



February 29, 2024

Mr. Chris Beale
Senior Planner
City of Puyallup
333 South Meridian
Puyallup, WA 98371

Re: Vector Development Company Freeman Road Logistics Project: Third-Party Second Review of Critical Areas Report

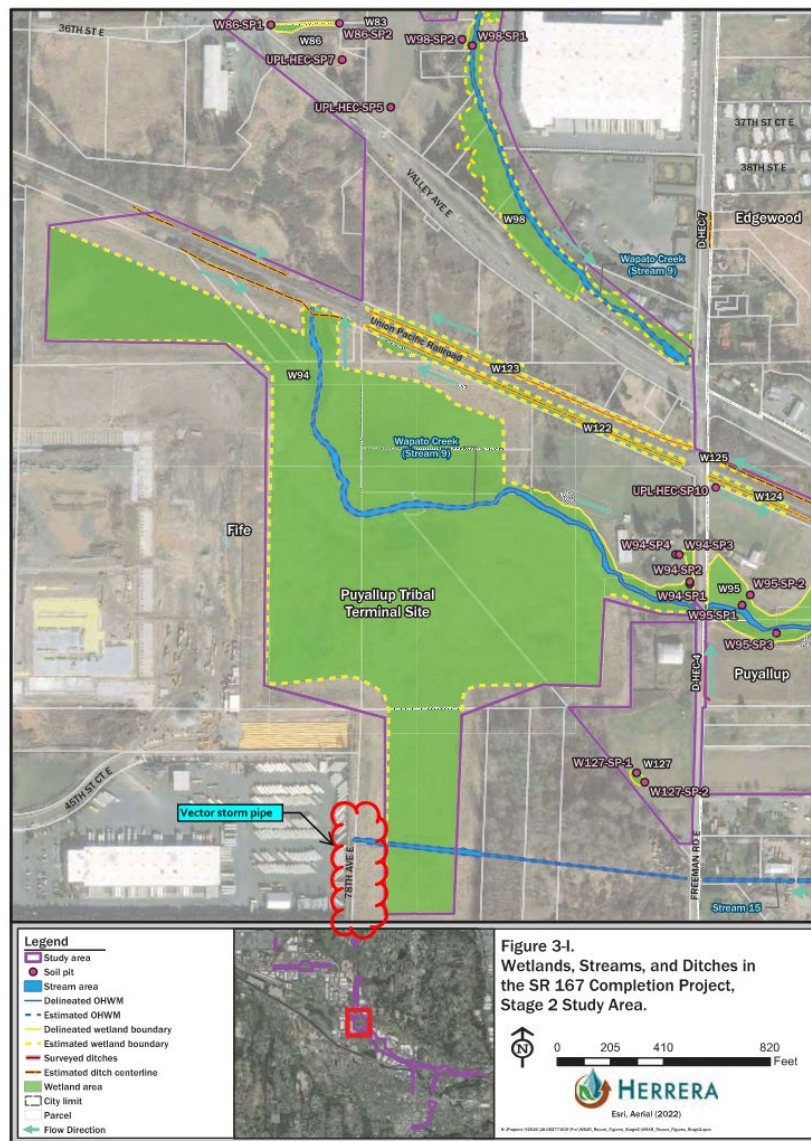
Dear Mr. Beale:

Confluence Environmental Company (Confluence) has reviewed the November 2023 Critical Areas Report (CAR) prepared by Anchor QEA, LLC (Anchor) for the Freeman Road Logistics project (2023 CAR; Anchor 2023). The 2023 CAR is the second submittal intended to address comments on the October 2021 CAR (Anchor 2021) provided in the first review memo (Sato and Vieira 2022). This memo provides results of our review.

STUDY AREA AND CRITICAL AREAS ASSESSMENT

- The 2023 CAR lists the following parcels as part of the study area: 15 adjacent parcels in Puyallup to be developed (parcels 0420174075, 0420201040, 0420201039, 0420201045, 0420201066, 0420201101, 0420205003, 0420205017, 0420201027, 0420201052, 0420201034, 0420201036, 0420201042, 0420205004, 0420205016) and 5 other parcels that will support the development through transportation or utility improvements (0420201104, 0420201008, 0420201114, 0420201115, and 0420174032).
 - Parcel 0420201115, listed above, is not shown in figures.
 - There are several parcels along the proposed drainage easement in the City of Fife that are not identified as part of the study area. The report should address a study area that includes all proposed work. Provide critical areas assessment for the parcels associated with the stormwater easement along 48th Street E and 78th Avenue. The following should be considered when addressing these additional parcels:
 - Stream 15 crosses Freeman Road, continues west, and intersects with the proposed drainage easement (see figure below).

