



October 15, 2021

CITY OF LYNDEN TECHNICAL REVIEW COMMITTEE

STAFF REPORT

Re: The application of Freeland and Associates, Inc. for a Conditional Use Permit Application.

CUP #21-03 Alliance Freeze Dry
FINDINGS, CONCLUSIONS, AND
RECOMMENDATION

I. APPLICATION SUMMARY AND RECOMMENDATIONS

Proposal: The request is for a Conditional Use Permit to allow the use of food processing to occur within the Industrial Business Zone (IBZ). The proposal details the construction of a 220,000 square foot facility which processes, and packages freeze-dried pet food.

Conditional Use Permit approval is also required to exceed building heights of more than 45 feet. The proposal includes a request to build a portion of the building to a height of 75-feet.

Recommendation: Staff recommends approval of the Conditional Use Permit (CUP), subject to the conditions of approval.

II. PRELIMINARY INFORMATION

Applicant: Tony Freeland, Freeland and Associates, Inc.

Property Owner: PeaceHealth

Property Location: 675 Redwood Road, Lynden WA

Parcel Number: 400224-037346 and 400224-037380

Legal Description: LOT 1 AND 2 WEST LYNDEN BUSINESS PARK SBSP NO. 1, RECORDED UNDER AUDITOR'S FILE NO. 2071000873, RECORDS OF WHATCOM COUNTY, WASHINGTON

Alliance Freeze Dry Conditional Use Permit – TRC Report

<u>Notice Information:</u>	Application Submitted:	August 16, 2021
	Notice of Application:	September 8, 2021
	Notice of SEPA determination:	September 22, 2021
	Notice of Hearing:	September 8, 2021
	Comment Period Ending:	September 22, 2021

SEPA Review: Lynden SEPA #21-15. Mitigated Determination of Non-Significance (MDNS) issued September 20, 2021

Authorizing Codes, Policies, and Plans:

- LMC Chapter 16 Environmental Policy
- LMC Chapter 17 Land Development
 - LMC Chapter 17.09, Review and Approval Process
 - LMC Chapter 17.09.040, Planning Commission Review and Recommendation
- LMC Chapter 18 Subdivisions
- LMC Chapter 19 Zoning Code
 - LMC Chapter 19.25, Industrial Zone
 - LMC Chapter 19.25.030, Primary Permitted Uses
 - LMC Chapter 19.25.040,
 - LMC Chapter 19.25.050, Performance Standards
 - LMC Chapter 19.25.060, Required Bulk Regulations, Height Limits and Setbacks
 - LMC 19.25.070, Landscaping requirements
 - LMC Chapter 19.49, Conditional Use Permits
 - LMC Chapter 19.49.020, Standards and Criteria for Granting a Conditional Use Permit
 - LMC Chapter 19.49.040 Special Conditions for the Approval of a Conditional Use Permit within the West Lynden Sub Area.
- International Building Code
- City of Lynden Manual for Engineering Design and Development Standards
- RCW 197-11-340(2)

III. PROJECT DESCRIPTION

The request is for a conditional use permit to allow the use of food processing to occur within the Industrial Business Zone (IBZ). The proposal details the construction of a 220,000 square foot facility which produces and packages freeze-dried pet food. The processing plant site is approximately 9.93 acres and located at the southeast corner of

the intersection of Main Street and Berthusen Road. The parcel has frontage on, and is addressed from Redwood Road.

The proposal also includes a request to build a portion of the building to 75-foot height. Most of the building will fall below the permitted maximum height of 45 feet. A warehousing section of the building, about 7.5% of the footprint, is proposed to reach up to 75 feet in height to allow for the mechanized stacking of product.

IV. PUBLIC NOTICE AND COMMENT

Notice of Application: Formal legal notice for this application was published in the Lynden Tribune on September 8, 2021

Notice of SEPA determination: Formal notice of the SEPA Determination (MDNS) was published in the Lynden Tribune on September 22, 2021 and mailed to neighbors within 300 ft of the property. The comment period for the SEPA determination expired on October 6, 2021.

Public Comment Received:

The comments are summarized, with City response, below:

- 1) Thomas VanBerkum - Submitted a letter (included in the PC package) citing concerns related to the height of the proposed building and its impact on views, storm drainage challenges in this area, and other impacts including additional traffic, odors, noise and light.
- 2) Greg Dykstra - Email (included in the PC package) citing concerns related to storm water runoff, odors that would be created from the processing plant, the noise associated with the facility, and the potential for views to be blocked by the 75 foot tall portion of the building.
- 3) Randy Korthus – Letter submitted (included in the PC package) which details concerns related to drainage along Berthusen Road and the West Lynden Business Park, building height and consistency with other buildings in the area, and snow drifting on the west side of the proposed building negatively affecting Berthusen Road.

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City's response: The subject property is slated for industrial development. The proposed facility is a large-scale industrial building that will be highly visible from Main Street and Berthusen Road. However, landscape buffers and street trees along public road frontages are required. Architecture includes the screening of roof-top mechanical equipment.

Buildings in this zoning category are permitted to reach heights of 45 feet and most of the building will be within this height limitation with the top of wall reaching about 41 feet. Only 7.5% of the building footprint will be constructed to a 75-foot height. The extra height portion is designed to create an efficient warehousing system within the building. This taller portion will not cast a shadow on adjoining ag or residential properties as it is separated by wide street right-of-ways. The scale of the site and surrounding properties will accommodate this additional height without significant impact on views.

Similar requests for additional height have been granted to Preferred Freezer on Curt Mayberry Drive (although granted, this additional height was not utilized by the freezer), as well as on two structures for Darigold on Depot Road. For reference the Darigold tower at Main and Depot is 145 feet tall.

Lighting on the site can and will be directed downward and shielded so as not to cast light on surrounding properties. The applicant has agreed that site lighting will be shielded to avoid light trespass.

Noise and odor impacts are subject to performance standards referenced in LMC 19.25. Adjacent agriculturally zoned properties are not subject to these same standards.

Regarding snow closures. Travel lanes on Berthusen Road are about 75 feet away from the western wall of the Alliance facility. Alliance will be motivated to keep snow from drifting over the access lane along the western façade in order to maintain day-to-day function.

The Conditional Use Permit is not focused on stormwater review. However, it should be noted that the stormwater management plan for this site will be held to the strict standard of the Western Washington Stormwater Manual. It will be designed to accommodate the stormwater that falls on this site and properly address downstream impacts. Development here will include a storm water management system where there is currently none in place.

V. ANALYSIS AND CONSISTENCY WITH REGULATIONS

The application is reviewed in accordance with the LMC 19.49.020 and the criteria listed for land use application review in LMC 17.09.040(C) “Planning Commission Review and Recommendation; Required Findings”.

A. Certain uses may be allowed by a CUP granted by the City Council, after it receives a recommendation of the Planning Commission. The Planning Commission shall issue its recommendation after a public hearing on the CUP application. In the application and during the hearing process, it shall be clearly shown by the applicant that the proposed use is not detrimental to the surrounding area or a liability to adjacent uses. For the purpose of this review, the surrounding area, or neighborhood, means those parcels that are in close proximity to the subject parcel.

B. An application for a CUP may be made only for those uses specified under the conditional use section of the appropriate zoning district.

C. The Planning Commission and Council shall enter findings to support any recommendation or decision on a CUP application. Conditions may be attached to CUP approvals to mitigate any adverse impacts, protect surrounding properties and to promote the general welfare of the public. A CUP will be granted only if the proposed use complies with the standards and criteria listed below. The applicant shall bear the burden of proof in all CUP proceedings.

1. The proposed use in the proposed location will not be detrimental to surrounding uses legally existing or permitted outright within the zoning district.
2. The proposed use, together with proposed mitigation, will not be detrimental to public health or safety and will be compatible with the surrounding area and land uses with respect to the following:
 - a. Traffic and pedestrian circulation;
 - b. Noise, smoke, fumes, glare or odors generated by the proposed use;
 - c. Building and site design; and
 - d. The physical characteristics of the subject property.

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3. The proposed use is supported by adequate public facilities and services unless conditions can be established to mitigate adverse impacts to those facilities or services.
4. The traffic generated by the proposed use will not cause the traffic circulation system in the vicinity to deteriorate below the adopted level of service.
5. The proposed use complies with the performance standards, parking requirements, height, setback and lot coverage requirements, landscaping standards and other provisions of the Lynden Municipal Code.
6. There are adequate buffering devices, as specified in the landscape standards, or other topographic characteristics, to protect the adjacent properties from adverse impacts of the proposed use.
7. The proposed use will not destroy or substantially damage any natural, scenic or historic feature of major importance.
8. The proposed use is generally consistent with the purposes and objectives of the city comprehensive plan and applicable sub-area plan.

VI. TECHNICAL REVIEW COMMITTEE COMMENTS

Planning and Development Department

- *Modification of Specific Binding Site Plan Required:* As this area was previously slated to become a medical facility, the Specific Binding Site Plan, by which the subject lots were created, currently requires that the property be developed per the City's medical services overlay. The applicant has acknowledged that the SBSP must be modified. The process for modifying a SBSP is detailed in LMC 18.24.110.
- *Landscape Buffer and Screening:* Landscape buffer areas are currently indicated on the Specific Binding Site Plan in widths that exceed the typical standard. Per LMC 19.25.070, landscape enhancement is required along all streets in an industrial zone. The applicant has acknowledged that this is to include a minimum 10 foot, Type I landscape buffer which consists of "a combination of trees, shrubs and other landscaping materials, including bark and/or decorative rock, or grass. The landscaping shall be designed to improve the appearance of the development, not necessarily to obscure it." (LMC 19.61.070). A landscape plan must be included in the civil plan set which verifies compliance.

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- *Street Trees:* The applicant has acknowledged that the installation of street trees along all public street frontages will be required. Code requires that trees be planted a minimum of 30 feet on center or averaged to reach an equivalent quantity. Minimum caliper at the time of planting is 1.5 inches. A landscape plan must be included in the civil plan set which verifies compliance.
- *Building and Siting Requirements:* After reviewing the proposed site plan, the building official has noted that the setback for “unlimited area buildings” on the south property line should be addressed per 2018 IBC section 507.2.1. This will require that a “no-build” easement be secured or that the building size be reduced to accommodate a 60-foot setback from the south property line. Applicant has acknowledged and is addressing through the establishment of a “no build” easement. No building permit will be issued until this easement is in place.
- *Building Height and Construction Methods:* The applicant has acknowledged that per International Building Code and Fire Code standards the building, as currently designed, shall not exceed 75 feet in height. Heights beyond this limit would trigger additional building and fire code requirements.
- *Screening of Condenser Units:* Consistent with the City’s design standards in commercial zones, staff strongly recommends, and the applicant has agreed that all roof-mounted condenser units be screened from view so that this mechanical equipment is not visible from public streets.
- *Building Finish:* Applicant has indicated that the building will be metal wall panels that are a white color. An online link to the material supplier was provided.
- *Site Lighting:* Public comment has raised concerns related to site lighting specifically light pollution that may disturb nearby residences. The applicant has agreed that site lighting will be shielded to avoid light trespass.

