



January 15, 2009  
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Carol Lumb, Senior Planner  
Department of Community Development  
City of Tukwila  
6300 Southcenter Boulevard, Suite 100  
Tukwila, WA 98188

RE Shoreline Master Plan Update  
Costco Wholesale  
400 Costco Drive, Tukwila, Washington  
Costco Loc. No. 6 / Our Job No. 14193

Dear Carol:

On behalf of Costco Wholesale, Barghausen Consulting Engineers, Inc., is providing supplemental comments in response to the City's letter dated December 1, 2008.

We previously commented on the proposed Shoreline Master Program (SMP) by letter dated October 9, 2008. In that letter, concerns were raised regarding the buffer requirements and the lack of non-conforming provisions in the SMP.

1. Buffers.

Costco supports the City's modification on the last page of Attachment A, which provides: "End buffer on river side of existing improved street or roadway." Costco understands that this provision would apply to the Costco site with respect to Saxon Drive and Christensen Drive. The City should list roadways that meet this provision (including Saxon Drive and Christensen Drive) in the SMP.

With respect to areas other than improved streets or roadways, the City has generally rejected Costco's buffer comments, opting instead for a uniform, 125-foot buffer, regardless of individual property characteristics and potential engineering design solutions. Costco continues to object to the City's proposed 125-foot buffer.

2. Landscaping.

We suggest the following revisions to Attachment C-7:

1. General Requirements

"For any new development or redevelopment that disturbs the River Buffer in the Shoreline Jurisdiction, except single-family residential development of four or fewer lots, invasive vegetation must be removed and native vegetation planted and maintained in the River Buffer, including the river bank, to improve the ecological functions of the shoreline."

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We suggest that if shoreline improvements are required, that the SMP allow for a fee in-lieu-of payment to the City of Tukwila to design, permit, and construct improvements within the shoreline. We also suggest that the City provide clarification within the SMP or issue a written policy statement regarding the specific thresholds that would trigger such improvements.

3. Nonconforming Development.

We suggest the following revisions to Attachment G, Section E:

1. Adoption of the vegetation protection and landscape regulations contained in this SMP shall not be construed to require a change in the landscape improvements for any legal landscape area which existed on the date of adoption of this SMP, unless and until the property **within the River Buffer** is redeveloped ~~or alteration of the existing structure beyond the thresholds provided herein.~~
2. At such time as the property **within the River Buffer** is redeveloped ~~or the existing structure is altered beyond the thresholds provided herein~~ and the associated premises ~~does not comply with the vegetation protection and landscape requirements of this SMP,~~ a landscape plan which conforms to the requirements of this SMP shall be submitted to the Director for approval.

Again, Costco suggests that the City of Tukwila provide clarification within the SMP or issue a written policy statement regarding the specific thresholds that trigger such improvements.

Thank you for the opportunity to provide additional comments on the City's draft SMP.

Sincerely,



John Ellingsen  
Senior Planner  
On Behalf of Costco Wholesale Corporation

JCE/ath

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cc: Rick Jerabek, Costco Wholesale Corporation  
Gail Tsuboi, Costco Wholesale Corporation