



Community Development Department

Director: Lauren Prentice

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Submit to: planning@co.walla-walla.wa.us

https://www.co.walla-walla.wa.us/residents/community_development/index.php

FINAL DETERMINATION OF NON-SIGNIFICANCE (DNS)

File(s):	SEPA22-012/SDP22-001
Description of Proposal:	Construct a light industrial/distribution warehouse building with offices 201' x 496', approximately 104,000 square feet in area and a fleet service garage of 48' x 65', approximately 3,120 square feet in area.
Proponent:	SUNCAP PROPERTY GROUP attn Maxwell Mowry 1125 17TH ST, SUITE 800 DENVER CO, 80202
Owner:	PORT OF WALLA WALLA 310 A. ST WALLA WALLA WA, 99362
Location of Proposal:	The site is generally located at 2nd Avenue and Poplar Street in the Burbank Business Park (Lot 142, Burbank Business Park Binding Site Plan Amendment 4, AFN 2022-0669). The property is located within the Industrial/Business Park zoning district in the Burbank Urban Growth Area.

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2) (c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

The Determination of Non-Significance (DNS) is based on the project as proposed and reflected in the following:

- SEPA Checklist dated 3/21/2022 (SEPA22-012) with attachments:
 - Transportation Impact Analysis for Burbank BSP
 - Information on past cultural resources studies within development
 - General Inadvertent Discovery Plan (IDP)
- Site Plan dated 4/12/2022
- Revised Site Plan dated 7/7/2022
- Preliminary Plan Set dated 7/7/2022
- Site Development Permit Application (SDP22-001)
- Project Narrative Letter dated 4/11/2022

- Zoning Determination Letter dated 4/15/2022
- Memorandum by Joy Bader, Walla Walla County Public Works Department, dated 8/4/2022
- Letter from Paul Gonseth, P.E., Regional Planning Engineer, Washington State Department of Transportation dated 8/8/2022
- Letter from Sydney Hanson, Local Government Archaeologist, Washington State Department of Archaeology & Historic Preservation, dated 8/9/2022
- Letter from Department of Ecology, dated 8/10/2022
- Email from Fire District No. 5, dated 7/28/2022
- Emails from Paul Gerola (Port of Walla Walla) on cultural resources, dated 8/31/2022 and 9/1/2022 with one attachment:
 - Approval Decision from Walla Walla County’s Hearing Examiner approving the Port of Walla Walla Burbank Business Park Development Agreement, dated 11/2/2015

This DNS is issued after using the optional DNS process in WAC 197-11-355. **There is no further comment period on this DNS.**

The lead agency has determined that the requirements for environmental analysis, protection, and mitigation measures have been adequately addressed in the development regulations and comprehensive plan adopted under chapter 36.70A RCW, and in other applicable local, state or federal laws or rules, as provided by RCW 43.21C.240 and WAC 197-11-158. Our agency will not require any additional mitigation measures under SEPA.

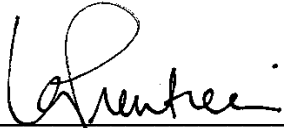
This DNS may be withdrawn at any time if the proposal is modified so that it is likely to have significant adverse environmental impacts (unless a non-exempt license has been issued if the proposal is a private project); if there is significant new information indicating, or on, a proposal’s probable significant adverse environmental impacts; or if the DNS was procured by misrepresentation or lack of material disclosure.

Lead Agency: Walla Walla County

Responsible official: Lauren Prentice, Community Development Director

Address: 310 W Poplar Street, Suite 200
 Walla Walla, WA 99362
 Phone: 509-524-2610
 Email: planning@co.walla-walla.wa.us


Issue Date: 9/15/2022

Signature:  _____ **Date:** 9/14/2022

Staff Contact: Jennifer Ballard, Senior Planner, 509-524-2626

You may appeal this determination, in writing, to the CDD no later than fourteen days from the date of issue. You should be prepared to make specific factual objections. Contact the CDD to read or ask

about the procedures for SEPA appeals and obtain details regarding submittals for appeals (including application forms and fees). Walla Walla County Code (WWCC) Chapter 14.11 outlines the County's appeal procedure.