Public Works Department

- *Access Points:* The applicant has acknowledged that no vehicular access is permitted on Berthusen Road or Main Street. Emergency access locations which are gated to day-to-day use may be approved by Public Works and the Fire Chief. Access to these gated entrances must be coordinated with the Lynden Fire Department.
- *Stormwater Infrastructure:* Staff has acknowledged that the applicant has submitted a Preliminary Stormwater Design Memo, written by Freeland and Associates and

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dated September 10, 2021. The memo identifies the property soils, the project details and the expected methods for treating and detaining stormwater. Additionally, the memo addresses the 9 Minimum Requirements (2014 DOE Manual) and associated stormwater management BMPs and concludes that the project, as preliminarily proposed, can comply with stormwater management regulations. The applicant has acknowledged that approval of final civil plans is required prior to issuance of building permit.

The applicant has acknowledged that a stormwater management plan including pipe sizing prepared by a professional engineer and meeting the requirements of the City's Manual for Engineering Design and Development Standards and the approved Department of Ecology Stormwater Manual is required. This plan must be approved by the City of Lynden prior to final approval of the project plans. Additionally, applicant has acknowledged that groundwater is high in this area. A groundwater investigation shall be incorporated into this design.

- **Stormwater Pollution Prevention Plan:** The applicant has acknowledged that a final Stormwater Pollution Prevention Plan (SWPPP) (erosion control and sediment plan) must be included in the drainage plan and construction plans. This must be designed by a professional engineer and constructed in compliance with the Department of Ecology's Best Management Practices (including all known and reliable technologies) and the standards approved in the Manual for Engineering Design and Development Standards.
- **Utilities – Water and Sanitary Sewer:** The applicant has acknowledged that water hookup fees and sanitary sewer fees shall be paid as established by City Code. If future structure increases/changes demand for water or sewer capacity, studies may be required to see if impacts to the City system require remediation. Applicant must demonstrate the capacity of the existing service line prior to water connection. Sewer discharge quantity and/or concentration studies may be required to see if impacts to the City system require remediation.
- **Street Improvements – Dedication Required:** The applicant has acknowledged that the City is coordinating the improvement of the Berthusen and Main Street intersection with the construction of a round-about. This improvement will be designed for truck movement and will improve safety at this location. The City will require the dedication of property necessary to facilitate the round-about. The applicant has indicated that they will seek compensation for the property dedicated to this street project. The City can provide compensation in the form of credit toward Transportation Impact Fees in the amount equal to the assessed value of the land dedicated.

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Fire Department

- *Permit Review:* The applicant has acknowledged that due to the complexity of this type of facility, and the on-site storage of hazardous materials, the City will coordinate 3rd party review of building and fire code requirements.
- *Hydrants:* The applicant has acknowledged that additional hydrants may need to be installed to meet required 300-foot clear access spacing between hydrants. Complete Fire review will occur at the time of building permit.

Parks Department – had no comments on this application.

VII. RECOMMENDATION

Based on the above findings, Staff recommends approval of the Conditional Use Permit subject to the following conditions:

- 1) The requirements and conditions listed by the Technical Review Committee in Section VI of this report are included in this recommendation.
- 2) The proposed conditional use permit shall be consistent with the scope of the proposal as provided in Conditional Use Application #21-03. The application was supplemented by the applicant's October 7, 2021 responses and updated building elevations which demonstrated the screening of roof-top mechanical equipment. Additionally, site layout was subsequently updated in coordination with the planned intersection improvements at Berthusen and Main Street. Any changes to the proposal may require additional review and approval by City staff and/or City Council.
- 3) Issuance of this Conditional Use Permit does not release the applicant from any other Local, State, or Federal statutes or regulations applicable to the proposed development.



Freeland and Associates, Inc.

220 W. Champion St., Suite 200
Bellingham, Washington
(360) 650-1408

October 7, 2021

City of Lynden
300 4th Street
Lynden, WA 98264

Attention: Korene Samec
Email: Sameck@lyndenwa.org

Subject: Response to Technical Review Committee Report
CUP #21-03, Alliance Freeze Dry

Dear Ms. Samec:

We have received the Technical Review Committee Report for the Alliance Freeze Dry project dated October 4, 2021. We offer the following response to staff comments received:

Planning Department Comments:

1. Existing Lot Lines: The subject property consists of two lots. Lot line revision is necessary to avoid siting the proposed building on top of the property line. A lot line adjustment or modification of the Specific Binding Site Plan are options for revision. Please address.

Response: Acknowledged.

2. Modification of Specific Binding Site Plan Required: As this area was previously slated to become a medical facility, the Specific Binding Site Plan, by which the subject lots were created, currently requires that the property be developed per the City's medical services overlay. If the site is to be developed otherwise the SBSP must be modified. The process for modifying a SBSP is detailed in LMC 18.24.110.

Response: Acknowledged.

3. Performance Standards: This facility is expected to comply with performance standards detailed in LMC 19.25.040 and 19.25.050. This includes, but is not limited to, emissions of smoke, dust and other particulate matter, and of toxic and noxious gases. All discharge must meet or exceed standards set by Northwest Clean Air Authority and all Washington State and federal standards. Note that

emissions which do not meet performance standards and are offensive or regularly prevent the enjoyment of surrounding properties may be considered an unlawful nuisance. Public comment has raised concerns related to noise and odors. Please describe the measures that will be taken to reduce noise and odors associated with this facility.

Response: The plant will only utilize frozen raw materials that meet food standards, and will not carry out any slaughtering, cutting, cleaning and cooking during the entire production process. The whole process is simply physical mixing, forming, freeze-drying, packaging and storage onsite. The plant will include a designated low-temperature waste room to temporarily keep the organic waste generated in the process, and will be recycled promptly by a professional waste recycling company. The process will not produce offensive odors.

The hot water boilers will meet the State of Washington air quality emissions requirements.

OTR (Over the Road) Trucks could produce some noise, but this would generally be on the east side of the Facility which faces the Industrial Park. The expected traffic is less than 9 OTR trucks daily during the daytime generally. City waste trucks or recycling trucks, could also produce some noise on a limited basis – possibly 5 trips per week.

The mechanical refrigeration equipment will also produce some noise inside the building which are generally confined inside the building. There could be some indication of equipment running at the exterior of the building. We would expect the level to be similar to or less than the existing freezer which now resides in the Industrial Park and will satisfy the requirements of the Washington Department of Ecology.

4. Landscape Buffer and Screening: Landscape buffer areas are currently indicated on the Specific Binding Site Plan in widths that exceed the typical standard. Per LMC 19.25.070, landscape enhancement is required along all streets in an industrial zone. This is to include a 10-foot, Type I landscape buffer which consists of “a combination of trees, shrubs and other landscaping materials, including bark and/or decorative rock, or grass. The landscaping shall be designed to improve the appearance of the development, not necessarily to obscure it.” (LMC 19.61.070). A landscape plan must be included in the civil plan set which verifies compliance.

Response: Acknowledged.

5. Street Trees: Be advised, the installation of street trees along all public street frontages will be required. Code requires that trees be planted a minimum of 30 feet on center or averaged to reach an equivalent quantity. Minimum caliper at the time of planting is 1.5 inches and the species theme consistent with existing trees on Main Street. A landscape plan must be included in the civil plan set which verifies compliance.

Response: Acknowledged.

6. Building and Siting Requirements: After reviewing the proposed site plan, the building official has noted that the setback for the unlimited area buildings on the south property line should be addressed per 2018 IBC section 507.2.1. This will require that a “no-build” easement be secured or that the building size be reduced to accommodate a 60-foot setback from the south property line. Please address.

Response: A “no build” easement is being prepared in associated with the adjoining property owner.

7. Building Height and Construction Methods: Per International Building Code and Fire Code standards the building, as currently designed, shall not exceed 75 feet in height. Heights beyond this limit would trigger additional building and fire code requirements.

Response: Acknowledged.

8. Building Height and Impacts: The IBZ zoning allows for a maximum building height of 45 feet but specifically allows for a Conditional Use Permit, rather than a variance, to act as a tool for requesting additional height. The applicant has requested that a portion of the building be permitted to reach a height of 75 feet. It appears that much of the building will be 30-32 feet in height. Please provide the final “top of wall” height for the majority of the building as well as the percentage of the building which would be reaching (or nearly reaching) the 75 foot mark.

Response: Top of wall for the majority of the building will be +/- 41' AFF (above finished floor). The area approximately 75' in height is +/- 7.5% of the total building area.

9. Screening of Condenser Units: Consistent with the City’s design standards in commercial zones, staff strongly recommends that all roof-mounted condenser units be screened from view so that this mechanical equipment is not visible from public streets. Please revise building elevations to include condenser screening.

Response: Condenser screening provided on Drawing A9.1 [Dated 10.5.21].

10. Building Finish: Please provide the anticipated color palette of the completed building.

Response: The anticipated color palette is Imperial White. See Kingspan color palate attached below; <https://www.kingspan.com/us/en-us/product-groups/insulated-metal-panels/wall-panel-systems/ks-series>

MP (Modified Polyester)

Imperial White
SR:0.62 E:0.86 SRI:74

11. Site Lighting: Public comment has raised concerns related to site lighting – specifically light pollution that may disturb nearby residences. Please provide more information about how the site will be lit and what will be done to prevent the spread of light to residential areas to the west.

Response: Site Lighting will be shielded to avoid light trespass.

12. Public Comment: The public comment period associated with the SEPA has not yet completed. Additional comment on the SEPA may generate additional staff comments in the final TRC report.

Response: Acknowledged.

Public Works Department

13. Access Points: No vehicular access is permitted on Berthusen Road or Main Street. Emergency access locations which are gated to day-to-day use may be approved by Public Works and the Fire Chief. Access to these gated entrances must be coordinated with the Lynden Fire Department.

Response: Acknowledged.

14. Stormwater: The proponent has submitted a Preliminary Stormwater Design Memo, written by Freeland and Associates and dated September 10, 2021. The memo identifies the property soils, the project details and the expected methods for treating and detaining stormwater. Additionally, the memo addresses the 9 Minimum Requirements (2014 DOE Manual) and associated stormwater management BMPs and concludes that the project, as preliminarily proposed, can comply with stormwater management regulations. Approval of final civil plans is required prior to issuance of building permit.

Response: Acknowledged.

- a. A stormwater management plan including pipe sizing prepared by a professional engineer and meeting the requirements of the City's Manual for Engineering Design and Development Standards and the approved Department of Ecology Stormwater Manual is required. This plan must be approved by the City of Lynden prior to final approval of the project plans. Groundwater is high in this area. A groundwater investigation shall be incorporated into this design.

Response: Acknowledged.

- b. A final Stormwater Pollution Prevention Plan (SWPPP) (erosion control and sediment plan) must be included in the drainage plan and construction plans. This must be designed by a professional engineer and constructed in compliance with the Department of Ecology's Best Management Practices (including all known and reliable technologies) and the standards approved in the Manual for Engineering Design and Development Standards.

Response: Acknowledged.

15. Utilities - Water: Water hookup fees shall be paid as established by City Code. Please contact the Building Division for a fee estimate. Be advised, if future structure increases/changes demand for water, studies may be required to see if impacts to the City system require remediation. Applicant must demonstrate the capacity of the existing service line prior to water connection.

Response: Acknowledged.

16. Utilities - Sanitary Sewer: Fees are established by City Code. Please contact the Building Division for a fee estimate. Be advised, if future structure increases/changes sewer discharge quantity and/or concentration studies may be required to see if impacts to the City system require remediation.

