3. PROJECT DESCRIPTION

The Applicant seeks to develop a warehouse complex (Project) of up to seven warehouses with up to 2.6 million square feet of building space on the approximately 188-acre Knutson Farms property (Project site) located in unincorporated Pierce County, Washington within the City of Puyallup's UGA and Potential Annexation Area. The Applicant has not made a binding commitment to an end use for the facility, and a diverse set of end uses could be allowed under Pierce County Code. However, the Applicant and the City of Puyallup recorded a Declaration of Restrictive Covenant (Recording Number 4874-8301-9788) 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.*" The covenant further strictly prohibits the applicant from developing the site for use as a high-cube fulfillment center warehouse (LUC 155) or high-cube parcel hub warehouse (LUC 156), as defined in the 11th edition of the ITE Trip Generation Manual.

The Project site is located within the County's Alderton- McMillin Community Plan boundary and zoned by Pierce County as an Employment Center (EC), which primarily allows industrial uses (Table 3-1). The City of Puyallup's future land use map designations for the subject Project site are Rural Buffer Residential (RBR) adjacent to the Puyallup River, Business/Industrial Parks (BIP), as well as Light Manufacturing/Warehouse (LMW) and Auto Oriented Commercial (AOC). The implementing zoning for the CPCP designations would allow a mixture of auto-oriented commercial, very low density residential, agricultural, open space, business park/industrial, and limited manufacturing/warehousing.

PCC 18A.10.080A.2.a., Employment Center

An Employment Center (EC) is a concentration of low- to high-intensity office parks, manufacturing, other industrial development, or a combination of activities. It may also include commercial development as a part of the center if the commercial development is incidental to the employment activities of the center and supports and serves the needs of the workforce.

Based on the uses allowed within the County EC zone and information provided by the Applicant, 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. Under the Employment Center zone, the Project would fit within the Industrial Use Category. The Industrial Use Category is described as "the on-site production, processing, storage, movement, servicing, or repair of goods and materials" (Pierce County 2021a).

Table 3-1. Impacted Parcels

PARCEL #	Project Acreage	Pierce County Comprehensive Plan Land Use Map Designation	City of Puyallup Comprehensive Plan Future Land Use Map Designation	Pierce County Zoning
0420252006 [a]	0.04	Employment Center	Rural Buffer Residential	Employment Center
0420252045 [a]	0.09	Employment Center	Rural Buffer Residential	Employment Center
0420252055 [a]	0.30	Employment Center	Rural Buffer Residential	Employment Center
0420252056 [a]	0.81	Employment Center	Rural Buffer Residential	Employment Center
0420252057 [a]	8.40	Employment Center	Rural Buffer Residential	Employment Center
0420252702 [a]	20.02	Employment Center	Rural Buffer Residential	Employment Center
0420252703 [a]	12.35	Employment Center	Rural Buffer Residential	Employment Center
0420253007	3.08	Employment Center	Rural Buffer Residential	Employment Center
0420253022	0.03	Employment Center	Auto-Oriented Commercial	Employment Center
0420253036	0.45	Employment Center	Rural Buffer Residential	Employment Center
0420253057	0.88	Employment Center	Rural Buffer Residential	Employment Center
0420253063	1.09	Employment Center	Rural Buffer Residential	Employment Center
0420253064	0.72	Employment Center	Rural Buffer Residential	Employment Center
0420253073	18.95	Employment Center	Auto-Oriented Commercial	Employment Center
0420253702	9.18	Employment Center	Auto-Oriented Commercial	Employment Center
0420253706	18.17	Employment Center	Rural Buffer Residential, Business/Industrial Parks	Employment Center
0420253707 [a]	4.47	Employment Center	Rural Buffer Residential, Business/Industrial Parks	Employment Center
0420253708 [a]	10.55	Employment Center	Rural Buffer Residential	Employment Center
0420253709 [a]	11.17	Employment Center	Rural Buffer Residential, Business/Industrial Parks	Employment Center
0420253710 [a]	25.16	Employment Center	Rural Buffer Residential, Business/Industrial Parks	Employment Center
0420264066 [a]	14.91	Employment Center	Rural Buffer Residential, Light Manufacturing/Warehouse	Employment Center
0420264067	23.35	Employment Center	Light Manufacturing/ Warehouse	Employment Center

[a] Parcels that would be set aside partially or wholly as open space.

3.1 Applicant's Project Objective

Defining a proposed Project's objective plays a key role in determining the range of alternatives that will be considered and analyzed in an EIS. The objective guides the lead agencies in selecting a preferred alternative and in eliminating some alternatives from further consideration. In August 2022, the Applicant recorded a Declaration of Restrictive Covenant that establishes a stated intent to develop the Project as an "Industrial Park" consistent with ITE 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." Many industrial parks contain highly diversified facilities. Some industrial parks in the ITE database have a large number of small businesses and others have one or two dominant industries. The Declaration of Restrictive Covenant specifically prohibits high-cube fulfillment center warehousing (sort) and high-cube parcel hub warehousing as part of any future Project build-out.

The Applicant, in response to two requests for information in December 2020 and January 2021, made varying nonbinding statements concerning the Project objectives, including: "specific uses are not yet known," and "anticipated uses will be a mix of industrial and manufacturing uses as allowed under zoning code." In other nonbinding Project descriptions developed during the EIS process, the Applicant has variously identified distribution warehousing as the only proposed use and a mix of high-cube fulfillment center and "…manufacturing, service, and warehouse facilities with a wide variation in the proportion of each type of use from one location to another…" These descriptions have been nullified by the description of the Project agreed to in the Declaration of Restrictive Covenant. In October 2023, the Applicant further clarified the Project objective.

The Applicant's objectives for the Project include:

- Provide additional manufacturing, warehousing, and shipping capacity in Pierce County;
- Improve nearby arterial traffic corridors to meet the growing economic demands for such services in the Sumner/Puyallup valley;
- Create new manufacturing/warehousing/shipping jobs in Pierce County; and
- Preserve and integrate open space into development plans for the site to provide for flood storage, habitat, environmental mitigation, and passive recreation.
- Complete construction within 5 years of the issuance of a Final EIS, or by 2029.