Walla Walla County Community Development Department

310 W. Poplar Street, Suite 200, Walla Walla, WA 99362 / 509-524-2610 Main

File No. SEPA22-019

STATE ENVIRONMENTAL POLICY ACT (SEPA) Final Staff Evaluation Report for Environmental Checklist

This document is intended to supplement information in the applicant's submitted environmental checklist and also document some staff evaluation of the proposal. It is meant to serve as a supplement to the primary documents required by SEPA.

Date: 9/14/2022

Project Name: Burbank Distribution Center within Burbank Business Park

Proponent: SUNCAP PROPERTY GROUP attn Maxwell Mowry; 1125 17TH ST, SUITE 800'; DENVER CO, 80202

Description of Proposal: Construct a light industrial/distribution warehouse building with offices 201' x 496', approximately 104,000 square feet in area and a fleet service garage of 48' x 65', approximately 3,120 square feet in area.

Location of Proposal: The site is generally located at 2nd Avenue and Poplar Street in the Burbank Business Park (Lot 142, Burbank Business Park Binding Site Plan Amendment 4, AFN 2022-0669). The property is located within the Industrial/Business Park zoning district in the Burbank Urban Growth Area.

Zoning: Industrial Business Park (IBP)

Land Use Designation: Industrial

Conclusions: Based on the analysis herein, the proposal can be found to not have a probable significant adverse impact on the environment. Application materials, including the SEPA checklist, were sent to state and local agencies for review and comment during the Notice of Application comment period.

No public comments were received. Comments were submitted by several State and Local agencies, which will be discussed herein.

The County reserves the right to review any future revisions or alterations to the site or to the proposal in order to determine the environmental significance or non-significance of the project at that point in time.

Prepared by: Lauren Prentice, CDD Director, 509-524-2610

Reviewed project and environmental documents:

- SEPA Checklist dated 3/21/2022 (SEPA22-012) with attachments:
 - Transportation Impact Analysis for Burbank BSP

- Information on past cultural resources studies within development
- General Inadvertent Discovery Plan (IDP)
- Site Plan dated 4/12/2022
- Revised Site Plan dated 7/7/2022
- Preliminary Plan Set dated 7/7/2022
- Site Development Permit Application (SDP22-001)
- Project Narrative Letter dated 4/11/2022
- Zoning Determination Letter dated 4/15/2022

Agencies and organizations Notice of Application ODNs sent to:

- Walla Walla Valley Metropolitan Planning Organization (WVVMPO)
- Confederated Tribes of the Umatilla Indian Reservation (CTUIR)
- Walla Walla County Public Works Department
- Walla Walla County Building Official/Fire Marshal
- Walla Walla County Environmental Health
- Walla Walla County Sheriff
- Walla Walla County Fire District No. 5
- Washington State Department of Archaeology and Historic Preservation
- Washington State Department of Ecology, SEPA Register and Walla Walla Water Master
- Washington State Department of Fish and Wildlife
- Washington State Department of Health
- Washington State Department of Transportation
- Port of Walla Walla (also the property owner)

Received comment letters and agency correspondence:

- Memorandum by Joy Bader, Walla Walla County Public Works Department, dated 8/4/2022
- Letter from Paul Gonseth, P.E., Regional Planning Engineer, Washington State Department of Transportation dated 8/8/2022
- Letter from Sydney Hanson, Local Government Archaeologist, Washington State Department of Archaeology & Historic Preservation, dated 8/9/2022
- Letter from Department of Ecology, dated 8/10/2022
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A. Background

Project/Application History:

The County received a Preapplication meeting request on February 17, 2022. A meeting was held on March 23, 2022. County project review began with the submittal of an Environmental Checklist and Site Development Permit application on April 12, 2022.

A Notice of Incomplete Application was issued on April 21, 2022, notifying the applicant that a revised site plan would be required prior to final review. After miscellaneous emails and phone calls in May and June, a submittal addressing this request was received July 8, 2022, 78 days later, eighteen days after the 60-day deadline.

The application was determined to be complete for processing on July 22, 2022. The optional (integrated) SEPA process was used to review this proposal. A Notice of Application (ODNS) was issued on July 28, 2022, with a comment period ending on August 11, 2022.