Response: Acknowledged.

17. Easements:

18. ROW Improvements: The City is coordinating the improvement of the Berthusen and Main Street intersection with the construction of a round-about. This improvement will be designed for truck movement and will improve safety at this location. The City will require the dedication of property necessary to facilitate the round-about.

Response: Acknowledged. AFD will require financial compensation from the City for the dedication of right-of-way.

Fire and Life Safety

19. Permit Review: Be advised, due to the complexity of this type of facility, and the on-site storage of hazardous materials, the City will coordinate 3rd party review of building and fire code requirements.

Response: Acknowledged.

20. Hydrants Required: Additional hydrants may need to be installed to meet required 300-foot clear access spacing between hydrants. Complete Fire review will occur at the time of building permit.

Response: Acknowledged.

Parks and Recreation

21. The Parks Department has reviewed the application and has no comment.

Response: Acknowledged.

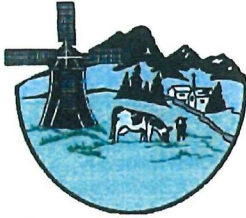
Sincerely,

Freeland and Associates, Inc.



Tony Freeland, PE

Encl. Drawing A9.1



CUP# 21-03

City of Lynden

Conditional Use Permit Application

General Information:

Property Owner

Name: Alliance Freeze Dry (USA) Inc (Guang Xu)
 Address: 5292 272 Street Langley BC V4W 1S3 Canada
 Telephone Number: 1-778-223-8683 Alt Number: _____
 E-mail Address: gary@canature.ca

Applicant (Agent, Land Surveyor or Engineer)

Name: Freeland and Associates, Inc. (Tony Freeland)
 Address: 220 West Champion Street, Suite 200, Bellingham, WA 98225
 Telephone Number: 360-650-1408 Cell Number: 360-739-1589
 E-mail Address: tfreeland@freelandengineering.com

Who is the primary contact for this project? This person will receive all official correspondence for the project. Property owner Applicant

Property Information

Project Location (street address / block range): Redwood Road
 Legal Description (attach if necessary): Lot 1 and Lot 2 West Lynden Business Park SBSP No. 1
 Assessor's Parcel Number: 400224 037346; 400224 037380 Zoning Designation: IBZ
 Parcel Square Footage: 9.93 acres Property Dimensions: 665' x 635'
 Applicable Sub-Area: West Lynden Building/Structure Size: _____
 Height of Structure: _____ Addition Size: _____

Please describe request in detail: CUP Criteria must be attached

The proposed project includes construction of a 220,000 square foot pet food freeze dry processing plant in an industrial business zone. The proposal includes a request to build the warehouse portion of the building to 75 feet in height.

BY SIGNING THIS APPLICATION, I CERTIFY THAT ALL THE INFORMATION SUBMITTED IS TRUE AND CORRECT. I ALSO UNDERSTAND THAT NO FINAL APPROVAL WILL BE ISSUED UNTIL ALL FINAL REVIEW COSTS ARE PAID IN FULL.

SUBMITTED BY: Tony Freeland, Freeland and Associates, Inc. DATE: 08/23/2021

PROPERTY OWNER SIGNATURE: _____ DATE: 08/23/2021

PROPERTY OWNER PRINTED NAME: Guang Xu DATE: 08/23/2021

Agent Authorization

If you are authorizing an agent to apply for permits on your behalf you must complete this form, which will provide authorization for a designated agent to apply for a Conditional Use Permit ("CUP") and documentation related to the State of Washington Environmental Policy Act ("SEPA") process, (each an "Application") on your behalf.

I/we, PeaceHealth, the owner(s) of the subject property, understand that by completing this form I hereby authorize Alliance Freeze Dry (USA) Inc and their agents to act as my agent for the limited purposes described above. I understand that said agent will be authorized to submit Applications, and that any associated fees are due by the said agent. I also understand that once an Application has been submitted that all future correspondence on that Application will be directed to the agent.

Redwood Road, Lynden, Washington
Property Address

400224 037346, 400224 037380
Parcel Number(s)

PeaceHealth
Property Owner Printed Name

[Signature]
Property Owner Signature

August 16, 2021
Date

I certify that I know or have satisfactory evidence that Steven Glenn is/are the person(s) who appeared before me, and said person(s) acknowledged it to be his/her free and voluntary act for the uses and purposes mentioned in this instrument.

Dated August 16, 2021



Notary Signature: [Signature]
Printed Name: Rebecca Tapley
Notary Public in and for the State of Washington
Residing at Cowlitz
My appointment expires: 12/30/2024

Excerpts from Chapter 19.49 of the Lynden Municipal Code

Standards and criteria for granting a Conditional Use Permit (CUP)

- A. Certain uses may be allowed by a CUP granted by the City Council, after it receives the recommendation of the Planning Commission. The Planning Commission shall issue its recommendation after a public hearing on the CUP application. In the application and during the hearing process, it shall be clearly shown by the applicant that the proposed use is not detrimental to the surrounding area or a liability to adjacent uses. For the purpose of this ordinance, the surrounding area, or neighborhood, means those parcels that are in close proximity to the subject parcel.

Response: *The proposed use is not detrimental to the surrounding area or a liability to adjacent uses. Instead, the proposed use will provide new employment and business opportunities for residents and their businesses.*

- *Alliance Freeze Dry (USA) Inc will construct a new 220,000 square foot freeze dry pet food plant on a 9.93-acre property within West Lynden Business Park. The designed processing capacity will be 17,000 metric-tons frozen raw materials (fruits/vegetables/meats) which will produce 3,600 metric-tons of pet food and pet treat final products, and 5,000 mixed material semi-final products.*
- *The freeze dry pet food plant will create new employment opportunities. This plant operation will employ approximately 77 staff.*
- *The current zoning is Industrial Business (IBZ) per Lynden Municipal Code 19.25.030. The proposed use is consistent with the specification for Food and Pharmaceutical Processing Plants under Lynden Municipal Code 19.25.030. The Conditional Use Permit application is made based on the said IBZ zoning ordinance to add the pet food free dry processing, frozen raw material processing and final product packaging operations.*
- *The proposed facility will be built to comply the applicable safety and environmental standards.*

- B. An application for a CUP may be made only for those uses specified under the conditional use section of the appropriate zoning district.

Response: *The current zoning is Industrial Business (IBZ) per Lynden Municipal Code 19.25.030. The proposed use is consistent with the specification for Food and Pharmaceutical Processing Plants under Lynden Municipal Code 19.25.030. The CUP application is made based on the said IBZ zoning ordinance to add the pet food free dry processing, frozen raw material processing and final product packaging operations under the CUP permit.*

- C. The Planning Commission and Council shall enter findings to support any recommendation or decision on a Conditional Use Permit application. Conditions may be attached to CUP approvals to mitigate any adverse impacts, protect surrounding properties and to promote the general welfare of the public. A CUP will be granted only if the proposed use complies with the standards and

criteria listed below. The applicant shall bear the burden of proof in all CUP proceedings:

1. The proposed use in the proposed location will not be detrimental to surrounding uses legally existing or permitted outright within the zoning district;

Response: *The proposed use in the proposed location will not be detrimental to surrounding uses. The current zoning for the proposed location is for Industrial Business uses (IBZ). The proposed use will be designed, constructed, and operated to meet the IBZ with CUP requirements. Surrounding uses are agriculture and industrial business. The proposed project is a mix of agriculture and industrial use.*

2. The proposed use, together with proposed mitigation, will not be detrimental to public health or safety and will be compatible with the surrounding area and land uses with respect to the following:
 - i) traffic and pedestrian circulation,
 - ii) noise, smoke, fumes, glare or odors generated by the proposed use,
 - iii) building and site design,
 - iv) the physical characteristics of the subject property

Response:

- *The proposed facility will have fire lanes, truck access, and employee access using pre-planned access connections.*
- *The proposed use in the proposed location will not be detrimental to surrounding uses.*
- *The noise and odors generated will be enclosed in the proposed structure.*
- *The proposed plant will be an integrated freeze dry pet food plant which will be environment friendly, and comply to applicable safety and environmental standards.*
- *The plant operation will not generate extraordinary traffic load since the plant will be highly automated with advanced technologies. The plant will operate with 45 employees for the largest day shift and 8 employees for the night shift.*
- *The new plant will be designed, constructed, and operated with the state-of-the-art technologies and solutions and will meet the state and federal building code and environmental standards for the controls of noise, glare and odor*
- *The new facility will be designed with state-of-the-art technologies and meet state and federal building codes. The plant will only accept and use frozen raw materials which meet the food safety standards. There will be no slaughtering, unfrozen raw materials processing and slicing, raw material cleaning, or cooking in this factory. This plant will simply perform physical mixing/forming/freeze drying/packaging/warehousing on site. The final products are always referred to as dried fresh food.*
- *The proposed plant's building design, exterior appearance, and overall site design will be a high-scale modern manufacturing facility with an emphasis on blending into the local*

community and environment.

- *The proposed plant's exterior will be constructed with industrial standard high quality building materials similar to other existing structures within the business park currently. The office will be constructed using a "high-tech" appearance with glass and landscaping.*
- *The site will be landscaped to meet City of Lynden requirements and make efforts to enhance the aesthetics of the vicinity.*
- *The property is generally flat matching physical characteristics of surrounding properties.*

3. The proposed use is supported by adequate public facilities and services unless conditions can be established to mitigate adverse impacts to those facilities or services; and

Response:

- *The proposed use is supported by adequate public facilities and utility services described below:
Electric - Puget Sound Energy
Water - City of Lynden
Sanitary Sewer - City of Lynden
Natural Gas - Cascade Natural Gas
Refuse Service-Nooksack Valley Disposal
Telephone - Zply, Century Link
Internet - Comcast*
- *The stormwater management solution is being developed by civil engineers working with affected property owners and the City of Lynden.*

4. The traffic generated by the proposed use will not cause the traffic circulation system in the vicinity to deteriorate below the adopted level of service.

Response:

- *The proposed use will not cause the traffic circulation system in the vicinity to deteriorate below the adopted level of service. The project will use existing access driveways established by the Binding Site Plan.*
- *The plant operation will be highly automated and will not generate extraordinary traffic load with 45 employees for the largest day shift and 8 employees for the night shift.*
- *Trip generation estimates for this project are based on average trip rates summarized in the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 10th Edition (2017). The trip rates for the proposed project were based on ITE's Manufacturing (LU #140) land uses.
Daily trips=190 trips AM peak=28 trips PM Peak=25 trips*

5. The proposed use complies with the performance standards, parking requirements, height, setback and lot coverage requirements, landscaping standards and other provisions of the Lynden Municipal Code.

Response:

- *The performance of the noise, smoke, fumes, glare or odors generated by the proposed use will be designed, constructed and controlled to meet the applied standards.*
- *The proposed parking, building height, setbacks, and lot coverage for the proposed use will comply with the provisions of the Lynden Municipal Code and Conditional Use Permit requirements.*
- *The proposed use will be landscaped to meet City of Lynden requirements and make efforts to enhance the aesthetics of the vicinity. Landscaping will be established in the areas recorded on the Binding Site Plan.*
- *The project will provide parking for each employee on the largest shift.*
- *The maximum building height will be 75 feet.*
- *The building will be setback from all easements and property lines.*

6. There are adequate buffering devices, as specified in the landscape standards, or other topographic characteristics, to protect the adjacent properties from adverse impacts of the proposed use.

