, WA 98371

Draft EIS Issuance Date

December 14, 2023

Availability of Draft EIS

This Draft EIS has been distributed to agencies, organizations, and individuals noted on the Distribution List contained in Appendix B of this document.

This Draft EIS is available for download on the Project website:

<https://knutsonfarmseis.org/>

Copies of the Draft EIS are also available for review at City of Puyallup Development and Permitting Services Center at 333 S. Meridian, Puyallup, Washington, during business hours of 9:00 a.m. to 3:00 p.m.

A printed copy may also be requested at cost (see Lead Agency Contact above).

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Appendix B: Draft EIS Distribution List

Appendix C: Wetland D Report

Appendix D: Air Quality Calculations

Appendix E: Transportation Analysis

Appendix F: Cultural Resources Inventory Technical Report

Acronyms and Abbreviations

6PPD-q	6PPD-quinone
°F	degrees Fahrenheit
µg/L	micrograms per liter
µg/m ³	micrograms per cubic meter
AC	asphaltic concrete
ACS	American Community Survey
AI	Area of Impacts
AQ	air quality
ARL	Agricultural Resource Lands
ARO	Agriculture, Recreation, and Open Space
Ave	Avenue
BACT	Best Available Control Technology
BAS	Best Available Science
B/IP	Business/Industrial Park
BMPs	Best Management Practices
BP	years before present
ca.	circa
CARA	Critical Aquifer Recharge Area
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFP	Capital Facilities Plan
CFR	Code of Federal Regulations
CH ⁴	methane
CIP	Capital Improvement Program
cmbs	centimeters below ground surface
cmf	crash modification factor
CMX	Mixed Use

CMZ	channel migration zone
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ -e	CO ₂ equivalents
CPCP	City of Puyallup Comprehensive Plan
CSCSL	Confirmed and Suspected Contaminated Sites List
CSZ	Cascadia Subduction Zone
CWA	Clean Water Act
CY	cubic yards
DAHP	Department of Archaeology and Historic Preservation
dB	decibels
dba	A-weighted decibels
DEM	Department of Emergency Management
DO	dissolved oxygen
DPM	diesel particulate matter
DPS	Distinct Population Segment
DS	Determination of Significance
E	East
EB	eastbound
EC	Employment Center
Ecology	Washington State Department of Ecology
EDNA	environmental designation for noise abatement
EFH	Essential Fish Habitat
EHS	Extremely Hazardous Substances
EIS	environmental impact statement
ESAL	Equivalent Single-Axle Loads
ESNW	Earth Solutions NW, LLC
ESA	Endangered Species Act

ESU	Environmentally Significant Unit
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FLUM	Future Land Use Map
FR	<i>Federal Register</i>
FTA	Federal Transit Authority
ft ³ /s	cubic feet per second
FWD	falling weight deflectometer
GHG	greenhouse gases
GIS	Geographic Information Systems
GLO	General Land Office
GMA	Growth Management Act
HAP	hazardous air pollutant
HASP	Health and Safety Plan
HFC	hydrofluorocarbons
HPA	Hydraulic Permit Application
HRA	Historical Research Associates, Inc.
HVAC	heating, ventilation, and air conditioning
HWA	HWA GeoSciences Inc.
IPaC	Information for Planning and Consultation
KFIP	Knutson Farms Industrial Park
KOP	key observation point
LC50	lethal concentration 50
Leq	equivalent noise level
LID	low-impact development
Lmax	maximum noise level
LM/W	Light Manufacturing/Warehousing
LOS	level of service

LRE	long-range estimates
LUC	Land Use Code
LUST	leaking underground storage tank
MDNS	Mitigated Determination of Non-Significance
ML	Limited Manufacturing
ML-SPO	Limited Manufacturing, Shaw-East Pioneer Overlay
MOE	measures of effectiveness
mph	miles per hour
MS4	municipal storm sewer system
MSAT	mobile source air toxics
MSW	Municipal Solid Waste
mtpy	metric tons per year
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NB	northbound
NE	Northeast
NMFS	National Marine Fisheries Service
NO ₂	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O ₂	carbon dioxide
O ₃	ozone
OHWM	Ordinary High Water Mark
OSHA	Occupational Safety and Health Act
PAHs	polynuclear aromatic hydrocarbons
Pb	lead

