in site architects

PRRWF20250002

Wesley Homes Bradley Park PH2 – Retaining Wall
(PERMIT APP# PRRWF20250002)
Puyallup, WA
August 12, 2025

City of Puyallup – Permit Center
Building Division
Yianni Charitou and Chris Beale

Architect: InSite Architects
1000 University Avenue West, Suite 130 / St. Paul, MN 55104
Phone 952.412.5546

Owner: Wesley Homes

Dear Sirs -

Please see responses to the following:

PERMIT REVIEW CORRECTION LETTER – May 6, 2025

ENGINEERING REVIEW:

- The retaining wall building permit site plan must match the approved civil site plan. Since there was a significant change to the building footprint that impacts storm drainage, utility crossings, and other civil components, a formal Plan Change Request (PCR) is required for civil construction permit PRCCP20231028. Please email the new civil plans and PCR form to the City's development engineer assigned to the civil permit.

The Engineering review on the retaining wall building permit cannot be approved until the civil permit PCR is approved first since the two permits must match. It is the applicant's responsibility to coordinate the next building permit submission with the approval of the PCR to avoid redundant reviews and permit fees. [SITE PLAN, sheet A0.1] [SITE PLAN - RESUB; 2025\PRRWF20250002\SITE PLAN - RESUB.pdf; pg. 1]

- Civil PCR-02 was approved on 8/4/25 and includes the retaining wall information. Per comments included here, it has been uploaded with Architectural Site plans.

- Provide a drainage plan for the proposed retaining wall that depicts the footing drain at the back of the wall. The referenced footing drain is not depicted in the AHBL structural plans, Barghausen civil plans, or in any details. More information is needed on the footing drain

design and its connection to the onsite stormwater system. [SITE PLAN, sheet A0.1] [SITE PLAN - RESUB; 2025\PRRWF20250002\SITE PLAN - RESUB.pdf; pg. 1]

- To satisfy the utility overlay requirement from the first review corrections, please submit the approved PCR civil plans with the next retaining wall resubmission. [SITE PLAN, sheet A0.1] [SITE PLAN - RESUB; 2025\PRRWF20250002\SITE PLAN - RESUB.pdf; pg. 1]

- The approved PCR-02 has been included with this resubmission. Please see sheets C5 & C10.

PLANNING REVIEW:

What is the exposed face height of the retaining wall? The structural plans are not clear, they only appear to show top of wall elevations.

- Exposed wall heights are shown in the circle on the Civil sheet. The heights have greatly changed becoming shorter not only in height by more than half, but also in length.

Will the retaining wall construction require disturbance and replanting of the averaged wetland buffer at the time this wall is constructed? The construction plan sheets need to show area of disturbance to the site and the limits of the area of work since the construction will occur adjacent to a wetland buffer area.

- Please refer to attached response from the wetland biologist including an updated technical memorandum regarding the wetland area.

Sincerely,

in site architects

Jill D. Krance, AIA, LEED AP
Partner
Mobile: 952-412-5546
Direct: 612-252-4822

Cc:

Kevin Anderson, Wesley
Anthony Mizin, Walsh Construction
Steve Nornes, Senior Housing Partners

Attachments:
Grette Environmental – Biologist Response – dated 7/7/25
Grette Technical Memo - dated 062525

FARALLON CONSULTING | Grette Associates ENVIRONMENTAL CONSULTANTS

Kevin Anderson - CEO
Wesley Homes
815 South 216th Street
Des Moines, WA 98198-6332

July 7, 2025

Re: City of Puyallup Permit Review Correction Letter – Biologist Response

Dear Mr. Kevin Anderson:

Farallon Consulting, L.L.C. dba Grette Associates (Grette) has prepared this letter in response to the City of Puyallup's (City) critical area permit review comments submitted May 6 and May 14, 2025, regarding Wesley Homes' Phase 2 project located at 707 39th Avenue Southeast in Puyallup. Provided below is a summary of the City's comments (italic) followed by Grette's response.

