



King County  
Department of Permitting and  
Environmental Review 35030  
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Applicant's responses are  
inserted in ***bold blue italics*** after  
each comment. 11/5/18

April 23, 2018

Karen Deal  
Lakeside Industries  
PO Box 7016  
Issaquah, WA 98027

RE: Maple Valley Asphalt Facility KC File GRDE17-0069

Dear Ms. Deal:

King County Department of Permitting and Environmental Review (DPER) staff reviewed the proposed asphalt plant project and have the following comments:

A. Wetland, Stream and Wildlife Corridor:

The King County Wetland Scientist reviewed the Stream and Wetland Report prepared by The Watershed Company, dated February 24, 2017, and performed a field visit on February 2<sup>nd</sup> 2018. Enclosed, please see her evaluation of the site's streams and wetlands. She has requested the following to complete the assessment of the proposed asphalt plant on the site:

1. Revise the critical areas report to evaluate Streams A and B in more detail to see if the presumption of salmonid use is valid, including topography, drainage basin size, and other criteria in the Rule and WAC. If either stream can be presumed to support salmonid fish, then its buffer width shall be 165 feet.
2. Provide a rating form as justification for buffer width for Wetland D.
3. Evaluate the site for wildlife habitat conservation areas in KCC 21A.24.382 and wildlife habitat network in KCC 21A.24.386

*See attached "Response to DPER Comments" prepared by The Watershed Company, dated 8/27/18*

If you have any questions regarding the wetland, stream or wildlife corridor, please contact Laura Casey at [laura.casey@kingcounty.gov](mailto:laura.casey@kingcounty.gov) or (206) 477-0368.

B. Traffic impacts and Road Standards

The site has a direct access to SR 169 a state highway. Washington State Department of Transportation has reviewed the Traffic Report prepared by TENW prepared June 19, 2017 and has the following comments:

1. Please include the intersections at SR 169/SE Jones Rd and SR 169 / 154<sup>th</sup> Pl SE/152<sup>nd</sup> Ave SE in the analysis so we can determine the extent of impacts based on vehicular trip thresholds, LOS thresholds, crash history, existing and future turning movements, etc. as defined in the Developer Services Manual, Chapter 4, Pan 1.
2. Based on the previous comment, a revised TIA may require further analysis of operational impacts to other access connection and intersections, including the SR 169/SE Jones Rd intersection and SR 169/154<sup>th</sup> Pl SE/152<sup>nd</sup> Ave SE intersection. If so, please include an analysis and results from Trafficware Synchro and SimTraffic. Provide average vehicular movement delay and 95<sup>th</sup> percentile queuing results based on an average of five simulation runs. Include in the results the 95<sup>th</sup> percentile queue length in order to determine impacts.
- 3 Per WSDOT Design Manual 320.10(1), please provide methods and assumptions section. Please describe why the ITE trip generation is not appropriate and provide quantitative evidence. Please provide a discussion and quantitative reasoning for why the national Trip Generation Manual data might not be appropriate for this application per the Trip Generation handbook, 3rd Edition, Section 9.3.
4. For the applicant provided estimated trip generation, please provide methods and baseline data used for trip generation. Please include this in the methods and assumptions section.
5. Please consider collecting trip generation information from other facilities of similar size in the Puget Sound region and use that data to calculate trip generation values for this specific site. Please use the collected data to derive an estimated trip generation rate per the Trip Generation handbook, 3rd Edition, Section 9.3. If you do not choose to collect data, the most appropriate ITE LUC would be to use the General Light Industrial LUC 110 for daily and AM/PM peak-hour trip generation.
6. Please provide the anticipated opening year of the proposed center. Please use the future year to calculate opening year trips.
7. Please confirm if SU-30 is the predominant large vehicle size that will be using the facility. The required ISD might be underestimated. Please clarify why the values from Design Manual chapter 1340 were not used.
8. Please verify if reduction in deceleration area coming from the east has been analyzed as there is some conceit.
9. Please change the SR 169 classification from rural principal arterial to urban principal arterial in the Frontage and Right-of-Way section. WSDOT classifies SR 169 as urban.

*See attached "Response to Transportation Comments" prepared by TENW, dated 11/2/2018*

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C. Drainage Review KCSWDM:

Enclosed, please see Comments from Amanda Reeck, project's site engineer. Drainage plan and the TIR must be revised to reflect the entire project. If the project to be phased, It must be clearly

shown compliance with the King County Surface Water Design Manual. The following will be

required:

1. A revised drainage plan as discussed in the attached comments by Ms. Reeck
2. A revised and complete Technical Information Report (TIR).

*Revised Drainage Plans and a complete TIR are included within the Site Engineering Plan (SEP) submittal package prepared in response to this letter.*

Amanda Reeck can be reached at [amanda.reeck@kingcounty.gov](mailto:amanda.reeck@kingcounty.gov) or 206-263-5783.

D. The State Environmental Policy Act (SEPA) Review:

Although the building permit for construction of the asphalt plant has not been submitted due to the moratorium, the SEPA review will be conducted for entire project. Unless the scope of the project is changed, the following should be provided so that the full impact of the project can be assessed:

1. A noise study shall be prepared by a qualified acoustics consultant to show the projected noise from the proposed asphalt plant. The study should identify the typical equipment used in the facility and their locations on the site. The study should evaluate any projected noise impact from the development site on nearby properties and the residential and recreational uses nearby. The study should provide recommendations to mitigate any noise exceeding the King County Noise Code (12.86). *Ramboll US Corp has prepared a Noise Assessment report for the project, copies of which are included in the Site Engineering Plan submittal package prepared in response to this letter.*
2. A conceptual development plan must show compliance with the King County Code Parking (21A.18) and landscaping (21A.16) requirements. *Our review of 21A.16.030.C.4 indicates that landscaping requirements are applicable to "mineral extraction and processing" under industrial uses, but not "asphalt/concrete mixtures and block". Pursuant to 21A.16.030.F, unlisted uses are not subject to landscaping requirements. However, a conceptual landscape plan is included in the Site Engineering Plan package. Also, a conceptual, dimensioned parking plan is provided.*
3. DPER will recommend additional mitigation measures to reduce the development's impacts and enhance the site's degraded critical areas buffers. This should include the full restoration of the onsite stream, wetland buffers and wildlife corridor along the north portion of the west property line. The impacted buffer area will be within Water District 90's 10-year recharge area. Restoration of the degraded buffer will enhance



4. water quality and mitigate potential impacts on both surface and ground water.  
*See attached "Response to DPER Comments" prepared by The Watershed Company, dated 8/27/18*
5. We received multiple comments from members of public concerning air quality and odor from the proposed asphalt plant. For this, we have contacted the Puget Sound Clean Air Agency for comments regarding potential odor and other air quality impacts from the proposed project. The agency commented that it will review your proposal once you apply for a permit with them and evaluate the plant under the agency's New Source Review Program for compliance with emissions and criteria pollutants, I recommend that you start this process earlier or at the same time you are ready to submit your application for a building permit. We would like to receive an assessment of their review based on the plant components, design and chemicals used. Additionally, we would like to see mitigation measures addressing any potential air quality impacts including odor.

*The asphalt plant to be relocated and operated on the site was issued an Order of Approval for Notice of Construction No. 11175 by PSCAA on November 7, 2016. The plant is registered with PSCAA as a portable plant (Registration No. 14103) with current installation address listed as 18808 SE 256<sup>th</sup> St, Covington, WA. In accordance with PSCAA Regulation I, Section 6.03(b)(3), a Notice of Construction application and Order of Approval are not required for relocation of portable batch plants for which an Order of Approval has been previously issued by the Agency provided a complete notification is filed with the Agency. Lakeside will submit the proper notifications to PSCAA prior to relocating to 18825 SE Renton-Maple Valley Road, Renton. In addition, Lakeside will submit notification to PSCAA of plans to install additional silo loadout fugitive emission collection and controls to mitigate odor concerns expressed during public comment. Lakeside will require that all trucks leaving the site with asphalt have covered loads. These controls are for odor mitigation and not necessary for compliance with emission limitations.*

6. Our office has received comments regarding impacts from the proposed plants on area ground water and the nearby Cedar River. The checklist must address this issue and provide an evaluation of any potential impact on ground water and Cedar River's health and water quality.