PCBs	polychlorinated biphenyls
PCC	Pierce County Code
PCE	Primary Constituent Element
PCRHP	Pierce County Register of Historic Places
PCSD	Pierce County Sheriff's Department
PCSWDM	Pierce County Stormwater Management and Site Development Manual
PEM	Palustrine Emergent
PF	Public Facilities
PFC	perfluorocarbons
PM	particulate matter
PM ₁₀	particulate matter less than or equal to 10 microns in diameter
PM _{2.5}	particulate matter less than or equal to 2.5 microns in diameter
PMC	City of Puyallup Municipal Code
ppb	parts per billion
PPD	Puyallup Police Department
PRHP	Puyallup Register of Historic Places
Project	warehouse complex
PROS Plan	Parks, Recreation and Open Space Plan
PSCAA	Puget Sound Clean Air Agency
PSD	Prevention of Significant Deterioration
PSE	Puget Sound Energy
PSMFC	Pacific State Maine Fisheries Commission
RBR	Rural Buffer Residential
RCW	Revised Code of Washington
RM	River Mile
RM-10	Multiple-Family Residential
ROW	right-of-way
S	South

SB	southbound
SE	Southeast
SED	Shoreline Environment Designation
SEPA	State Environmental Policy Act
SERC	State Emergency Response Commission
SF	square feet
SF ₆	sulfur hexafluoride
SIP	State Implementation Plan
SMA	Washington State Shoreline Management Act
SMP	Shoreline Master Program
SO ₂	sulfur dioxide
SPCC	Spill Prevention, Control, and Countermeasure
SR	State Route
St	Street
SVC	Soundview Consultants
SWMPP	City of Puyallup Stormwater Management Program Plan
SMMWW	Stormwater Management Plan for Western Washington
SWPPP	Stormwater Pollution Prevention Plan
TDMP 2018	2018 Talasea Detailed Mitigation Plan
THPO	Tribal Historic Preservation Officer
tpy	tons per year
TRB	Transportation Research Board
TTR	Technical Traffic Report
UGA	Urban Growth Area
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency

USSG	United States Surveyor General
USFWS	United States Fish and Wildlife Service
v/c	volume-to-capacity
vpd	vehicles per day
vph	vehicles per hour
VOC	volatile organic compounds
WAC	Washington Administrative Code
WB	westbound
WCI	West Consultants Inc.
WDFW	Washington State Department of Fish and Wildlife
WDNR	Washington State Department of Natural Resources
WHR	Washington Heritage Register
WISAARD	Washington Information System for Architectural and Archaeological Records Database
WISHA	Washington Industrial Safety and Health Act
WOTUS	Waters of the United States
WPCP	Water Pollution Control Plant
WQ	water quality
WSDOT	Washington State Department of Transportation
WSU	Washington State University
Wy	Way

1. EIS SUMMARY

1.1 Introduction

The City of Puyallup is preparing this environmental impact statement (EIS) under the Washington State Environmental Policy Act (SEPA) for the Knutson Farms Industrial Park (KFIP) Project. Knutson Farms, Inc. (Applicant) proposes to construct and operate a warehouse complex (Project) of up to 2.6 million square feet of building area on the approximate 188-acre Knutson Farm property located within unincorporated Pierce County, Washington.

1.2 Project Objective

A SEPA EIS requires clear definition of the proposed Project's objective, which creates a foundation for the analyses of existing conditions, potential impacts, and mitigation for impacts identified as a result of independent analysis conducted in the EIS. The Applicant's Project objective is to construct a warehouse complex facility of up to 2.6 million square feet of building area.

