



March 31, 2023

Rachel Brown, Associate Planner  
City of Puyallup  
333 S Meridian  
Puyallup, WA 98371

**Re: Third-Party Review of “Update of the Biological Habitat Assessment of Deer Creek for Project Impacts from the Kilcha Sekyra Senior Housing Complex Regarding Federal and State Listed Endangered and Sensitive Species for Compliance with the Endangered Species Act (ESA)”**

Dear Rachel:

Confluence Environmental Company (Confluence) has reviewed the biological evaluation and floodplain habitat assessment report submitted by John Comis Associates, LLC (JCA), for the Easton Senior Housing project (PLCUP20220150) located at 704 25<sup>th</sup> Street SE, Puyallup Washington (Parcels 0420267003, 0420267027, 0420267028, 0420267013, 0420267008, 0420267007, 0420267001) (JCA 2023).

The SalmonScape GIS dataset (Figure 6), has “modeled presence” for Chinook salmon and steelhead trout in Deer Creek. The site has mapped as Zone AE for Deer Creek (not the Puyallup River) (see attached LOMR maps). Therefore, the project must be designed and an assessment of floodplain functions under pre- and post-development conditions conducted assuming these species are present.

The last sentence of Section E(b) (page 10) of the report states, “Therefore, no compensatory storage is recommended or should be required.” Because of the modeled presence of 2 ESA-listed species, compensatory flood storage will be required. However, on Figures 2 and 7 of the report, there is an area in the south labeled as compensatory flood storage pond, but this area was not labeled as compensatory floodplain storage on the standalone site plan submitted as part of the permit application. The drainage report states the project is within the AE floodplain and will be providing compensatory storage. A 1:1 fill to compensatory storage at equivalent elevations to that displaced from fill will be required to avoid “take” of any endangered species and avoid shifting the floodplain.

Please update the report to:

- document the property is in floodplain Zone AE;

- assume Chinook salmon and steelhead trout are present in Deer Creek, based on SalmonScape data;
- include an assessment of floodplain functions under pre- and post-development conditions; and
- describe the proposed compensatory floodplain storage.

If you have any comments or questions, please feel free to contact me.

Respectfully yours,



**KERRIE McARTHUR, PWS, CERP, FP-C**

Managing Senior Biologist

206.999.6201

[kerrie.mcarthur@confenv.com](mailto:kerrie.mcarthur@confenv.com)