May 6, 2025 Comments and Response

City Comment #1: Will the retaining wall construction require disturbance and replanting of the averaged wetland buffer at the time this wall is constructed? The construction plan sheets need to show area of disturbance to the site and the limits of the area of work since the construction will occur adjacent to a wetland buffer area.

Based on the information provided, grading will not extend into any wetland buffer area. Please see the project design sheets for details.

May 14, 2025 Comments and Response

City Comment #1: Grette needs to provide updated analysis and narrative to the wetland report based on the current plans. It appears all that was submitted was an update to Attachment B. Attachment B shows enhancement area where sheet C5 shows additional permanent grading disturbance and a relocated stormwater dispersion trench. Is the additional grading area and dispersion trench now located in the buffer area?

Grette revised the wetland buffer averaging plan to address the minor changes to the position of the building. These revisions include updating the narrative of the buffer averaging plan to address the reconfiguration of the increased buffer area as well as including a revised Attachment B which shows the modifications of the increased buffer area.

The relocated stormwater dispersion trench and additional grading area are both located outside of the buffer. Please refer to the updated wetland buffer averaging plan and design sheets for further details.

City Comment #2: Please analyze 21.06.940(1)(C) for consistency with regard to buffer allowances for storm facilities; provide a coordinated (civil and biologist) response to (i)-(vi).

- *Is the dispersion trench located in the outer 25 percent of the buffer?*

The dispersion trench is located entirely outside of the buffer. Please see Attachment B of the revised buffer averaging plan for details.

- *Is the flow path downslope of the dispersion trench vegetated in a manner that will prevent sedimentation into the wetland?*

The flow path downslope of the relocated dispersion trench is currently vegetated with blackberry and grass. As summarized in the buffer averaging plan, approximately 3,500 square feet of wetland buffer enhancement will occur to reestablish a native vegetation community in this area. As such, the area downslope of the dispersion trench will contain vegetation that will provide valuable water quality and hydrologic wetland buffer functions.

- *Will the hydroperiods be affected?*

The hydroperiods of Wetland C will not change.

Based on the information provided, the pre-developed contributing basin of Wetland C was approximately 0.63-acre of forested land which equates to an annual average runoff equal to 0.895 acre-feet of stormwater. A dispersion trench was constructed in Phase 1 to maintain Wetland C hydrology and accommodates approximately 0.3-acre of roof area which equates to 0.900 acre-feet of annual average runoff. A wetland hydroperiod analysis was presented in the approved Phase 1 stormwater report. For Phase 2, the existing dispersion trench will be relocated approximately 65 feet to the northwest to avoid conflicts with the Phase 2 building expansion. A new connection to the dispersion trench is proposed from a retaining wall drain which will convey minimal amounts of groundwater (if any) away from the new wall and toward Wetland C; which is the natural flow direction based on topography. While the amount of groundwater is undefined, the hydroperiod analysis has previously accounted for groundwater and we expect impacts to the wetland hydrology to be insignificant.

City Comment #3: Please analyze the averaging code (21.06.930(4)(a)-(c) based on the newest plan set. Does this still meet the averaging standards or is this compensatory mitigation based on the current plans? An additional mitigation plan may be necessary if the averaging code cannot be met.

Yes, the revised buffer averaging plan is consistent with PMC 21.06.930. The only change that occurred from the 2024 buffer averaging plan is a reconfiguration of the shape of the increased wetland buffer area. Approximately 191 square feet of wetland buffer that was previously proposed will be shifted from the west side to the east side of the proposed increased wetland buffer area. Please refer to the updated wetland buffer averaging plan for further details.

City Comment #4: Provide updated planting plans with the wetland report for offset mitigation due to grading and/or dispersion trench vegetated flow path, as necessary.

The grading and dispersion trench are located entirely outside of the buffer. However, the flow path of the relocated dispersion trench through the buffer is within the buffer enhancement area that will be densely revegetated with native trees and shrubs.

If you have any questions, please contact me at (253) 573-9300, or by email at chadw@gretteassociates.com.

