

# Project Narrative

## Mid I-5 Industrial Park

### Trammell Crow, Portland Development Inc.

### 7/20/2022

#### Project location

The proposed project is located in Sections 12 and 13, Township 7N, Range 2W, WM, immediately west of Interstate 5 and south of State Highway 432, on Cowlitz County tax parcel numbers 24905 and 24385, in Kelso, Washington. See attached survey.

#### Site Owner, Applicant, and Contact

Site Owner	Applicant	Contact
Segale Properties LLC Mike Pruett 5811 Segale Park Dr. Tukwila, WA 98188 Phone: 206-396-4548 email: mpruett@segaleproperties.com	Trammell Crow Company Kirk Olsen 1300 SW Fifth Ave, Suite 3350 Portland, OR 97201 Phone: 503-946-4980 email: kolsen@trammellcrow.com	TRJ Planning Inc. Todd Johnson 1417 NW 102nd St. Vancouver, WA 98685 Phone: 360-310-9409 email: todd@trjplanning.com

#### Project Description

The Mid I-5 Industrial Park includes an 1,406,855 square foot (SF) industrial building, up to 55-feet in height, with approximately 20,000 SF of office space. The facility is planned to have 465 vehicle parking stalls, 541 trailer storage spaces, and 263 dock doors for truck loading and unloading. Site improvements will include connecting to existing water and sanitary sewer lines, construction of a sanitary sewer force main and pump station, and construction of a private road to Talley Way. Site development will include paving of all maneuvering areas, landscaping and site lighting, fencing, and stormwater collection, treatment and retention/infiltration facilities.

The site was previously approved for 725,000 SF of retail commercial center on April 12, 2010 (BSP 10-0001). There was also a development agreement signed in June of 2010 with the city to address transportation infrastructure improvements and I-5 interchange upgrades for the commercial retail center. Those approvals expired with the binding site plan on April 26, 2015. Transportation impacts assumed in the prior mitigation were 50,117 daily trips with a PM peak hour volume of 4,372 trips. The current proposal includes a transportation impact analysis prepared by SCJ Alliance in July of 2022. This study shows the proposed development, based

on an ITE use category of High-Cube Fulfillment Center Warehouse, will generate approximately 1,716 new PM peak hour trips at full buildout, which is significantly fewer trips than was approved previously.

The project will be developed in up to four (4) phases, with each phase including parking, maneuvering, loading and unloading, and trailer storage sufficient to support that phase. The minimum size of the first phase will be approximately 800,000 SF, and each additional phase will be no less than 200,000± SF. It is possible that multiple phases will be built at the same time. Timing of the phased construction will be based on market demand.

Users will be identified following the preliminary approval of the building. The industrial park will operate 24 hours a day.

## Existing Uses and Site Description

The site is generally flat with no existing uses on the site. The site has been used for dredge spoils stockpiling and disposal in the past. There are no adjacent land uses, due to the site's geographic location, with I-5, the BNSF railroad and WA State Route 532 as borders.

The site has adjacent drainage ditches and wetlands. Portions of the site on the northeast and southwest sides, within the ditches, are within the 100-year flood plain e, as well as the southwest portion, behind the building. However, the development area has been previously filled and is above the 100-year flood elevation. All areas proposed for development have been filled to be outside of the designated flood plain and no improvements are proposed within a flood plain. The proposed project avoids impacts to ditches and any critical areas surrounding the site. A small portion of the wetland buffer areas may be impacted and the proposed development will include mitigation for any buffer impacts.

## Applicable Approval Processes

The proposed industrial building and site uses require a Site Plan Review, SEPA and Critical Areas Review. Those applications are included in this submittal.

Kelso Municipal Code (KMC) 17.10.030 (Permit Classification Table) requires a Class 2 review for the SEPA and Critical Areas Permit. Per KMC Table 17.22.020, footnote 4, states that a class 2 review is required for buildings over 35 feet in height. Therefore, this application is subject to a Class 2 review.

KMC 17.10.050 requires a preapplication conference be conducted for Class 2 reviews. A preapplication conference was held for this project on June 6, 2022.

## Site Plan Approval Criteria

**KMC 17.10.130.C provides the criteria for approval of a site plan. Below are those criteria and responses on how those criteria are met:**

*C. The city may approve a proposed site plan in whole or in part, with or without conditions, if all of the following findings of fact can be made in an affirmative manner:*

*1. The project is consistent with the Kelso comprehensive plan and meets the requirements and intent of the Kelso Municipal Code, including the type of land use and the intensity/density of the proposed development.*

**Response:** The Light Industrial zone for this property was approved recently along with the comprehensive plan amendment to an Industrial designation, because the city found that this comprehensive plan designation and zoning better fit the requirements and intent of the Kelso Municipal code and Comprehensive Plan. The proposed industrial park is a permitted use in the Light Industrial zone and is within the allowable density and lot coverage for industrial uses.