7. The SEPA Checklist states that there are no plans for “future additions, expansion, or further activity...” but the revised site plan submitted in July shows a building expansion area of 20,000-square feet on the east side of the building.
8. Details regarding the environmental documents prepared by the Port of Walla Walla for the Business Park were not included in the submitted checklist. This project is located within a Business Park that has previously undergone phase SEPA environmental review.

The Port of Walla Walla undertook environmental review of the Burbank Business Park using a phased environmental review pursuant to WAC 197-11-060(5). The Port first conducted environmental review of the development of the Business Park when it entered into an Interlocal Agreement with the City of Pasco for the Sewer System, which was a preliminary step in the development of the Business Park. The Port issued a Determination of Non-significance (DNS) on February 23, 2012, prior to entering into an Interlocal Agreement with the City of Pasco.

On July 9, 2012, the Port issued a Mitigated Determination of Non-significance (MDNS) when it took action related to the construction of the transmission line for the sewer system. That MDNS assessed the broader development proposal including: the division and development of lots through the binding site plan process and the construction of business park infrastructure, including construction of a sewer system. The Port subsequently completed an Addendum to the MDNS for more specific components of the sewer system on March 27, 2014.

10. The applicant has chosen to submit a Site Development Permit application, which is not required by the County for this project; this application is currently under review.

B. Environmental Elements

1. Earth

Generally concur with checklist. According to the Checklist, 85% of the site will be covered with impervious surfaces.

2. Air

Generally concur with checklist.

3. Water

Generally concur with checklist. The Walla Walla County Public Works Department submitted comments stating that all stormwater must be retained and infiltrated onsite, construction BMPs are required, and a comprehensive Stormwater Site Plan will be required prior to grading or building permit issuance as required by Walla Walla County Code Title 11.

4. Plants

Generally concur with checklist.

5. Animals

Generally concur with checklist.

6. Energy and natural resources

Generally concur with checklist.

7. Environmental Health

Generally concur with checklist.

8. Land and Shoreline Use

Generally concur with checklist.

h. The Checklist incorrectly states that no mapped critical areas are located within the site. The site is within a Critical Aquifer Recharge Area (CARA) (e.g. 10-year time-to-travel wellhead protection areas); a critical areas permit application and CARA Critical Areas Level 1 Hydrogeologic Assessment will be required prior to building permit issuance. A Level 1 assessment for another site/project was submitted, which cannot be used to fulfill the requirements of Chapter 18.08 for this project.

The property is also partially located within a mapped seismic hazard area with a moderate to high liquefaction susceptibility, but the project site is outside this area, so no additional review is required for this critical area.

9. Housing

Generally concur with checklist.

10. Aesthetics

Generally concur with checklist.

11. Light and Glare

Generally concur with checklist.

12. Recreation

Generally concur with checklist.

13. Historic and cultural preservation

No historic or cultural resources are known to exist within the project site, but the site is within an area with a high probability of encountering cultural resources. At the time of the Port's binding site plan (BSP) and Development Agreement applications for the Burbank Business Park, SEPA environmental review considered potential impacts to historic and cultural resources. A summary of previous cultural resources investigations and monitoring was provided with the SEPA Checklist.

The project site is located within the boundaries of the approved Burbank Business Park, within the project area that was considered by the County in review of the prior applications, and within the project area that was defined in the Port's 2012 SEPA MDNS and related environmental documents. The proposed use and development in the current applications are consistent with the County's zoning regulations and the previous SEPA review. This project application is within the timeframe of the Development Agreement and there is nothing in the submitted project documents that indicates that the previous environmental review was not

appropriate or should be revisited. The geographical boundaries of the project site are within the area shown in the 2012 SEPA documents. In short, this site was always planned to be fully developed with industrial uses and potential impacts to cultural resources from development of the site was considered in previous SEPA reviews. However, as noted by DAHP, inadvertent discovery procedures, the mitigation required by the prior MDNS is not a good detection method because it can result in costly construction delays and/or damage to the resource.

