



August 15, 2024

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

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

Dear Mr. Beale:

Confluence Environmental Company (Confluence) has reviewed the June 2024 Critical Areas Report (CAR) prepared by Anchor QEA, LLC (Anchor) for the Freeman Road Logistics project (2024 CAR; Anchor 2024). The 2024 CAR is the third submittal and is intended to address comments on the November 2023 CAR (Anchor 2023) provided in the second review memo (Sato 2024). This memo provides the results of our review. The City will conduct the review of 2024 CAR Section 6.3 Special Flood Hazard Habitat Assessment for consistency with the Puyallup Municipal Code (PMC); Confluence did not provide a review of that section.

STUDY AREA AND CRITICAL AREAS ASSESSMENT

- Stream 15 crosses Freeman Road, continues west, and intersects with the proposed drainage easement (Figure 4 shows this). Section 4.3 of the 2024 CAR states that the stream is not located on parcel 0420174032. Section 4.4.1 of the 2024 CAR does not describe Stream 15 as crossing the drainage easement on 78th Avenue E. However, several sources show Stream 15 crossing Freeman Road, and flowing across parcel 0420174032, and parcel 0420174707.
 - Update stream description.
 - Impacts to critical areas and buffers must meet Fife Municipal Code.
- A wetland has been identified on parcel 0420174707 in association with a Tribal mitigation project. The existing gravel road shown on Sheet C13 of 47 from the Preliminary Drainage Outlet Plan does not look like it extends all the way to the connection. It is not clear if drainage work will occur beyond an established road. Impacts to critical areas and buffers must meet Fife Municipal Code.

WETLAND DELINEATION

- Wetland B is a Category III wetland. Update Table 4 with correct information.
- Wetland A is a Category II wetland with 150-foot buffer. Update Table 8 with correct information, including habitat and water quality scores.

CRITICAL AREAS IMPACT ASSESSMENT

- Please provide figures that show the stormwater extension work along 78th in relationship to wetlands, streams, and buffers.
- City staff will not accept the impacts to Wetlands 87 and 93 and Stream 14 buffers. The proposed truck parking impacts are not unavoidable 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. Section 7.4.2 states that 1 parking space per 3,000 square feet is desired. Reduce parking stalls within the proposed buffers to the minimum required by PMC.
- Wetland 146/148: Section 7.4.2 states that 1 parking space per 3,000 square feet is desired. Reduce parking stalls within the proposed buffers to the minimum required by PMC.
 - Indirect impacts: Based on the information provided in Appendix D, the assumption that WSDOT wetlands will have buffers contained to their parcels is not correct. Wetlands will be created to the property line. The plans show wetland reestablishment and restoration to the property line with a perimeter buffer to the compensation area, which in this case is wetland.
 - Provide indirect impact assessment based on the existing wetlands not future conditions.

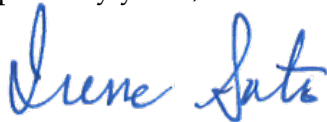
MITIGATION

- Wetland 146/148:
 - Per PMC 21.06.930, demonstrate how mitigating at the mitigation bank provides wetland buffer functions greater than or equivalent to those lost by reducing the buffer from 80 feet to 0.

- Address impervious surfaces constructed within 50 feet of the wetland boundary. Also address how hydroperiods will be protected.
 - 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 21.06.970(1)(e). All impacts to wetland buffers shall be mitigated at a 1:1 ratio, which should translate to 0.2:1 mitigation credit per Upper Clear Creek Mitigation Bank Instrument.
- Indirect Impacts: reevaluate mitigation for indirect impacts to be consistent with existing conditions and not proposed future offsite work.

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

Respectfully yours,



IRENE SATO, PWS, CESCL

Senior Biologist

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REFERENCES

Anchor (Anchor QEA, LLC). 2023. Freeman Logistics critical areas report. Prepared for Vector Development Company, Kirkland, Washington, by Anchor, Seattle, Washington.

Anchor. 2024. Freeman Road Logistics critical areas report. Prepared for Vector Development Company, Kirkland, Washington, by Anchor, Seattle, Washington.

Sato, I. 2024. 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. February 29, 2024.