

## INTRODUCTION

### 1.1 How to Use this Report

The City of Puyallup (City) is the lead agency overseeing the preparation of an environmental impact statement (EIS) under the State Environmental Policy Act (SEPA) for the proposed Knutson Farms Industrial Park project. An EIS provides an impartial discussion of probable adverse environmental impacts, reasonable alternatives, and mitigation measures that would avoid or minimize adverse impacts.

The purpose of scoping is to identify the issues to be analyzed in the EIS. The purpose of this scoping report is to summarize the priority issues identified by individuals, tribes, organizations, and agencies during the scoping comment period for the Knutson Farms Industrial Park project EIS. This report distills all comments received into key themes, giving equal weight to each issue and concept; it does not contain all comments received verbatim nor does it quantify comments by topic.

All comments received during the scoping comment period are available as Appendix A or on the project website: <https://knutsonfarmseis.org/>.

Scoping comments will be used by the City to help determine the issues and extent of the analysis to be included in the EIS, as well as options for reasonable alternatives to the proposed project and mitigation measures that could be considered. The City will have the opportunity to review comments as they develop the Draft EIS.

### 1.2 Proposal Overview

Knutson Farms, Inc. (applicant), seeks to develop a Level 8 Warehousing, Distribution, and Freight Movement facility of up to 2.6 million square feet of building area on the approximate 162-acre Knutson Farm property located within unincorporated Pierce County. The project would include construction of seven warehouse buildings. Site work activities would include grading, paved parking and truck maneuvering areas, landscaping, water and sanitary sewer extensions, storm water facility, franchise utility improvements, and roadway improvements including establishment of new access to and use of City roads.

### 1.3 Purpose of Scoping

The first step in the development of an EIS is called “scoping.” During scoping, agencies, tribes, local communities, organizations, and the public are provided opportunities to comment on factors that should be analyzed and considered in the EIS. Specifically, the scoping process is intended to collect input on the following topics:

1. Reasonable range of alternatives
2. Potentially impacted resources and extent of analysis for those resources
3. Potential measures to avoid, minimize, and mitigate impacts of the proposed project

This report allows the City to review and consider all comments when developing the scope of the EIS. In accordance with SEPA requirements for scoping, the City does not respond to all individual comments.

## 2.0 SCOPING PROCESS

### 2.1 Notification of Scoping

#### 2.1.1 Determination of Significance and Second Notice

The City of Puyallup issued a Determination of Significance (DS) on the proposed development on May 10, 2017. Proceeding with preparation of an EIS was delayed due to appeals (now withdrawn) of the DS by Pierce County and the applicant, as well as litigation (now resolved) concerning the City's authority to issue a DS.

Recognizing that significant time had passed since the initial scoping notice, the City issued a second notice on November 17, 2020, to invite the public, tribal governments, and agencies to renew and/or update comments on the scope of the EIS. The original DS and second notice are provided in Appendix B. An extended 30-day scoping comment period was issued for this project to give the public additional time to provide comments.

#### 2.1.2 Public Notification

The City notified key stakeholders, interested parties, agencies, and the general public of the DS, the scoping comment period, and the ways in which they could provide comments using a variety of communication tools. Notifications are provided in Appendix C and included:

1. Tacoma News Tribune Legal Notice (November 18, 2020)
2. Email Listserv (November 17, 2020)
3. Mailed notice to property owners within 500' of the project site (November 23, 2020)
4. City website (<https://www.cityofpuyallup.org/1115/Puyallup-Valley-Warehouse-Development>)
5. Project website (online open house; [knutsonfarmseis.org](http://knutsonfarmseis.org)) launched on November 17, 2020
6. Social media posts (Facebook; November 17, 23; December 8, 15, 2020)

#### 2.1.3 Opportunities to Provide Comment

During the scoping period, the public was invited to submit comments in the four ways described below. No in-person scoping meetings were held due to Washington State COVID-19 safety guidelines.

##### *Online Open House ([knutsonfarmseis.org](http://knutsonfarmseis.org))*

The City hosted an online open house that provided an opportunity for visitors to learn more about the proposed project, submit their scoping comments online, and sign up for project notifications. The site accepted comments throughout the scoping comment period (November 17 to December 17, 2020). The online open house received more than 2,000 visits from approximately 1,700 users during the scoping comment period.

The online open house included a Google Translate function that allowed visitors to translate the site into various languages.

### *Voicemail*

A toll-free number was available for people to call and leave verbal comments.

### *Email*

Stakeholders could submit comments via email to [comment@knutsonfarmseis.org](mailto:comment@knutsonfarmseis.org) or directly to City staff.

### *Written Comments via Mail*

Those who wished to provide written comments could mail them directly to the City. A printable comment form was available on the online open house website.