3.2 Location

The Project is in the UGA of the City of Puyallup in unincorporated Pierce County (see Figure 3-1). The 188-acre Project site is situated east of Shaw Road East and East Main Avenue, north of East Pioneer Avenue and 88th Street East, and west of the Puyallup River within Sections 25 and 26, Township 20N, Range 4E in the Willamette Meridian baseline.

3.3 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.

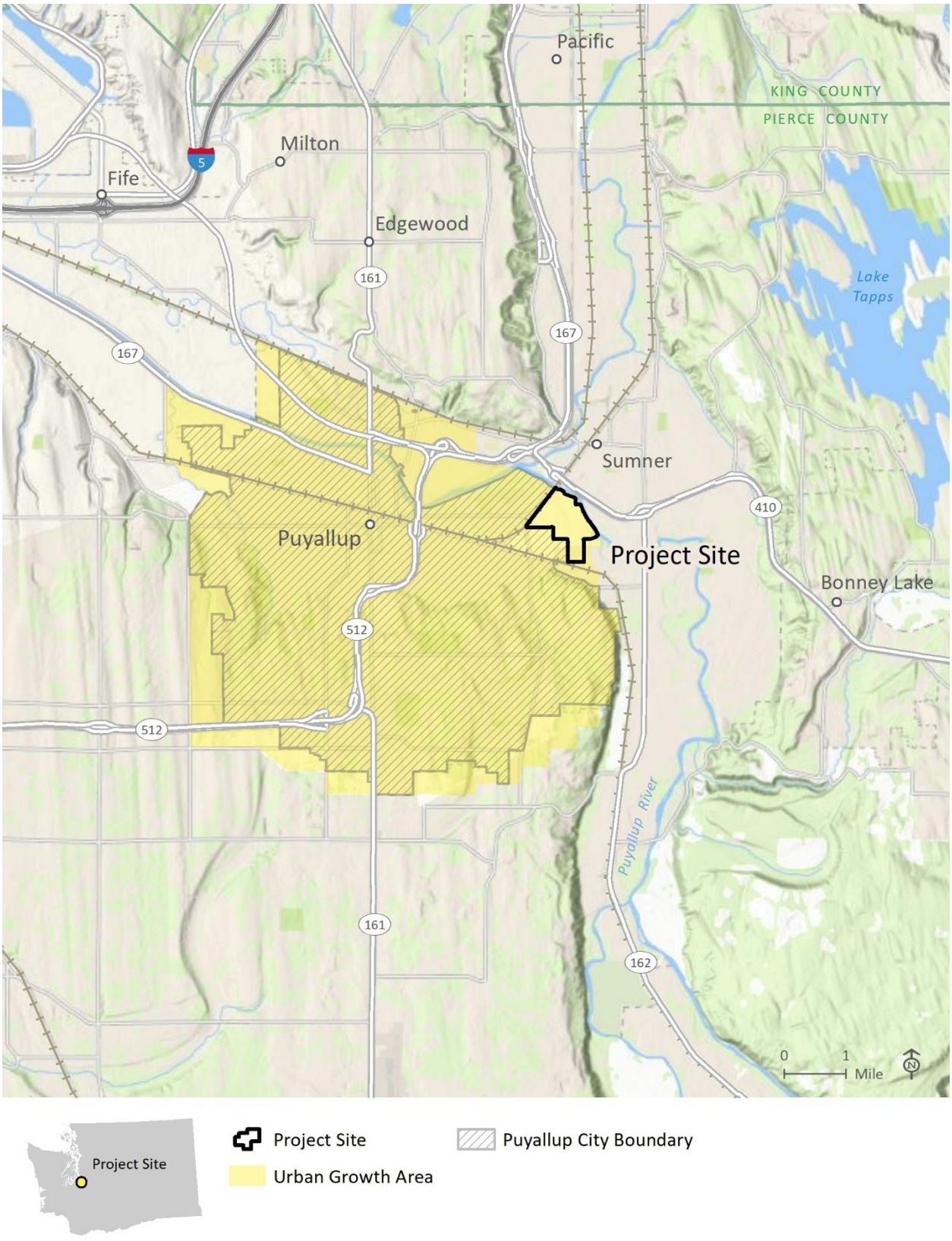

Figure 3-1. Location/Vicinity Map

3.4 Proposed Project

The Applicant's proposal is to develop a total of approximately 2.56 million square feet (SF) of building area (Figure 3-2) potentially configured as seven 45-foot-tall warehouses (Warehouses A–G), each varying in size from approximately 190,000 SF to 490,000 SF. The development would have 1,730 parking spaces for cars and 473 parking spaces for trailers (Table 3-2).

Table 3-2. Project Building Characteristics

Warehouse	Proposed Warehouse Size	Parking Spaces (Car/Trailer)
A	417,000 SF	235/156
B	492,000 SF	260/46
C	341,000 SF	225/46
D	458,000 SF	277/0
E	416,000 SF	187/138
F	193,000 SF	224/87
G	244,000 SF	322/0
Total	**2,561,000 SF**	**1,730/473**

The Project would include grading, paving of parking and truck maneuvering areas, landscaping, site lighting, water and sanitary sewer extensions, construction of stormwater facilities, utility improvements, and roadway improvements including establishment of new access to and use of City roads. The proposal also includes the construction of a new pedestrian trail near Warehouses A, C, and E.

The Project site includes lands that are currently used for agriculture, with a few associated houses. During construction, some of these agricultural lands, houses, and other buildings associated with farming would be removed (it is anticipated that agriculture production will continue on portions of the project site area in the lower bench floodplain, indicated as set aside open space by the applicant). Two Pierce County roadways within the Project site would be proposed to be vacated during construction: the northern portions of 134th Avenue East and 74th Street East. There is an existing stormwater outfall at the Puyallup River north of proposed Warehouse A that serves the existing Viking Warehouse facility. There is also an existing natural gas pipeline (Williams Pipeline) that runs between proposed Warehouse E and Warehouses F and G.

The proposed Project would maintain approximately 62 acres of open space on the northern portion of the site. The open space in this portion of the Project site is not proposed for development.