Regards,

Chad Wallin, PWS
Biologist
Farallon Consulting L.L.C. dba Grette Associates

References:

Grette Associates. 2024. Wesley Homes – Bradley Park Phase II: Buffer Averaging Plan. Prepared for Wesley Homes. January 19, 2024.

Grette Associates. 2025. Wesley Homes – Updated Bradley Park Phase II: Buffer Averaging Plan. Prepared for Wesley Homes. June 25, 2025.

TECHNICAL MEMORANDUM

Prepared for: Kevin Anderson – CEO
Wesley Homes
815 South 216th Street
Des Moines, WA 98198-6332

June 25, 2025

Prepared by: Farallon Consulting, LLC dba Grette Associates
2709 Jahn Ave NW, Suite H-5
Gig Harbor, WA 98335

File No.: 3412-001

Re: Wesley Homes – Updated Bradley Park Phase II: Buffer Averaging Plan

1 INTRODUCTION

Grette Associates is under contract with Wesley Homes to prepare a revised wetland buffer averaging plan (Plan) in response to the City of Puyallup's May 14, 2025 critical area review comments associated with the Bradley Park Phase II project.

The purpose of this Plan is intended to update the 2024 wetland buffer averaging plan (Grette Associates 2024) in response to the updated project design that included minor changes to the orientation of the new building from what was addressed in the 2024 wetland buffer averaging plan.

2 BACKGROUND

2.1 2017 Wetland Delineation and Mitigation Summary

In support of Phase I and II project, Soundview Consultants LLC (SVC) identified and delineated four wetlands within the project site during their assessment performed in 2013 (Wetlands A, B, C, and D; SVC 2017). Wetland C is the only wetland feature in the vicinity of the Phase II project area; as such this section is limited to a summary of Wetland C and the approved buffer reduction outlined in the 2017 report.

The 2017 report characterizes Wetland C as a palustrine scrub-shrub wetland (Cowardin et al. 1979) that was approximately 3,075 square feet in size. Dominant vegetation included salmonberry (*Rubus spectabilis*) and soft rush (*Juncus effusus*). Hydrological support came primarily from uphill seeps and shallow groundwater.

Wetland C was rated Category III and was subject to a standard buffer width of 110 feet; however, this standard buffer was approved to be reduced to 50 feet (SVC 2017).

2.2 2023 Wetland Verification

In response to the City's July 11, 2022 review comments and the subsequent October 26, 2022 meeting with City staff, Grette Associates performed a site visit to verify if the southern boundary of Wetland C has significantly changed since SVC's 2013 delineations.

Based on data collected, the southeastern portion of Wetland C extended approximately 10 feet south of the wetland boundary delineated in 2013 (Grette Associates 2023; Attachment A). A preliminary wetland rating (excludes rating figures) was completed using the current version of the Washington Department of Ecology 2014 wetland rating system (Hruby and Yahnke 2023). The wetland was rated Category III which is consistent with SVC's rating summarized in their 2017 report.

2.3 December 2023 Critical Area Review Comments

The City provided comments (December 19, 2023) upon review of Grette Associates' 2023 verification report. A summary of the City's comments associated with the review of the 2023 verification report is provided below:

- New modeling and a qualitative assessment of possible impacts associated with additional stormwater to Wetland C needs to be provided;
- Plans need to be revised to show the expansion of the modified buffer to reflect the 2023 wetland boundary;
- Provide mitigation sequencing and impact analysis to address the updated wetland buffer;
- Revise the 2023 verification report to include a copy of the preliminary rating form.

3 REVIEW RESPONSE

On January 2, 2024, the project team and the City participated in a virtual meeting to review the December 2023 comments. The project team informed City staff that the roof drain for the new care center will no longer be directed to the dispersion trench upslope of Wetland C. In addition, the existing dispersion trench will be replaced and repositioned outside of the buffer for Wetland C. This update appeared to sufficiently address the City's comment regarding additional stormwater analysis associated with Wetland C.