## ATTACHMENTS

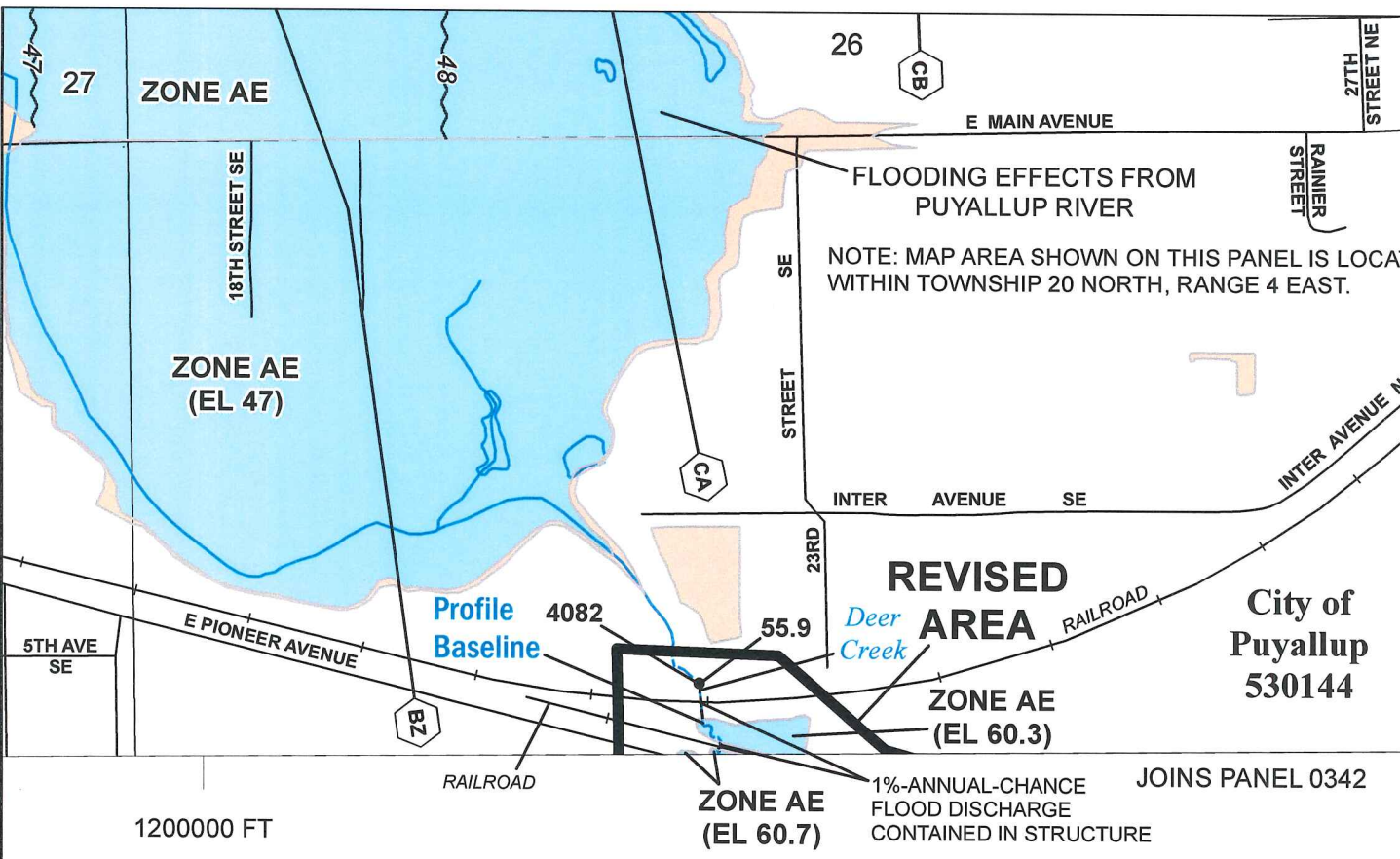
LOMR Map

## REFERENCES

JCA (John Comis Associates, LLC). 2022. Update of the Biological Habitat Assessment of Deer Creek for Project Impacts from the Kilcha Sekyra Senior Housing Complex Regarding Federal and State Listed Endangered and Sensitive Species for Compliance with the Endangered Species Act (ESA). Prepared for Kilcha Sekyra, Puyallup, Washington, by John Comis Associates, LLC, Tacoma, Washington.

C\_Puyallup\_001395\001395.015\_Task 17 - Easton Manor Senior Housing-FHA\Reports\Easton Senior Housing FHA review.docx

# Pierce County Unincorporated Areas 530138



**SPECIAL FLOOD HAZARD AREAS**

- Without Base Flood Elevation (BFE)  
Zone A.V, A99
- With BFE or Depth Zone AE, AO, AH, VE, AR
- Regulatory Floodway
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
- Future Conditions 1% Annual Chance Flood Hazard Zone X
- Area with Reduced Flood Risk due to Levee See Notes. Zone X

**OTHER AREAS OF FLOOD HAZARD**

**SCALE**

Map Projection:  
NAD 1983 UTM zone 10N;  
Western Hemisphere; Vertical Datum: NAVD 88

1 inch = 500 feet 1:6,000

0 250 500 1,000 Feet

0 75 150 300 Meters

**FEMA**  
National Flood Insurance Program

**NATIONAL FLOOD INSURANCE PROGRAM**  
FLOOD INSURANCE RATE MAP

**PIERCE COUNTY, WASHINGTON**  
and Incorporated Areas

Panel **334** OF **1375**

Panel Contains:

COMMUNITY	NUMBER	PANEL	SUFFIX
EDGEWOOD, CITY OF	530328	0334	E
PIERCE COUNTY	530138	0334	E
PUYALLUP, CITY OF	530144	0334	E
SUMNER, CITY OF	530147	0334	E

**REVISED TO  
REFLECT LOMR  
EFFECTIVE: April 4, 2019**

VERSION NUMBER  
1.1.1.0

MAP NUMBER  
53053C0334E

EFFECTIVE DATE  
MARCH 7, 2017



1%-ANNUAL-CHANCE  
FLOOD DISCHARGE  
CONTAINED IN STRUCTURE

1%-ANNUAL-CHANCE  
FLOOD DISCHARGE  
CONTAINED IN STRUCTURE

NOTE: MAP AREA SHOWN ON THIS PANEL IS LOCATED  
WITHIN TOWNSHIP 20 NORTH, RANGE 4 EAST AND  
TOWNSHIP 19 NORTH, RANGE 4 EAST.

JOINS PANEL 0334

REVISED  
AREA

122° 15' 07.5"

47° 11' 15"

JOINS PANEL 0361

ZONE AE  
(EL 60.3)

ZONE AE  
(EL 60.3)

ZONE AE

56°00'00"E

Deer Creek -  
Pioneer

Profile  
Baseline

SPECIAL FLOOD  
HAZARD AREAS

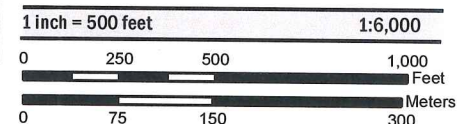
Without Base Flood Elevation (BFE)  
Zone A.V, A99  
With BFE or Depth Zone AE, AO, AH, VE, AR  
Regulatory Floodway

OTHER AREAS OF  
FLOOD HAZARD

0.2% Annual Chance Flood Hazard, Areas  
of 1% annual chance flood with average  
depth less than one foot or with drainage  
areas of less than one square mile Zone X  
Future Conditions 1% Annual  
Chance Flood Hazard Zone X  
Area with Reduced Flood Risk due to Levee  
See Notes. Zone X

SCALE

Map Projection:  
NAD 1983 UTM zone 10N;  
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National Flood Insurance Program

NATIONAL FLOOD INSURANCE PROGRAM  
FLOOD INSURANCE RATE MAP

PIERCE COUNTY, WASHINGTON  
and Incorporated Areas

PANEL 342 OF 1375

Panel Contains:

COMMUNITY	NUMBER	PANEL	SUFFIX
PIERCE COUNTY	530138	0342	E
PUYALLUP, CITY OF	530144	0342	E



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Deer Creek

26

ZONE AE

8TH AVE SE

9TH AVE SE

9TH AVE CT SE

20TH  
STREET E

10TH AVE SE

STREET SE

10TH AVE  
CT SE

23RD  
PL SE

11TH AVENUE SE

12TH AVE SE

21ST

13TH  
AVE SE

ZONE AO  
(DEPTH 1)

13TH ST SE

PL SE

14TH AVENUE SE

TERRACE DRIVE  
VALLEY  
VIEW DRIVE

VISTA  
DRIVE SE

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STREET SE

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