Response: *The proposed plant will provide an adequate buffering area and solution which comply to the City of Lynden requirements to protect the adjacent properties from adverse impacts of the proposed use. Wide landscape buffers will be maintained on all sides of the property.*

7. The proposed use will not destroy or substantially damage any natural, scenic or historic feature of major importance.

Response: *The proposed use will not destroy or substantially damage any natural, scenic or historic feature of major importance, as none of such items have been identified on the site.*

8. The proposed use is generally consistent with the purposes and objectives of the City Comprehensive Plan and applicable Sub-Area Plan.

Response: The project site is located within the West Lynden Sub-Area. The objectives for Industrial developments within the West Lynden Sub Area include the following:

“Economic diversity and growth are the key components in Lynden’s Comprehensive Plan. The City adopted the Comprehensive Economic Development Plan in September 1998,

which outlines the need and desire for family wage jobs within the community. It also expresses the benefits of a healthy economy as a method to support the services that the community values and the quality of life that is important to Lynden residents.”

- ***The proposed facility will provide economic growth and new job opportunities for the local Lynden community.***

“The preference for growth in this area includes “high-tech” development or other types of industrial growth that makes the most effective use of the community’s water and wastewater treatment resources. Effective use may be defined as providing both quality (wages and benefits) jobs as well as quantity of jobs. The input of the Economic Development Team will be sought and considered when proposals for industrial development are brought before the Planning Commission and City Council.”

- ***The proposed freeze dry plant includes highly automated systems with advanced technologies. The designed processing capacity will be 17,000 metric-tons frozen raw materials (fruits/vegetables/meats) which will produce 3,600 metric-tons of pet food and pet treat final products, and 5,000 mixed material semi-final products. The plant will provide high quality job opportunities for up to 77 people.***

“Opportunities to incorporate agricultural related business and industry in the development of the West Lynden Sub-Area should be explored. These opportunities may include value added food products, an agricultural research or tourist facility, or customs clearing station.”

- ***The proposed freeze dry pet food facility is considered an agricultural/industrial related business.***

“Land west of the Duffner Ditch, north of Birch Bay Lynden Road, and south of West Main Street is to be developed into a region of business and industrial growth. This area will support the development of a variety of industrial uses.”

- ***The project site is located in the West Lynden Business Park. The project includes developing a currently vacant 9.93-acre property for industrial use.***

“The development of this area should be undertaken in a manner that is consistent with aesthetic standards of the community. These standards include the building design, attractive signage, landscaping and the overall site design together with the building’s setback from the street and well-designed parking areas. The standards are more completely defined within the City’s Design Review Guidebook.”

- ***The proposed freeze dry plant’s building design, exterior appearance, and overall site design will be a high-scale modern manufacturing facility with an emphasis on blending into the local community and environment. The proposed plant will be landscaped to meet City of Lynden requirements and make efforts to enhance the aesthetics of the vicinity.***

“Improvements required under the adopted Development Standards, including curbs,

gutters, sidewalks and landscaping could be phased to allow the proponent the opportunity to invest in the business prior to the completion of these improvements. Bonding will be required to guarantee the completion of these improvements within a specified time period, but not to exceed three years from time of final occupancy.”

- ***The project will complete any required frontage improvements.***

“The Lynden Economic Development Team as created under the Comprehensive Economic Development Plan should coordinate economic development efforts.”

- ***The proposed use will provide new employment and business opportunities for the area.***

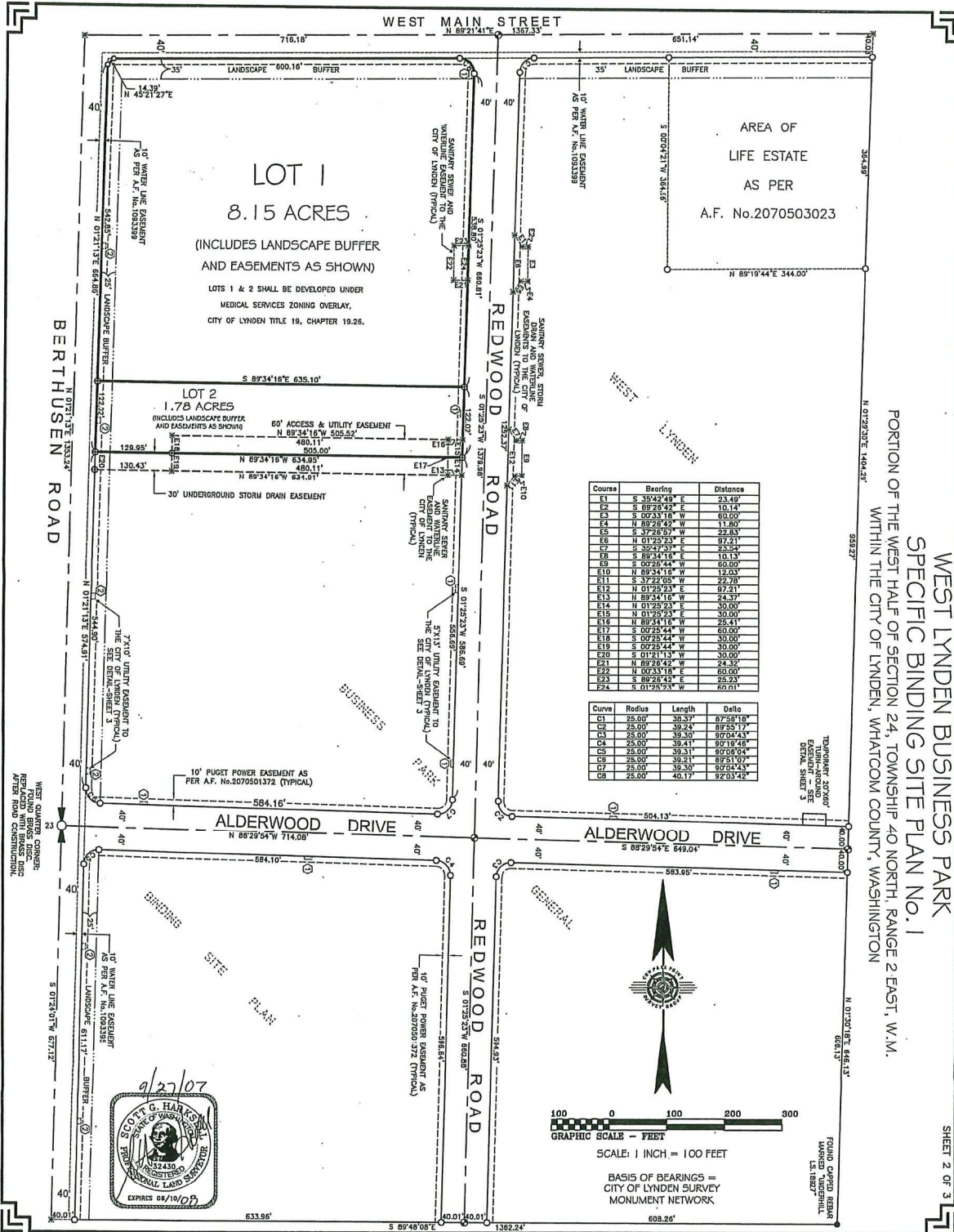
2071000 & 73

WEST LYNDEN BUSINESS PARK

SPECIFIC BINDING SITE PLAN NO. 1

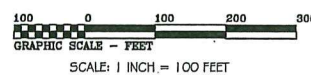
PORTION OF THE WEST HALF OF SECTION 24, TOWNSHIP 40 NORTH, RANGE 2 EAST, W.M.
WITHIN THE CITY OF LYNDEN, WHATCOM COUNTY, WASHINGTON

SHEET 2 OF 3



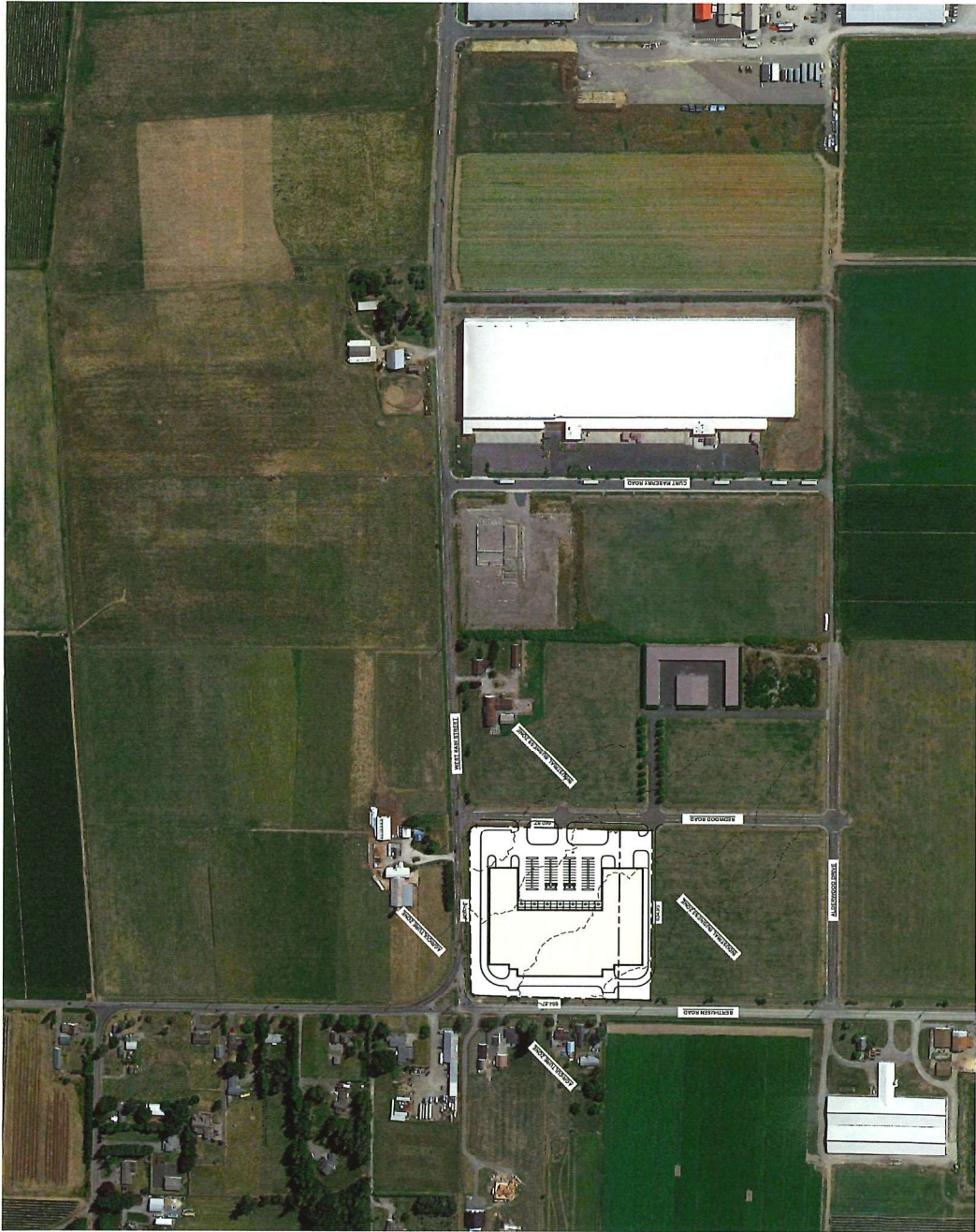
Course	Bearing	Distance
E1	S 39°24'48" E	23.48'
E2	S 89°28'42" W	10.14'
E3	S 00°33'18" W	60.00'
E4	N 89°28'42" E	13.86'
E5	S 37°28'57" W	22.83'
E6	N 01°25'23" E	87.21'
E7	S 32°24'39" E	23.54'
E8	S 89°34'18" E	10.13'
E9	S 00°25'44" W	60.00'
E10	N 89°34'18" W	12.03'
E11	S 37°22'05" W	22.78'
E12	N 01°25'23" E	87.21'
E13	N 89°34'18" W	24.37'
E14	N 01°25'23" E	30.00'
E15	N 01°25'23" E	30.00'
E16	N 89°34'18" W	25.41'
E17	S 00°25'44" W	60.00'
E18	S 00°25'44" W	30.00'
E19	S 00°25'44" W	30.00'
E20	S 01°21'13" W	30.00'
E21	N 89°28'42" W	24.32'
E22	N 00°33'18" E	60.00'
E23	S 89°28'42" E	22.23'
E24	S 01°25'23" W	60.01'