## 2.1.4 Comments Received

The City invited comments through a variety of methods. Table 1 provides a count for the number of comments submitted during the scoping comment period and the methods by which comments were received. A list of the tribes and governmental agencies that submitted comments is provided in Appendix D.

*Table 1. Tally of Comments Received during Scoping*

Comment Options	Number of Comments Submitted
Online open house comment form	268
Voicemail	0
Email	29
Written (letters or printable comment form)	4
<b>TOTAL</b>	<b>302</b>

## 2.2 Comment Analysis Process

The extended scoping period began on November 17, 2020, for 30 days and closed on December 17, 2020. During this time, a total of 302 scoping comments were received through the various methods described in Table 1. All submissions were reviewed and analyzed in the preparation of this report. A copy of all scoping comment submissions can be found on the project website: <https://knutsonfarmseis.org/>.

### 2.2.1 Processing Communications

The full text of all comment submissions was reviewed and entered into a single database for analysis. Analysts recorded the name and contact information of each commenter, the source of the submission, and date received.

Once the commenters' names and their submissions were entered into the database, analysts read each submission to identify and code unique comments. Many submissions contained multiple comments. Comments were defined as unique concepts or ideas within a submission. Each unique comment was assigned one or more unique categories.

Each unique submission was reviewed at least twice—once by the primary coding analyst, and again by a second analyst for quality assurance and control and/or during the preparation of this scoping summary. This process allowed for resolution of discrepancies or inconsistencies.

### 2.2.2 Analysis Methodology

To create this report, analysts queried the database to generate lists of comments organized by comment categories. Comments within each category were then summarized to capture the unique issues and concerns expressed by commenters.

For the purpose of this summary, every comment has value, whether it is stated only once or multiple times. The analysis represented in this report did not seek to tally the number of comments received on any given topic or whether a comment ultimately supported or opposed the proposed project. Scoping is designed to help identify issues that should be addressed and analyzed in the EIS and is not intended to function as a “voting” process.

## 3.0 PUBLIC COMMENTS SUMMARIZED BY ISSUES OF CONCERN

This section reflects the issues and concerns mentioned during the scoping period. The issues and concerns are summarized and paraphrased, and do not capture every comment for each category; they are not quantified. Please also note that comments often mix statements of fact with statements of opinion, and, as a result, this report may include inaccurate or incomplete information in the form it was provided by commenters.

### 3.1 Comments Summarized by Topic

Key comment topics included the project objective; project description; alternatives; geology/soils; surface water; groundwater; plants and animals; land use; recreation and aesthetics; air quality and greenhouse gases; transportation; health and safety; public services and utilities; cultural resources; noise; social elements; mitigation; and permitting. Comments received during the scoping period are summarized and paraphrased by topic below.

#### 3.1.1 Project Objective

Commenters questioned why there was a need for more warehouses when there are so many that sit empty in the area.

#### 3.1.2 Project Description

One commenter noted that the developer estimates that 700–900 people would work at the completed project; however, the developer’s plan is to sell or rent the property to a separate party business, so there is no guarantee as to the number of workers who would conduct business at the property.

#### 3.1.3 Alternatives

Commenters noted several alternatives to the proposal, including:

- Developing the land for mixed-use developments, affordable housing, residential use, community centers, retail businesses, outdoor recreation (including parks, dog parks, and walking paths), or event centers.
- Selecting an alternative location that is closer to Interstate 5 or in Graham.

- Redeveloping vacant buildings in the industrial areas of Tacoma.
- Redeveloping vacant commercial space in the city.
- Reducing the size of the facility by reducing the number of warehouses (many noted that Warehouses F and G could be removed from the proposal) and leaving the remaining space as open space or parkland, or for other purposes such as housing.

#### 3.1.4 Geology/Soils

Many commenters noted that the project would destroy fertile farmland that cannot be restored.

Commenters asked if the project would lead to further erosion of the hill above Pioneer Way and expressed concerns about increased risk of mudslides.

Commenters noted concern that the project would cause soil pollution from truck traffic.

#### 3.1.5 Surface Water

The Muckleshoot Indian Tribe Fisheries Division requested that the EIS include an assessment of riparian impacts potentially arising from the project. They suggested that the assessment include a complete delineation of the Channel Migration Zone and the 100-year flood plain, and consideration of whether the project would directly or indirectly influence these areas or their associated protection measures afforded by applicable code.

Commenters noted that the area floods and that constructing the warehouses within a wetland, adjacent to the Puyallup River, and within the 100-year floodplain would cause adverse impacts.

Many commenters were concerned about increased impervious surfaces and water run-off, especially into the Puyallup River.