*This is addressed in the Revised Critical Area Assessment (CAA) prepared by AESI, dated 10/02/18, which is included in the Site Engineering Plan submittal package prepared in response to this letter. (see pages 17-19 of that document)*

E. Current operation on the site

It appears that the site is presently used as a material processing facility. Although this use is allowed in Industrial (I) zone, no permit has been obtained to operate such facility. This operation must end and a grading permit be applied for to allow this use. Please provide a narrative about the current operation being conducted on the site and its future plans.

*Please refer to Lakeside Industries letter to Holly Sawin dated June 14, 2018 and Ms. Sawin's email response dated July 12, 2018. (Copies attached).*

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*The code enforcement case will be closed to permit GRDE17-0069 when final approvals are issued.*

The following are required to be provided by July 27, 2018:

1. Six copies of a revised plan set including grading, drainage and site improvement plans reflecting items discussed above.
2. Ten copies of a revised ECL addressing issues above.
3. 6 copies of requested studies.
4. Electronic copies of the requested information.

I can be reached at (206) 477-0375 or \_\_\_\_\_ if you have any questions.

Sincerely,



Fereshteh Dehkordi, Project Manager  
Resource Product Line

Enclosures

Cc: Ty Peterson, Resource Product Line Manager  
Steve Bottheim, KC DPER Senior Geologist  
Laura Casey, KC DPER Environmental Scientist III - Ecologist  
Amanda Reeck KC DPER Engineer  
Robert Eichelsdoerfer, Traffic Engineer, KCDOT



## King County

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April 17, 2018

TO: Fereshteh Dehkordi, Project/Program Manager III

FM: Amanda L. Reeck, Engineer III

RE: Preliminary Engineering/Drainage/Site Review Comments,  
GRDE17-0069, Maple Valley Asphalt Plant Clearing/Grading Permit Application,  
Parcel 192306-9026

Lakeside Industries, Inc. submitted a materials for a grading permit application (GRDE17-0069, MAPLE VALLEY ASPHALT PLANT CLEARING/GRADING) proposing to remove contaminated soil, to grade the property, and to provide compliance for previous code enforcement on parcel 192306-9026. The applicant also submitted documents related to the SEPA review process for the overall future Maple Valley Asphalt Plant project. King County Department of Permitting and Environmental Review (DPER) engineering staff began an initial review of the submitted materials in the subsequent months and visited the site on February 7, 2018.

Additional information is needed to continue the site development and engineering/drainage reviews of the application materials. These comments are preliminary in nature; detailed review comments will be provided once a more complete set of application material is available. The grading permit application cannot be considered complete until a revised TIR and revised plans are submitted.

It is my understanding that the proposed grading permit is for a version of the work shown on sheet C2 of 3. However, the draft Technical Information Report (TIR) and drainage plan submitted were based on a version of the future concept shown on Sheet C3 of 3. The work for which the grading permit application was submitted must be made distinguishable from future work or plans. DPER understands that some items in the TIR way have been provided for the purposes of facilitating SEPA review of the overall project proposal or perhaps for the benefit of the applicant, such that another TIR won't need to be prepared for a future phase, but the specifics of what is being proposed for approval at this time needs to be clear.

For the purposes of providing feedback on the submitted materials, I will call the work to be permitted under this grading permit the "current phase work." My comments for the applicant and their engineer are below:

### General Comments

1. The current phase work needs to be shown on the site plan and clearly delineated. The TIR needs to address all nine Core Requirements and five Special Requirements. Even the absolute minimum amount of work depicted on sheet C2 would require a drainage review/approval based on engineering plans and a TIR. Future phases can be addressed in the TIR but they need to be



separate from the portions of the TIR that address current phase work. Future work can also be shown on the site plan as long as it too is clearly distinguishable from the current phase work. The TIR needs to clearly address project phasing so that a drainage review can be completed for the grading permit. *The project is not being phased. We are amending the current Grading Permit application with a Site Engineering Plan (SEP) application. The SEP will address the work initially contemplated with GRDE 17-0069 as well as all of the site improvements associated with development of the asphalt plant.*

2. For detailed information on submittal requirements for engineering design plans as part of a permit application, see SWDM Chapter 2. The applicant must submit a site improvement plan in accordance with SWDM Section 2.3.1.2 that shows how the drainage will be addressed for current phase work. Provide plans and profiles for all construction to be completed under this grading permit, including required elements as described on SWDM pages 2-24 through 2-26. To avoid confusion, the drainage plan sheet should show only the drainage facilities, devices, and conveyances for the current phase work. If the applicant wishes to show future phases, then future phases could be shown on separate sheets. Proposed contours must be shown for any work intended to be included in the clearing/grading permit (i.e. all work intended to be evaluated as part of the drainage review). Anticipated limits of work for the grading permit should be depicted (even if they are approximations with the exact extent to be determined based on conditions encountered in the field). Facility and BMP details must be provided for all construction to be approved, including items listed on SWDM page 2-26. Additional guidance on submittal requirements for grading permits can be found in UCC 16.82.060. *OK*
3. To avoid confusion, the TIR must address all Core and Special Requirements for the current phase work separate from future phases. The drainage plans for the current phase work need to stand on their own, and drainage requirements for current phase work cannot be deferred to future phases. Future phase work included in the TIR for the benefit of the applicant will be reviewed by the County when a permit application is made for the future phase, and these comments do not address all information in the current draft TIR related to the future concept. *The updated TIR addresses all Core and Special Requirements for the project as one phase.*
4. In some portions of the SEPA documentation, the current phase work is described only as removal of contaminated soil and backfill with clean soils while, at other times, the current phase work is described as also including landscaping work or grading activities necessary for future construction of the asphalt plant and accessory structures. Please clarify the amount of disturbed areas necessary for, existing impervious surfaces affected by, and new/replaced impervious surfaces created by the project site for current phase work. Plans should indicate whether the current phase proposes rough grading of the future development area, landscaping/planting, and/or construction of stormwater facilities. *The current plans indicate the work initially contemplated with GRDE 17-0069 as well as all of the site improvements associated with development of the asphalt plant. Disturbed, existing and proposed new/replaced imperious areas are identified on the SEP plans and TIR.*
5. The project boundary shown in the "Upstream Basin Exhibit" doesn't match the limits of clearing/work limits shown on page C2 of 3 on the full size plan set or the project boundary/Basin A, shown on the existing conditions exhibit. Where exact work limits are yet to be determined based on conditions encountered in the field, square footage calculations for the maximum assumed extent of affected areas should be used for the purposes of applying drainage review thresholds. The work limits and project site should include work necessary to address any agreement reached with the neighboring property owner to correct trespass issues on parcel number 1923069016. *Per agreement with the Neighbor, disturbed offsite property will be restored with native vegetation by the Applicant, under separate permit (if required).*



