



July 23, 2024

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

**Re: Third-Party Review of “Revised Biological Habitat Assessment of Deer Creek for Project Impacts from the Senior Housing Complex for Kilcha Sekyra 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).

## **COMPLETENESS REVIEW**

Confluence found that the report was incomplete according to the requirements for floodplain habitat assessments outlined in Puyallup Municipal Code (PMC) Chapter 21.07 and 21.06.530. The report is missing a discussion on mitigation sequencing (avoidance, minimization, and mitigation). Per FEMA (2013), mitigation sequencing must be demonstrated in the floodplain habitat assessment.

## **TECHNICAL REVIEW**

The revised report has been updated to include the requested information from our March 2023 review.

A discussion on mitigation sequencing is missing from the report. If the applicant has not already done so, alternative building layouts should be considered to avoid and minimize impacts to the floodplain. For example, could Building A and associated parking be relocated to an area outside of the floodplain (e.g. where the southwest compensatory storage area is proposed)? If alternative

building layouts have been reviewed, a discussion of these layouts and why they were rejected should be included in the report.

The floodplain habitat assessment relies heavily on the storm drainage and floodplain engineering information for the project to come to its conclusions. The conclusion that the proposed project would have no impacts to the floodplain storage capacity appears based on the assumption that the proposed compensatory floodplain storage areas meet the requirements of PMC 21.07 and FEMA (2013). While the project does provide the necessary flood storage capacity, the proposed compensatory flood storage areas do not appear to meet the hydraulic connectivity requirement in PMC 21.07 or FEMA (2103) or the fish passage requirements identified in FEMA (2013). Under PMC 21.07.060.1.f(i)(B), compensatory storage must be hydraulically connected to the source of flooding (Deer Creek). The proposed piped connection from the Deer Creek floodplain to the compensatory storage areas would not likely be considered hydraulically connected to the Deer Creek floodplain, nor would the pipes be considered fish passable.

Please revise the report:

- Document mitigation sequencing.
- If the proposed compensatory flood storage areas are not redesigned to address hydraulic connectivity and fish passage, then the report will need to be revised to either reflect potential impacts from the design not meeting PMC 21.07 of FEMA (2013) or include redesigned proposed compensatory flood storage areas.

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

Respectfully yours,



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

Managing Senior Biologist

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## REFERENCES

FEMA (Federal Emergency Management Agency). 2013. Regional guidance for floodplain habitat assessment and mitigation in the Puget Sound Basin. FEMA, Region 10, Bothell

Washington. Available at: [https://ecology.wa.gov/getattachment/b2847e38-b79a-4646-8d3a-78d734f567f5/FEMA-Region10\\_Habitat-Assessment-Guide\\_2013.pdf](https://ecology.wa.gov/getattachment/b2847e38-b79a-4646-8d3a-78d734f567f5/FEMA-Region10_Habitat-Assessment-Guide_2013.pdf) (accessed July 16, 2024).

JCA (John Comis Associates, LLC). 2023. Revised biological habitat assessment of Deer Creek for project impacts from the senior housing complex for Kilcha Sekyra 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.