- A wetland has been identified on parcel 0420174707 in association with a Tribal mitigation project (see figure below). The proposed easement appears to be in the buffer. Anchor needs to verify that the easement width (as shown by the applicant's engineering team) is sufficient to be approved by Fife's Public Works Department; they have not approved the easement dimensions yet.
- Impacts to critical areas and buffers must meet Fife Municipal Code.
- Section 3.2 of the 2023 CAR states that there are no streams in the study area. However, Stream 14 and Stream 15 are in the study area and are shown on Figure 4 as being in the study area. Please correct the text.



WETLAND DELINEATION

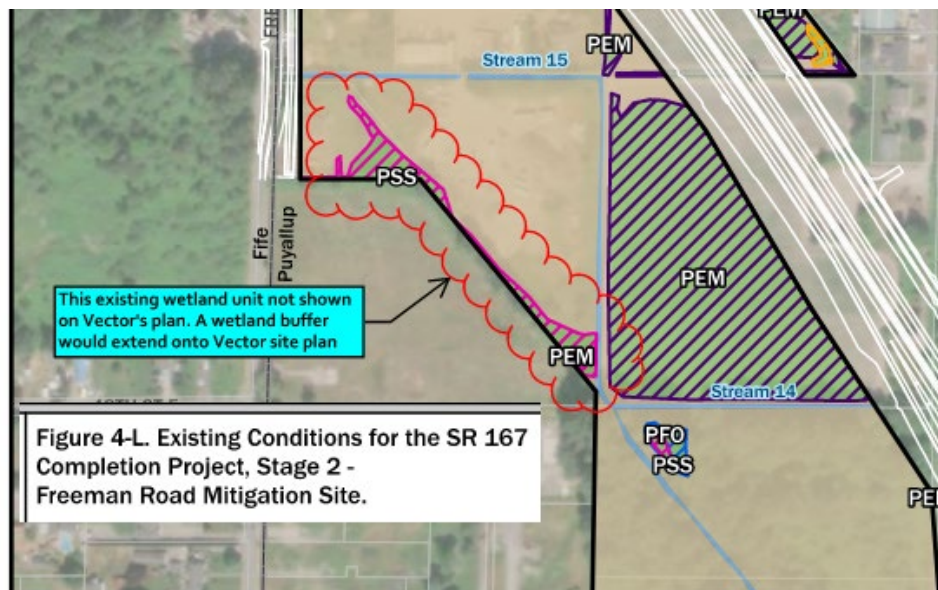
- Wetland A
 - Appendix C, Figure 1 is missing the points for DP1 W, DP2 Up, and DP3 W.
 - Wetland A should be rated as a Category II Wetland. The rating given (Category III) is not consistent with the figures provided with the rating form.
 - Appendix C Figure 6 shows the project within Puyallup River TMDL. Question D 3.3 should be Yes. This makes the D 3 total = 3 for a high rating value. **The Water Quality rating should be MMH for a score of 7.**
 - Appendix C Figure 3 shows the contributing basin is less than 10 times the wetland. Question D 4.3 should be 5 points. This makes the D 4 total 16 for a high rating value.
 - Question D 6.1. The wetland is in the Puyallup River floodplain. Flooding occurs in a sub-basin immediately down-gradient of the wetland. This should have 2 points giving D 6 a high rating value. **The Hydrology rating should be HHH for a score of 9.**
 - Question H 3.1. It appears that riparian, instream, and snag priority habitats are within 100 m of the wetland. This changes the score to 2 points for a high value. **The Habitat rating should be MLH for a score of 6.**
 - The total score for Wetland A should be 22 with a Habitat score of 6. **This would make the wetland a Category II wetland with a 150-foot buffer.**
- Wetland B: Provide Data Sheets for Wetland B DP1, DP2, and DP3 shown in Figure 1 of Appendix C.