6. If portions of the proposed upstream area are being converted to landscaped areas or restored to previous conditions, then that work needs to be included in the "project site" area as "land disturbing activity" because it will result in a change in the existing soil cover and/or existing soil topography. If the proposed pervious condition of this area after completion of the current phase work will not increase surface runoff from existing conditions, then, for the purposes of applying drainage review thresholds, it should be called something other than "new pervious surface" to avoid confusion with the SWDM definition of new pervious surfaces. *Understood.*
7. Show the location of the proposed septic system on the drainage plans. *No onsite disposal system is proposed at this time. Office waste water will be plumbed to a buried 10,000 gal holding tank. This tank will serviced regularly in accordance with a King County Health Department permit.*
8. Please review the descriptions of TIR Section 4 and TIR Section 5 on pages 2-14 through 2-16 in SWDM Section 2.3.1.1, the applicable Core and Special Requirements in SWDM Chapter 1, and the design criteria and other applicable requirements from the appropriate sections of SWDM Chapters 4, 5, and 6 to ensure that TIR Section 4 and TIR Section 5 address all the necessary items, including required narrative, sketches, and supporting documentation. The standardized format described for these TIR sections can be used as guidance to organize all the required elements. *Descriptions for TIR Section 4 and 5 as outlined in the SWDM have been followed in the updated/expanded TIR.*
9. The "Developed Conditions" subsection of the TIR is not complete unless there are supporting plans, details, and sections sufficient to evaluate whether the proposed system meets design criteria from the 2016 SWDM. These should be shown in the site improvement plan set as necessary according to the requirements discussed in SWDM Chapter 2. *Understood. Additional plans, details and sections are incorporated in both SEP plans and TIR*
10. List other required approvals/permits in Section 7 of the TIR and note any requirements of those permits that may affect the drainage plan. For example, based on current information about the overall project, it seems the project requires a NPDES Construction Stormwater General Permit (CSWGP), a NPDES Sand and Gravel General Permit, Health approval for septic, well decommissioning, and a PSCAA permit. There may also be requirements related to Code Enforcement or work completed under the previous Demolition Permit that may need to be noted here. *This information is now included in the TIR*
11. The grading permit may need to include additional details of how the applicant proposes to address issues related to compliance for previous code enforcement cases on the parcel. For example, if work will occur in critical areas buffers to remove unpermitted stockpiles or demolition debris, it should be depicted on the site plans and addressed in the TIR. Information about restoration of the buffers to pervious conditions in accordance with KCC 16.82.100.G.1 or proposed planting with native vegetation to meet critical areas requirements or to provide SEPA mitigation is not clearly shown in the TIR or on the plan sheets, so site development (clearing/grading code) and drainage requirements applicable to such work cannot be clearly evaluated at this time. If work will be occurring under this permit in the buffers, how are the code requirements for that work being addressed? Are SWDM requirements for those previously disturbed areas where work will be occurring appropriately addressed, by incorporating those areas as part of the "project site," TDA, and targeted surfaces as appropriate?  
*Please refer to Lakeside Industries letter to Holly Sawin dated June 14, 2018 and Ms. Sawin's email response dated July 12, 2018. (Copies attached). Work proposed within Critical Areas buffers is depicted on the SEP plans, which include Mitigation plans prepared by Watershed. The plans show enhancement of the Critical Areas and include mitigation for prior encroachments into the Critical Areas by previous land owners and tenants. Drainage requirements related to this mitigation work are addressed in the TIR.*



12. Update the "TIR Worksheet" to include additional relevant items such as the DPER permit number(s), Shoreline Management review if needed, NPDES permits, Flood Hazard Certificate for unmapped floodplains associated with streams, corrected revision dates, Category 1 and 2 CARAs, wildlife network/corridor, high groundwater table, Sole Source Aquifer, wellhead protection areas/one-year time of travel for the Group A well, LID feasibility, proposed SEPA conditions, flow control BMPs, spill control facility, required maintenance log, required financial guarantees/liability, type of oil/water separator proposed, any required covenants/easements, any structural analysis related to the steep slopes, etc. *The TIR has been updated and expanded to include these items directly or to reference elements that are part of accompanying studies by others.*
13. The initial engineering/drainage review completed by DPER staff doesn't focus on the Environmental Checklist provided for the SEPA review. Keep in mind that changes made to the project phasing, overall concept, plans, or TIR to meet the engineering/drainage review requirements way need to be reflected in any revisions to the SEPA documentation that have been requested by other reviewers. *Understood*

#### Core Requirement #1: Discharge at the Natural Location

14. Core Requirement #1 details under what conditions concentrated water can be allowed to discharge (outfall). If offsite flows are currently flowing onto or across the project site and are currently leaving the site as sheet flows or by natural dispersion, then any of those flows that are proposed to be collected on the site or bypassed around the site via conveyance must meet described in Core Requirement #1 under "Discharge Requirements" (p. 1-25). The TIR must discuss whether the bypass conveyances, drainage facilities, and flow control BMPs have the potential to create impacts related to the landslide, steep slope, and erosion hazard areas adjacent to the project site. *Understood.*

#### Core Requirement #2: Offsite Analysis

15. Core Requirement #2 requires an offsite analysis meeting the requirements of SWDM Section 1.2.2 and as described on SWDM pages 2-10 through 2-14, including both a downstream analysis and study of upstream areas tributary the proposed project area. *Both downstream analysis and study of upstream areas tributary to the project are described. See also Flood Hazard Assessment for additional detail for basins tributary to onsite streams/wetlands.*
16. Critical areas (wetlands, streams, steep slopes, OHWM of river, erosion hazard areas, seismic hazard areas, etc.) should be shown on the offsite analysis map (offsite drainage exhibit). *Critical areas are depicted on the map or referenced in attached studies prepared by others.*
17. The upstream area as relevant to the discussion of the required offsite analysis area may be different from the upstream/offsite tributary basin as discussed for the purposes of hydrologic modelling and sizing/analysis of facilities, BMPs, or conveyance. Additional clarification regarding the delineation of the upstream tributary areas would be helpful in the report and figures, maps, plans. Some of the plans refer to "Basin B" as an offsite tributary area and a small bypass area to describe a portion of the "project site" and target areas that drains directly to the ditch along SR 169. Other exhibits and portions of the report discuss a different 9.03 acre "upstream pervious area," including both existing pervious surfaces and proposed pervious surfaces, which way or way not also be bypassed around the proposed site, flow control facilities, and water quality facilities. Consistent and clear naming, labelling, and discussion of these areas under both the existing and proposed conditions will improve the clarity of the report. *Existing basin areas have been clarified.*

18. The existing upstream area shown on the "Upstream Basin Exhibit" is not consistent with the description of the upstream basin provided in TIR Section 3.2, which references this exhibit, and the way that the mitigated land use of the "Upstream Basin" was modelled in WWHM. If new conveyances are proposed to intercept flows from all or a portion of the "upstream" areas for bypass around the site to the natural discharge location, they need to be discussed in the TIR and depicted on the drainage plan. See SWDM Sections 1.2.3.2.E and 1.2.3.2.F for further information on the bypass of runoff from target and non-target surfaces. The decision about whether or not any contributing areas are bypassed around the site or the facilities will also need to be discussed as part of Core Requirement #3 and #4 and accurately reflected in the WWHM model. *Basin areas have been recalculated and made consistent throughout the text; bypass areas and target status are clearly identified.*
19. The ownership at the location of the existing outfall for the project is unclear; examine Core Requirement #6 to determine whether a grant of easement is required where the existing concrete culvert outfalls to parcel (192306UNKN) if that property isn't publicly owned. *This culvert will no longer see developed project flows. Runoff from disturbed targeted areas will be disposed of onsite via infiltration. Emergency overflow drainage will outfall to the existing culvert to the east that discharges into property owned by King County.*
20. For the offsite analysis, show the study area boundaries on the "Offsite Drainage Exhibit;" show streams A, B, and C, and the wetlands on the map. Also, ensure that the extent of the soils map is expanded to include information on downstream areas included in the offsite analysis and any upstream areas that affect the hydrologic modelling for the project (include any offsite drainage area tributary to the project site and provide information on the drainage system upstream to a distance sufficient to preclude any backwater effects). *Study area boundaries are shown. Soils map has been expanded.*
21. Once the discussion of upstream, offsite, and bypass areas has been clarified in the report and on the relevant plans/figures, please verify for Core Requirements #1 and #2, whether any portion of the site currently flows to the wetlands or streams A, B, or C. *No portion of the developed site flows into the critical areas.*
22. There is a discrepancy between various sources as to whether all or a portion of the site is in the one-year time-of-travel (TOT) wellhead protection area (WHPA), five-year TOT WHPA, or ten-year TOT WHPA for the Water District 90 Group A wells located northwest of the site. Please clarify and include this information in the TIR and on plans as necessary (TIR Section 3--offsite analysis, TIR Section 6--special studies, and/or other portions of the report where groundwater protection may be relevant, such as for WQ or lining requirements). *WHPA TOTs have been clarified. Impermeable linings are provided where untreated drainage is in contact with soil.*