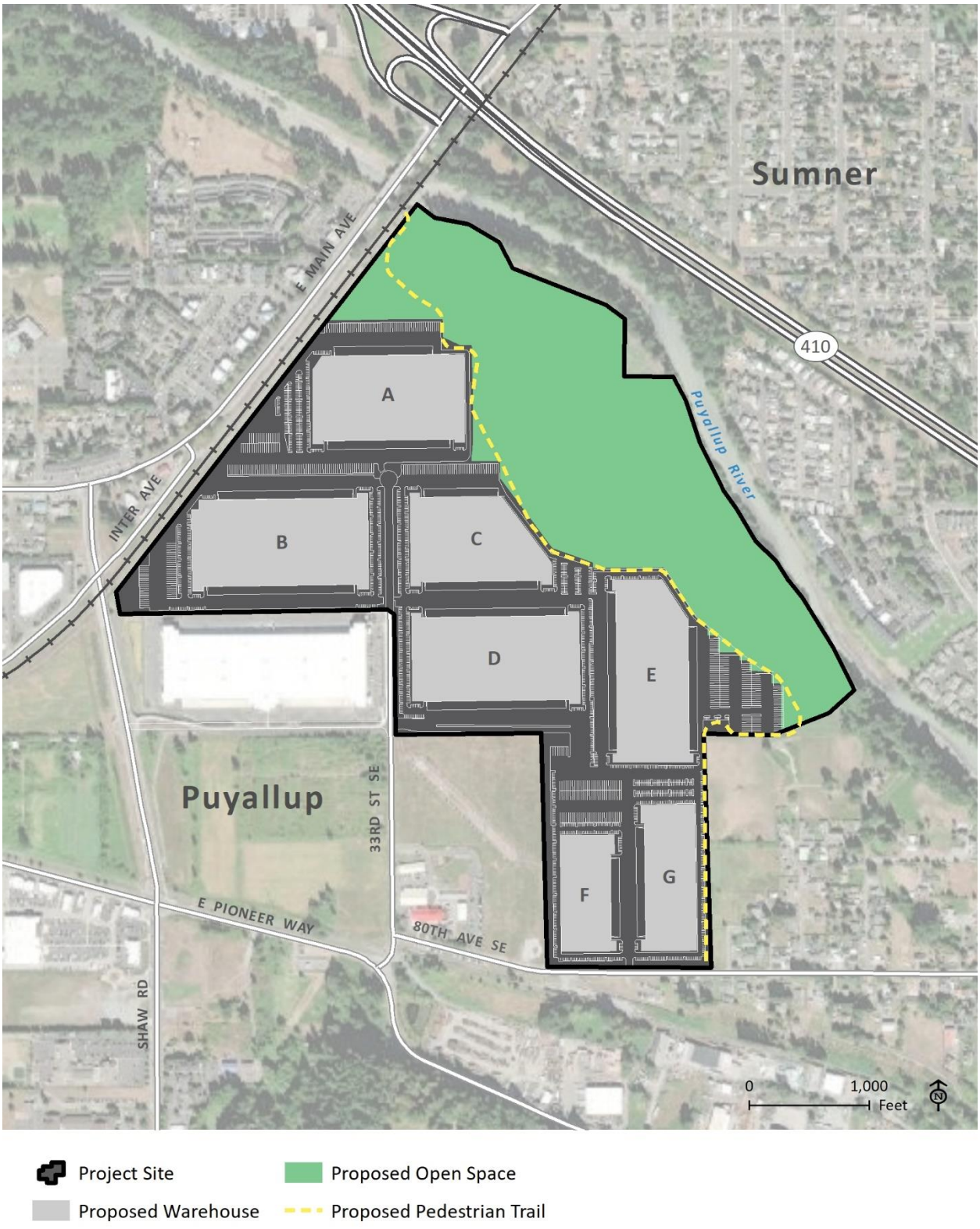

Figure 3-2. Development Map

3.4.1 Proposed Facilities

The proposed Project development has not been identified with any specified end uses; as outlined in Table 3-3, a diverse set of end uses is allowed under PCC for the Industrial Use Category C. The Applicant and the City of Puyallup recorded a Declaration of Restrictive Covenant (Recording Number 4874-8301-9788) 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.*" The covenant further strictly prohibits the applicant from developing the site for use as a high-cube fulfillment center warehouse (LUC 155) or high-cube parcel hub warehouse (LUC 156), as defined in the 11th edition of the ITE Trip Generation Manual.

Table 3-3. Industrial Use Category Examples

Use Category	Description	Examples
Basic Manufacturing	Uses that involve the primary processing of a raw or initially processed material into a product that requires additional processing, manufacture, or assembly in order to become a consumer good.	1. The production of basic chemicals; 2. The manufacture of castings and other basic metal products and the manufacture of nails, spikes, and insulated wire and cable; 3. The tanning, curing, or storage of raw hides or skins; 4. The manufacture of cement, ready-mix concrete, cut stone, and crushed rock and other primary products from materials taken principally from the earth in the form of stone, clay, and sand; 5. The manufacture of asphalt and asphalt reclamation processes; 6. Soil remediation facilities; 7. Saw, lath, shingle, planing, plywood, and veneer mills engaged in producing lumber and basic wood materials; 8. The manufacture of pulps from woods and other cellulose fibers and from rags; 9. Petroleum and natural gas refining and processing; and 10. The smelting and refining of ferrous and non-ferrous metals from ore or scrap, rolling, drawing, and alloying metals.
Contractor Yards	An area for construction or contracting business offices, interior or outdoor storage, repair, or maintenance of heavy equipment, vehicles, or construction supplies and materials.	Level 1: Contractor Yards that include an outdoor storage area of less than or equal to 2 acres. Level 2: Contractor Yards with outdoor storage areas greater than 2 acres in size.