*2. The physical location, size, and placement of the development on the site and the location of the proposed uses within the project minimize impacts to any critical resource or floodplain area to the greatest extent possible or are compatible with the character and intended development pattern of the surrounding properties.*

**Response:** The proposed development is consistent with the setbacks, coverage allowed, location of proposed uses, and density permitted in this zone, as shown in the Development Standards section below (KMC 17.22.020). The development of the site minimizes impacts to wetlands, flood plains, and wetland buffers on the site. This is documented in the attached reports provided with this application. Those reports are:

*Ecological Land Services, Inc. (ELS) 2022. Critical Areas Report for the Mid I-5 Industrial Park. July 7, 2022.*

*Ecological Land Services, Inc. (ELS) 2022. Mid I-5 Industrial Park Wetland Buffer Justification Memo. July 7, 2022.*

*Ecological Land Services, Inc. (ELS) 2022. Habitat Management and Buffer Enhancement Plan for the Mid I-5 Industrial Park. July 7, 2022.*

*3. The project makes adequate provisions for water supply, storm drainage, sanitary sewage disposal, emergency services, and environmental protection to ensure that the proposed project would not be detrimental to public health and safety.*

**Response:** The proposed development utilizes existing water and sanitary sewer infrastructure constructed and extended to the site, and immediate site vicinity, to serve a previously approved commercial development, which had a higher demand for water supply, sanitary sewage, and emergency services than the proposed industrial facility. Water and sanitary sewer mains for the site were sized to support 905,720 gallons/ day of sanitary sewer flow. According to the Skillings Connolly calculations performed for the previous application, the water service to the site provides 3075 GPM at 65 PSI residual and a static pressure of 74 PSI.

Through compliance with all applicable zoning requirements, development standards and environmental critical areas regulations, this project demonstrates the development would not be detrimental to public health and safety. To the contrary, the development of this site will stabilize a largely unvegetated site, with no access control, by developing the site and constructing a building, which will be occupied 24 hours a day and providing fencing and security to minimize criminal activities onsite.

*4. Public access and circulation including non-motorized access, as appropriate, are adequate to and on the site.*

**Response:** Improvements to the SR 432 interchange, Talley Way and associated traffic systems have been implemented based on the current land use of Commercial.

The existing transportation infrastructure was constructed to support a regional center with 30,117 average daily trips<sup>1</sup>

Water and sanitary sewer mains for the site were constructed to support 905,720 gallons/ day of Sanitary Sewer Flow<sup>2</sup>. According to the Skillings Connolly calculations performed for the previous application, the water service provides 3075 GPM at 65 PSI residual and a static pressure of 74 PSI.

These improvements are adequate to serve the proposed development.

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<sup>1</sup> *Madison Development Kelso Site, Final Traffic Impact Analysis Report, Revised September 15, 2008, Skillings Connolly Inc*

<sup>2</sup> *Sewer Flow Projections, Kelso Village land use application*

*5. Adequate setbacks and buffering have been provided. Any reduction to setbacks or buffer widths is the minimum necessary to allow for reasonable economic use of the lot and does not adversely impact the functional value of the critical resource area or adjoining land uses.*

**Response: No reductions to buffers or setbacks are proposed. The Critical areas impacts are minimized by limiting the development to the previously filled and graded portions of the site, with no proposed impacts to wetland buffers on the site.**

*6. The physical location, size, and placement of proposed structures on the site and the location of proposed uses within the project are compatible with and relate harmoniously to the surrounding area.*

**Response: The surrounding area is predominantly used for transportation, with SR 432 to the north, I-5 to the east and south, and a rail maintenance yard to the west. Rail lines extend to the north and south. There are no adjacent land uses developed. The physical location of the proposed development is selected to minimize impacts to the critical areas, and the size of the structure maximizes the utilization of the industrial land. Compatibility with the surrounding area criteria is met, since there are no existing uses adjacent to the site.**

*7. The project adequately mitigates impacts identified through the SEPA review process, if required.*

**Response: A SEPA review is required and a SEPA ECL is included in this application for use in the review of this project. This project will comply with this standard through the review process.**

*8. The project would not be detrimental to the public interest, health, safety, or general welfare.*

**Response: By providing an economic use of the site, which has been vacant, the proposal will increase tax revenues and provide for stabilization of previously un-stabilized soils and provide fencing and a people present 24 hours a day. All of these elements of the proposal increase public welfare, safety, and support the economic growth in the community which supports the public interest.**

Variation to the 35-Foot Height Standard

KMC 17.10.190 allows a variance to height if certain circumstances exist. Below are the approval criteria for a variance and responses to those criteria.