#### Core Requirement #3: Flow Control Facilities

23. Core Requirement #3 requires Level 2 Flow Control to mitigate for new impervious surfaces, new pervious surfaces, and replaced impervious surfaces that are identified as target surfaces and includes a requirement related to bypass of runoff from non-target surfaces. The TIR does not clearly address the distinction between target surfaces and non-target surfaces, and the way in which areas referred to in the TIR as upstream, offsite, and/or bypass areas both inside and outside of the project site boundaries are addressed in the model is unclear. *Targeted vs non targeted surfaces have been clarified. Mitigation for flow control is no longer proposed. Stormwater is being disposed of onsite via infiltration.*
24. The proposed conditions figure in Section 4 of the TIR needs to include information regarding the upstream offsite basins that will flow onto the project site or show how those areas will be bypassed around the project. Where is the proposed ditch discussed on page 4-6 to convey



upstream runoff around the project improvements? Also, on the existing and proposed conditions plans, include other relevant critical areas buffers (as discussed in the geological critical areas assessment) in addition to the wetland/stream buffers and shoreline jurisdiction boundaries. The proposed conditions may need to include areas in the critical area buffers where work will occur for proposed conversion of existing impervious surfaces to pervious conditions. *Basin areas have been recalculated and made consistent throughout the text; bypass areas, conveyances and target status are clearly identified.*

25. Please provide an illustration with topo/contours that more clearly shows the boundaries of all four basins that are described for developed conditions. Currently multiple figures must be compared to determine how the measured areas used for Basin A, Basin B, Bypass Basin/Developed Conditions Bypass, and Upstream Basin may have been calculated. *Combined basin map has been provided.*
26. For hydrologic modelling, the assumed constructed stormwater wetland/pond surface area should be included as an impervious surface in the mitigated land use basin. *Pond is no longer proposed.*
27. There is an error on pages 4-5 and 4-7 regarding the applicable land classifications for the existing and developed upstream basin. The forested portions of that area are "Steep," not "Flat." The offsite upstream area is also not all forested, which will be important to keep in mind when sizing any required bypass conveyance. *Land classifications have been revised.*  
Address whether the predevelopment, historic, soil conditions for the portions of the site mapped as NRCS "urban land" unit are better represented by till or outwash. This is related to the selection of "C, Forest" versus "A/B, Forest" for the land use classification in WWHM modelling inputs. *This is addressed on page 7 of AESI's Subsurface Exploration, Infiltration Testing, Design Infiltration Rate, and Groundwater Mounding Analysis report, which is included in the SEP submittal package.*
28. Selection of land use classification and area calculations used in WWHM for upstream areas that are tributary to the project site may need to be updated based on Tasks 1 and 2 of the offsite analysis. *Understood.*
29. It appears the existing 100-year developed peak flow rate from the upstream areas not targeted for mitigation could be greater than 50% of the 100-year undetained developed peak flows for the areas that must be mitigated, and, if so, a bypass must be designed that meets the criteria of SWDM Section 1.2.3.2.F. Show the bypass on the plans, provide details and specifications as needed, and discuss how the requirements of Section 1.2.3.2.F are being met. *Bypass flows and Mitigation Trade areas and requirements have been addressed; conveyance details are provided in the SEP.*
30. Include the electronic files for the WWHM2012 modelling. *OK*
31. The bottom area calculated using WWHM for the detention portion of the pond is very different from the stormwater wetland surface areas. The plans and details should show the relationship between these areas and how the difference will be addressed in the design (planting requirements, pond geometry, etc.). Use the TIR narrative to highlight relevant portions of the supporting calculations, explain how the attached calculations and modelling output were used in the facility design, and clarify the relationship between the design of the flow control portion and water quality portion of the combined facility. *Pond is no longer proposed.*
32. Orifice 2 and Orifice 3 on the discharge structure for the detention portion of the pond aren't on the riser. Demonstrate that the riser dimensions and orifice diameters/elevations used for the WWHM modelling meet the SWDM requirements and criteria. The flow restrictor (and its outlet) for combined detention and stormwater wetland facilities shall meet the requirements for detention ponds. Provide details/sections as necessary to illustrate how the design meets the criteria in Section 5.1.4.2, and the "Inlet and Outlet" criteria described on page 6-100 and 6-77. *Pond with flow restrictor riser is no longer proposed.*

Core Requirement #4: Conveyance System

33. Core Requirement #4 requires analysis, design, and construction that meets SWDM requirements for all new conveyance system elements, existing onsite conveyance systems that will experience a change in flow characteristics, and existing offsite conveyance systems that will be used for direct discharge. Drainage review cannot be completed without the conveyance system analysis and design, including all information required for TIR Section 5. Understood. *Conveyance calculations are provided in the TIR*
34. Spill control provisions apply; see SWDM Section 1.2.4.3.G. Ensure that the design, specifications, and details in the planset meet the applicable SWDM criteria and requirements from Section 4.2.1.1 and that the relevant information is discussed in the TIR. *Spill control is addressed in the SEP (FROP-T in flow splitter, submerged outlet in presettling vault), and discussed in the CWSPP portion of the TIR.*
35. In groundwater protection areas, liners are required for conveyances handling untreated water that is in direct contact with the soil, unless the existing soil has an initial infiltration rate of less than 2.4 inches per hour or the soil suitability criteria for groundwater protection given in SWDM Chapter 5, Section 5.2.1 is met. Provide liners for new conveyances in compliance with SWDM Section 1.2.4.3.H, or provide information documenting that the soils in which the conveyances are located meet the required criteria. Ensure that the design, specifications, and details in the plan set meet the applicable SWDM criteria and requirements from Section 6.2.4 and that the relevant information is discussed in the TIR. *A compacted till liner, meeting SWDM criteria, is specified for all conveyances/treatment facilities in direct contact with soil.*

Core Requirement #5: Erosion and Sediment Control

36. Core Requirement #5 requires that erosion and sediment control (ESC) measures and stormwater pollution prevention and spill control (SWPPS) measures appropriate to the project site be implemented through a comprehensive Construction Stormwater Pollution Prevention (CSWPP) plan. Section 8 of the TIR is key to the current phase work proposed under the grading permit and must be provided in the next TIR submittal for the grading permit. *Understood. A CSWPP is provided.*
38. An NPDES Construction Stormwater General Permit (CSWGP) is required because the proposal is a Common Plan of Development > 1 acre, even if the initial grading permit/removal of contaminated soil is kept under 1 acre, but the CSWPP plan, including the ESC plan, SWPPS plan, and CSWPP report, as described in the SWDM and Appendix D, must still be approved by DPER for the grading permit. Obtaining the NPDES Construction Stormwater General Permit does not excuse a project from the County requirements for CSWPP. See SWDM Section 1.2.5, Section 2.3.1, and pages D-115 to D-116. *Understood.*
39. The TESC plan provided on Sheet C2 needs to be accompanied by all other required CSWPP elements (narrative and plan). Sheet C2 is missing many of the required elements (see Section 2.3.1.3 and other guidance in the SWDM and Appendix D). *See SEP for new TESC plan. Narrative for updated plan is included as part of CSWPP.*
40. If there will be more than one configuration of the TESC plan for the current phase work that goes beyond adaptive management of the project, then, that should be reflected in the CWSPP's two component plans. However, there does need to be an ESC plan that is specific to this current phase work. To avoid confusion, the TESC plans for future phases should either not be shown in the engineering plans (including TIR) or shown on separate sheets that are clearly marked as not for use for this permit. *The project is not being phased – only one configuration of TESC plan is provided.*