One commenter questioned if the project has been considered in regard to the 2023 Comprehensive Flood Hazard Management Plan.

#### 3.1.6 Groundwater

One commenter was concerned about groundwater being impacted by the proposal.

One commenter noted that Knutson Farms currently has a water right to withdraw water from the Puyallup River for irrigation. The commenter felt that this right should be vacated upon development of this site, which would increase low-flow quantities for endangered salmon.

#### 3.1.7 Plants and Animals

Many commenters expressed concern about animals being displaced and about degraded or destroyed habitat.

One commenter noted that Chinook salmon and bull trout are known to be in the Puyallup River and should be addressed in the EIS. Commenters expressed concern about the chemical in tire rubber that can impact coho salmon and that the impact would be exacerbated by additional truck traffic.

One commenter noted that the effects of the industrial development would have a negative impact on Southern Resident Orca, which rely on the salmon from the Puyallup-White watershed—one of the few in Puget Sound with spring-run Chinook—for the entirety of their diet.

One commenter noted that the erosion would negatively impact the Puyallup River and its floodway, as well as animal and plant life in and along the river/floodway. The location of planned construction is just upstream of where the Puyallup River and White River converge. This spot is important for the conservation of many fish species and is a seasonally popular/important spot for fishing. There is concern that the 3- to 5-year construction process, as well as the planned permanent proximity of the warehouses to the river, would negatively impact conservation and fishing practices.

Commenters were concerned about pollution runoff into creeks and rivers from the warehouse and the possible damage to salmon and other wildlife habitat.

One commenter noted that the project would disrupt the Pacific Flyway for Migratory Birds and would endanger the habitat of salmon, steelhead, trout, and other species of fish in the Puyallup River. One commenter noted that there are 108 different bird species that have been observed at the project site, and that impacts to these bird species and other wildlife should be considered.

One commenter noted that wild lupine grow on this property. According to the U.S. Forest Service, certain species of lupine are listed as endangered.

One commenter noted that beaver have been found on nearby streams, and it is highly likely that deer, eagles, and herons have also been in the area. The commenter felt that an appropriate inventory of animals utilizing the site and methods to mitigate the development's impacts to these animals must be studied.

### 3.1.8 Land Use, Recreation and Aesthetics

Many commenters noted concerns regarding land use and zoning of the project and compatibility of the surrounding land uses—particularly, the expansive residential and multifamily development that was approved and built farther south along the Shaw/Military Road and meridian corridor. Commenters requested that the City's land use plan be followed. One commenter noted that the project is not consistent with Puyallup's land use plan that calls for limited warehouses, a business park, and protection of farmland and open space; others noted that the land was initially supposed to be made into parks, that it is not a commercial or industrial area, and that large warehouse developments should be located outside residential communities.

Commenters noted concern with the warehouses keeping with the character of the community—specifically the density and size of buildings; the scale of the project would be in contrast with existing surroundings, and going from farmland to warehouses is not in keeping with the character of the community.

One commenter noted growth in the downtown area and that industrial buildings are not needed.

Commenters noted that the presence of warehouses and semi-truck traffic would result in negative aesthetics impacts for the community, including disruption of views and impacts on views from nearby parks.

Many commenters shared that they thought the project would not be aesthetically pleasing and that there are enough ugly warehouses in Pierce County. Commenters noted that the project would tarnish the view of Mount Rainier and the Cascades and that the rural feel of the area would be lost forever. One commenter noted that past city projects were ugly.

One commenter noted that windblown debris and clutter from these types of facilities result in negative aesthetic impacts.

Commenters noted general concerns about negative light pollution impacts from headlights and taillights from trucks entering and existing the proposed facility at night.

One commenter noted that Farm 12, as an event center, relies on an aesthetically pleasing atmosphere and surroundings (currently in place).

Many commenters expressed concern that the development would interfere with existing recreation experience and access in the area, including the positive experience that children can currently have at the Van Lierop park and the nearby Foothills Trail.

Commenters suggested an increase in the amount of open space to the northeast along the Puyallup River and development of the areas along the banks of the Puyallup River as an extension of existing bike and walking trails, including connecting the foothills bike path to the Puyallup River trails.

One commenter questioned whether quality public space would be provided by the developer.

### **3.1.9 Air Quality and Greenhouse Gases**

Many commenters noted that air quality would be negatively impacted by the increase of truck traffic.

Commenters noted that the air quality for Shaw Road Elementary and the private school next to it would be degraded for students.

### **3.1.10 Transportation**

Many commenters expressed concern about the traffic impacts of the proposal. Many expressed concern that the warehouses are not suitable with current traffic patterns. They noted that Shaw Road is a major arterial connecting hundreds to thousands of daily commuters to Washington State Route (SR) 410/167/Sounder transportation networks and that additional high-volume commercial traffic, semis, and employees would significantly degrade the current situation for Puyallup residents and negatively impact the quality of life.