Curve	Radius	Length	Delta
C1	25.00'	38.37'	87°58'18"
C2	25.00'	39.24'	89°55'17"
C3	25.00'	39.50'	90°04'43"
C4	25.00'	39.41'	89°10'48"
C5	25.00'	39.31'	89°08'04"
C6	25.00'	39.30'	89°15'09"
C7	25.00'	39.30'	89°04'43"
C8	25.00'	40.17'	92°03'42"

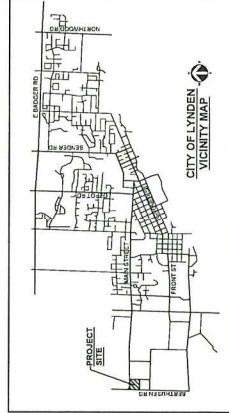


BASIS OF BEARINGS = CITY OF LYNDEN SURVEY MONUMENT NETWORK





LEGAL DESCRIPTION
 LOTS 1 & 2, OF WEST LYNDEN BUSINESS PARK SPECIFIC BINDING SITE P. AN,
 RECORDED ON OCTOBER 5, 2007, UNDER AUDITOR'S FINE NO. 2071000873
 SITUATE IN WHATCOM COUNTY, WASHINGTON.



PROJECT NO.	2108
CITY OF LYNDEN	WASHINGTON
DATE	AP-2
SCALE	1" = 100'
PROJECT NAME	FOOD FACILITY
ENGINEER	FFE ENGINEERING, INC.
ADDRESS	2000 1ST ST, LYNDEN, WA 99225
PHONE	509-225-1111
FAX	509-225-1112
WEBSITE	www.ffe-engineering.com
PROJECT LOCATION	AREA MAP

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REVISIONS

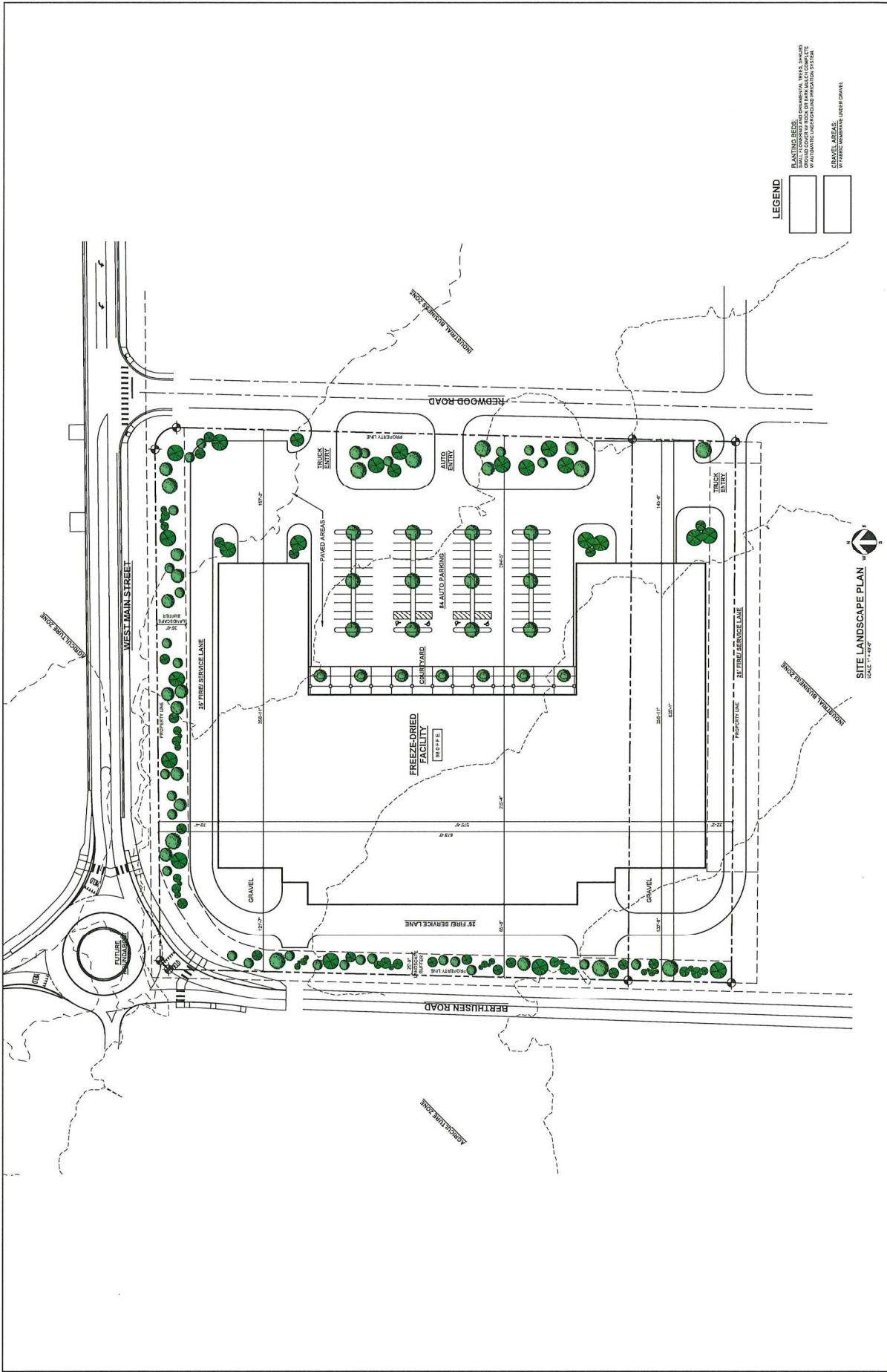
PRELIMINARY
 NOT FOR CONSTRUCTION
 08/13/21
 THIS DOCUMENT IS PRELIMINARY IN NATURE AND IS NOT TO BE USED FOR ANY PURPOSES WITHOUT THE WRITTEN AND SEALED DOCUMENT.

GENERAL NOTES:





GENERAL NOTES: 1. ALL WORK AND MATERIALS SHALL BE IN ACCORDANCE WITH THE LATEST EDITIONS OF THE BUILDING CODES AND SPECIFICATIONS APPLICABLE TO THIS PROJECT. 2. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL AUTHORITIES. 3. THE CONTRACTOR SHALL MAINTAIN ACCESS TO ALL ADJACENT PROPERTIES AND UTILITIES AT ALL TIMES. 4. THE CONTRACTOR SHALL BE RESPONSIBLE FOR PROTECTING ALL EXISTING UTILITIES AND STRUCTURES. 5. THE CONTRACTOR SHALL MAINTAIN A SAFE WORKING ENVIRONMENT AT ALL TIMES. 6. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY INSURANCE COVERAGE. 7. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY BONDS. 8. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY REFERENCES. 9. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY REFERENCES. 10. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY REFERENCES.	REVISIONS 1. 08/24/21 AS NOTED PRELIMINARY NOT FOR CONSTRUCTION 08/24/21 THIS DOCUMENT IS PRELIMINARY AND NOT BE USED FOR FINAL BIDDING AND SALES DOCUMENTS.	CLIENT: CURATIVE FOOD FACILITY FOR PROJECT NO.: 2108 DATE: 08/24/21 SHEET: AP-4 DRAWN BY: [Name] CHECKED BY: [Name]
	KEY PLAN A simplified site plan showing the location of the building on the property.	Curative FFC ENGINEERING, INC. 1000 W. 10TH AVENUE, SUITE 100 DENVER, CO 80202 (303) 733-1111 WWW.CURATIVEENGINEERING.COM

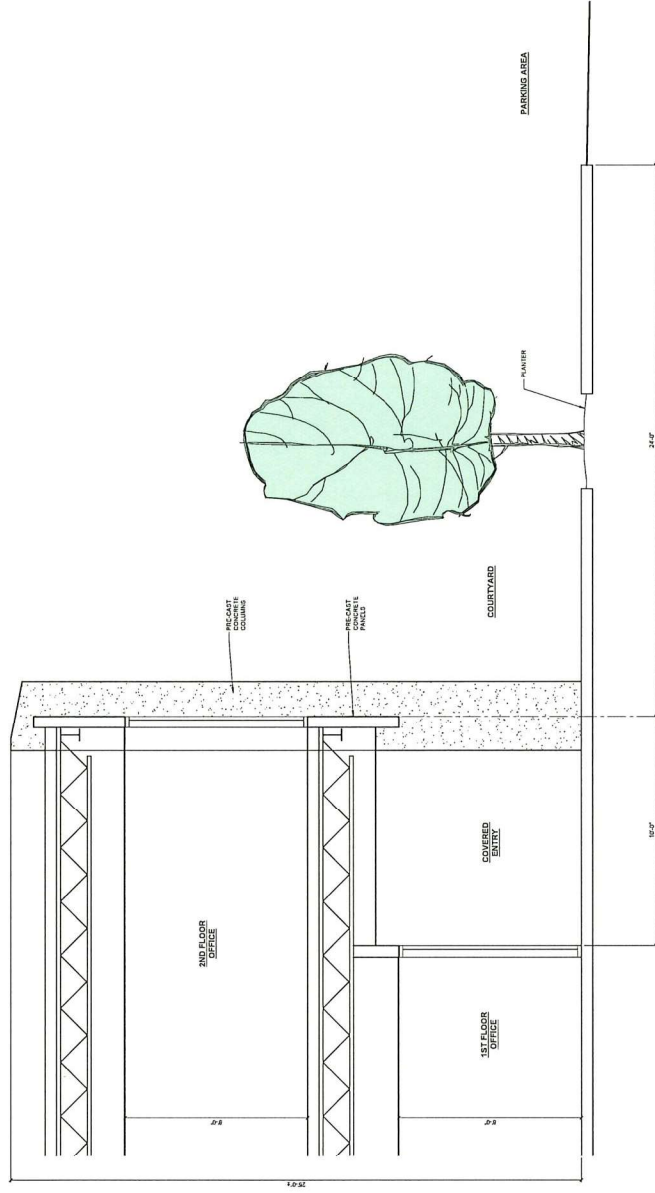


LEGEND

PLANTING BEDS
 ALL PLANTING BEDS SHALL BE CONSTRUCTED WITH 2" POLYETHYLENE GLASS FIBER REINFORCED CONCRETE (GFR) CURBING. PLANTING BEDS SHALL BE CONSTRUCTED WITH 2" POLYETHYLENE GLASS FIBER REINFORCED CONCRETE (GFR) CURBING.