Core Requirement #6: Maintenance and Operations

41. Core Requirement #6 requires completion of Section 10 of the TIR because preparation of an operations and maintenance manual is required to address all privately maintained drainage facilities, except flow control BMPs. Furthermore, as described in SWDM Chapter 2, the manual should include information beyond only what is provided in Appendix A of the SWDM. A drainage facility declaration of covenant and grant of easement must be recorded before any permit is approved. See page 1-66 and 2-19 for general requirements related to Core Requirement #6, and be sure to also address any specific operations and maintenance considerations related to the design criteria for the selected facilities/BMPs. Address maintenance specifications for privately maintained flow control BMPs in the site's declaration of covenant and grant of easement. *A maintenance and operations guidance is provided for all privately maintained facilities. A declaration of covenant and grant of easement will be provided prior to permit issuance.*

Core Requirement #7: Financial Guarantees and Liability

42. Core Requirement #7 needs to be addressed, and this should be reflected on the TIR Summary Sheet. Drainage facilities constructed for this project must comply with the financial guarantee requirements (i.e. the drainage facilities and site stabilization guarantee, which does apply to privately maintained/operated facilities). Section 9 of the TIR is required, including the bond quantities worksheet, facility summary sheet(s), and any required declaration of covenant/grant of easement for review and approval by DPER prior to recording. If the current phase work will not require any facilities and associated financial guarantees, then, the TIR should clearly state why, under the 2016 SWDM, in the engineer's opinion, that is the case. *Required financial guarantee documents including bond quantity worksheet, facility summary sheet and declaration of covenant/grant of easement will be provided for DPER review.*

Core Requirement #8: Water Quality

43. Core Requirement #8 requires the Enhanced Basic Water Quality Menu for Target Surfaces in the TDA because more than 50% of the runoff draining to the proposed WQ facility is from a commercial/industrial land use. In areas where removal of soil will be occurring or where surfaces will be otherwise modified as part of the current phase work, the TIR should clearly identify whether or not these areas are target surfaces for Core Requirement #8 and why. If water quality exemptions or exceptions apply to the current phase work, the TIR must clearly state which apply, why they apply, and what requirements apply in place of the Enhanced Basic WQ menu. If the WQ facility will not be built as part of the current phase work, the TIR must clearly explain why the facility requirement does not yet apply. The current TIR is not clear about whether the proposed facilities are intended to be constructed under the current phase work and whether the facilities are required for the current phase work, based on the amount of pollution-generating surfaces targeted for treatment under the grading permit (see SWDM pages 1-73 - 1-74). Surfaces are considered pollution-generating if subject to vehicular use (regularly used by motor vehicles, including recurring use of more than one routine vehicle access per week), industrial activities, or storage of erodible or leachable materials/wastes/chemicals. Proposed new landscaped areas are considered new pollution generating pervious surfaces, even if they are not considered "new pervious surfaces." See SWDM definitions for more details. *As previously stated, all runoff from targeted areas will be collected and disposed of via infiltration onsite. Prior to infiltration, runoff will be collected in grass lined swales, conveyed through coalescing plate separators to a pre-settling vault and then pumped to a sand filter. Discharge from the sandfilter will gravity drain to a StormTech infiltration gallery for disposal.*

44. Clarify how you used the WWHM2012 data to support use of a required wetpool storage volume of 12,929 cubic-feet (0.2968 acre-feet), as noted on page 4-8 of the TIR and at the beginning of the wetland design spreadsheet/summary. The Water Quality BMP Flow and Volume for 'POC #1, shown on the last page in the "LKSD 17-0530 Wetpond Sizing" report, is 0.9881 acre-feet (43,042 cf), which does not match the value of 0.2968 acre-feet (12,929 cf) that was used as the initial input into your "Stormwater Wetland Design" spreadsheet. *Modeling input and output has changed with elimination of the pond. See new hydrologic analysis and modeling results associated with full infiltration solution.*
45. Provide details and cross sections with elevations of the proposed facility so that the elevation differences and depths can be checked for compliance with both the detention pond criteria and stormwater wetland criteria as outlined in Section 6.4.3, Section 5.1.1.1, Section 6.4.4, Section 5.1.4.2, Figure 5.1.1.B, and Figure 6.4.3.A, as well as the modified/clarified design criteria for Combined Detention and Stormwater Wetland listed on SWDM pages 6-100 and 6-101. *Elevations and detailed cross sections are provided in the SEP for each stormwater facility.*
46. Liners are required for the conveyance system, water quality facility, and detention facility as outlined in SWDM Section 6.2.4 for both groundwater protection and to ensure the necessary permanent pools and wet conditions. Provide details on how the design complies with criteria in Section 6.2.4 and on page 6-94. The project site is in a groundwater protection area; lining is required to the two-year live storage elevation for combined facilities. *A compacted fill liner, meeting SWDM criteria, is specified for all conveyances/treatment facilities in direct contact with soil.*
47. For the inlet to the stormwater wetland, spill control must be provided as described on page 6-94 and as detailed in Section 4.2.1.1. *A stormwater wetland is no longer proposed.*
48. Ensure that the design, specifications, and details in the plan set for all water quality elements of the project meet the applicable SWDM criteria and requirements and that the relevant information is discussed in the TIR. Use the TIR narrative to as needed to provide clarification. *All treatment facilities have been designed in accordance with SWDM criteria, and are discussed in the TIR.*

#### Core Requirement #9: Flow Control BMPs

49. Core Requirement #9 requires that this project meet the LID Performance Standard. Since the project does not fully meet the criteria for the Direct Discharge exemption that would exclude all or some of the project site from the LID Performance Standard (as is the focus of discussion in Section 2 and Section 4 of the current draft of the TIR); Section 4 of the TIR should address how the project can be designed to meet the LID Performance Standard and how the project complies with the other criteria for Core Requirement #9. The feasibility of other options beyond simply providing a Level 2 Flow Control Facility must be discussed. Could flows from some portion of the site, or some portion of the target surfaces, be infiltrated or fully dispersed? If the project cannot meet the LID Performance Standard, a drainage adjustment may be required. *The LID Performance Standard is not applicable since runoff from all targeted areas is being fully infiltrated.*
50. If it was determined by the designing engineer that the LID Performance Standard couldn't be met based only on the calculated size of a detention pond or a combined wetpond, then the TIR may need to discuss the feasibility of flow control BMP options that are more likely to satisfy the LID Performance standard, such as full dispersion or infiltration. A PIT test should be used to determine infiltration rates if the feasibility of infiltrative facilities/BMPs is related to low infiltration rates. If other site characteristics were determining factors for selection of a facility that cannot meet the LID Performance Standard, then the TIR narrative should provide a statement as to why the other options were not feasible in the narrative, and any necessary supporting documentation should be clearly referenced and included with the TIR (calculations,



special study, geotech report). If the project cannot comply with Core Requirement #9, a drainage adjustment may be required. *A PIT test confirmed excellent infiltration capacity and ongoing groundwater monitoring and mounding analysis performed by AESI indicate sufficient separation from groundwater. Full infiltration is feasible. No drainage adjustment will be necessary.*

- 51. Ensure that the LID report prints in a legible format. *OK*
- 52. Address maintenance specifications for privately maintained flow control BMPs in the site's declaration of covenant and grant of easement. *Maintenance specification for privately maintained infiltration gallery will be provided for DPER review.*