Use Category	Description	Examples
Food and Related Products	Uses that involve the processing of non-animal food materials, raw milk, ice manufacturing, and other food products manufacturing, processing, storage, and packaging.	Level 1: Small scale wineries, distilleries, breweries, cideries (up to 2,500 SF; no exterior storage). Level 2: Food processing and packaging facilities (up to 10,000 SF). Level 3: Food processing and packaging facilities (up to 80,000 SF). Level 4: Food processing and packaging facilities (greater than 10,000 SF).
Industrial Services and Repair	Refers to businesses that support industrial and commercial uses.	Repair of equipment or vehicles; fuel, gas, and oil storage and distribution; bio-tech or high-tech research and laboratories. Other services integral to the functioning of the industrial or commercial use.
Intermediate Manufacturing and Intermediate/Final Assembly	Refers to uses that involve intermediate processing of semi-processed material into a consumer good and to uses that involve the assembly of semi-processed and/or intermediate processed products into a consumer good.	Production, manufacture, fabrication or assembly of one or more of the following product types: 1. Clothing and fabricated products; 2. Products manufactured by predominately chemical processes and which are to be used for ultimate consumer or industrial consumption; 3. Products manufactured by predominately chemical processes and which are to be used in further manufacture of other products; 4. Electronic computers, computer hardware components and related equipment, and other machinery, apparatus and supplies for the generation, storage, transmission, transformation, and utilization of electrical energy; 5. Industrial and commercial machinery and equipment; 6. Finished products made entirely or mainly from wood for use in construction; 7. Paper and paperboard and its conversion into other paper-based products; 8. Ferrous and non-ferrous metal products and a variety of metal and wire products manufacturing; 9. Products manufactured or assembled from plastic resins and from natural, synthetic, or reclaimed rubber; 10. Paving and roofing materials, compounding lubricating oils and greases, rubber reclaiming, manufacture of synthetic rubber; 11. Instruments for measuring, testing, analyzing and controlling, optical instruments and lenses, surveying and drafting instruments, medical instruments and equipment, photographic equipment, watches and clocks, and supplies associated with the previous products;

Use Category	Description	Examples
		12. Glass and glass products, clay products, pottery, concrete and gypsum products, abrasive and asbestos products, and other secondary products from materials taken principally from the earth in the form of stone, clay and sand; 13. Woven and knit fabrics, and carpets and rugs from yarn; 14. Dyeing, finishing, coating, waterproofing, and other treating of fiber, yarn, and fabrics; 15. Felt, lace goods, non-woven fabrics, and miscellaneous textiles; 16. Equipment for transportation of people or cargo by land, air, rail, or water; and 17. Other manufacturing and/or assembly processes in which processed or semi-processed materials are made or assembled into consumer products.
Off-Site Hazardous Waste Treatment and Storage Facilities	Facilities that treat and store hazardous waste generated off-site and are authorized pursuant to Revised Code of Washington 70.105.	Contiguous land and structures used for recycling, reusing, reclaiming, transferring, storing, or treating hazardous wastes.
Recycling Collection and Processing Facilities	Commercial and industrial activities that specialize in accepting, buying, collecting, storing, or processing recyclable materials, excluding activities that fall under the following specific use types: “Organic Waste Processing Facilities,” “Waste Disposal Facilities,” or “Waste Transfer Facilities.”	Level 1: Recycling collection sites at staffed or unstaffed locations which accept source-separated recyclable materials from off-site household or commercial generators. Patrons place recyclable materials into containers designed and marked to receive specific recyclable commodities or a combination of commodities. All containers are removed from the site for sorting, grading, packaging, manual processing, mechanical processing, remanufacturing or reuse. Level 2: Buy-back centers or any small-scale business operated solely indoors which collects, receives, or buys recyclable materials from household, commercial, or industrial sources for the purpose of sorting, grading, or packaging recyclables for subsequent shipment and marketing, not to include processing and crushing activities. Recyclable materials must have been separated from non-recyclable municipal garbage at the source of generation prior to delivery to the buy-back center. Level 3: Industrial activities that specialize in accepting, storing, and processing any waste, other than hazardous waste or municipal garbage, for reuse and that may use heavy mechanical equipment to do the processing and include outdoor processing and storage of recycled materials. This includes material recovery facilities designed and operated to accept and process recyclable materials that were separated from non-

Use Category	Description	Examples
		recyclable municipal garbage at the source of generation. This also includes buy-back centers that involve materials stored outside in containers, dumpsters, piles, or bales. Facilities that collect, store, and process recyclables still co-mingled with municipal garbage are classified as a Waste Transfer Facility Level 4.
Salvage Yards/Vehicle Storage	Uses that involve the salvage of wrecked vehicles, vehicle parts, and appliances; and the storage of vehicles.	Level 1: Salvage yards dealing with salvage of wrecked motor vehicles, vehicle parts, and appliances in which all vehicles and merchandise are stored within an enclosed building(s). Level 2: Salvage yards dealing with salvage of wrecked motor vehicles, vehicle parts, mobile and manufactured homes, and appliances in which vehicles and merchandise are stored in an outdoor storage area. Level 3: The area for vehicle storage shall be no more than 10,000 SF for storage of parking tow-aways, impound yards, and storage lots for automobiles, trucks, buses, and recreational vehicles. The area for vehicle storage shall be fenced. It does not include parking lots or the storage of vehicles for repair, sale, or the sale of vehicle parts. Level 4: Vehicle storage areas of more than 10,000 SF for storage of parking tow-aways, impound yards, and storage lots for automobiles, trucks, buses, and recreational vehicles. The area for vehicle storage shall be fenced. It does not include parking lots or the storage of vehicles for repair, sale, or the sale of vehicle parts.
Warehousing, Distribution, and Freight Movement	The large-scale warehousing and distribution of manufactured or processed products for one or more businesses; the large-scale distribution of raw, manufactured, or processed products for one or more businesses at a central location; and the central dispatch and servicing of a delivery truck fleet, where no reloading (transfer facility), warehousing, or consolidation of materials takes place on site.	Level 1: Transported or stored products that are manufactured, processed, semi-processed products, and raw materials on a lot or combination of less than 2 acres. Level 2: Same as Level 1 on a lot or combination of from 2 to 5 acres. Level 3: Same as Level 1 on a lot or combination of exceeding 5 acres. Level 4: Transported or stored products that are high- and low-level explosive materials and blasting agents as defined by the relevant federal regulatory agencies. Must meet federal standards for setbacks, buffers, and separation, and not be less than 10 acres in size. Level 4 requires a conditional use permit pursuant to PCC 18A.18.010.

