



July 16, 2021

Mr. Chris Beale, AICP
Senior Planner
City of Puyallup Planning Services
333 South Meridian
Puyallup, Washington 98371

**Re: Benaroya Capital Company – South Hill Data Center Wetland and Fish and Wildlife Habitat
Assessment Report Third-Party Review**

Dear Mr. Beale:

This memorandum includes the results from the third-party review of the 2020 wetland and fish and wildlife habitat conservation area assessment report prepared for Benaroya Capital Company at the South Hill Data Center property, located at 1015, 1019-1021, and 1023 39th Avenue SE, Puyallup, WA 98374 (tax parcels 0419034036, 0419034037, and 0419034038).

COMPLIANCE WITH CODE

Confluence biologists reviewed the report (Soundview Consultants 2020) and determined it was complete according to the regulations outlined in Puyallup Municipal Code (PMC) Chapter 21.06 for Critical Areas Regulations.

TECHNICAL REVIEW

Soundview Consultants delineated a total of 6 wetlands, identified as Wetlands A-F, on the property. Confluence conducted a site visit on June 16, 2021, to verify the wetland boundaries. During the site visit, Confluence located each of the wetlands and verified their proposed boundaries, using vegetation, evidence of inundation, topography, and soil probes as guidance. Note, that while many of the wetland flags placed in 2016 were missing, enough were present to determine the proposed wetland boundaries.

Confluence observed vegetation, soil, and hydrology conditions conducive to wetland area within Wetlands A-F. Clear shifts in vegetation, topography, and hydrology conditions conducive to upland areas were also observed adjacent to each of the proposed wetlands. Based on the site visit findings, Confluence agreed with the proposed wetland boundaries for Wetlands A-F.

Confluence also reviewed the 2016 wetland rating forms prepared for Wetlands A-F provided in the 2020 report (Soundview Consultants 2020). Confluence generally concurred with all of the wetland ratings, with the exception of Wetland F. However, some of the rating figures were missing required components (i.e., location of outlet and plant density for slope wetlands). Rating figures should be updated to contain all required components.

Wetland F was misclassified as a slope wetland when it should have been rated under the depressional hydrogeomorphic class. While Wetland F is located on a gradual slope, it contains depressions and water does not flow unidirectionally throughout the entire wetland unit. Per Ecology's guidance, a wetland with both slope and depressional characteristics is rated as depressional (Hruby 2014).

In addition, Confluence reviewed the wetland determination data forms. While the overall wetland determinations were accurate, Confluence observed several minor errors throughout the forms. Multiple instances were noted in which hydric soils were marked as present but a hydric soil indicator was not provided or vice versa. Additionally, for data plots 12 and 13, hydric soil indicator Sandy Redox (S5) was identified, however, hydric soils were marked as absent with the explanation that the soil profile was apparently representative of subsoils exposed by excavation activities. Given the established vegetation in the area and the absence of evidence observed during the site visit, Confluence requests additional documentation to support the proposed condition of the soils. This could be in the form of aerial imagery, site observations, etc.

In summary, we concur with the boundaries for Wetlands A-F and agree with the wetland ratings for all but Wetland F. The following actions are needed to correct issues with the report:

- Complete rating form figures.
- Re-rate Wetland F under the depressional hydrogeomorphic class. This may change the overall category and buffer.
- Fix errors in wetland determination forms.
- Provide documentation to support the explanation for the lack of hydric soils for data plots 12 and 13.

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

Respectfully yours,



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