Special Requirement #1: Other Adopted Area-Specific Requirements

- 53. As part of the Cedar River Basin, this project is in the Mainstem subarea of the 1997 Lower Cedar River Basin Plan, and, as summarized in Section 2 of the current TIR, Special Requirement #1 would not impose additional requirements at this particular site beyond what is required under the 2016 SWDM. Therefore, no further information is required regarding this special requirement. *Acknowledged.*

Special Requirement #2: Flood Hazard Area Delineation

- 54. Special Requirement #2 relates to both mapped FEMA floodplains and unmapped flood hazard areas. There are unmapped flood hazard areas associated with the streams/wetlands that need to be addressed (Special Requirement #2, Floodplain/Floodway Delineation and SWDM Section 4.4.1). A completed Flood Hazard Certificate (FHC) also needs to be submitted addressing the unmapped flood hazard area on the site and any potential work that may be occurring in the floodplain of the streams/wetlands. *A Flood Hazard Assessment and FHC has been prepared for the unmapped streams/wetlands by DEA and is included in the SEP submittal.*

Special Requirement #3: Flood Protection Facilities

- 55. Special Requirement #3 doesn't apply to this project unless the proposed project relies on one of the existing Cedar River flood protection facilities (revetments/levees). However, if, in the engineer's judgement, the project relies on protection from the existing revetment, then, provide information on how the project complies with Special Requirement #3. Make a note in the TIR worksheet regarding the applicability of this requirement. *Inapplicability has been addressed by AESI in the Revised Critical Area Assessment, included in the SEP submittal. (see page 21)*

Special Requirement #4: Source Control

- 56. Special Requirement #4 requires implementation of water quality source controls in accordance with King County Stormwater Pollution Prevention Manual and KCC 9.12. Applicable structural source control measures shall apply to the entire site containing the project, and all applicable structural source control measures shall be shown on the site improvement plans submitted for engineering review and approval. Special Requirement #4 may need to be discussed in more detail than the current summary with accompanying activity sheets provided in Section 2 of the TIR. Additional discussion can be included in Section 4 or Section 8 of the TIR as appropriate. Proposed structural source controls should be shown on the plans. Recommendations in the memo from the WLRD Science and Technical Support Section and in the critical area assessment by Associated Earth Sciences rely on an assumption that a

comprehensive source control plan, including a SWPPS plan and spill control plan, will be prepared. The project requires a commercial site development permit, and, according to the SWDM definitions, this is considered an industrial site. If some of the source controls are not required during or following the grading phase, and therefore will not be constructed under the current work phase, then they should be discussed separately from any structural source controls that may be required as part of the current work phase. *Source control measures including structural controls are addressed in the CSWPP plan included with the TIR.*

#### Special Requirement #5: Oil Control

57. Special requirement #5 requires use of oil control options from the high-use menu in SWDM Section 6.1.5 for the proposed future use because the asphalt plant meets the SWDM definition of a high use site. If the project is considered a redevelopment project, the current phase work appears to result in new plus replaced pollution generating impervious surfaces of 5,000 square feet or more at an existing high use site. Section 2.2.5 on Page 2-5 of the TIR states that additional details related to the Oil Control requirement will be discussed in Section 4, but Section 4 of the TIR does not provide information on the type of oil/water separator proposed for the site or how the separator will meet the requirements and criteria in SWDM Section 6.6.2. The oil/water separator needs to be shown on the drainage plan and in the appropriate profiles and details. Some oil control facility options have special maintenance considerations that will need to also be addressed under Core Requirement #6 and in TIR Section 10. If the current phase work requires oil control, then, the Oil/Water Separator Operations and Maintenance Guidelines referenced in the Table of Contents List of Supplemental Information must be provided with the next revision to the TIR. If the current phase work will not require oil control, then, the TIR should clearly state why, in the engineer's opinion, that is the case. *Two coalescing plate oil-water separators will be employed for oil control. The units will be sized for tributary water quality flows; excess flows will bypass. Details are provided in the SEP and sizing calculations are provided in the TIR.*

If the applicant and their engineer have any questions regarding the above comments, they can contact me at 206-263-5783 or by e-mail at [AReeck@kingcounty.gov](mailto:AReeck@kingcounty.gov).





King County  
Department of Permitting  
and Environmental Review  
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Snoqualmie, WA 98065-9266  
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March 5, 2018

TO: Fereshteh Dehkordi, Project/Program Manager III

FM: Laura Casey, Environmental Scientist III – Ecologist

RE: GRDE17-0069, Shorelines and Ecological Critical Areas Review Comments  
Parcel 192306-9026, Lakeside Industries Restoration Grading Permit

We visited the site on February 7, 2018. At the time of our site visit, buildings were being actively demolished in the vicinity of the southwest wetlands. Some of the large piles of organic material previously present in aerial photographs were gone, but something organic had been mixed with gravel and spread throughout much of the lower area of the property. While we were there, a large truck arrived and offloaded new beauty bark onto an area that already had a huge pile of bark. There were no erosion controls in place, and evidence of sedimentation from the site onto the State Route 169 right-of-way.

As noted previously, a narrow portion of the property adjacent to the highway is within 200 feet of the ordinary high water mark of the Cedar River, in Rural shoreline environment. Asphalt processing is regulated as a Mineral Resource land use in KCC 21A.08.090. Mineral uses as defined in KCC 21A.08.090 are prohibited in the Rural shoreline environment per the Table of Shoreline Uses in KCC 21A.25.100. Access to the site should be revised to be located outside of shoreline jurisdiction.

The applicant provided a Stream and Wetland Report by The Watershed Company, dated February 24, 2017. The site plan depicts several wetlands and a stream on the property in the vicinity of the proposed development.

Wetlands A and B are correctly identified and rated. A is Category IV with a 50-foot buffer; B is Category III with an 80-foot buffer. Their northern buffers are completely disturbed from prior development on the property, including an ecology block structure. The southern buffers are vegetated with shrubs and blackberries. The Report identified a couple of marginal wetland areas near the sheds north of Wetland A. The sheds have been demolished and large piles of concrete and other debris were located in that area, so I could not evaluate them. Wetland C

onsite appears to be an old excavated stormwater pond that now functions as a wetland. It is connected to a much larger forested wetland offsite to the west, and is correctly identified and rated as Category II with a 150-foot buffer. Wetland D is located upslope in an area of dense blackberry outside of the developed portion of the site. I did not look for this wetland, and it is not identified in the Wetland Report. The "right-of-way" wetland is correctly delineated and rated as Category II with a 100-foot buffer. The wetland buffer widths are correctly identified in the Report based on the location outside of the Urban Growth Boundary and the high impact land use.

Stream A flows down the slope and onto the western edge of the site, where it joins with Stream B. The channel for Stream A is a four to eight feet wide, and the buffers are vegetated until it reaches the confluence with Stream B. The Report states the channel gradient for Stream A is approximately 20%, but there is no topographic data to support this. Stream B flows out of Wetland A and joins with Stream A. The stream then flows through a deep created v-ditch, and the stream width is identified as six to ten feet wide with a nearly flat grade and silt substrate. The buffers on the north and east side of Stream B are completely disturbed, and in some cases buried beneath huge piles of concrete debris. Stream C is a narrow channel about one foot wide flowing out of blackberries and other shrubs on site, and would have a 65-foot buffer.

The County has a Public Rule regarding the Presumption of Salmonids in streams. This Rule is based on WAC 222-16-031(3)(b)(i) identified in email comments dated 11/16/17 from the Muckleshoot Tribe.

The County's Wildlife Network crosses this property in the northwestern corner. The wildlife network is required to maintain a width of 300 feet, and be not less than 150 feet wide at any point. Wildlife Habitat Conservation Areas have not been evaluated. They are protected habitat for certain species nesting, as identified in KCC 21A.24.382.