In regards to the wetland boundary changes, the City provided clarification for requiring an update to the previously approved 50-foot wetland buffer and discussed potential options for a path forward to address this issue. It was determined that the appropriate approach to address the buffer change would be through buffer averaging. Provided below is a summary of mitigation sequencing and a proposed buffer averaging plan.

The 2023 verification report was updated to include the preliminary rating form completed by Grette. Please note that this rating form did not include a formal figure set because the 50-foot wetland buffer was previously approved by the City. Grette evaluated the previous rating figure (SVC 2017) and reviewed the online databased to prepare the preliminary rating.

4 BUFFER AVERAGING PLAN

This buffer averaging plan has been prepared to address the southern expansion of Wetland C that extends towards the Phase II project area. In summary, the wetland boundary has extended approximately 10 feet south, which also extends a portion of the previously approved 50-foot wetland buffer to the south (Attachment 1). Approximately 400 square feet of new buffer extends into the project area.

4.1 Mitigation Sequencing

Per Puyallup Municipal Code (PMC) 21.06.610, an applicant shall demonstrate that all reasonable efforts have been made to avoid, minimize, or compensate for any potential impacts that may occur as a result of a proposed project.

4.1.1 Avoidance

Elements of Phase II were evaluated during the review and approval of Wesley Home's Phase I project. During the construction of Phase I, all general earth work within the Phase II project area was completed which extended to the edge of the established 50-foot buffer associated with Wetland C. Furthermore, all associated infrastructure such as roads, parking lots, and sidewalks have been constructed throughout the Phase I and Phase II project areas. Given the existing development, there is no design alternative to move the new care center to avoid wetland buffer impacts while achieving the goals and objectives of the project as well as other City design standards.

4.1.2 Minimization

All minimization efforts were made during design of both Phase I and Phase II (SVC 2017). As noted above, with the exception of the actual care center, the Phase II site development was largely completed during the construction of Phase I. No additional minimization efforts are available in response to the unanticipated and after-the-fact buffer change.

4.1.3 Rectifying and Reducing

Given the Phase II project area within the new buffer area is permanent, restoration or eliminating the impact over time is not possible.

4.1.4 Compensation

Given the existing conditions of the 400 square feet of new buffer, it is Grette's professional opinion that the encroachment into this area will not have a significant impact to the functions of Wetland C or its buffer. As such, with an approved buffer averaging plan, compensatory actions are not necessary to address the updated wetland buffer. Per PMC 21.06.930, any approved buffer averaging plan will need to establish a native plant community. These conditions are currently lacking within the new modified buffer area; therefore, buffer enhancement will be performed in this area for compliance with PMC 21.06.930. See below for more detail.

4.2 Averaging Plan

Per PMC 21.06.930, a proposed buffer averaging plan shall demonstrate that there is no net loss of buffer area, development will not reduce the overall function of the wetland, and the remaining buffer width shall not be less than 33 percent of the standard buffer width.

The proposed buffer area to be reduced is approximately 400 square feet in size. The proposed buffer averaging will increase buffer area by approximately 735 square feet immediately adjacent to where the buffer reduction will occur (Attachment 2).

Please note that the revised buffer averaging plan only consists of a minor change in the configuration of the increased wetland buffer area. This relocated approximately191 square feet of increased buffer area from the westside to the eastside of the 2024 proposed buffer averaging plan.

The updated wetland buffer that extends approximately 10 feet south of the existing 50-foot buffer is relatively developed and largely devoid of vegetation and doesn't provide much, if any, buffer function. More specifically, this area was previously cleared and graded during Phase I construction in preparation for Phase II and was not previously considered wetland buffer. It is Grette's professional opinion that reducing the buffer by 10 feet (20%) to maintain the previously approved buffer boundary where the care facility is planned to be constructed will not have an adverse impact to existing wetland or buffer functions.

