

March 29, 2022

Nabila Comstock Assistant Planner City of Puyallup Planning Services 333 South Meridian Puyallup, Washington 98371

Re: 43<sup>rd</sup> Avenue SW Multifamily Development Project (PLPSP20220016) Critical Areas Third-Party Review

Dear Nabila:

This letter includes the results from the third-party review of the Critical Area Review (CAR) for AVT Services, LLC's property at 43<sup>rd</sup> Avenue SW, Puyallup, WA 98372 (tax parcel number 4320000160) by Russell & Associates (2020). Confluence Environmental Company (Confluence) biologists reviewed the CAR and conducted a site visit to the project property on March 29, 2022.

During the site visit we confirmed the property has no wetlands or streams on-site or within 300 feet of the parcel.

## **COMPLIANCE WITH REPORTING REQUIREMENTS**

Confluence reviewed the CAR for completeness according to the regulations outlined in Puyallup Municipal Code (PMC) Chapter 21.06.530 for Critical Areas Regulations specific to general critical area report requirements. The CAR is missing two of these requirements: Per PMC 21.06.530(1)(d), the report is to include the dates, names, and qualifications of the persons preparing the report and documentation of any fieldwork performed on the site. The CAR does not specify the date of the site visit or provide the qualifications of Mr. Eric Russell.

## **TECHNICAL REVIEW**

Confluence reviewed the CAR for technical accuracy. The report has the incorrect parcel number. The CAR identifies the tax parcel number as 4320000360, but the correct parcel number is 4320000160. The CAR should be updated to include the correct parcel number.

The CAR does not provide a site plan showing the locations where data were collected, most importantly where soil and hydrology data were collected. The site plan needs to be updated to show these locations.



The site plan provided with the CAR shows a proposed development layout that does not match the layout submitted for development. The CAR site plan should be updated to either remove the proposed development features or show the updated, proposed development.

## **SUMMARY**

In summary, we concur that no wetlands or streams are on-site or within 300 feet of the parcel. The following actions are needed to correct issues with the report:

- Update the report to include the date of the field investigation.
- Update the report to include the qualifications of Mr. Russell.
- Update the report to correct the parcel number.

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 Include an updated site plan with the report, including locations where data were collected and either removing the proposed development features or correcting them to match the updated proposed development.

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

Respectfully yours,

KERRIE McARTHUR, PWS, CERP, C-FP

Managing Senior Biologist 206.999.6201

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## REFERENCES

Russell & Associates. 2020. Critical area review of 43<sup>rd</sup> Avenue Southwest multifamily development project, Pierce County parcel #4320000360. Prepared for AVT Services, LLC, Tacoma, Washington by Russell & Associates, Tacoma, Washington.

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