Please request that the applicant provide the following:

- Evaluate Streams A and B in more detail to see if the presumption of salmonid use is valid, including topography, drainage basin size, and other criteria in the Rule and WAC. If either stream can be presumed to support salmonid fish, then its buffer width will be 165 feet.
- Provide rating form as justification for buffer width for Wetland D.
- Evaluate the site for wildlife habitat conservation areas in KCC 21A.24.382 and wildlife habitat network in KCC 21A.24.386.



TO: Fereshteh Dehkordi, Project/Program Manager III  
RE: Lakeside Industries Restoration Grading Permit GRDE17-0069  
March 5, 2018  
Page 3

- The proposed development must be located outside of wetlands and aquatic areas and their buffers, and protected wildlife habitat network and wildlife habitat conservation areas.
- The access driveway(s) must be located to avoid shoreline jurisdiction. This may impact wetland buffers. If so, compensatory mitigation will be required.

*See attached "Response to DPER Comments" prepared by The Watershed Company, dated 8/27/18*

*As a Transportation Facility, the proposed property access and related SR 169 frontage improvements are permitted under KCC21A.25.280(A). Buffer impacts associated with roadway widening for acceleration/deceleration lanes, are addressed in Watershed's Critical Areas Report dated September 2018 (included with the SEP submittal package).*

## TECHNICAL MEMORANDUM



Date: August 27<sup>th</sup>, 2018  
To: Karen Deal, Lakeside Industries  
From: Sarah Sandstrom, Senior Fisheries Biologist, PWS  
Project Number: 160414  
Project Name: Maple Valley Asphalt Facility

### **Subject: Response to County DPER Comments**

This memorandum addresses responses to King County Department of Permitting and Environmental Review (DPER) comments pertaining to critical areas dated April 23, 2018. County comments are italicized and consultant responses are not italicized below.

#### *A. Wetland, Stream and Wildlife Corridor:*

1. *Revise the critical areas report to evaluate Streams A and B in more detail to see if the presumption of salmonid use is valid, including topography, drainage basin size, and other criteria in the Rule and WAC. If either stream can be presumed to support salmonid fish, then its buffer width shall be 165 feet.*

See updated description of Streams A and B in the Critical Areas Report. The buffer of Stream A was updated to 165 feet based on a presumption of fish use. Stream B is too steep to support fish use.

2. *Provide a rating form as justification for buffer width for Wetland D.*

Wetland D was re-visited and rated. Wetland DD was also identified as a separate wetland unit and rated in the Critical Areas Report. Rating forms for both wetlands are included with the Critical Areas Report.

3. *Evaluate the site for wildlife habitat conservation areas in KCC 21A.24.382 and wildlife habitat network in KCC21A.24.386*

Applicability of wildlife habitat conservation areas and the wildlife habitat network are addressed in the Critical Areas Report.

#### *D. The State Environmental Policy Act (SEPA) Review:*

3. *DPER will recommend additional mitigation measures to reduce the development's impacts and enhance the site's degraded critical areas buffers. This should include the full*



*restoration of the onsite stream, wetland buffers and wildlife corridor along the north portion of the west property line. The impacted buffer area will be within Water District 90's 10-year recharge area. Restoration of the degraded buffer will enhance water quality and mitigate potential impacts on both surface and ground water.*

The proposed mitigation plan includes restoration of all degraded onsite stream and wetland buffer areas. Among others, these areas encompass the wildlife habitat network area in the northwest corner of the property. See mitigation plan and Critical Areas Report for more detail.

## TECHNICAL MEMORANDUM



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To: Karen Deal, Lakeside Industries  
From: Sarah Sandstrom, Senior Fisheries Biologist, PWS  
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See updated description of Streams A and B in the Critical Areas Report. The buffer of Stream A was updated to 165 feet based on a presumption of fish use. Stream B is too steep to support fish use.

2. *Provide a rating form as justification for buffer width for Wetland D.*

Wetland D was re-visited and rated. Wetland DD was also identified as a separate wetland unit and rated in the Critical Areas Report. Rating forms for both wetlands are included with the Critical Areas Report.

3. *Evaluate the site for wildlife habitat conservation areas in KCC 21A.24.382 and wildlife habitat network in KCC21A.24.386*

Applicability of wildlife habitat conservation areas and the wildlife habitat network are addressed in the Critical Areas Report.

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*restoration of the onsite stream, wetland buffers and wildlife corridor along the north portion of the west property line. The impacted buffer area will be within Water District 90's 10-year recharge area. Restoration of the degraded buffer will enhance water quality and mitigate potential impacts on both surface and ground water.*

The proposed mitigation plan includes restoration of all degraded onsite stream and wetland buffer areas. Among others, these areas encompass the wildlife habitat network area in the northwest corner of the property. See mitigation plan and Critical Areas Report for more detail.

## MEMORANDUM

**DATE:** November 2, 2018

**TO:** Fereshteh Dehkordi, King County  
Mann Sidhu, WSDOT

**FROM:** Jeff Schramm / Amy Wasserman  
TENW

**SUBJECT:** Response to Transportation Comments  
Lakeside Industries SR 169 Development (GRDE17-0069)  
TENW Project #5390

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This document provides responses to the transportation-related comments dated April 23, 2018 provided by WSDOT and the King County Department of Permitting and Environmental Review (DPER) (see Attachment A) in reference to the proposed Lakeside Industries SR 169 development. Responses to the transportation comments are provided below and are reflected in the Updated *Transportation Impact Analysis (TIA)* dated November 2, 2018.

*Comment #1. Please include the intersections at SR 169/SE Jones Road and SR 169 / 154th Place SE / 152nd Ave SE in the analysis so we can determine the extent of impacts based on vehicular trip thresholds, LOS thresholds, crash history, existing and future turning movements, etc. as defined in the Developer Services Manual, Chapter 4, Part 1.*

TENW Response:

The intersections of SR 169/SE Jones Road and SR 169/154<sup>th</sup> Place SE/152<sup>nd</sup> Ave SE have been included in the Updated *Transportation Impact Analysis* report dated November 2, 2018.

*Comment #2. Based on the previous comment, a revised TIA may require further analysis of operational impacts to other access connection and intersections, including the SR 169/SE Jones Road intersection and SR 169/154th Place SE/152nd Ave SE intersection. If so, please include an analysis and results from Trafficware Synchro and SimTraffic. Provide average vehicular movement delay and 95th percentile queuing results based on an average of five simulation runs. Include in the results the 95th percentile queue length in order to determine impacts.*

TENW Response:

Future year 2020 peak hour LOS analyses at the of SR 169/SE Jones Road and SR 169/154<sup>th</sup> Place SE/152<sup>nd</sup> Ave SE intersections were evaluated and documented in the Updated *Transportation Impact Analysis*; the analyses were based on *Synchro* (version 10.3) for overall intersection LOS and vehicular delay, and the average of five (5) *SimTraffic* (version 10.3) simulation runs for individual movement vehicular delay. Estimated future year 2020 peak hour 95<sup>th</sup>-percentile queue lengths without and with the proposed Lakeside SR 169 project were also documented in the Updated *Transportation Impact Analysis* based on the average of five (5) *SimTraffic* simulation runs.



*Comment #6. Please provide the anticipated opening year of the proposed center. Please use the future year to calculate opening year trips.*

TENW Response:

The anticipated opening year of the proposed Lakeside Industries project is 2020. Opening year project trips and future year analysis were based on year 2020 forecast traffic conditions, which are documented in the *Updated TIA* dated November 2, 2018.