CRITICAL AREAS IMPACT ASSESSMENT

- Please provide figures that show project elements in relationship to wetlands, streams, and buffers.
- Wetland 87: The project proposes buffer averaging. The area identified as an addition to the wetland buffer is associated with a different wetland (Wetland 93). How is this providing equivalent buffer to Wetland 87?
- Wetland B: Mitigation proposed is out-of-kind. Per PMC 21.06.960, demonstrate how buffer enhancement provides wetland functions greater than or equivalent to those lost.

If the intent is to meet PMC 21.06.640 Innovative Mitigation, please provide a more detailed justification. Please use the correct mitigation ratios as defined by PMC 21.06.980 for additional types of mitigation, if proposed to be used. Section 6.1.1 of the 2023 CAR states that the project may qualify to purchase wetland mitigation credits from the Upper Clear Creek Mitigation Bank. The City has determined that use of a mitigation bank is not possible.

- Wetland A: Determine if there are impacts to wetland buffer since the buffer increased to 150 feet.
- City staff will not accept the impacts to Wetlands 87 and 93 and stream 14 buffers. The proposed truck parking is not unavoidable impacts to achieve the project objective. Avoidance sequencing criteria requires “Avoiding the impact altogether by not taking a certain action or parts of an action.” The project site can still be built and objectives achieved without the impacts to the buffers for these off-site critical areas. The site plan and report will need to be modified.
- Wetland 146/148 is shown in the WSDOT SR 167 Completion Project, Stage 2 Mitigation Plan (WSDOT 2023) but not in the Wetland and Stream Assessment Report (WSDOT 2022) (see figure below). We contacted WSDOT to discuss with them but did not receive a response. Please clarify with WSDOT the existence of this wetland. If this wetland exists, the buffer would be impacted by the project and mitigation would be required.

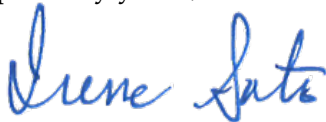


- Stream 15: Assess impacts to the stream from Freeman Road widening and drainage easement work.

- Section 6.1.7 of the 2023 CAR states that if stormwater is conveyed to the Fife Oxbow wetland a revised CAR will be provided to address potential impacts to that wetland. The current proposal shows discharge to an existing system that discharges to the wetland. Please provide this analysis, consistent with Fife Municipal Code and the ECY storm water manual (MR8). Wetland hydroperiod analysis conducted by the applicant's engineering team must be validated by Anchor. Approval is required from the Puyallup Tribe.
- Verify that the road improvements at Levee Road will not impact the buffer of Wetland A. The proposed stormwater plan shows sheet flow discharge of new stormwater onto the Tribe property; verify new stormwater will not impact Wetland A. No data points were taken in this vicinity. The Puyallup Tribe will not allow Data Points to be dug on their property without a tribal representative present. Please coordinate with Andrew Strobel to get access.
- Roadway improvements appear to be located in the shoreline environment and riparian buffer area for the Puyallup River. Please provide additional analysis. Shoreline permits are required.

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

Respectfully yours,



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REFERENCES

Anchor (Anchor QEA, LLC). 2021. Freeman Logistics critical areas report. Prepared for Vector Development Company, Kirkland, Washington, by Anchor, Seattle, Washington.

Anchor. 2023. Freeman Road Logistics critical areas report. Prepared for Vector Development Company, Kirkland, Washington, by Anchor, Seattle, Washington.

Sato, I. and S. Vieira. 2022. Vector Development Company Freeman Road Logistics Warehouse: third-party review of critical areas report. Memo prepared for City of Puyallup, Washington, by Confluence Environmental Company, Seattle, Washington. March 4, 2022.

WSDOT (Washington State Department of Transportation). 2022. Wetland and stream assessment report: SR 167 Completion Project – Stage 2: SR 167/I-5 to SR 161 – New Expressway Project. Prepared by WSDOT SR 167 Completion Project Puget Sound Gateway Program and Herrera Environmental Consultants, Inc., Seattle, Washington.

WSDOT. 2023. SR 167 Completion Project, Stage 2: SR 167/I-5 to SR 161 – New Expressway Project: Stage 2 mitigation plan. Submitted by WSDOT Megaprograms Puget Sound Gateway Program, through WSP USA, Seattle, Washington; prepared by Herrera Environmental Consultants, Inc., Seattle, Washington.