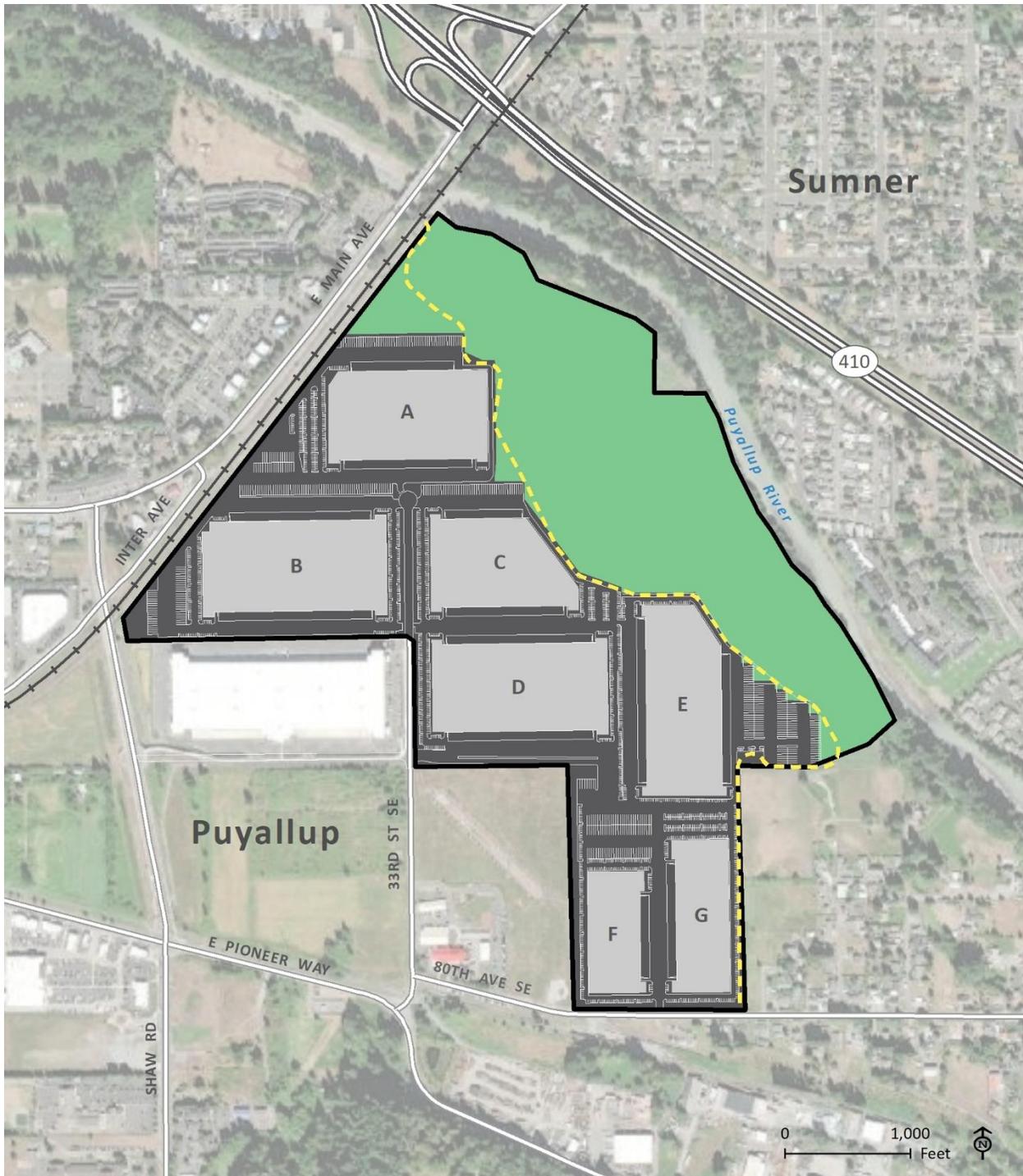
1.3 Project Description

1.3.1 Project Location

The Project is in the Urban Growth Area (UGA) of the City of Puyallup in unincorporated Pierce County. The 188-acre site is situated east of Shaw Road East and East Main Avenue, north of East Pioneer and 88th Street East, and west of the Puyallup River within Sections 25 and 26, Township 20 North (N), Range 4 East (E) in the Willamette Meridian baseline.

1.3.2 Proposed Project

The Applicant is seeking to develop a Project (Figure 1-1) of up to 2.6 million square feet of building area in seven warehouses on the approximately 188-acre Knutson Farm property located within unincorporated Pierce County, Washington, and the UGA of the City of Puyallup. Pierce County Code classifies the site as an Employment Center (EC) zone, which primarily allows industrial uses. Based on the uses allowed within the county EC, the Project could consist of uses allowed by county zoning, including basic manufacturing, contractor yards, food and related products, industrial services and repairs, intermediate manufacturing and intermediate/final assembly, off-site hazardous waste treatment and storage facilities, recycling collection and processing facilities, salvage yards/vehicle storage, and warehousing distribution and freight movement. The City of Puyallup's Comprehensive Plan (CPCP) designates the area a mix of future land uses, including warehousing, manufacturing, business park, auto oriented commercial, and rural buffer residential. As of the preparation of this document, the Applicant has yet to make a binding commitment on a final end user(s) of the proposed facilities; a restrictive covenant is recorded on the site that establishes no high cube fulfillment centers will occupy the structures in the Project area. The restrictive covenant further establishes that the site will be built out consistent with the International Traffic Engineering definition of Industrial Park, which includes a range of industrial/warehouse uses and intensities.