Source: PCC 18A.33.280 (A – I)
Note: Some uses would not be allowed per development restrictions within the Critical Areas code (PCC 18E).

Additional Facilities

Additional facilities to be constructed within the Project site boundary include roads, parking lots, sanitary sewer lines, a new public sewer lift station, extension of new 8-inch and 12-inch water mains, new stormwater drainage conveyance and water quality treatment systems, and a new private stormwater discharge to the Puyallup River.

The Project would include two separate stormwater systems to manage runoff from proposed impervious surfaces. The first consists of trench drains, catch basins, a storm drain network, and water quality vaults to collect, convey, and treat stormwater runoff from pavement areas and roof runoff from Warehouses B, F, and G. Approximately 70 acres of impervious surfaces would drain to this system. Following water quality treatment, the runoff would be directed to a new 42-inch-diameter stormwater trunk line, which would discharge to the Puyallup River at the northeast corner of the Project site at a recently constructed engineered outfall (see Section 4.2 for outfall information). The engineered outfall is intended to function with a large armored and vegetated energy dissipator located above the ordinary high-water mark of the Puyallup River. The outfall has two existing discharges pipes: the first is currently receiving flow through a 42-inch-diameter trunk line and the second is a "dry pipe" that does not presently receive storm water and will receive additional new flows from this Project.

The second stormwater system would convey rooftop runoff from Warehouses A, C, D, and E to one of three infiltration/dispersion systems along the northeast upper topographical "bench" of the site. The infiltration systems are intended to reduce surface runoff rates from the Project site and maintain hydrology of the adjacent wetlands and riparian areas in compliance with Minimum Requirement 8: Wetlands Protection of the Pierce County Stormwater Management and Site Development Manual (PCSWDM; Pierce County 2021b). Approximately 38 acres of impervious surfaces would drain to these facilities.

The Project is required to comply with Minimum Requirements 1 through 10 of the PCSWDM (PCC 11.05.050) (Pierce County 2021b) to control the quantity and quality of stormwater produced by the site to meet water quality standards and beneficial uses of the receiving waters.

3.4.2 Construction Equipment and Staging

Construction is anticipated to require standard equipment, including bulldozers, loaders, high lifts, dump trucks, concrete trucks, trash trucks, street sweepers, water trucks, skid steers, pickup trucks, cranes, back hoes, and excavators. No use of pile-driving equipment is proposed.

Access to the site during construction would be from Shaw Road via 5th Avenue Southeast and Pioneer Way via 134th Avenue East. The primary access for semi-truck traffic would be Shaw Road via 5th Avenue Southeast.

Staging areas would be located on the property but outside of the public right-of-way (ROW), typically far away from the warehouse being constructed, in areas used for parking or maneuvering. The exact locations of construction staging areas would be determined prior to the commencement of construction of each warehouse.

3.4.3 Construction Methods and Sequencing

The Applicant's stated objective would be to complete construction within 5 years of the issuance of a Final EIS, or by 2029. Construction would begin at the northern portion of the site with Warehouses A to E, followed by construction of Warehouses F and G. Construction of each warehouse would take 15–18 months, with construction of some warehouses occurring simultaneously to meet the overall 5-year construction schedule. Construction could be anticipated to begin in 2024. Construction would generally be anticipated to occur between 7 a.m. and 5 p.m., Monday through Friday; utility or road work on heavily trafficked arterials may require nighttime work. Up to 150 employees would be expected on site at any one-time during construction.

Construction of each warehouse would occur in the following three stages:

1. Grading and filling
2. Installation of on-site utilities
3. Warehouse construction

Grading and Filling

Grading and filling for each warehouse is anticipated to take about 6 weeks. Grade and fill work would prepare the site and warehouse pads for development. On-site and off-site roadway improvements would also occur during grading and filling.

As provided by the Applicant, the estimated earthwork quantity for the overall Project would be up to 450,000 cubic yards (CY) of on-site excavation and fill, approximately 120,000 CY of imported fill, and approximately 80,000–110,000 CY of excavated material. A portion of the stripping material (existing site cover, debris, weeds, and the like), primarily topsoil, would remain on site and would be used for berms in landscaping areas. The remaining stripping material would be exported from the site to an approved receiving site. Approved receiving sites and their capacities in the area are discussed in Section 4.11, Utilities. Depending on groundwater elevations determined for each individual phase, there may be a need to raise the warehouse and site elevations by importing additional fill material. Imported fill is estimated to be between 20,000 and 40,000 CY of material for each warehouse. Most of the import fill would be used for preparation or preloading of the warehouse pads.

The grading and filling phase for construction of each warehouse would require approximately 1,900 total truck trips, including:

- General equipment deliveries and pickups: 100 trips
- Site work (dirt, pipe, materials, landscaping): 1,500 trips
- Material stripping export: 300 trips

Over the course of grading and filling for each warehouse, up to 320 truck trips per day would be expected.

Installation of On-site Utilities

Installation of on-site utilities is anticipated to take approximately 27 weeks. The primary activities associated with construction of utilities include trenching to place new sewer, water, and stormwater

conveyance lines. New roads and parking lots would require preparation and grading of the surface and laying of asphalt. On average, installation of on-site utilities would require approximately 100 trips for general equipment deliveries and pickups, resulting in about 4 truck trips per day.

Warehouse Construction

For each warehouse building, construction is anticipated to occur over approximately 40 weeks. Pre-construction civil work would occur prior to concrete work. Concrete work includes laying slab, panels, and the roof structure, and installing interior and exterior sprinklers.

On average, construction of each warehouse would require approximately 2,330 total truck trips, including:

- General equipment deliveries and pickups: 300 trips
- Concrete trucks: 1,500 trips
- Site paving: 400 trips
- Lumber/steel package: 130 trips

Over the course of construction of each warehouse, up to 60 truck trips per day would be expected.

3.4.4 Operations

In accordance with the Declaration of Restrictive Covenant, the Applicant has provided a stated intent to develop the Project as an "Industrial Park" consistent with the ITE LUC 130 (ITE manual, 11th edition). During operations, the seven warehouses are anticipated to employ up to approximately 1,500 individuals. There would be three shifts per day, which would result in approximately 500 employees on the Project site at any time.