GRAVEL AREAS
 2" POLYETHYLENE GLASS FIBER REINFORCED CONCRETE (GFR) CURBING.

GENERAL NOTES: PRELIMINARY NOT FOR CONSTRUCTION 08/13/21 THIS DOCUMENT IS PRELIMINARY IN NATURE AND IS NOT TO BE USED FOR CONSTRUCTION AND SEALED DOCUMENT.	REVISIONS NO. 1 DATE 08/13/21 DESCRIPTION PRELIMINARY	PROJECT NO. 2108
	CLIENT CANTATA 10000 10TH AVENUE SEASIDE, WA 98148	ARCHITECT FFE ENGINEERING, INC. 2000 10TH AVENUE SEASIDE, WA 98148
SITE LANDSCAPE PLAN		



1 BUILDING SECTION - OFFICE ENTRY
SCALE OF 1/4" = 1'-0"

GENERAL NOTES:

REVISIONS

**PRELIMINARY
NOT FOR CONSTRUCTION**
08/13/21
THIS DOCUMENT IS PRELIMINARY IN NATURE AND IS NOT TO BE USED FOR PERMITS AND SEALED DOCUMENT.

All models and arrangements exhibited or presented herein are preliminary in nature and are subject to change without notice. The user of this document is advised that the user shall be responsible for verifying the accuracy of the information contained herein. The user shall be responsible for obtaining all necessary permits and approvals for the project. The user shall be responsible for obtaining all necessary approvals for the project. The user shall be responsible for obtaining all necessary approvals for the project.

DATE	2/10/21	PROJECT	CAVALIER RETAIL CENTER WEST FOOD PLANT FOR
SCALE	AS SHOWN	LOCATION	ENGINEN WASHINGTON
NO.	AP-6	DESIGNER	ENGINEERING, INC.
2000 10TH AVENUE, SUITE 200, WASHINGTON, WA 98001 WWW.FEE-ENGINEERING.COM			
BUILDING SECTION - OFFICE ENTRY			



Freeland and Associates, Inc.

220 West Champion Street
Suite 200
Bellingham, Washington
(360) 650-1408

September 10, 2021

City of Lynden
Public Works
300 4th Street
Lynden, WA 98264

Attention: Mr. Mark Sandal

Subject: Alliance Freeze Dry (USA), Inc.
675 Redwood Road
Preliminary Stormwater Design Letter
F&A Project No. 21129

Dear Mr. Sandal:

This letter serves as a preliminary stormwater design narrative for the industrial development proposed at 675 Redwood Road in Lynden, Washington 98264. The project will develop two tax parcels that occupy a combined 9.93 acres of land. The site is bound by West Main Street to the north, Berthusen Road to the west, and Redwood Road to the east. Figure 1 provides a vicinity map of the proposed project site. The project site is currently undeveloped and maintained with grass and a few trees. Figure 2 provides an aerial photograph of the recent ground cover conditions on site.

Soils on the site are mapped by the NRCS as Edmonds-Woodlyn loams #45, 0 to 2 percent slopes. The Edmonds-Woodlyn loams series are dually classified as hydrologic group B/D. The first letter applies to the drained and the second to the undrained condition. Hydrologic group B soils have moderate infiltration rates when thoroughly wetted and consisting chiefly of moderately fine to moderately coarse textures. Hydrologic group D High runoff potential and very slow infiltration rates when thoroughly wetted. Figure 3 provides a regional soils map. A site-specific soils evaluation by a geotechnical professional is in progress.

A new 220,000 square foot freeze dry pet food processing plant will be constructed on the property. Included with the processing plant, parking and truck loading facilities will be included. Preliminary stormwater design includes enhanced stormwater treatment, underground detention system, and pump station to lift stormwater due to shallow outfall.

With more than 5,000 square feet of combined hard surfacing, the project will be subject to Minimum Requirements #1 through #9 as provided in the 2014 DOE Manual. Minimum Requirements #1 through #9 are addressed as follows:

Minimum Requirement #1 Preparation of Stormwater Site Plans

This letter serves as a preliminary Stormwater Site Plan (SSP). All stormwater management systems have been designed according to Department of Ecology (DOE) and City of Lynden standards. A construction Stormwater Pollution Prevention Plan (SWPPP) has also been prepared and is included with this letter.

Minimum Requirement #2 Construction Stormwater Pollution Prevention (SWPPP)

A construction SWPPP will be prepared and included with in construction documents.

Minimum Requirement #3 Source Control of Pollutants

The proposed industrial project is not expected to create any unusual sources of stormwater pollutants. Pollutant sources include vehicular traffic, fertilizers, and other detergents or chemicals typical to building maintenance activities. These sources will be controlled at the source to the maximum extent possible. All known, available, and reasonable source control BMPs will be applied to the design and layout of the site plans and stormwater plans. Per the DOE Manual, land use controls that emphasize prevention of water quality impacts are preferred over treatment strategies. Therefore, clearing areas will be limited to the minimum areas necessary for construction.

Minimum Requirement #4 Preservation of Natural Drainage Systems and Outfalls

Currently, the entire project site is contained within a single regional basin. During summer months, while the regional groundwater table is low, stormwater appears to completely infiltrate on site. As the regional groundwater table increases during the winter months, stormwater likely runs off to the southwest. Stormwater from the developed site will be controlled on site through engineered systems and no significant stormwater diversions are proposed as a part of this project.

Minimum Requirement #5 On-Site Stormwater Management

As a project that is expected to trigger Minimum Requirements #1 through #9, this project will be required to demonstrate compliance with the LID Performance Standard or shall use BMPs from List #2 in the 2014 DOE Manual. This project is expected to comply with List #2.

Projects choosing to utilize List #2 of the 2014 DOE Manual to meet the requirements of Minimum Requirement #5 – On-site Stormwater Management must consider the BMPS in the order listed for each type of surface. The first BMP that is considered feasible must be used on the site. No other

On-site Stormwater Management BMPs are necessary for that surface. The following table identifies all of the required BMPs in List #2 and if they are feasible or infeasible.

TABLE 3 - MINIMUM REQUIREMENT #5				
LIST #2				
Minimum Requirement		Feasible	Infeasible	Criteria Comments
#	Lawn & Landscaped Area			
1	Post-Construction Soil Quality and Depth - BMP T5.13	✓		This BMP will be applied to all areas outside of roofs or hard surfaces disturbed during construction.
#	Roofs			
1	Full Dispersion - BMP T5.30 Full Infiltration - BMP T5.10A		✓	Infeasible due to impervious surface coverage and lack of suitable vegetated areas to accommodate dispersion. High groundwater renders infiltration systems infeasible.
2	Bioretention – BMP T5.70		✓	Infeasible due to impervious surface coverage and high groundwater.
3	Downspout Dispersion BMP T5.10B		✓	Infeasible due to insufficient vegetated flow path length and high groundwater.
4	Perforated Stub-out Connection BMP T5.10C		✓	Infeasible due to impervious surface coverage and high groundwater.
#	Other Hard Surfaces			
1	Full Dispersion BMP T5.30		✓	Infeasible due to impervious surface limits.
2	Permeable Pavement - BMP T5.15		✓	Infeasible due to the type of project (i.e. manufacturing plant with potential for heavy equipment/vehicle loading) and high groundwater.
3	Bioretention – BMP T5.70		✓	Infeasible due to impervious surface coverage and high groundwater.
4	Sheet Flow Dispersion BMP T5.12 Concentrated Flow Dispersion BMP T5.11		✓	Infeasible due to insufficient vegetated flow path length on site.

Preliminary Stormwater Management Summary

Stormwater runoff from the project will be managed on site with an underground detention system and pump station to lift stormwater due to shallow outfall. BMP T5.13 will be applied to all areas outside of roof or hard surfaces disturbed during construction.

Minimum Requirement #6 Runoff Treatment

New pollution-generating hard surface (PGHS) areas are expected to exceed 5,000 square feet. Therefore, this project will exceed thresholds set forth in Section 2.5.6 in Volume I of the 2014 DOE Manual and enhanced stormwater treatment BMPs will be required.

Minimum Requirement #7 Flow Control

The proposed project will create more than 10,000 square feet of hard surfacing and will exceed flow control thresholds in Section 2.5.7 in Volume I of the 2014 DOE Manual. Stormwater flow control will be provided with a new underground detention system.

Minimum Requirement #8 Wetlands Protection

No existing wetlands have been identified on site or in the immediate vicinity. Therefore, no further wetland protection measures are required.

Minimum Requirement #9 Operation and Maintenance

A separate operations and maintenance manual will be prepared for the proposed stormwater management facilities. The manual will contain a description of the facilities, what the facilities do, and how they work. The manual will also identify and describe maintenance tasks for each component of the facilities and the required frequency of each task.

As shown above, this project can comply with current stormwater management requirements in place for the City of Lynden. Please contact us with any questions or concerns regarding these observations.

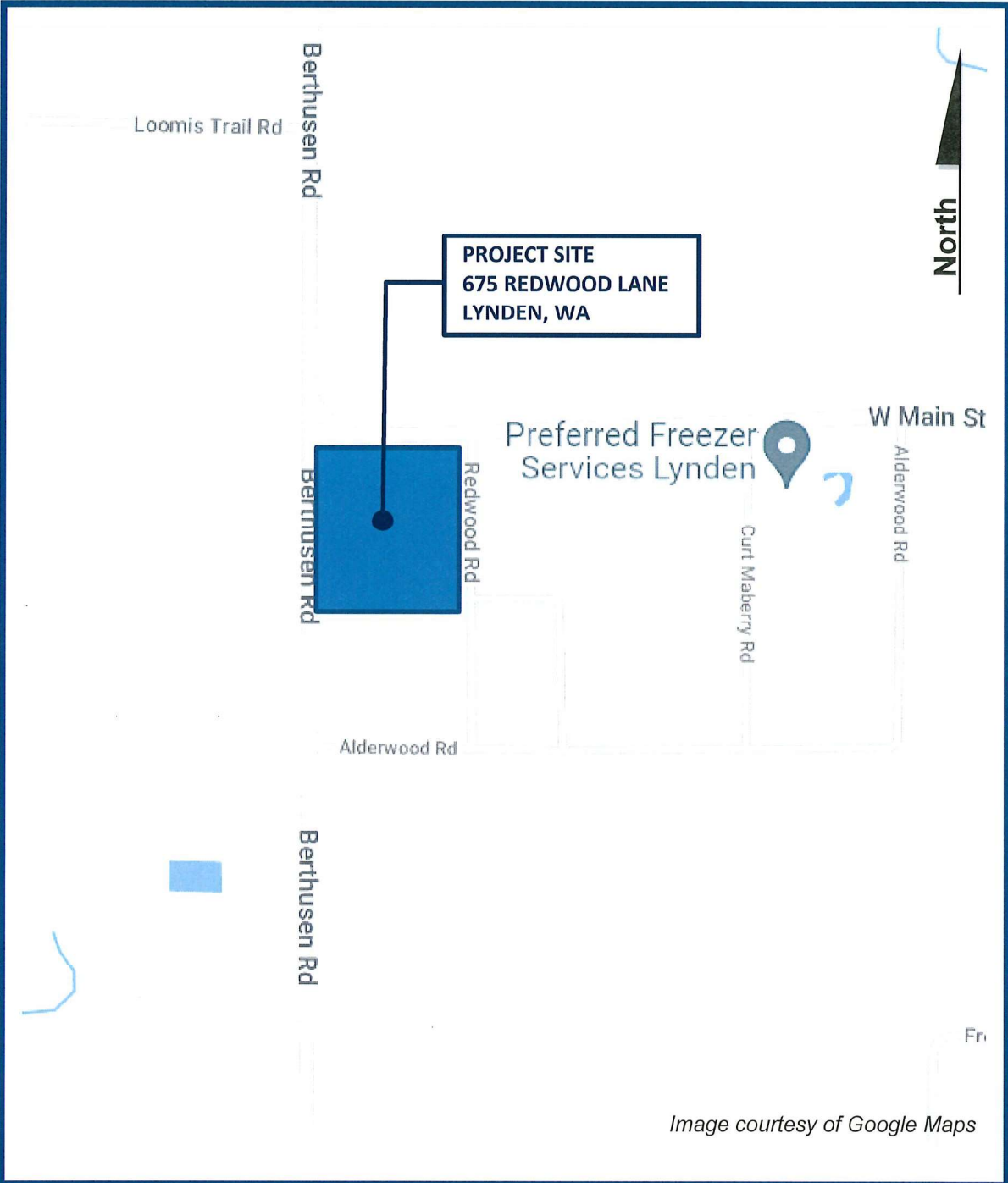
Sincerely,
Freeland and Associates, Inc.