-  Project Site
-  Proposed Open Space
-  Proposed Warehouse
-  Proposed Pedestrian Trail

Figure 1-1. Development Map

The Project would include construction of seven warehouse buildings. Site work activities would include grading; paving of parking and truck maneuvering areas; landscaping; water and sanitary sewer extensions; construction of stormwater facilities; franchise utility improvements; and roadway improvements, including establishment of new access to and use of City roads. See Section 3.4, proposed Project, for further details.

1.3.3 Alternative 1 – Rail Transport

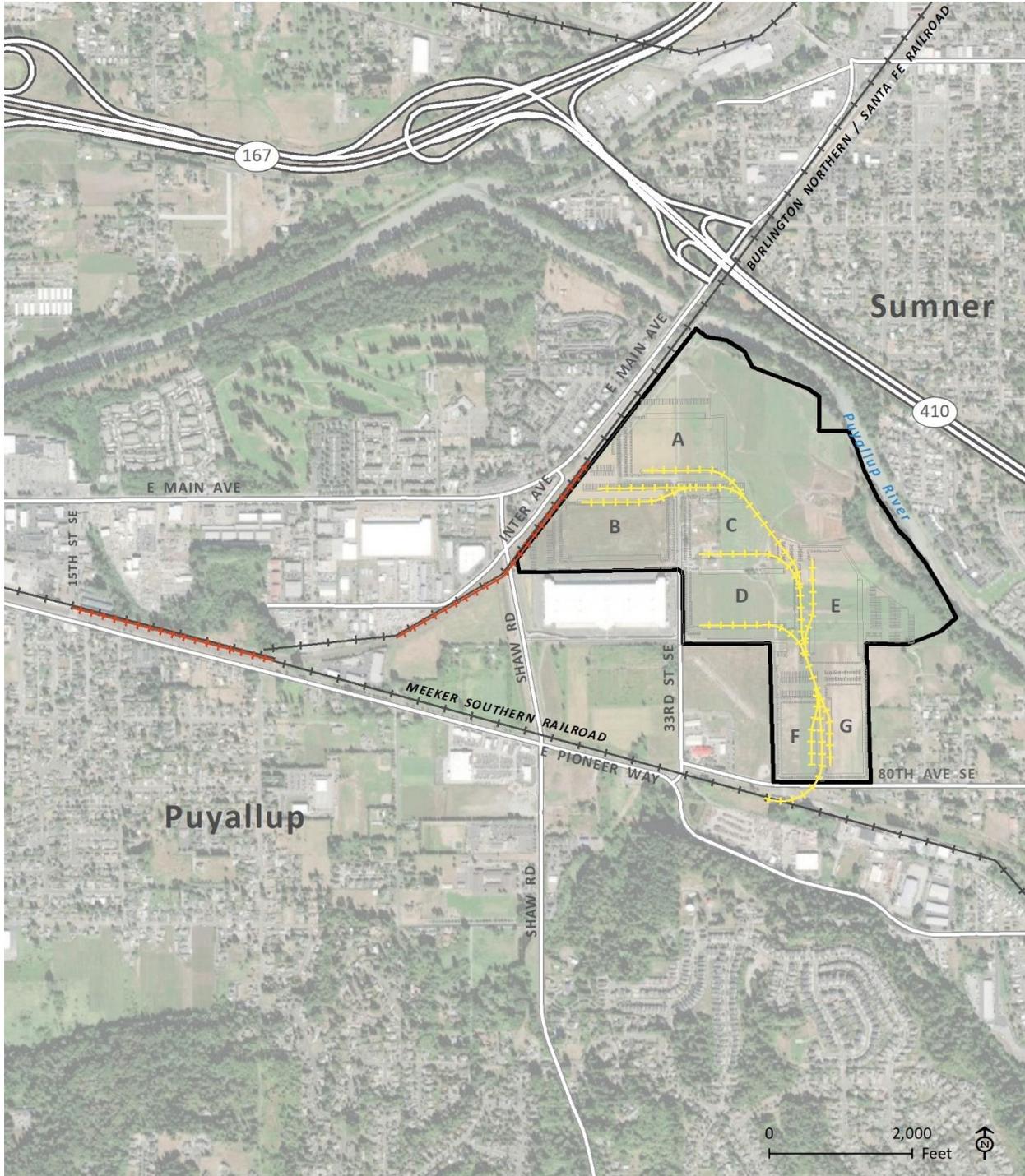
Under Alternative 1 (Figure 1-2), the facility constructed would be the same as described under Section 3.4, Proposed Project; however, rail lines would also be constructed to facilitate movement of materials into and out of the proposed facility. The proposed rail lines would be constructed to enable rail access to the seven proposed warehouses from the existing Meeker Southern rail line, which is located south of the Project site. See Section 3.5, Alternative 1 – Rail Transport for further details.

