



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Coastal Region • Region 6 • 48 Devonshire Road, Montesano, WA 98563-9618
Telephone: (360) 249-4628 • Fax: (360) 249-1229

August 31, 2023

City of Puyallup
ATTN: Chris Beale
333 S. Meridian
Puyallup, WA 98371

Dear Chris Beale:

Thank you for the opportunity to comment on PLPSP20230080 - Bradbury Place Townhomes Application, proposed by Contour Engineering LLC. The Washington Department of Fish and Wildlife (WDFW) is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. In recognition of our responsibilities, we submit the following comments for PLPSP20230080 - Bradbury Place Townhomes Application. Other comments may be provided in the future.

Project Area of Potential Effect:

The project is located at 2525 5th St SE in the City of Puyallup, WA.

Fish and Wildlife Resources and Recommendations:

Significant trees are important in developed areas for the ecological functions they provide. Large, significant trees provide refuge for migratory birds and wildlife where there is limited habitat due to development. Significant trees provide benefits that cannot be mitigated for by planting plans including a large shade cover that is important to humans and wildlife, and increased carbon storage. The City of Puyallup's [Vegetation Management Standards Administrative Policies and Procedures](#) (VMS) manual defines significant trees as healthy and growing trees greater than fifteen inches diameter breast height. The Critical Root Protection Zones for significant trees is: tree diameter (in inches) x 2, converted into feet.

In the Soundview Consultants LLC (SVC) Arborist Report, 2023_05_09 SVC Tree Assessment – Bradbury, they identified 61 significant trees onsite with no significant trees proposed to be retained. City of Puyallup's VMS manual recommends retaining significant trees when possible, and that perimeter trees in landscaping setback areas represent the highest likelihood for retention and shall receive special attention. The arborist report tree inventory map shows many trees along the perimeter but does not provide reasoning on why perimeter trees are not able to be retained.

For the reasons above, WDFW recommends that perimeter trees (labelled 1, 2, 4-7, 9, 12, 15, 16, 20, 30, 33, 35-37) be retained and at a minimum retention of 50% of the perimeter trees.

If you have any questions or concerns, please feel free to contact me at (360)584-4731 or Jennifer.Eberly@dfw.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Eberly', with a large loop at the start and a long tail extending to the right.

Jennifer Eberly
WDFW Habitat Biologist
1111 Washington St SE
Olympia, WA 98501

Cc: Gwen Lentos, Regional Habitat Program Manager (Gwendolen.Lentos@dfw.wa.gov)

Elliott Winter, Assistant Regional Habitat Program Manager (Elliott.Winter@dfw.wa.gov)

Jessica Bryant, Regional Land Use Planner (Jessica.Bryant@dfw.wa.gov)

Miles Penk, Area Habitat Biologist (Miles.Penk@dfw.wa.gov)