Many commenters were concerned that the project would increase traffic in nearby neighborhoods, that the trucks would use Shaw Road to circumvent Meridian, and that an increasing number of commuters would cut through the residential neighborhoods to find a faster route around the gridlock.

Many commenters noted that the local infrastructure, including roads and bridges, is not equipped to handle the additional traffic. Commenters noted that they do not think the new entrance to SR 410 on Main Street would be able to handle semi-truck traffic and suggested re-routing to use the SR 512 ramp on Pioneer instead. One commenter noted that the current highway and road infrastructure does not support additional industrial traffic and the addition of more lanes to the highway and a direct industrial route would be acceptable.

One commenter suggested that once the Milwaukee Bridge is completed, a large number of trucks will route down Meridian and Valley Avenue and over the bridge, and will back up traffic all up and down 5th Street NE. One commenter noted that traffic during the State Fair would create major traffic delays. One commenter noted that the heavy traffic is usually in the morning and evening hours or when an accident has occurred, that these routes are used to bypass it, and that it would be beneficial if 5th Street could tie into 80th Street E in some way.

One commenter noted that the developer's plans mainly concern internal-to-the-property roads, do not describe who is to pay for the improvements to City roads, and do not seem to acknowledge the impact of the intersection at 80th Street E and WA-162, or the use of Inter Avenue.

Commenters noted that the project needs better documentation on the volume of traffic, trucks, and other traffic that would be generated and better documentation on the impact on the Shaw Road overpass and other corridors.

One commenter requested that traffic lights be installed at any entry or exit points to the facility and other points along Main Street and Shaw Road.

One commenter noted that the on/off ramp already constructed for the current warehouse that stems from the Shaw Road E bridge cannot accommodate semi-trucks, which would be the primary vehicles for the completed warehouse project.

One commenter questioned how it would be possible to reroute all the trucks from Shaw Road.

One commenter noted that the Shaw Road southbound left-turn lane onto 5th Avenue SE is too short to handle more than two trucks. They felt that a study needs to be conducted to determine the optimum length of this turn lane and construction required by the project. The commenter questioned that the ability for a semi-truck to take this angle during a turn was not adequately considered.

Commenters noted that the project would make getting to the Sumner Sound Transit station more difficult because of increased traffic.

One commenter noted that the amount of direct traffic to be shifted away from property for construction would make traffic congestion even higher on existing (external to the property) roadways.

One commenter noted that previously published estimates of the truck traffic generated by the project are underestimates and that the existing conditions need to be updated to account for current traffic levels. They also noted that the project needs to account for proposed nearby projects, including a new Safeway shopping center and a proposed mixed-used development.



One commenter requested that Knutson and other developers be required to build and pay for their own access roads. One commenter questioned if this complex would be mandated its own exit/entrance, off SR-410.

One commenter suggested adding access and egress from Shaw Road and all points of entry/exit to the warehouses.

One commenter noted that traffic on Shaw Road travels well over the 35 mph posted speed limit.

Commenters noted that Pioneer and Main Street are heavily used by pedestrians and that Pioneer is narrow and does not have sidewalks.

Commenters noted that the rate of traffic accidents would increase due to the additional trucks and that the trucks would be traveling on roads that have three elementary schools nearby.

Commenters expressed a desire for a bike lane and a speed reduction from the foothills trail to downtown.

One commenter noted that the construction project as proposed includes plans for approximately 2,202 parking spaces. The estimated number of workers and the planned number of parking spaces do not logically align. One commenter noted that there is no parking for the trail, the new park, or Farm 12.

#### **3.1.11 Health and Safety**

One commenter noted that the warehouse industry could lead to an increase in homeless camps in public areas, which poses a safety concern for people in nearby parks.

Commenters noted that residents would be exposed to the negative health effects of pollution from the warehouses.

Commenters noted that semi-trucks in the current traffic situations and on residential roads would be dangerous.

The Washington Department of Ecology (Ecology) noted that the property is within a quarter mile of two contaminated sites. The sites are Puyallup Landfill A, Facility Site ID (FSID) 49172; and Highway 410 at Traffic Avenue Overpass, FSID 58749. If contamination is suspected, discovered, or occurs during the proposed construction of the warehouse, distribution, and freight movement facility, testing of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by sampling, Ecology must be notified.

#### **3.1.12 Public Services and Utilities**

Many commenters expressed concerned about stormwater drainage into the Puyallup River. One commenter noted that drainage from the property onto adjacent properties needs to be accounted for and mitigated, including through installation of storm and sewer drains. One commenter noted that the risk of contaminated runoff from industrial sites, inadvertent disposal, and illicit discharge should be considered carefully, considering that all discharges flow directly to the Puyallup River, which is used by endangered species. Possible mitigations include secondary containment, enhanced water quality treatment, and other measures.