The primary vehicle traffic routes to and from the Project site driveways would be via 5th Avenue Southeast as an east-west roadway between Shaw Road East and 134th Avenue/33rd Street Southeast and from 80th Street East, in Pierce County. Secondary routing is expected at 134th Avenue East (33rd Street Southeast in the City of Puyallup) south with connection to 8th Avenue Southeast/80th Street East, and East Pioneer Avenue. The access via 134th Avenue East/33rd Street Southeast, between 5th Avenue and 8th Avenue Southeast, is presently limited to use by passenger vehicles only; restrictions to the section of 33rd Street Southeast between 5th Avenue and 8th Avenue Southeast would not change. All trucks would enter and exit the site via the new 5th Street Southeast east-west roadway between Shaw Road and 134th Avenue East or along 80th Street East between Van Lierop Park and 139th Avenue Court East.

Operations are expected to occur 7 days per week, 24 hours per day. Per the Declaration of Restrictive Covenant, the maximum total number of daily trips in the AM or PM peak hours is 884. Total daily for heavy-duty vehicles would be 1,482 and for passenger cars/light-duty trucks (i.e., delivery vans) would be 8,724. The PM peak period generates the greatest demand traffic from the proposed site, 776 passenger car/light-duty vehicles and 104 heavy-duty trucks. On-site speed limits are anticipated to be 25 miles per hour (mph) on the public streets within the development and 10 to 15 mph on private access routes within the development and on-site maneuvering areas.

The internal operations of the warehouses would be dependent on the final use of the buildings in accordance with Table 3-3 and the Declaration of Restrictive Covenant. Outside the warehouses, the on-site driveway system would accommodate the loading, unloading, and movement of goods off site toward their destinations.

Maintenance activities would include preventive and routine maintenance of the warehouses, associated structures, equipment, and internal road system; and landscaping.

3.5 Alternative 1 – Rail Transport

Under Alternative 1, 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. This alternative would shift some of the truck traffic generated by the Project off of local roadways and onto the nearby existing rail lines. The alternative was developed in coordination with BNSF and Meeker Southern rail line by evaluating the feasibility of constructing new interchanges to the existing rail lines; evaluating the on-site requirements to access the warehouses via rail; and determining how many truckloads could be shifted to rail based on the site constraints. The alternative development and feasibility were documented in a Rail Mitigation Analysis technical memorandum (HDR, 2021)

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 (Figure 3-3). To connect to the Meeker Southern rail line, the proposed rail line would extend outside of the Project site. In addition, to facilitate the ability of the Meeker Southern rail line to handle additional train traffic:

- The track from the interchange between the Meeker Southern rail line and the BNSF main line would be extended by about 2,000 feet to the northeast. This would involve extending the existing interchange track parallel to the BNSF mainline along Inter Avenue from its existing terminus near Kassel Motorsports to the northeast to near the northern terminus of 33rd Street NE.
- The track from the interchange between the Meeker Southern rail line and the BNSF main line would be extended by about 1,000 feet to the west. This would involve extending the existing interchange track parallel to the BNSF mainline along East Pioneer from near 18th Street SE to the east of the at-grade crossing with 15th Street SE.

Both extensions would occur within BNSF ROW, and the details would be negotiated between BNSF and the Meeker Southern rail line.

The construction of the rail line would not result in additional site disturbance beyond that described for the proposed Project except for the portion required to connect to the Meeker Southern rail line south of 80th Avenue SE and the BNSF-Meeker Southern interchange extensions. Rail line construction south of the Project site would require a ROW width of 50 feet and about 300 feet of track. Within the ROW, the constructed track would be about 10 feet wide and would require excavation depths of up to 3 feet. Construction would require equipment similar to that required for the proposed Project.

Once operational, trains would arrive via the BNSF mainline with switching operations required to transfer the trains to the Meeker Southern rail line for delivery to the proposed facility. Alternative 1 would generate 8,487 total trips per day consisting of 1,207 daily heavy-duty vehicle trips, 7,280 passenger car/light-duty truck (i.e., delivery van) trips, and two trains per day. Each train would have up to 55 rail cars. This would be the equivalent of removing up to 275 trucks per day from the number of heavy-duty vehicles expected under the proposed Project.