*C. Variances may be approved by the city based on a finding that such variance will not be contrary to the public interest and the comprehensive plan or where literal enforcement of the provisions of this title would result in undue hardship. A variance shall not be granted unless the city further finds that the applicant has demonstrated all of the following:*

*1. That special circumstances applicable to the subject property, including size, shape, topography, location or surroundings, do exist; and*

**Response:** The proposed development site is surrounded on all sides by rail, highway, and undeveloped wetland areas as well as some nearby land for future industrial development. The location and surroundings of this development minimize the need to strictly regulate heights for buildings because none of the uses surrounding this property would be impacted by a building that exceeds the height standard of the base zoning. In addition, the large scale of the property, approximately 117 acres, minimizes the impact of the building height due to the large area available for development. The size and scale, along with the location of the proposal, are all special circumstances that apply to this project and support a taller structure than what would be typically allowed in the base zone.

*2. That because of such special circumstances, strict application of this title would deprive the subject property of rights and privileges enjoyed by other properties in the vicinity under identical zoning district classification; and*

**Response:** Newly constructed, large-format, industrial facilities typically include internal clear heights that exceed 35 feet. This enables users to install internal cranes, construct mezzanine levels and store product more efficiently and is common in the I-5 corridor. The proposed facility is large (1+ million SF) and deep (650') and requires a commensurate internal clear height of at least 45 feet. Therefore, the need to include roof structure, insulating materials, and sufficient roof slope to promote effective roof drainage, the extra height is needed to provide the typical internal height for this type of building. Strict application of the height limitations provides no public benefit, as the property is surrounded by transportation facilities, and would significantly deprive the subject property of the ability to develop modern facility that is widely acceptable to various end-user companies.

*3. That the granting of the variance will not be materially detrimental to the public welfare or injurious to the property or improvements in the vicinity and zoning district classification in which the property is situated; and*

**Response:** As is stated above, the property is not adjacent to any existing land uses nor are adjacent properties likely to develop to any different uses other than some adjacent industrial development. The surrounding transportation routes isolate the development property from other properties in the vicinity. It is not likely to have any negative impact on public welfare or property improvements in the vicinity, because the development does not occur in proximity to any non-transportation use.

*4. That the special circumstances do not result from the actions of the applicant; and*

**Response:** The applicant had no control over the development of the surrounding roadways or the size and shape of the resulting parcel. These are the most notable special circumstances that support this requested increase in height.

*5. That the granting of a variance will be in harmony with the general purpose and intent of this title, the specific zoning district, and the comprehensive plan.*

**Response:** Granting this variance is specifically contemplated in the Light Industrial zone, which provides that the height limitation of 35 feet may be exceeded through a class 2 review. This proposal seeks to extend the height by 20 feet to a maximum height of 55 feet. This height extension is contemplated in the adopted code, which is in compliance with the comprehensive plan. The granting of this variance is in harmony with, and directed by, the general purpose and intent in the Light Industrial Zone and the comprehensive plan.

## Environmental Review

Chapter 17.14 of the Kelso Municipal Code defines the SEPA process for development applications. This project is not exempt from SEPA review but does not result in any significant environmental impact. The application includes the required SEPA Checklist with supporting studies for review through the SEPA process. The applicant hereby requests early notice if a determination of significance may be likely, as allowed under KMC 17.14.070.A.

## Zoning

The site is zoned LI (Light Industrial) in the City of Kelso. KMC 17.18.030.H. defines the light industrial zone as:

*H. Light Industrial Zone. The purpose of the light industrial (LI) zone is to provide opportunities for industrial activities involving manufacturing, processing, assembling, repairing, servicing or storage of goods or products as well as professional services and mixed-use development in a business park setting.*

This proposal is for a development of an industrial facility prior to an occupant/user being identified. The ultimate use of the building and site could be any of the allowed uses consistent with the purpose of the zone as defined above.

Table 17.18.040 allows a warehouse as a permitted (P) use in the Light industrial zone. None of the footnotes or other limitations listed apply to a warehouse use in the Light Industrial Zone.