Many commenters expressed concerns about who was going to pay for the increased costs of public services, including fire and police, and utilities, including water and sewer. Commenters noted concern that crime would spike and there would be an increased need for fire and police protection. One commenter noted concern over the expense of flooding as well as the cleanup and protection of public and private property. One commenter was concerned that the project would create more waste/garbage by the people who would work there.

One commenter noted that the use of natural gas is a contributing factor to carbon pollution and should be excluded from the development or that mitigation of its carbon effects be provided.

Ecology noted that all grading and filling of land must utilize only clean fill. All other materials may be considered solid waste, and permit approval may be required from the local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site.

Williams-Northwest Pipeline commented that there is a 75-foot-wide high-pressure natural gas transmission right-of-way through the project area. They noted that they have been consulted regarding development and encroachment standards and have not granted approval for any disturbance, equipment crossings, utility crossings, pavement, or any changes in land use, whatsoever. Until an encroachment agreement is in place between the owner and Williams, no approvals will be granted.

### **3.1.13 Cultural Resources**

The Washington Department of Archaeology and Historic Preservation (DAHP) commented that they are pleased that the EIS scoping is including cultural resources as an element of analysis. DAHP is interested in this project and recommends that an archaeological survey of the project area be completed during the EIS process. Having the initial cultural resources work completed during the EIS will help the DAHP make more informed recommendations for project alternatives during the EIS review period.

The Nisqually Indian Tribe, Squaxin Island Tribe, and Puyallup Tribe requested a thorough sub-surface archaeological survey and cultural resource investigation of the entire project area using comprehensive background research into the long history of the Puyallup Valley as a guide. They also request that an archaeological monitor be present once groundwork on the project begins.

Commenters noted that the EIS needs to identify any cultural sites and impacted tribal lands.

### **3.1.14 Noise**

Commenters noted that diesel engine noise generated by the project would cause uninterrupted noise throughout the project area and that the existing noise level is already loud from trains and existing traffic.

Commenters noted that noise from construction, which is expected to last 3–5 years (as previously stated in the document), would negatively impact business operations of surrounding businesses—especially Farm 12, which is a restaurant and event center largely enjoyed by the community.

### 3.1.15 Social Elements

Commenters noted economic concerns with the proposed development, including that the warehouse would not promote local business and economic growth, would not create that many jobs, and would adversely impact adjacent property values.

One commenter noted that the project would be an opportunity to bring jobs to Puyallup.

Commenters noted that the environmental costs would outweigh the economic benefits of the project.

Commenters noted that the farmland needs to be preserved and the City should encourage future farmers. One commenter noted that Pierce Conservation District has identified Pierce County farmlands as a significantly declining resource. This project is proposing to eliminate 161.55 acres of scarce farmland without mitigation.

One commenter noted that affordable housing is a huge need in all communities, and this project proposes elimination of three affordable housing units with no mitigation proposed. A project of this magnitude needs to mitigate this loss.

### 3.1.16 Mitigation

To mitigate traffic impacts, commenters provided several suggestions, including:

- The applicant should be required to upgrade all roads to four lanes, including East Pioneer, 80th Street E, and the Orting Highway over the Puyallup River to Highway 410 to account for traffic impacts.
- The project should be required to help pay for costs to build SR 167 to Tacoma.
- Commercial routes should be segregated from residential routes and pre-developed.
- The project should include access to E Main from 134th Avenue E.
- Truck traffic should be prohibited from entering or exiting the development during weekday rush hours (5:30 am to 8:00 am and 3:30 pm to 6:30 pm).
- The City of Puyallup should be required to complete the four-lane widening project where E Main meets the new Hwy 410 bridge/Traffic Avenue no later than December 15, 2020, or the bridge project was a waste of taxpayer money and will result in worsening traffic problems that will be created by this project.
- Truck traffic should be limited to a certain time of day.
- Shaw Road should be improved to be a four-lane road or at least add a turn lane in the middle.
- Trucks must be required to enter/exit directly to Hwy 410.
- The project should utilize rail instead of trucks for transporting goods.

To mitigate transit impacts, one commenter requested that the developer be required to upgrade both adjacent bus stops with concrete pads and transit shelter packages due to the increase of expected bus riders. Additionally, because the transit stops are located across the train tracks from the project, the commenter requested that a pedestrian pathway be installed between the project site and Main Street to provide safe and efficient access to the bus stops. One commenter suggested that a light rail link in the community that ties into the Sounder could be developed using the Meeker line.