Tony Freeland, PE
Principal Engineer

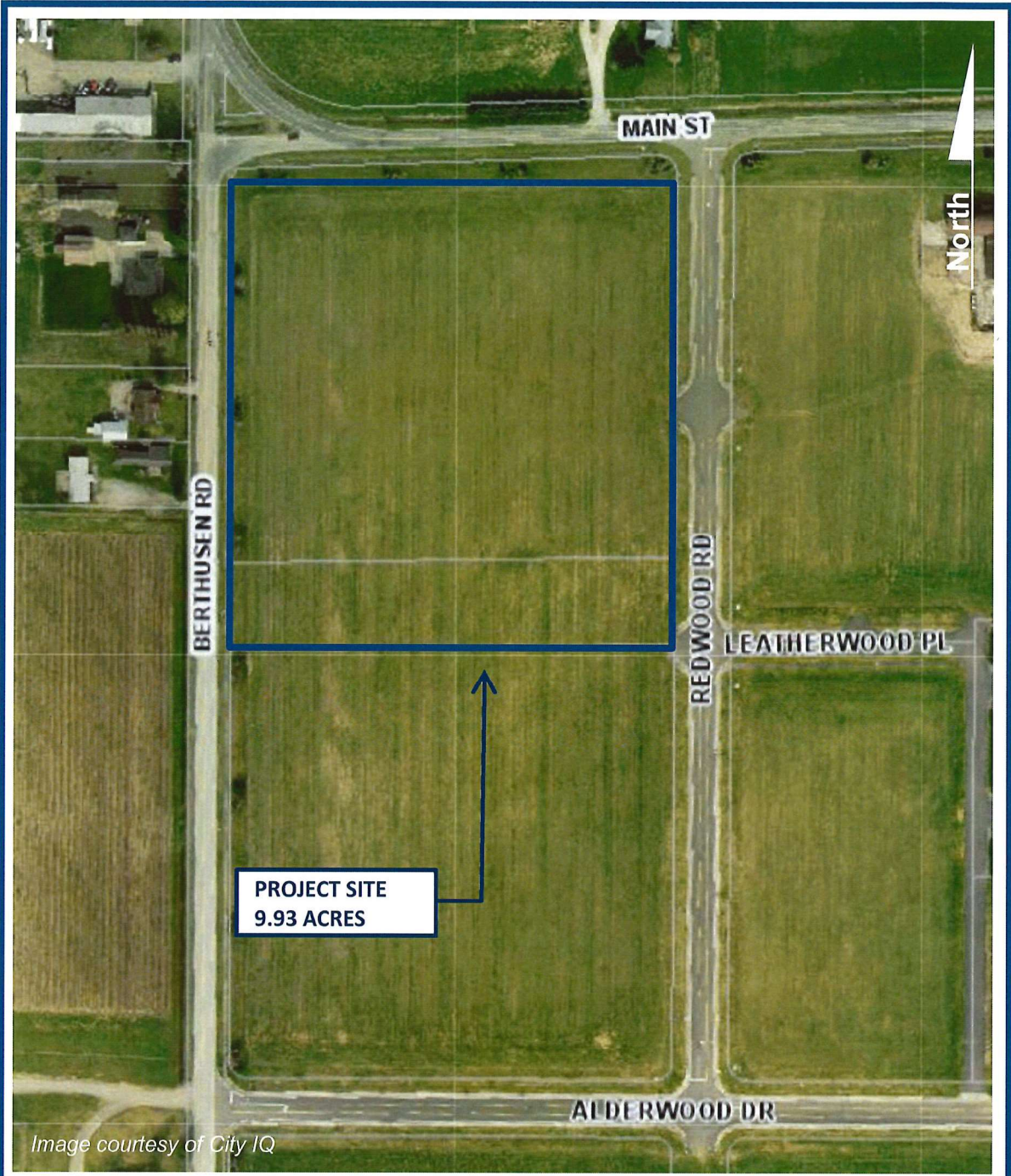
Attachments

- Fig. 1 Vicinity Map*
- Fig. 2 Aerial Photograph of Site*
- Fig 3. Soils Map*
- Preliminary Site Plans*
- Stormwater Pollution Prevention Plan (SWPPP)*