Per PMC 21.06.930, vegetation enhancement shall be performed in conjunction with a proposed buffer averaging plan when those buffer area(s) do not consist of a native plant community. Phase II will enhance the 201[1] square feet of additional buffer and enhancement through invasive species removal, namely Himalayan blackberry (approx. 3,500 sq. ft.), and native plantings within the portion of the buffer adjacent to the new care facility (Attachment 2).

4.2.1 Planting Schedule

The planting schedule for the proposed buffer enhancement is presented below in Table 1. In order to reduce mortality, a late fall planting installation (October – November) schedule is preferred. Plants should not be installed during or immediately before freezing weather.

Table 1. Planting Schedule

Scientific	Common Name	Size	Spacing[1]	Quantity[1]	Buffer Location
Trees					
Acer macrophyllum	big leaf maple	5 gallon	10 feet	21	Inner Area[2]
Acer circinatum	vine maple	2 gallon	10-15 feet	6	Averaging Area
Frangula purshiana	cascara	2 gallon	10-15 feet	6	Averaging Area
Alnus rubra	red alder	2 gallon	10 feet	14	Inner Area[2]
Shrubs					
Holodiscus discolor	oceanspray	1-2 gallon	4-6 feet	50	Inner / Averaging Area[3]
Oemleria cerasiformis	osoberry	1-2 gallon	4-6 feet	50	Inner / Averaging Area[3]
Corylus cornuta	beaked hazelnut	1-2 gallon	4-6 feet	50	Inner / Averaging Area[3]

[1] Spacing and quantities estimated based on the Sound Native Plants Plant Quantity Calculator (2023).
[2] Species to be planted with 50-foot buffer area.
[3] 15 shrubs will be planted in the averaging area and 35 shrubs will be planted in the inner buffer area.

Plant installation will be performed in accordance with the specifications outlined in this Plan. Any alterations to the planting plan due to site conditions will require prior approval from the project biologist and/or land architect.

4.2.2 Post-Installation Inspections and Monitoring

Compliance monitoring will consist of evaluating the plantings immediately after construction to confirm the plan was followed and plants were installed appropriately. A walk-through survey will be conducted by a qualified biologist to verify that the installation conforms to the approved plan. Following completion of the post-installation inspection, a memorandum will be prepared to verify that the enhancement was correctly implemented and document any changes to the

[1] This enhancement area includes the 725 square feet of increased buffer and the 218 square feet of new 50-foot buffer that extends into the enhancement area.

planting plan that may have occurred. The post-installation inspection will occur no later than 30 days after plants have been installed.

4.2.3 Long-Term Monitoring

Long-term monitoring will be conducted over a three-year period for compliance with PMC 21.06.930 with observations conducted during years 1, 2, and 3 (Table 2). The purpose of the long-term monitoring program is to evaluate the establishment and maintenance of the plant communities within the enhancement areas. The long-term monitoring associated with this plan will be completed concurrently with the current mitigation monitoring that is occurring for Phase I (SVC 2017).

4.2.4 Performance Standards

Performance standards outlined in Table 2 are established based on the buffer averaging requirements defined in PMC 21.06.930(4).

Table 2. Performance Standards

Restoration Goal	Functional Objective	Performance Standard	Year Inspected	Sampling Method
Provide improved buffer functions	1. Plant an assortment of native trees and shrubs within approx. 3,700 sq. ft. of wetland buffer area (3,500 square feet of buffer enhancement area and 200 square feet of buffer creation area).	1a. The buffers will be free of trash and dumping each monitoring year.	0, 1, 2, 3	Visual walk through
		1b. A minimum of 80% survival of planted vegetation each monitoring year[1,2].	0, 1, 2, 3	Visual walk through
		1c. A maximum of 20% invasive and noxious species coverage throughout the monitoring period.[3]	0, 1, 2, 3	Visual walk through

[1] 100% percent survival during the post-installation inspection.
[2] All dead plants will be replaced by the landscape contractor at Year 1.
[3] Class A, B and C-listed species in the most current Washington State Noxious Weed List (as issued by the Washington State Noxious Weed Control Board).