To offset traffic impacts, one commenter suggested that the City of Puyallup have at least 10 plans for things like parks and trails and gardens; spaces for cultural events and breweries and wine tasting rooms; a state-of-the-art swimming facility; and grocery stores like Trader Joe's or Whole Foods.

To mitigate greenhouse gas emissions, one commenter suggested that all warehouses must be required to have solar panels and/or vegetation (native plants or agricultural crops) covering the entirety of otherwise empty roof space.

To mitigate impacts for the loss of agricultural lands, one commenter suggested that property developers must buy and restore an equal number of unused agricultural lands in the Puyallup River-Orting Valley for a community farming project, offering use at \$1/acre/applicant.

To mitigate noise and fumes, one commenter suggested that the entrance/exit of the project should be moved to farther down on Main Street near the freeway to keep noise and fumes away from homes and schools.

To mitigate water quality issues, one commenter suggested an excellent filtration system and annual water quality monitoring.

One commenter suggested an analysis of economic impact to see if the project would be at least beneficial economically.

Commenters noted that the new Van Lierop Park, the new Step by Step facility, and a future Foothills Trails connection must be protected with mitigation that preserves their character. Warehouses must be screened to protect the visual impact at these facilities.

One commenter suggested that the height of the buildings be limited and that landscaping and architectural features be added to improve the appearance and minimize impacts to views.

One commenter noted that the property should be used to build a city park, add more works of art, and connect the River Walk to the Foothills Trail on the Knutson Farms property, which will add far more economic and environmental value to the town.

One commenter requested that the large California cedar tree on the property be preserved, as well as any other large trees on the property.

Commenters suggested that a full environmental restoration corridor be created along the Puyallup River, with a 300-foot buffer from the river's edge.

One commenter suggested that the applicant should extend the Puyallup Riverwalk through the area from the East Main Street bridge, to the Foothills Trail-East Puyallup Trailhead, with a skyway pedestrian/bicycle bridge built over 80th Street SE.

One commenter noted that all lighting should be shielded and Dark Sky Association-approved to mitigate nighttime light impacts.

One commenter noted that the mitigation where the developer has proposed to accommodate for this recreation area is not ideal for any sort of high-traffic path (which includes skateboarders, roller skaters/bladers, dog walkers, joggers, bike riders, etc.).

Ecology noted that erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or storm drains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants. Ecology noted that if there are known soil/ground water contaminants present on-site, additional information (including, but not limited to, temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location[s]; and additional studies/reports regarding contaminant[s]) will be required to be submitted.

### 3.1.17 Permitting

The Tacoma-Pierce County Health Department noted that all wells that would not be included in the public water system for this project must be properly decommissioned per Washington Administrative Code 173-160 prior to final application approval. The Tacoma-Pierce County Health Department must be contacted 48 hours prior to any decommissioning activity at the site. They further noted that when an existing on-site sewage disposal system is abandoned, the Tacoma-Pierce County Health Department requires that all tanks be pumped by a certified septage hauler, all tanks filled with soil, and a Decommissioning Application be completed, pursuant to Environmental Health Code, Chapter 2, On-Site Sewage.

Ecology noted that the following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more and discharge stormwater to surface waters of the State.
  - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, and discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
  - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
  - b) Reasonably expects to cause a violation of any water quality standard.

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## **Appendix A – Comments Received During Scoping**

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## **Appendix B – Determination of Significance and Second Notice for Scoping Comments**



# CITY OF PUYALLUP

Development Services Department

## DETERMINATION OF SIGNIFICANCE AND REQUEST FOR COMMENTS ON SCOPE OF EIS

### **Description of proposal :**

"The Applicant seeks to develop a Level 8 Warehousing, Distribution and Freight Movement facility of up to 2.6 million square feet of building area on the approximate 161.55-acre Knutson Farm property located within unincorporated Pierce County. The site is zoned EC (Employment Center) and is within the Alderton-McMillin Community Plan area and within the Urban Service area of the City of Puyallup. The development will apply for Administrative Design Review with a parking reduction request, a public road deviation request, a proposed trail amenity and a 7-Lot Commercial Short Plat."

See 9/14/2016 Revised SEPA Environmental Checklist

<https://palsonline.co.pierce.wa.us/pals/public/documentView?docSysId=671084> .

"The project will include construction of 7 warehouse buildings along with site work activities to include grading, paved parking and truck maneuvering areas, landscaping, water and sanitary sewer extensions, storm water facility, franchise utility improvements and roadway improvements."

See 9/19/2016 Master Application

<https://palsonline.co.pierce.wa.us/pals/public/documentView?docSysId=671078>.