During the comment period on the Notice of Application ODNs, the County received comments from the Washington State Department of Archaeology & Historic Preservation (DAHP). DAHP recommended the following:

Our statewide predictive model indicates that there is a high probability of encountering cultural resources within the proposed project area; in fact, the proposed project area abuts the Lower Snake River Archaeological District, which encompasses numerous sites in the general area. Further, the scale of the proposed ground disturbing actions would destroy any archaeological resources present. While the proposed project area has been surveyed previously, there has been no subsurface investigation across the majority. Identification during construction is not a recommended detection method because inadvertent discoveries often result in costly construction delays and damage to the resource. Therefore, we recommend a professional archaeological survey of the project area be conducted and a report be produced prior to ground disturbing activities. This report should meet DAHP's [Standards for Cultural Resource Reporting](#).

The Port of Walla Walla, the property owner and the proponent of the Business Park, has responded to these comments, recommending that a cultural resources study is not warranted, nor should it be required because the project is consistent with the Development Agreement and prior environmental review.

A general Inadvertent Discovery Plan (IDP) for the Business Park was included with the SEPA Checklist. Prior to ground disturbance, the IDP should be revised to include project/site-specific contact information and distributed to contractors which was the only mitigation measure of the 2012 MDNS that related to cultural resources. The IDP fulfills compliance with the 2012 MDNS.

The Responsible Official generally agrees with the DAHP comments and recognizes that relying on identification during construction is not the best method for detecting cultural resources. The County would concur and recommend that a survey is completed so that project does not have to risk possible construction delays later, but this will not be required by the County. The County does not have codes or policies that require a survey and the prior SEPA decision for this development only required an IDP to mitigate impacts to cultural resources.

14. Transportation

Generally concur with checklist. The Public Works Department did not comment on transportation issues. The Washington State Department of Transportation (DOT) provided the following general comments on the proposal:

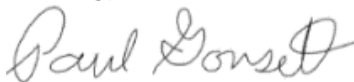
RE: SEPA22-012 – Burbank Distribution Center
US 12/SR 124 interchange vicinity

We have reviewed the proposed project and have the following comments.

The subject property is in the vicinity of the U.S. Highway 12 (US 12) and State Route 124 (SR 124) interchange. This interchange, including the ramp terminal roundabouts currently operate within acceptable safety and operational thresholds and it is to the benefit of the port, county and state to preserve this interchange's safety and efficiency.

Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding this letter, please contact Jacob Prilucik at (509) 577-1635.

Sincerely,



Paul Gonseth, P.E.
Region Planning Engineer

Trips: The checklist states on Page 11 that the project will generate 60 truck trips per day and 20 passenger vehicle trips per day. This is likely not accurate. It does not make sense that there would be only 20 passenger trips per day, yet they need 104 parking spaces. Generally, distribution uses run on three shifts so employee arrival and departures are often not during peak hours although arriving and departing delivery trucks do not follow shift hours and may occur during peak hours. County staff, who are not qualified traffic experts, did a rough calculation of peak hour trips based on the size of the building and the ITE Trip Generation Manual, 9th Generation. This resulted in an estimate of about 10 trips per AM peak hour and 12 trips per PM peak hour.

A Traffic Impact Analysis (TIA) was completed for the Business Park prior to the BSP and Development Agreement approvals. No site-specific TIA was completed. Neither County Public Works nor Washington State Department of Transportation requested a project-specific traffic review of any kind. The Development Agreement requires that when the number of trips within the development reaches 40% of the total anticipated trips, a new traffic review will be required. Based on the limited project information provided to the County, and lack of comments from WSDOT and County Public Works, it is assumed that this project alone will not move the development past the 40% threshold.

Parking: The checklist states on Page 11 that 90 truck/trailer parking stalls will be provided. The site plan shows 120 truck/trailer parking stalls plus approximately 30 additional truck/trailer stalls on the west property line in an "expansion" area. As stated in the Checklist, 104 passenger vehicle stalls will be provided.

15. Public Services

Generally concur with checklist. The site is served by the Walla Walla County Sheriff and Walla Walla County Fire District No. 5. Neither of these agencies responded to the Notice of Application ODNs.

16. Utilities

Generally concur with checklist.