1.3.4 Alternative 2 – Reduced Intensity Alternative

Washington Administrative Code (WAC) 197-11-440(4)–(5) describes alternatives to be considered in an EIS and states that “reasonable alternatives may be those over which an agency with jurisdiction has authority to control impacts either directly, or indirectly through requirement of mitigation measures.” As such, Alternative 2 (Figure 1-3) considers the potential reduction in impacts that would result if the necessary mitigation measures that reduce the site footprint of the facility, as outlined in this Draft EIS for the proposed Project, implemented consistently with the analysis in this EIS. The implementation of mitigation measures would reduce the total footprint of the facility from about 2.6 million square feet to about 1.8 million square feet. See Section 3.6, Alternative 2 – Reduced Intensity Alternative, for further details.

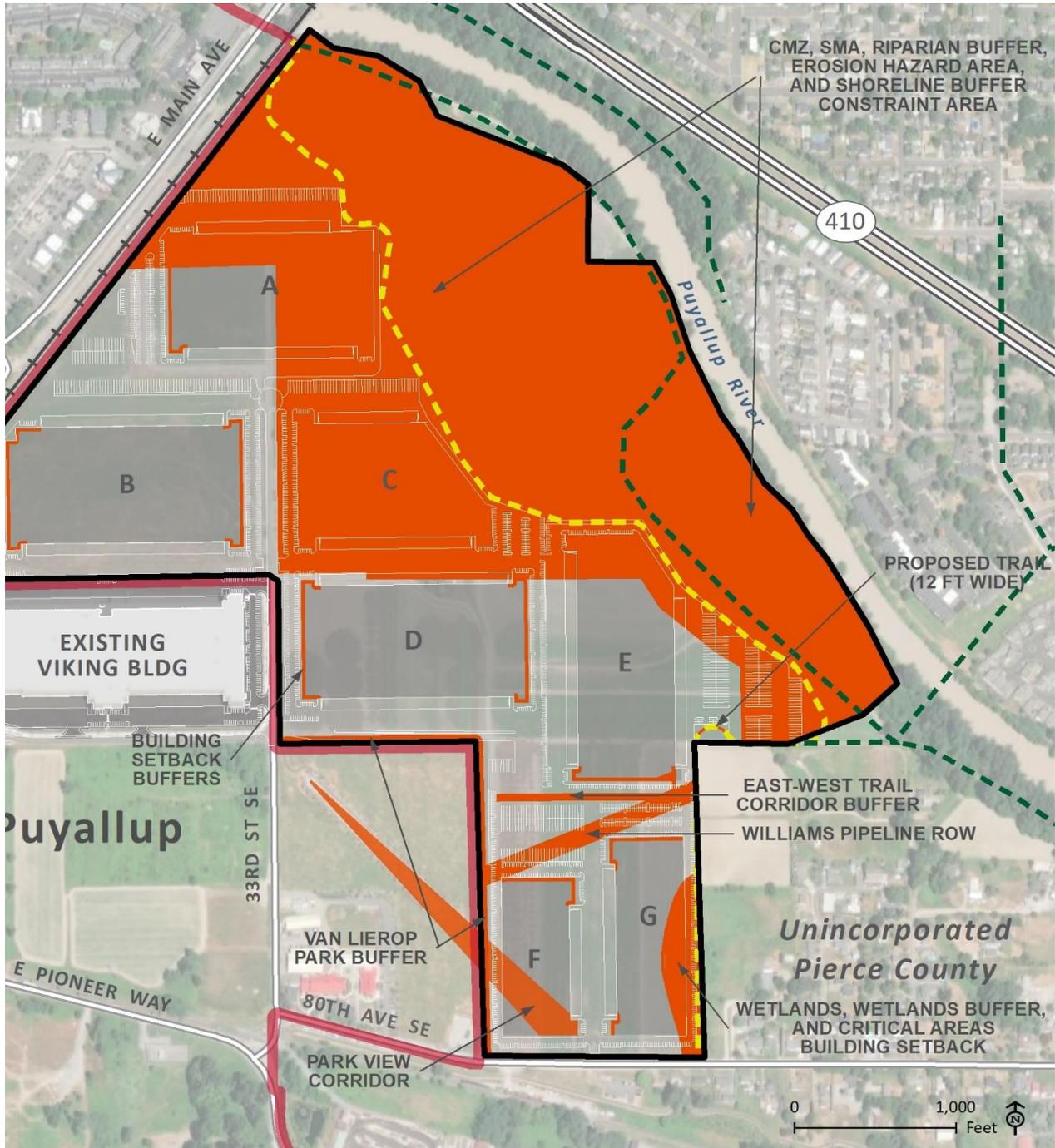
1.3.5 No Action Alternative

SEPA requires evaluation of a No Action Alternative as a benchmark from which other alternatives can be compared (WAC 197-11-440(5)). Under the No Action Alternative, none of the proposed facilities would be constructed.



- Existing Railroad
- Site Proposed Rail Line
- Proposed BNSF Mainline/
Meeker Southern Interchange Extensions
- Project Site

Figure 1-2. Alternative 1 – Rail Line Layout



-  Project Site
-  Proposed Warehouse
-  Site Constraints
-  City Boundary
-  Proposed Trail
-  Proposed Pedestrian Trail

*See Figure 4-55 for the
Van Lierop Park Concept Plan

Figure 1-3. Alternative 2 – Reduced Intensity Alternative

1.4 Policy Background

1.4.1 SEPA Substantive Authority

SEPA is generally described as having two aspects: one procedural and the other substantive. The procedural aspect of SEPA is what underlies the process of SEPA Checklist review; threshold determination; and, in some instances such as this one, preparation of an EIS.