"Grading of approximately 140 acres will occur for the construction of buildings and parking lots on the site. Approximately [sic] 450,000 cubic yards of on-site material will be excavated and filled to prepare the building pads, paved areas and open space areas for development. It is estimated that approximately 120,000 cubic yards of import fill will be used and approximately 110,000 cubic yards of stripping will be exported from the site. The applicant states that no portion of the floodplain or floodway will be filled. The area of the floodplain and floodway associated with the Puyallup River will be kept in a protective Tract as part of the proposed 7-Lot Commercial Short Plat."

See 9/14/2016 Revised SEPA Environmental Checklist

<https://palsonline.co.pierce.wa.us/pals/public/documentView?docSysId=671084> .

**Proponent:** Knutson Farms, Inc.

**Location of proposal :** 6719 134th Avenue East, Puyallup, WA, within Sections 25 and 26, T20N, R4E, W.M. in County Council District No. 2; also City of Puyallup streets, including, but not limited to, Shaw Road, East Maine Avenue and East Pioneer

**Lead agency:** City of Puyallup, Tom Utterback (SEPA Responsible Official)

**EIS Required:** The City of Puyallup has assumed SEPA lead agency status on this proposal and has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared. A SEPA Environmental Checklist and other materials indicating likely environmental impacts can be reviewed at the City of Puyallup Permit Counter (2<sup>nd</sup> Floor, City Hall, 333 S. Meridian), as well as on the Pierce County Planning & Land Service site for the application:  
<https://palsonline.co.pierce.wa.us/palsonline/#/permitSearch/permit/relatedPermits?applPermitId=792206>.

The City has initially identified the following areas for discussion in the EIS:

- Transportation, particularly transportation systems and traffic
- Public Services and Utilities, including stormwater, sanitary sewer and fire flow
- Water, Plants and Animals
- Land and Shoreline Use, including aesthetics, recreation, agricultural crops, and the project's relationship to existing land use plans
- Alternatives
- Mitigation measures

**Scoping:** Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS within 21 days of this DS issuance, or by 5:00 PM on Wednesday, May 31, 2017. You may comment, among other matters, on alternatives, mitigation measures, probable significant adverse impacts, and licenses or other approvals that may be required.

**Comments must be submitted in writing to the City's Responsible Official, Tom Utterback, at the address below or via email at [sepaofficial@ci.puyallup.wa.us](mailto:sepaofficial@ci.puyallup.wa.us).**

Any agency or person may appeal, pursuant to Puyallup Municipal Code Sec. 21.04.205, the City's Determination of Significance by filing a written appeal within 14 days of this determination, by 5:00 PM on Monday, May 24, 2017.

**Responsible official:**

Tom Utterback  
Development Services Director  
City of Puyallup  
333 S. Meridian  
Puyallup, WA 98371  
(253) 841-5502  
[tomu@ci.puyallup.wa.us](mailto:tomu@ci.puyallup.wa.us)

Date: May 10, 2017    Signature



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## **CITY OF PUYALLUP**

### **Development and Permitting Services**

333 S Meridian, Puyallup, WA 98371  
(253) 864-4165 Fax (253) 840-6678

#### **SECOND NOTICE\*:**

REQUEST FOR FURTHER COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR A PREVIOUSLY ISSUED DETERMINATION OF SIGNIFICANCE (DS)

**\*The City of Puyallup issued a Determination of Significance (DS) on the project on May 10, 2017. Proceeding with preparation of an EIS was delayed due to appeals (now withdrawn) of the DS by Pierce County and the Applicant as well as litigation (now resolved) concerning the City's authority to issue a DS. This second notice, although not required, is being issued due to the passage of time to invite the public, tribal governments and agencies to renew and/or update comments on the scope of the EIS.**

Project Name: [Knutson Farms Industrial Park](#)

Proponent: Knutson Farms, Inc.

Lead Agency: City of Puyallup

Project Location: The project is located in the Urban Growth Area of the City of Puyallup in unincorporated Pierce County. The 162-acre development site is located east of Shaw Road E. and East Main Avenue, north of East Pioneer and 88th Ave S.E., and west of the Puyallup River within Sections 25 and 26, Township 20N, Range 4E in the Willamette Meridian baseline.

Description of the Proposal: The Proponent seeks to develop a Level 8 Warehousing, Distribution and Freight Movement facility of up to 2.6 million square feet of building area on the approximate 162-acre Knutson Farm property located within unincorporated Pierce County. The project would include construction of seven warehouse buildings. Site work activities would include: grading, paved parking and truck maneuvering areas, landscaping, water and sanitary sewer extensions, storm water facility, franchise utility improvements and roadway improvements including establishment of new access to and use of City roads.