If you have any questions on this memo, please contact me at (253) 573-9300, or by email at chadw@gretteassociates.com.

Regards,

Chad Wallin, PWS
Biologist

References

Cowardin, L. M., V. Carter, F. C. Golet, and E. T. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats for the United States. FWS/OBS-79/31, U.S. Department of Interior, Fish and Wildlife Service. Washington D.C.

Grette Associates, LLC. 2023. Wesley Homes – Bradley Park Phase II. Wetland Verification Technical Memorandum. Prepared for Wesley Homes. November 2, 2023.

Grette Associates. 2024. Wesley Homes – Bradley Park Phase II: Buffer Averaging Plan. Technical Memorandum. Prepared for Wesley Homes. January 19, 2024.

Soundview Consultants LLC. 2017. Wetland Delineation, Habitat Assessment, and Final Mitigation Plan: Wesley Homes – Puyallup Senior Living. Prepared for: Wesley Homes. Revised August 2017.

ATTACHMENT A

WETLAND VERIFICATION MAP

WETLAND C

WB

SP2

SP3

SP1

10-FOOT EXPANSION

CLEARING LIMITS (TYP.)

MODIFIED WETLAND BUFFER

EX CB

INLET

DP-7

Existing stormwater dispersion trench

Existing stormwater dispersion trench

LEGEND

- APPROX. SAMPLE PLOT LOCATIONS
- APPROX. WETLAND BOUNDARY FLAG
- WB — APPROX. PREVIOUSLY DELINEATED WETLAND BOUNDARY
- APPROX. EXPANDED WETLAND BOUNDARY

SCALE IN FEET

20 10 0 20

Grette Associates LLC
ENVIRONMENTAL CONSULTANTS
2709 Jahn Ave NW, Suite H-5
GIG HARBOR, WA 98335
(253) 573-9300
gretteassociates.com

PROJECT #: 621.008
DESIGNED BY: TH — DATE: 09/28/2023
CHECKED BY: CW — DATE: 09/28/2023

CLIENT: WESLEY HOMES

WESLEY HOMES - WETLAND VERIFICATION

SITE ADDRESS: PUYALLUP, WASHINGTON

DRAWING SCALE: SEE SCALE

WETLAND VERIFICATION BOUNDARIES

SHEET 1 OF 1

ATTACHMENT B

BUFFER AVERAGING AND ENHANCEMENT MAP

FOR

PHASE 2 - WESLEY BRADLEY PA

WETLAND C

3,500 square-foot Buffer Enhancement Area

EX DISPERSION TRENCH TO BE REMOVED AND REPLACED WITH NEW 50' DISPERSION TRENCH SEE SHEET C16

CONCRETE WALL W/ HANDRAIL PER ARCHITECTURAL PLAN

50'

4.9 TW=456.88 BW=452.00

6.0 TW=451.00 BW=445.01

1 NEW RETAINING WALL

NEW GRAVEL FIRE ACCESS PATH

EX DRAINAGE

446
448
450

457.00
457.00
457.00
457.00
457.00

451.14

6'

4.9 TW=456.88 BW=452.00

0.9 TW=456.90 BW=456.00

TW=452.87 BW=447.92 5.0

452.98

453.18

BUFFER ADDITION AREA=201 SF

456.6± ME

457.0± ME

EXISTING PATH

BUFFER REDUCTION AREA=191 SF

457.0± ME

Grette Associates
ENVIRONMENTAL CONSULTANTS
2709 Jahn Ave. NW, Ste. H5
Gig Harbor, WA 98335-7999
(253) 573-9300
gretteassociates.com

CLIENT: WESLEY HOMES

PROJECT #: 3412-001 DATE: 06/19/25
DESIGNED BY: TH DATE: 06/19/25
CHECKED BY: CW

WESLEY HOMES
BUFFER AVERAGING PLAN

SITE ADDRESS: PUYALLUP, WASHINGTON

DRAWING SCALE: 1:20

BUFFER ENHANCEMENT AREA

SHEET 1 OF 1