The substantive component of SEPA established in Revised Code of Washington (RCW) 43.21C.060 and WAC 197-11-660 authorizes application of SEPA to condition or deny a proposal even when it may comply with the immediately applicable development regulations. The statute and regulations set out prerequisites for jurisdictions' use of this substantive SEPA authority. One aspect of substantive SEPA authority that differs from application of zoning regulations is that an application's vesting date does not govern what plans and policies may be applied through substantive SEPA authority. Instead, per the SEPA statute and regulations, plans and policies in effect when the Draft EIS is issued may be applied.

Consistent with the prerequisites, Pierce County has adopted Pierce County Code 18D.40.060, found at <https://pierce.county.codes/PCC/18D.40.060> and incorporated by reference here, which specifies when the County may exercise its SEPA substantive authority and the regulations, plans, and codes that Pierce County may rely upon in doing so. Pierce County may utilize this authority in connection with permits and approvals for the Project, which is located within the County. Among the specified plans is "Title 19A, Pierce County Comprehensive Plan."

The City of Puyallup in PMC 21.04.210, incorporated here by reference and at this link <https://www.codepublishing.com/WA/Puyallup/html/Puyallup21/Puyallup2104.html#21.04.210>, has similarly provided in its Code for use of substantive SEPA authority per the SEPA statute. The City of Puyallup may therefore also utilize substantive SEPA authority in connection with its jurisdiction over approvals needed, for example, for Project access to City streets.