EIS Required: The City of Puyallup has assumed SEPA lead agency status on this proposal and has determined this proposal is likely to have a significant adverse impact on the environment. An environmental impact statement (EIS) is required under RCW 43.21C.030(2)(c) and will be prepared.

Elements of the Environment: The lead agency has preliminarily identified the following elements for analysis in the EIS based on application materials as well as information

and circumstances that have come to the City's attention since May, 2017.

- Transportation, particularly transportation systems and traffic
- Public Services and Utilities, including stormwater, sanitary sewer and fire flow and fire protection services
- Water, Plants and Animals
- Cultural resources
- Noise
- Air quality, including green house gases
- Land and Shoreline Use, including aesthetics, recreation, agricultural crops, and the project's relationship to existing land use plans
- Alternatives
- Mitigation measures

Alternatives: The lead agency has preliminarily identified that the Proposed Action and No Action Alternative will be analyzed in the EIS.

Scoping: Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS within 30 days of this second notice request for further comments on a previously issued DS. Comments are due no later than 5:00 PM on December 17, 2020 using one of the methods below.

More project information may be found online at:

<https://www.cityofpuyallup.org/1115/Puyallup-Valley-Warehouse-Development>

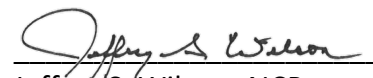
You may comment, among other matters, on alternatives, mitigation measures, probable significant adverse impacts, topic areas for the EIS, and licenses, permits or other approvals that may be required.

Methods for presenting your comments are described below:

- Via Email to: Chris Beale, Senior Planner, EIS project manager - [cbeale@puyallupwa.gov](mailto:cbeale@puyallupwa.gov)
- In writing to: Puyallup City Hall ATTN: Michelle Ochs, DPS Administrative Assistant, 333 S. Meridian, Puyallup, WA 98371
- Phone: (253) 841.5418 (written comments are preferred)

Date: 11/17/2020

SEPA Responsible Official:

  
Jeffrey S. Wilson, AICP

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## Appendix C – Public Notifications

### 2.3.1 EIS Scoping Process

The first step in the development of an EIS is called scoping. During the scoping process, agencies, tribes, local communities, organizations, and the public are invited to comment on factors that should be analyzed and considered in the EIS. Specifically, the process is intended to collect input on a reasonable range of alternatives; potentially affected resources and extent of analysis to determine impacts; measures to avoid, minimize, and mitigate impacts of the proposal; and cumulative impacts.

The City of Puyallup issued a DS on the proposed development on May 10, 2017. Preparation of an EIS was delayed due to appeals (subsequently withdrawn) of the DS by Pierce County and the Applicant, as well as litigation (now resolved) concerning the City's authority to issue a DS. Recognizing that significant time had passed since the initial scoping notice, the City issued a second notice of the 2017 DS on November 17, 2020, to invite the public, tribal governments, and agencies to renew and/or update comments on the scope of the EIS. An extended 30-day scoping comment period was issued for this Project to give the public additional time to provide comments. The scoping process was documented in the Knutson Farms Industrial Park Environmental Impact Statement Scoping Summary Report (Appendix A).

The City notified key stakeholders, interested parties, agencies, and the general public of the DS, the scoping comment period, and the ways in which they could provide comments using a variety of communication tools. Notifications included:

- Tacoma News Tribune Legal Notice (November 18, 2020)
- Email Listserv (November 17, 2020)
- Mailed notice to property owners within 500 feet of the Project site (November 23, 2020)
- City website (<https://www.cityofpuyallup.org/1115/Puyallup-Valley-Warehouse-Development>)
- Project website (online open house; <https://www.knutsonfarmseis.org>) launched on November 17, 2020
- Social media posts (Facebook; November 17 and 23; December 8 and 15, 2020)

The key issues identified during scoping and a summary of the scoping process are documented in the Knutson Farms Industrial Park Environmental Impact Statement Scoping Summary Report (Appendix A). Key comment topics received during scoping included the Project objective; Project description; alternatives; geology/soils; surface water; groundwater; plants and animals; land use; recreation and aesthetics; air quality and greenhouse gases; transportation; health and safety; public services and utilities; cultural resources; noise; social elements; mitigation; and permitting. The comments received were used in developing the scope of the analysis of this EIS.

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## **Appendix D: Tribes and Governments**

The following is a list of Tribes and government organizations who submitted comments during the scoping period.

### **Tribes**

Muckleshoot Indian Tribe Fisheries Division

Puyallup Tribe - Historic Preservation Department

Squaxin Island Tribe - Cultural Resource Department

Nisqually Indian Tribe – Tribal Historic Preservation Officers Department

### **Federal**

None

### **State**

Washington Department of Archaeology and Historic Preservation

Washington Department of Ecology

### **Local**

Pierce County - Planning and Public Works