



April 25, 2023

Ms. Rachael Brown
Associate Planner
City of Puyallup Planning Services
333 South Meridian
Puyallup, WA 98371

Re: Cascade Shaw Development LLC: Third-Party Review of Critical Areas Assessment Report, Dated June 6, 2022

Dear Rachael:

This letter includes the results from the third-party review of the June 2022 revised Critical Areas Assessment (revised CAA) for the Cascade Shaw Development, LLC, property at 808 Shaw Road, Puyallup, WA 98372 (tax parcel number 0420351003) by Habitat Technologies (Habitat Technologies 2022). Confluence Environmental Company (Confluence) biologists reviewed this revised CAA; the following sections include our findings and recommendations.

The revised CAA was reviewed according to the critical areas report requirements outlined in Puyallup Municipal Code (PMC) 21.06.530 and for technical accuracy.

Confluence agrees with the wetland boundaries and wetland ratings as described in the revised CAA. It should be made clear that the project is vested under the 2021 PMC, which exempts Category IV wetlands less than 10,000 square feet from critical area regulations. Offsite Wetland Y is rated as a Category IV wetland and is estimated to be just under 10,000 square feet. This wetland has not been delineated and could be greater than 10,000 square feet. If Offsite Wetland Y is greater than 10,000 square feet, according to the 2021 PMC the project is vested under, it would have a buffer of 50 feet. Due to the estimated location of the wetland, it is approximately 260 feet from the property line. Therefore, the buffer of Offsite Wetland Y is not expected to encroach onto the property.

Confluence agrees with the very generalized mitigation plan concept; however, a detailed mitigation plan will need to be prepared for us to determine if the mitigation plan complies with PMC 21.

Per Puyallup GIS, the western portion of the site is within the Deer Creek Floodplain. Per PMC 21.07.050.C, a habitat assessment is required. The CAA should be updated to include a floodplain habit assessment.

The site plan shown in the CAA (Figure 9) appears to be an outdated site plan. This site plan shows development within the floodplain. It is our understanding that a new site plan was submitted that does not include development within the floodplain.

In summary, we suggest the CAA be revised as follows:

- Provide a detailed mitigation/restoration plan meeting the requirements of the 2021 PMC.

- Include a floodplain habitat assessment for the project discussing how the project does or does not impact the floodplain.
- Change Figure 9 to the current site plan.

Respectfully yours,



KERRIE McARTHUR, PWS, CERP

Senior Biologist

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REFERENCES

Habitat Technologies. 2022. Revised critical areas assessment, western portion of parcel 0420351003, Cascade Shaw Development, LLC, City of Puyallup, Pierce County, Washington (CAA). Project number B-19-1107. Prepared for Abbey Road Group Land Development Services Company, LLC, Puyallup, Washington, by Habitat Technologies, Puyallup, Washington.