1.4.2 Application of Comprehensive Plan and Policies

Comprehensive plans and policies are not typically viewed as "regulatory." However, with adoption of the Growth Management Act (GMA), development regulations are mandated to treat comprehensive plans as blueprints: the regulations must implement and be consistent with them. Although comprehensive plans do not themselves apply as development regulations, they still can be brought to bear on review of a proposal such as the Project. As already noted, comprehensive plans can be utilized in exercise of substantive SEPA authority, assuming that the underlying prerequisites are met.

In addition, apart from SEPA, various types of development application decision-making involve consideration of comprehensive plans and local jurisdictions' policies. For example, Pierce County Code provisions that govern the Knutson application require that, to approve, the County must find that it is in the public interest; that "appropriate" provisions are made with respect to, among other things, open space, drainage/stormwater, streets/roads, water/sewer, etc.; and that "the proposal conforms with the intent of the County's Comprehensive Plan, applicable community plans, other applicable County codes, state laws and the criteria contained in this Title." See Pierce County Code 18F.50.040.D and 18F.50.040.E.

One of the purposes of an EIS, such as this one, is to inform the decisions that must take into account such criteria. Therefore, this EIS addresses both City and County potentially applicable regulations, plans, and policies as appropriate.

1.4.3 Mitigation, WAC 197-11-660

Mitigation measures or denials, per WAC 197-11-660(1)(a), shall be based on policies, plans, rules, or regulations formally designated by the agency (or appropriate legislative body, in the case of local government) as a basis for the exercise of substantive authority and in effect when the Draft EIS is issued. As such, the analysis in this Draft EIS uses the most current codes, plans, comprehensive plan policies, and regulations available in assessing impacts and assigning mitigation. This includes the review and application of both Pierce County's Comprehensive Plan and CPCP policies, where applicable, as the proposed Project is located in unincorporated Pierce County but within the City of Puyallup's UGA.

1.5 Summary of Environmental Impacts and Mitigation Measures

SEPA requires that an EIS analyze the adverse environmental impacts of a proposal and identify possible mitigation measures that would reduce or eliminate those impacts. For each environmental resource area, the following thresholds were considered for impacts:

- **Significant Impact:** the impact is irrevocable; there are no regulatory requirements, design measures, and/or mitigation measures that would avoid, minimize, or reduce the potential impacts identified.
- **Mitigated Significant Impact:** the potential impact identified is substantial and adverse; however, impacts could be avoided, minimized, or reduced with implementation of regulatory requirements, design measures, and/or mitigation measures.
- **Less than Significant:** the potential impact is neither substantial nor adverse; no mitigation is required. However, Best Management Practices (BMPs) would be implemented to reduce impacts as appropriate.
- **No Impact:** there are no identified impacts to the resource area.

Table 1-1 summarizes the potential environmental impacts associated with the No Action Alternative, proposed Project, Alternative 1, and Alternative 2 as well as the potential mitigation for the identified impacts.

SEPA defines mitigation as avoiding, minimizing, rectifying, reducing, eliminating, compensating, or monitoring environmental impacts (WAC 197-11-768). Mitigation may be suggested by the Applicant; mandated through local, state, and/or federal regulations; or required through conditions of approval of permits for the proposed Project (WAC 197-11-660). The intended environmental benefits of mitigation measures for significant impacts should be described in the EIS and considered by decision makers. Identification of mitigation measures in the EIS alone does not provide a mechanism for enforcement. Mitigation measures must be reasonable and capable of being accomplished. The applicant may be required to implement mitigation measures only to the extent attributable to the identified adverse impacts of the proposal. Additional voluntary mitigation may occur.

Under WAC 197-11-060(4)(b), “the lead agency shall not limit its consideration of a proposal’s impacts only to those aspects within its jurisdiction, including local or state boundaries.” In addition, the range of impacts to be analyzed in an EIS may be wider than the impacts for which mitigation measures are required of applicants (WAC 197-11-060(4)(e)). This would depend upon the specific impacts, the extent to which the adverse impacts are attributable to the applicant’s proposal, and the capability of applicants or agencies to control the impacts in each situation (WAC 197-11-060(4)(e)).

Mitigation measures identified in the EIS shall be related to specific, adverse environmental impacts. (WAC 197-11-660(1)(b)). An EIS should briefly indicate the intended environmental benefits of mitigation measures for significant impacts under WAC 197-11-440(6). SEPA requires the decision makers to judge whether possible mitigation measures are likely to protect or enhance environmental quality (WAC 197-11-660(2)).