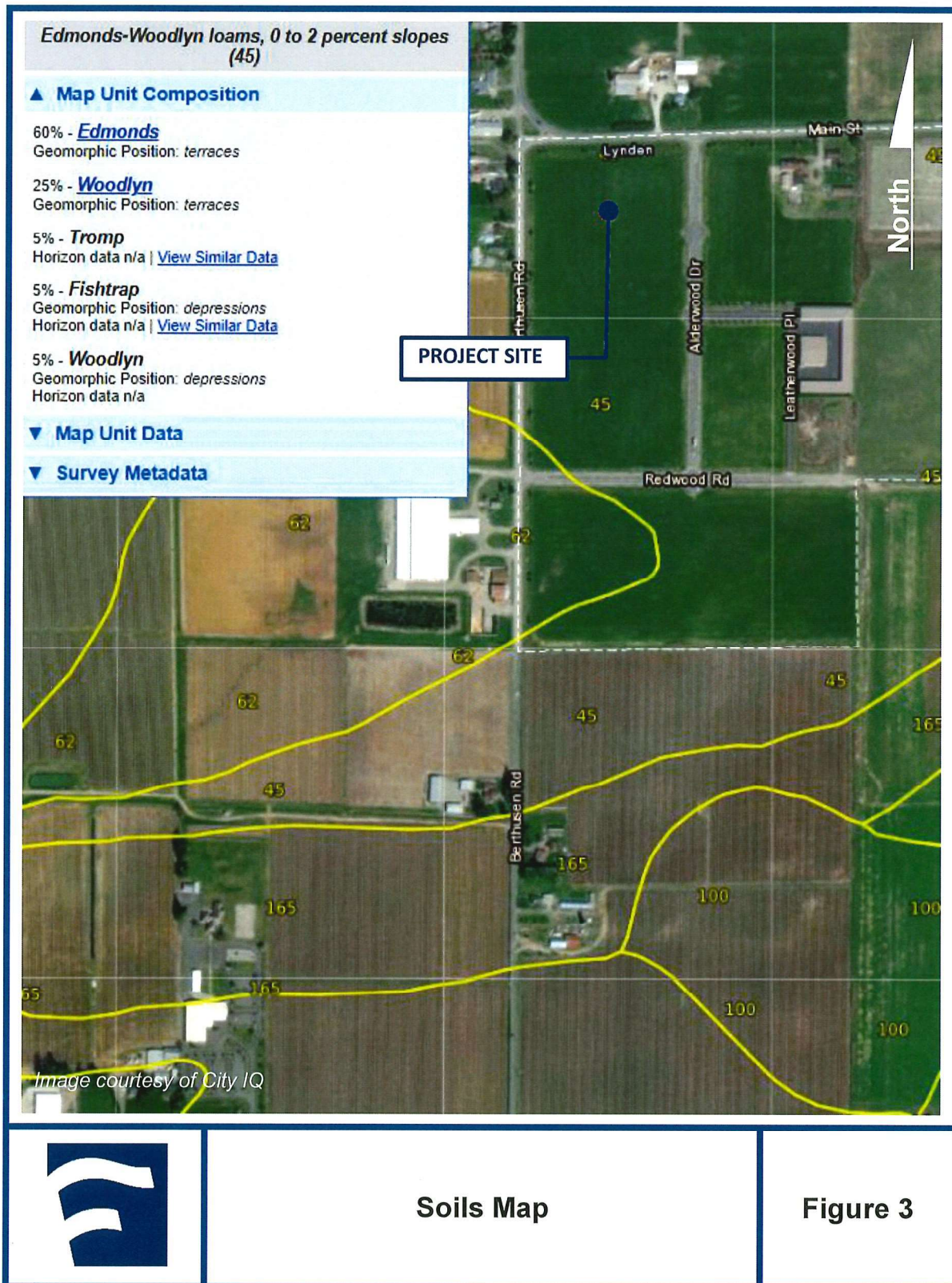
Vicinity Map

Figure 1



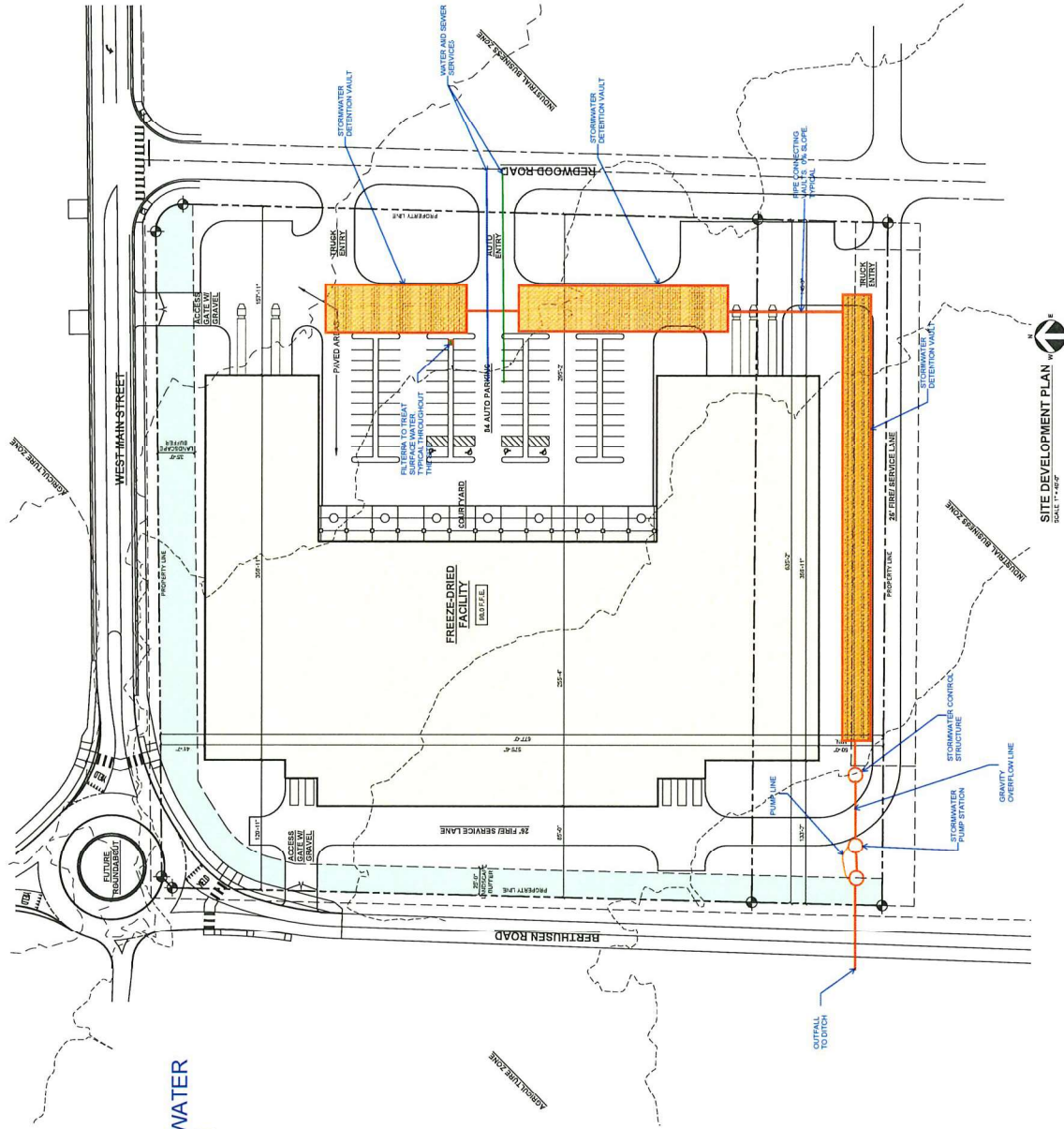
Aerial Photograph of Site

Figure 2



Preliminary Site Plans

SCHEMATIC STORMWATER MANAGEMENT PLAN



SITE DEVELOPMENT PLAN
SCALE: 1" = 40'-0"

<p>GENERAL NOTES:</p> <p>1. THIS DOCUMENT IS PRELIMINARY IN NATURE AND IS NOT TO BE USED FOR PERMITS AND SEALED DOCUMENT.</p>	<p>REVISIONS</p>	<p>DATE</p> <p>2/10/20</p>	<p>PROJECT</p> <p>WATERWORKS</p>
	<p>PRELIMINARY NOT FOR CONSTRUCTION 09/01/21</p> <p>THIS DOCUMENT IS PRELIMINARY IN NATURE AND IS NOT TO BE USED FOR PERMITS AND SEALED DOCUMENT.</p>	<p>CONTRACTOR</p> <p>UNION</p>	<p>DATE</p> <p>2/10/20</p>
<p>ALL RIGHTS AND EMPLOYMENT ARE RESERVED BY THE ENGINEERING FIRM. THE ENGINEERING FIRM SHALL BE RESPONSIBLE FOR THE DESIGN AND CONSTRUCTION OF THE PROJECT. THE ENGINEERING FIRM SHALL NOT BE RESPONSIBLE FOR THE DESIGN AND CONSTRUCTION OF THE PROJECT IF THE PROJECT IS NOT DESIGNED AND CONSTRUCTED IN ACCORDANCE WITH THE DESIGN AND CONSTRUCTION DOCUMENTS.</p>		<p>DESIGNER</p> <p>FFFE</p>	<p>PROJECT</p> <p>WATERWORKS</p>
<p>FFFE FOOD FACILITY ENGINEERING, INC. 2000 WASHINGTON ST., SUITE 100, WASHINGTON, WA 98090 TEL: 206.461.1000 FAX: 206.461.1001</p>		<p>DATE</p> <p>2/10/20</p>	<p>PROJECT</p> <p>WATERWORKS</p>
<p>SITE DEVELOPMENT PLAN</p>			

Stormwater Pollution Prevention Plan (SWPPP)

Element #1 Preserve Vegetation/Mark Clearing Limits

The project site has been cleared and maintained with grass for many years. No new tree clearing will be required. However, existing vegetation on site shall be retained as much as possible during construction. The contractor shall clearly delineate the work limits prior to construction.

Element #2 Establish Construction Access

Construction traffic will access the site from Redwood Road. All construction traffic, such as personal vehicles, work trucks, etc. that will routinely leave the site shall remain on existing paved surfaces or stabilized temporary parking areas as much as possible. Construction traffic may only leave the existing stabilized surfaces if necessary for equipment or material transfers. Construction personnel, vehicles, and equipment shall not block or obstruct access to any existing, developed residential lots. Vehicles and equipment shall not block travel lanes without a traffic control plan. Paved roads will be cleaned at the end of each day and sediment transported to roads will be swept and disposed of at a controlled disposal area.

Element #3 Control Flow Rates

Stormwater flow control facilities are required for the project. An underground stormwater detention facility is proposed to control stormwater runoff rates. The risk of construction stormwater leaving the site is also low due to the sandy soils found on site. See *Element #13 Protect Low Impact Development BMPs* for additional guidance.

Element #4 Install Sediment Controls

Sediment controls work in conjunction with BMPs in *Element #5 Soil Stabilization* to retain sediment on site to the maximum amount practicable. The duff layer, native topsoil, and natural vegetation or grasses on site will be retained in an undisturbed state to the maximum extent practicable. Silt fence will be installed along the work limits. Also, if excavated material is placed within the project site such that runoff from the material would flow off site, then sediment controls, such as temporary berms or silt fence, must be installed downhill from the newly graded material. Any temporary drainage channels that may be required during construction will be stabilized with linings and check dams.

Element #5 Stabilize Soils

Construction erosion control BMPs shall be installed prior to soil-disturbing activities to the maximum extent practicable. Any BMPs that cannot be installed prior to grading or soil disturbance shall be installed and made operable immediately after installation is made possible. Disturbed soils will be permanently stabilized on site with pavement or with permanent plantings and seeding. All exposed and unworked soil will be temporarily stabilized with seeding, mulch, straw, nets and blankets, or plastic covering per DOE standards. No soil will be exposed and unworked for more than seven days between May 1 and

September 30. No soil will be exposed and unworked for more than two days between October 1 and April 30. In addition, weather conditions shall be monitored (including before holidays and weekends) for purposes of preparing the site for predicted weather conditions at all times during the year.

Element #6 Protect Slopes

Minor grading and shaping will be performed on site. This work will not result in significantly tall cut or fill slopes. Any slopes that are created as part of the project will be stabilized with retaining walls or with soil covering per *Element #5 Stabilize Soils*.

Element #7 Protect Drain Inlets

All drainage inlets made operable during construction will be protected so that no stormwater may enter the conveyance systems without filtration or other treatment for sediment. In addition, existing drainage inlets near the work area will also be fitted with temporary filter inserts or another applicable inlet protection. Additional inlet protection may be required if sediment is tracked onto pavement beyond the catch basins that are identified on the plans. These inlet protections are extremely important since they drain to underground infiltration facilities.

Element #8 Stabilize Channels and Outlets

No open channels or outlets are proposed as part of this project. If any open channels are used during construction, the channels and their outlets shall be thoroughly stabilized per guidelines in the current Stormwater Management Manual for Western Washington.

Element #9 Control Pollutants

All pollutants, including waste materials and demolition debris, that occur on site during construction shall be handled and disposed of in a manner that does not contaminate or cause the contamination of stormwater. Clearing and land-disturbing activities will also be limited to the minimum area necessary in a further effort to minimize sediment transport off site. Concrete trucks and equipment shall not be washed off into the street or into existing or proposed drainage systems. Maintenance of heavy equipment involving oil changes, hydraulic system drain down, solvent and de-greasing clearing and/or other activities that may result in discharge or spillage of pollutants to the ground or into stormwater runoff will be conducted with spill prevention measures in place, including the use of drip pans and conducting maintenance on a temporary pad that can be used to capture large spills.

Element #10 Control De-Watering

No dewatering is anticipated for this project. If dewatering does become necessary during construction, the contractor shall prepare a dewatering plan in accordance with City of Lynden standards and Department of Ecology requirements.

Element #11 Maintain BMPs

All temporary and permanent erosion and sedimentation control BMPs shall be inspected by a certified erosion and sedimentation control lead (CESCL) and shall be repaired as needed to assure continued performance of their intended function. All maintenance and repair shall be conducted in accordance with BMP specifications.

All temporary erosion and sediment control BMPs shall be removed within 30 days after final site stabilization or after the temporary BMPs are no longer needed. Trapped sediment shall be removed or stabilized on site. Disturbed soil areas resulting from removal of BMPs or vegetation shall be permanently stabilized.

Element #12 Manage the Project

Phasing of Construction

This project will be built in a single phase. To the extent practicable, site disturbance, clearing, and construction will be scheduled appropriately to minimize the time that soil may be exposed. Clearing and grading activities will occur after the applicable permits have been obtained. When establishing clearing and grading areas, consideration will be given to minimizing removal of existing vegetation and minimizing disturbance and compaction of native soils except as needed for building purposes.

Seasonal Work Limitations

From October 1 through April 30, soil will not remain exposed and unworked for more than 2 days. From May 1 through September 30, soil will not remain exposed and unworked for more than 7 days. In addition, weather conditions shall be monitored (including before holidays and weekends) for purposes of preparing the site for predicted weather conditions at all times during the year. BMPs that are effective in stabilizing soils and protecting them from exposure to rain and wind or other climatic conditions will be implemented throughout the project. Inspection and evaluation of the effectiveness of the BMPs will occur on a daily basis. In the event of a forecasted precipitation event, the contractor shall evaluate existing BMPs on site and shall implement additional BMPs if the existing site conditions are inadequate to prevent rainfall from contacting unstabilized surfaces.

Inspection and Monitoring

As previously mentioned, all BMPs will be inspected, maintained, and repaired as needed to assure continued performance of their intended function. In the event that inspection and/or monitoring reveals that BMPs identified in the construction SWPPP are inadequate due to the actual discharge or potential to discharge a significant amount of any pollutant, this SWPPP shall be appropriately modified in a timely manner. The City of Lynden requires a CESCL to perform erosion control inspections and to provide recommendations for this project during construction. The contractor shall provide the name and valid certification for the project CESCL to the City of Lynden.

Maintenance of the Construction SWPPP

The construction SWPPP will be retained on site and will be updated on a regular basis. A log will be attached to the construction SWPPP to facilitate regular updates. Modifications to the construction SWPPP will be made whenever there is a significant change in the design, construction, operation, or maintenance of any BMP. If the contractor does not implement BMPs specified on these plans and if site conditions do not require the BMPs, the contractor shall provide written justification in the SWPPP for why the BMP is unnecessary.

Element #13 Protect Low Impact Development BMPs

No Low Impact Development BMPS are proposed.