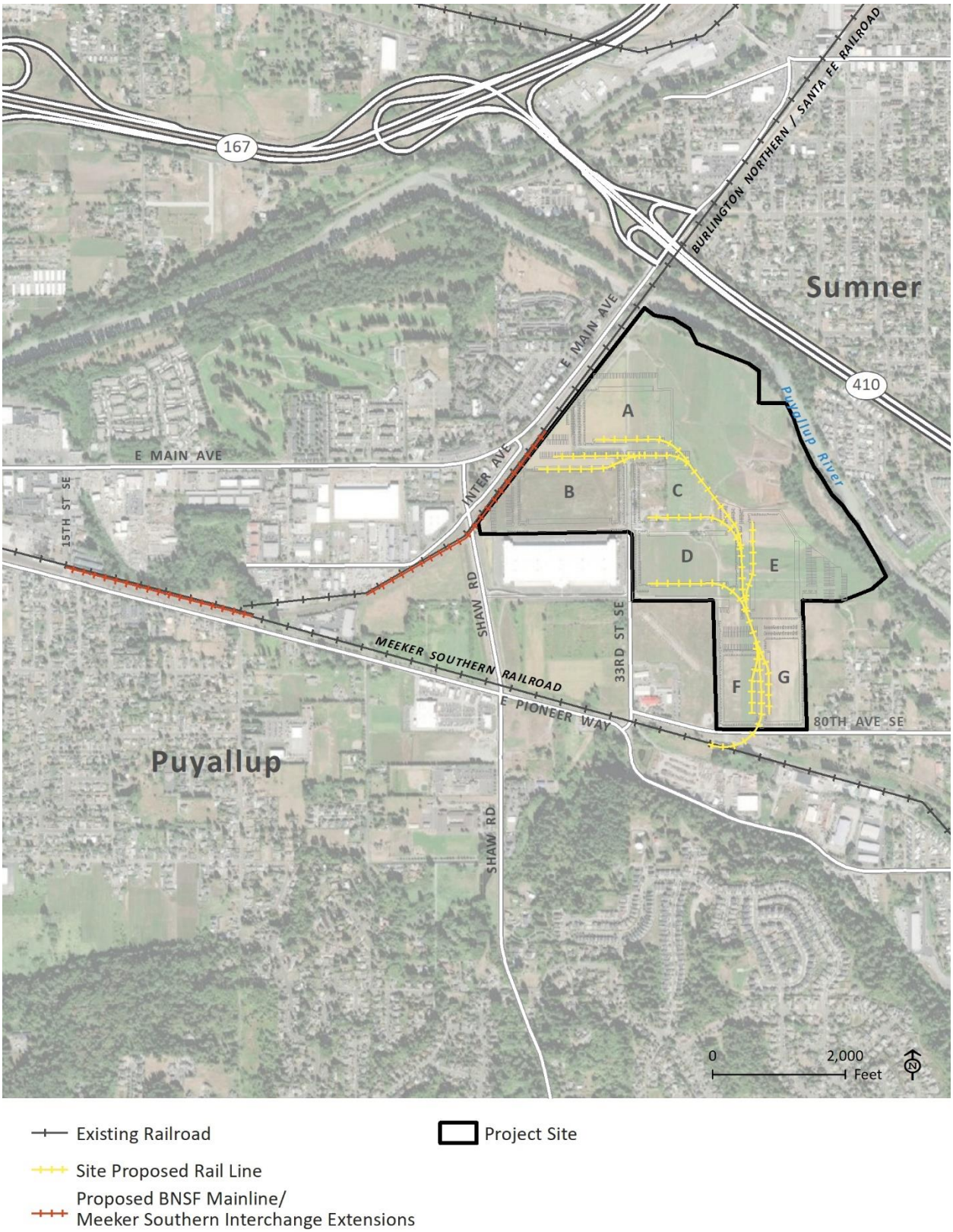

Figure 3-3. Alternative 1 – Rail Line Layout

3.6 Alternative 2 – Reduced Intensity Alternative

Under WAC 197-11-440(4)(5), the Lead Agency preparing an EIS is directed to analyze reasonable alternatives, which "shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." As such, Alternative 2 considers the potential reduction of impacts that would result if the mitigation measures that reduce the site footprint of the facility, as outlined in this Draft EIS for the proposed Project, were implemented by the permitting agency (Pierce County), consistent with the analysis in this EIS (Figure 3-4). As shown in Table 3-4, the total footprint of the facility would be reduced from about 2.6 million SF to about 1.7 million SF. The reductions would result from the following mitigation measures:

- All warehouses would include a minimum 15-foot-wide landscape bed to be provided along the entire length of blank wall facades of buildings (see mitigation measure AES-2, Section 4.6.4).
- Warehouses would not be constructed on lands designated Rural Buffer Residential (RBR) on the Future Land Use Map City of Puyallup's Comprehensive Plan Future Land Use Map. This would eliminate Warehouse C and would reduce the footprint of Warehouses A and E (see mitigation measure LU-1, Section 4.5.4).
- Warehouse F (and potentially portions of Warehouse G) and the associated site improvements (parking, landscaping) would be reduced in size to avoid blocking or obscuring the prime view corridor from Van Lierop Park (see mitigation measure REC-1, Section 4.7.4).
- Warehouse G would be reduced to avoid Wetland D and buffer, in accordance with Pierce County Code 18E.40.050, and critical areas setback requirements, in accordance with PCC 18E.10.080H (see mitigation measure SW-6, Section 4.2.4).
- Alternative 2 would be constructed in the same manner as described for the proposed Project in Section 3.4.3. The primary change would be a reduction in construction vehicle trips due to the reduced Project size and footprint of the facility. During grading and filing, up to 1,270 total construction vehicle trips (or up to 215 trips per day) would be expected; during utilities installation, up to 100 total construction vehicle trips (or up to 4 trips per day) would be expected; and during warehouse construction, a total of up to 1,560 construction vehicle trips (or up to 40 trips per day) would be expected.
- Alternative 2 would be operated in the same manner as described for the proposed Project in Section 3.4.4, but the number of vehicle trips generated by the Project would be lessened. Alternative 2 would generate at total of 5,844 total trips per day consisting of 998 daily heavy-duty vehicle trips and 4,846 passenger car/light-duty truck (i.e., delivery van) trips. Alternative 2 would require up to 1,000 employees during operations. There would be three shifts per day, which would result in approximately 333 employees on the Project site at any time.

Table 3-4. Reduced-Intensity Alternative

Warehouse	Proposed Project Building Footprint (SF)	Alternative 2 Building Footprint (SF)	Reason for Reduction
A	417,000	159,036	• Reduced to account for Landscape Bed mitigation requirement (AES-2) • Partially within the RBR future land use (LU-1)
B	492,000	470,296	• Reduced to account for Landscape Bed mitigation requirement (AES-2)
C	341,000	0	• Entirely within the RBR future land use (LU-1)
D	458,000	438,065	• Reduced to account for Landscape Bed mitigation requirement (AES-2)
E	416,000	327,882	• Partially within the RBR future land use (LU-1) • Reduced to account for Landscape Bed mitigation requirement (AES-2)
F	193,000	129,000	• Within the Van Lierop Park Prime View Corridor (REC-1) • Reduced to account for Landscape Bed mitigation requirement (AES-2)
G	244,000	199,458	• Wetland D and buffer are within building footprint (SW-6) • Reduced to account for Landscape Bed mitigation requirement (AES-2) • The required 15-foot critical areas setback for Wetland D and buffer are within the building footprint (PCC 18E.10.080H)
Total	**2,561,000**	**1,723,737**	