*Comment #7. Please confirm if SU-30 is the predominant large vehicle size that will be using the facility. The required ISD might be underestimated. Please clarify why the values from Design Manual chapter 1340 were not used.*

TENW Response:

The sight distance evaluation has been revised in the Updated *Transportation Impact Analysis* to reflect a combination truck+trailer as the predominant large vehicle size that will be using the facility. Based on information received from the project Applicant, approximately 50 percent of the trucks are estimated to be single-unit trucks and the other 50 percent of the trucks are estimated to be combination truck+trailer. Therefore, evaluating sight distance based on a combination truck+trailer as the predominant large vehicle size should be considered a conservative assumption.

Exhibit 1340-3 in WSDOT *Design Manual* Chapter 1340.06 (Driveway Sight Distance) was not used to evaluate sight distance for the proposed Lakeside Industries access due to the fact that combination trucks will be using the access, and evaluation of intersection sight distance (ISD) based on *Design Manual* Chapter 13.10.15 provides a more conservative analysis of sight distance.

*Comment #8. Please verify if reduction in deceleration area coming from the east has been analyzed as there is some concern.*

TENW Response:

A deceleration lane consistent with WSDOT Design Manual Section 1310.03(4) and Exhibit 1310-13 is proposed, and has been provided in the August 2018 Northwest Region Channelization Plan submittal to WSDOT. The deceleration lane design (475' including taper) actually exceeds the requirements in Exhibit 1310-13 (425' including taper) for 50mph design/target speed.

*Comment #9. Please change the SR 169 classification from rural principal arterial to urban principal arterial in the Frontage and Right-of-Way section. WSDOT classifies SR 169 as urban.*

TENW Response:

The classification of SR 169 has been updated from rural principal arterial to urban principal arterial throughout the Updated *Transportation Impact Analysis* report.

cc: Felix Palisoc – WSDOT  
Karen Deal, Bill Dempsey – Lakeside Industries  
Glen DuBreuil, Jeff Haynie, P.E. – TENW

Attachment



P.O. Box 7016 / Issaquah, WA 98027  
ph: 425.313.2800 / lakesideindustries.com

June 14, 2018

Holly Sawin  
Department of Permitting and Environmental Review  
35030 SE Douglas Street, Suite 210  
Snoqualmie, WA 98065-9266

**RE: King County Code Violation Code Enforcement Case #ENFR18-0321**

Dear Holly:

Lakeside Industries, Inc. (Lakeside) received your code enforcement case letter dated May 11, 2018 for Sunset Materials violations of King County Code on the property located at 18825 SE Renton-Maple Valley Road, King County, Washington. The letter references the following violations: Import of over 100 cubic yards of materials, operation of a processing plant, and placement of demolition materials within critical areas and/or associated buffers without permits.

Lakeside purchased the subject property in July of 2016 at which time Sunset Materials was actively operating a demolition and landscape materials processing facility. Sunset Materials had been importing and processing materials within the existing impacted area of the site since 1997. Lakeside allowed Sunset Materials to continue their longstanding operations within the footprint of the existing and established material processing and sales yard. Sunset Materials has continued operating within the existing impacted area. Under its agreement with Lakeside, Sunset Materials agreed it was responsible for complying with all laws and permit requirements. Upon receiving your letter of May 11, 2018, we took prompt action, as described below, to remedy the situations detailed in your letter.

To correct the violations, you have requested that Sunset Materials cease import of materials by May 4, 2018. Sunset Materials ceased import of all materials on May 1, 2018. In addition, Lakeside directed Sunset Materials to cease all material processing on May 4, 2018. Upon inspection of the site on May 17, 2018, Sunset Materials was in the process of screening wood fiber material and loading the material into trucks for transport off-site. Sunset Materials apparently continued processing even though they were directed by Lakeside, and had agreed, to cease processing of materials on-site. Lakeside then directed Sunset Materials to immediately cease all processing activities and remove all stockpiles from the site by no later than June 30, 2018.



The code enforcement letter further requests Lakeside submit a complete commercial ABC permit pre-screen application by June 15, 2018 and submit a complete permit application (for removal of materials and restoration of critical areas) within 60 days of the commercial pre-screening meeting.

We would like to bring to your attention the currently active permitting process, initiated by Lakeside, that affects the subject property and specifically addresses the permit actions necessary to correct historical violations associated with import, processing, and placement of materials within critical areas. The following is a summary of the permit application currently under review by the Department of Permitting and Environmental Review.

On December 20, 2016, Lakeside was granted a Pre-application Meeting (PREA16-0193) to discuss the application process for redevelopment of the subject property. At that time, Lakeside was informed that there were two code enforcement cases that appeared to still be open for the site. The pre-application meeting notes state that there was "an open King County code enforcement case from 1997 to remediate the soils on-site which the applicant is now working voluntarily with WSDOE to address. Another case appears to be open regarding a fill violation with current user Sunset Materials (E02G0253)". During the meeting it was concluded that both cases would be resolved with the submittal and approval of a clearing and grading permit application.

On August 3, 2017, Lakeside submitted a complete clearing and grading permit application to King County (GRDE17-0069). The Application Acknowledgement specifically describes the application as "Proposing to remove contaminated soil and grade the property, also comply with code enforcement case ENFR17-0130 (DEMO17-0056, PREA16-0193)" (attached). The application included an evaluation of currently impacted critical areas and future buffer requirements necessary for the proposed development.

On August 31, 2017, the grading permit application was determined complete by King County. Public notifications were made on September 25, 2017 of a pending SEPA Determination.

King County has been actively performing a SEPA review of this project and has requested Lakeside submit additional information by July 27, 2018 necessary to facilitate the continued SEPA review. The additional information will include further review of critical areas and mitigation measures to reduce the proposed development's impacts and enhance the site's degraded critical areas buffers.

Holly Sawin  
Code Enforcement Case #ENFR18-0321  
June 14, 2018  
Page 3 of 3

Given the facts about historical and ongoing operations, historical enforcement cases, and King County's acknowledgement that existing permitting actions initiated by Lakeside will address all violations on the subject property, Lakeside proposes that submittal of a complete commercial ABC permit pre-screen application and associated permit applications is a redundant and excessive use of County resources.

Lakeside respectfully requests confirmation that Code Enforcement Case #ENFR18-0321 will be addressed through the currently active permit (GRDE17-0069) review and approval process.

If you have any questions or need additional information, please contact me at (425) 313-2660.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Deal", is written over the "Sincerely," text.

Karen Deal  
Environmental & Land Use Director

Enclosures

Cc: Ty Peterson, Resource Product Line Manager  
Sheryl Lux, Code Enforcement Product Line Manager





Department of Permitting  
and Environmental Review  
35030 SE Douglas St., Ste. 210  
Snoqualmie, WA 98065-9266  
206-296-6600 TTY Relay: 711

## ***Application Acknowledgement***

**An application has been received for the following:**

**Application Number:** GRDE17-0069

**Application Date:** 08/03/2017

**Applicant:**

LAKESIDE INDUSTRIES INC.  
KAREN DEAL  
PO BOX 7016  
ISSAQUAH, WA 98027

**Location:**

**Site Address:** 18825 SE RENTON MAPLE VALLEY RD 98058  
**Parcel:** 1923069026

**Permit Type:** Grading

**Title:** MAPLE VALLEY ASPHALT PLANT CLEARING/GRADING

**Description:** PROPOSING TO REMOVE CONTAMINATED SOIL AND GRADE THE  
PROPERTY, ALSO COMPLY WITH CODE ENFORCEMENT CASE ENFR17-0130  
(DEMO17-0056, PREA16-0193)

Questions regarding this permit application and the status can be directed to the Main  
Customer Service line at 206-296-6600. Permit application information can also be  
found using online permit research tools on the DPER web site at  
[www.kingcounty.gov/permits](http://www.kingcounty.gov/permits)

**Grading Permit # GRDE17-0069**

**Code Enforcement # ENFR17-0130**

**Pre-App # PREA16-0193**