## Development Standards

KMC 17.22.020 provides the dimensional, height and setback requirements for the Light Industrial Zone. Below is a table addressing those standards and showing how the proposal complies with the development standards in this section.

	Maximum Residential Density (du/acre)	Minimum Lot Width (feet)	Maximum Building Height (feet)	Setbacks				Maximum Lot Coverage with Impervious Surfaces
				Front (Feet)	Side Street (feet)	Side (feet)	Rear (feet)	
<i>LI req'd</i>		25	35 (4)	20	20	20 (1)	20 (1)	85%
<b>Proposal</b>	N/A	<b>More than 1,360 feet</b>	<b>55-allowed through a class 2 review (4)</b>	<b>20</b>	<b>&gt;100</b>	<b>48</b>	<b>&gt;100</b>	<b>Approximately 66%</b>

Required setbacks are met and are proposed to be landscaped to meet KMC 17.22.100 as addressed below and do not include impervious surfaces. Sight distance triangles are maintained at the access driveway and at all onsite circulation intersections.

KMC 17.22.080 limits the height of fencing to 8 feet in height in the Light Industrial Zone. Fences on this site will be compliant with code.



KMC 17.22.090 requires a clearing and grading permit for clearing and grading activities. A clearing and grading permit application will be included in the final construction plan review set for this project and will be approved to meet these standards through that review process. Grading is also addressed in the SEPA ECL submitted for review with this project. KMC 17.22.100 lists requirements for landscaping and Section 17.22.100.C. lists the general requirements for landscaping plans. The landscaping requirements are listed below with responses to each as they apply to this proposal. Section 2 below has a consolidated response and does not list all criteria for the landscape plan required by code.

C. All landscaping plans shall conform to the following general provisions:

*1. All plans must be prepared or approved by a landscape architect licensed by the state of Washington, a Washington certified nursery professional, or a Washington certified landscaper, unless waived by the city.*

**Response: In general, this section will be applicable to the final site plan review and approval through the construction plan review process. The current plans demonstrate that meeting the landscaping requirements are feasible for this development. The submitted site plan shows all proposed landscaped areas. These requirements for planting, low impact development and the placement of trees will apply to the construction plan review process and will be met through the approval process.**

KMC 17.22.110 provides the criteria for parking. The proposed development includes sufficient parking, with the ability to make adjustments if needed, to meet projected parking needs associated with the proposed uses of the building and phased improvements. See the attached Parking Supply Memo prepared by SCJ Alliance dated July 13, 2022. The proposal will include ADA accessible parking spaces to meet the ADA requirements for this site.

KMC 17.22.120 requires compliance with the City's NPDES Permit and the Western Washington Stormwater Manual prepared by the Washington State Department of Ecology. A stormwater Technical Information Report and plan is included in this application to demonstrate compliance with these standards.

KMC 17.22.150 (Airport safety overlay.) applies to projects within the boundaries of the airport overlay (AO) as shown on the official zoning map. Although near the airport, the project site is not within the Airport Safety Overlay as shown in the current zoning map.

KMC 17.22.210 regulates Signs. Signs for this project will be permitted through a separate building permit review process and will demonstrate compliance with this section through that process.

KMC 17.22.300 has performance standards for nonresidential uses in all zones. These performance standards are generally addressed as follows:

1. Noise.

a. No use in this district shall exceed the maximum environmental noise level, established by Chapter 173-60 WAC.

b. Noise levels of any sound source, when measured in the manner and locations prescribed in Chapter 173-60 WAC, shall not exceed the levels shown in the following table:

EDNA of Noise Source	EDNA of Receiving Property		
	Class A	Class B	Class C
Class A Residential	55 dBA	57 dBA	60 dBA
Class B Commercial	57 dBA	60 dBA	65 dBA
Class C Industrial	60 dBA	65 dBA	70 dBA

c. Between the hours of 10:00 p.m. and 7:00 a.m., the noise limitations of the foregoing table shall be reduced by ten dBA for receiving property within Class A EDNAs.

d. At any hour of the day or night, the applicable noise limitations in subsections B1a and b of this section may be exceeded for any receiving property by no more than:

i. Five dBA for a total of fifteen minutes in any one-hour period; or

ii. Ten dBA for a total of five minutes in any one-hour period; or

iii. Fifteen dBA for a total of one and one-half minutes in any one-hour period.