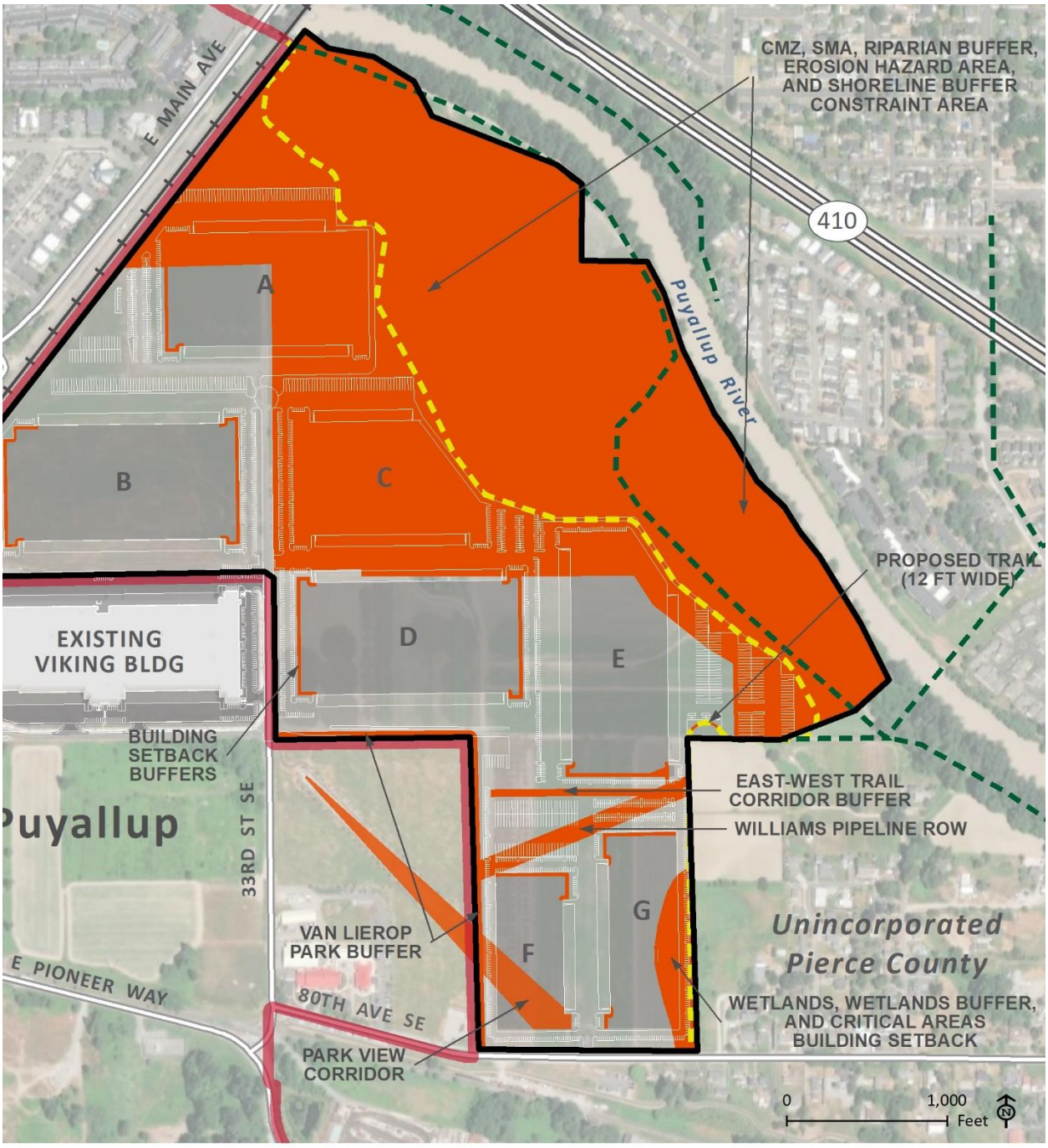

Figure 3-4. Alternative 2 – Reduced Intensity Alternative

3.7 Benefits and Disadvantages of Delaying Implementation

SEPA requires that an EIS discuss the benefits and disadvantages of delaying implementation of a proposed proposal (WAC 197-11-440(5)(vii)). The urgency of implementing the proposal can be compared with any benefits of delay. The foreclosure of other options should also be considered; that is, if implementation of the proposal would preclude implementation of another project at a later time.

If the proposed Project were postponed, the direct, indirect, and cumulative effects associated with the Project would be delayed. This would include potential lost economic benefits from sustained or increased employment, and tax revenues generated from construction and operation of the proposed Project. Delaying implementation may benefit the environment with less land impacts, including longer preservation of on-site agriculture activities for crop cultivation, preservation of ambient noise quality, limiting visual and air quality impacts in the short term, and fewer vehicle trips prior to construction and operations.

3.8 Alternatives

SEPA requires lead agencies to evaluate reasonable alternatives to a proposed project (WAC 197-11-786, 197-11-440(5)). As defined in the SEPA Handbook (Ecology 2018a), "a reasonable alternative is a feasible alternate course of action that meets the proposal's objective at a lower environmental cost." The objective of this proposal is described in Section 1.2.

Alternatives considered included on-site alternatives and alternatives suggested by commenters during the scoping process. Each potential Project alternative was analyzed to determine if it would meet the proposal's objective at a lower environmental cost or decreased level of environmental degradation. Alternatives that failed to meet these criteria were eliminated from further study.

3.8.1 On-Site Alternatives

Within the Project site, the configuration of the proposed development is limited by site and design constraints; therefore, no on-site alternatives outside of the proposed Project, Alternative 1 and Alternative 2 are evaluated in this EIS.

3.8.2 Off-Site Alternatives

When a proposal is presented for a project on a specific, privately owned site, SEPA requires the lead agency to evaluate a No Action Alternative and other reasonable alternatives on the same site but does not require evaluation of off-site alternatives (WAC 197-11-440(5)(d)). Therefore, alternative site locations are not evaluated in this EIS.

3.8.3 Alternatives Suggested During the EIS Scoping Process

Commenters suggested that the site remain under agricultural use (i.e., no action be taken) or be redeveloped for mixed-use, residential, open space, commercial, and other non-industrial uses. However, these uses would not meet the objective of the Project and are not considered further in this EIS. Commenters suggested alternative locations for the Project. However, as described above, off-site alternatives were considered as a result of scoping and were not taken further because they either did not meet the Project's objective, would not adhere to zoning requirements, or were not technically feasible.