



April 6, 2023

Nabila Comstock, Assistant Planner  
City of Puyallup  
333 S Meridian  
Puyallup, WA 98371

**Re: Wetland and Stream Study for American Pride Lending Property 212 Todd Road NE—Third Party Review**

Dear Nabila:

Confluence Environmental Company (Confluence) has reviewed the wetland and stream study (the critical areas study report) and mitigation plan sheet submitted by Altmann Oliver Associates, LLC (AOA) for the American Pride Lending property project (PLSSP20230011) located at 212 Todd Road NE, Puyallup Washington (Parcel 042022-2008) (AOA 2022).

## **COMPLETENESS REVIEW**

Confluence found that the critical areas study report was incomplete according to the regulations outlined in Puyallup Municipal Code (PMC) Chapter 21.06 for Critical Areas Regulations. The following elements were missing from the report: The qualifications of the person(s) preparing the report and analysis of their compliance with the city's Qualified Professional requirements (PMC 21.06.210 (108)).

The mitigation plan currently consists of a single plan sheet and requires a few additional elements to meet the City of Puyallup's requirements for mitigation plans (as described in Puyallup Municipal Code 21.06.530 and 21.06.620). The mitigation plan should be updated to include the following:

- A description of the proposed storm water management plan for the site, including consideration of impacts to drainage alterations.
- A site vicinity map.
- A figure showing critical areas and buffers within the study area (including within 300 feet of the site/project area).
- A detailed assessment of the potential impacts to critical areas and buffers resulting from site development.


- Storm water management features, on the mitigation plan sheet or a separate sheet.

## TECHNICAL REVIEW

Confluence conducted a site visit to the project property on March 28, 2023. During this site visit, we conducted a brief wetland and stream reconnaissance on the property to evaluate the location of the boundaries of Wetland A and Wapato Creek, as described in the report prepared by AOA. We agreed with the findings and conclusions of the report.

Confluence agrees with the plant schedule, planting plan, and specifications shown on the mitigation plan sheet.

## SUMMARY

In summary, we agreed with the findings of the critical areas study and with the mitigation plan; however, the mitigation plan is missing a few elements, and the qualifications of the personnel who conducted the critical areas study should be included in the report. We recommend that AOA update the report and mitigation plan and include all missing information detailed in the Completeness Review section,  above.

Respectfully yours,



**KERRIE McARTHUR, PWS, CERP, FP-C**  
Managing Senior Biologist  
206.999.6201  
[kerrie.mcarthur@confenv.com](mailto:kerrie.mcarthur@confenv.com)

## REFERENCES

AOA (Altmann Oliver Associates, LLC). 2022. Wetland and stream study, American Pride Lending Property, 212 Todd Road NE, Puyallup, WA (P-21-0146). Prepared for American Pride Lending, Puyallup, Washington, by Altmann Oliver Associates, LLC, Carnation, Washington.