**Response: An August 2003 publication titled “Living with Noise” published by the Federal Highway Administration, written by Chris Corbiser, states “Levels of highway traffic noise typically range from 70 to 80 dB(A) at a distance of 15 meters (50 feet) from the highway” which exceeds the permissible noise levels in the table above. The surrounding uses all have a significantly higher noise level than what would be generated onsite and therefore, the proposed development meets or exceeds these standards.**

2. Light and Glare. Exterior lighting for all uses and signs shall be directed downward and otherwise arranged, shaded, screened, shielded, and of a design that results in the light being directed onto the site and of an intensity or brightness that does not reflect or cause glare onto any adjacent or nearby use or interfere with the safe operation of motor vehicles.

**Response: Proposed lighting will be directed downward and onto the site to minimize light and glare impacts to passing vehicles. The project, although surrounded by state highways and federal interstate highways, is more than ¼ mile, measured horizontally, from these roadways. It is unlikely that any standard industrial light in parking or maneuvering area would impact surrounding traffic.**

3. Ground Vibrations. No ground vibration other than that caused by highway vehicles or construction activity shall be permitted which is discernible, without instruments, at or beyond the property line for the use concerned.

**Response: No ground vibrations other than the surrounding highways and construction activities are proposed or contemplated for this industrial facility. This criterion is met.**

*4. Waste Storage and Disposal, Including Hazardous Waste. The storage or disposal of industrial waste shall be in compliance with the regulations and requirements of the Cowlitz County health district, the State Department of Ecology, Chapter 70.105 RCW as amended, and this code.*

**Response: Waste produced at this site will be limited to garbage and recycling. No waste materials from processes are contemplated or proposed with this development.**

*5. Air Quality Emissions. No use in this district shall produce emissions of smoke, dust and/or odors beyond the property boundary that may unreasonably interfere with any other property owners use and enjoyment of his/her property. In addition, all sources and emissions units are required to meet the emission and the ambient air quality standards specified in Chapter 173-400 WAC, and administered by the Southwest Washington Air Pollution Control Authority (SWAPCA), and shall apply to all air contaminants listed therein.*

**Response: No emissions are proposed other than typical emissions from highway trucks and construction machinery.**

*6. Ground and Soil Contamination. Materials used or produced in any manufacturing process shall be handled in such a manner as to prevent ground or soil pollution which destroys or endangers the support of natural vegetation or which may contaminate underground aquifers or other natural drainage systems.*

**Response: No materials used or produced in a manufacturing process are proposed or contemplated with this project.**

*7. Electrical Interference. Provisions must be made for necessary shielding or other preventive measures against interference caused by mechanical, electrical, or nuclear equipment uses or processes with electrical apparatus in nearby buildings or use areas.*

**Response: This proposal does not include any electrical devices that cause interference beyond localized interference from electrical transmission or lighting.**

*8. Fire and Explosive Hazards. The manufacture, use, processing or storage of flammable liquids or materials, liquids or gases that produce flammable or explosive vapors or gases shall be permitted in accordance with the regulations of the adopted International Fire Code and the International Building Code. A hazardous*

*materials impact analysis, conforming to the requirements of the Cowlitz 2 Fire District, shall be required to determine potential off-site impacts and mitigation precautions.*

**Response: This proposal does not include any manufacturing, use or processing of explosive hazards. The proposed industrial facility will be constructed on a speculative basis, before an occupant/use has been identified. The future user may store some chemical products and conduct bulk storage and distribution of products. If a future user proposes to store flammable liquids or materials, a hazardous materials impact analysis will be requested as required.**

## Environmentally Sensitive Areas Chapter 17.26

The proposed development occurs on a parcel that is designated with environmentally sensitive areas. The property includes floodplains, wetlands, and geologic hazard areas. Development is proposed on a previously filled and graded portion of the site which was elevated to a foot above the flood plain. The development area also avoids the wetlands and buffer areas on the site. For more information see the following studies included in this application:

- NV5, Geotechnical report, October 25, 2021
- Ecological Land Services, Inc. (ELS) 2022. Critical Areas Report for the Mid I-5 Industrial Park. January 20, 2022.
- Ecological Land Services, Inc. (ELS) 2022. Mid I-5 Industrial Park Wetland Buffer Justification Memo. July 7, 2022
- Ecological Land Services, Inc. (ELS) 2022. Habitat Management and Buffer Enhancement Plan for the Mid I-5 Industrial Park. July 7, 2022

## Building and Construction Chapter 17.50

The proposed building and site development plans will demonstrate compliance with chapter 17.50 of the KMC through a building permit review process prior to commencing building construction.

## Conclusion

As demonstrated in the responses above, and further supported by the plans and attached studies, documents, and materials, this proposal meets all of the applicable approval criteria and should be approved.