



October 11, 2022

Nabila Comstock, Assistant Planner
City of Puyallup
333 S Meridian
Puyallup, WA 98371

Re: Third-Party Review of "Wetland and Drainage Corridor Evaluation and Delineation Parcels # 7845100032 and 0420271171, City of Puyallup, WA"

Dear Nabila:

Confluence Environmental Company (Confluence) has reviewed the wetland delineation and streams report submitted by Beaver Creek Environmental Services, Inc. (Beaver Creek) for the Taco Time on Main project (PLPSP20220120) located at 1115 East Main Street, Puyallup Washington (Parcels 7845100032 and 0420271171) (Beaver Creek 2022).

COMPLETENESS REVIEW

Confluence found that the critical areas study report was incomplete according to the regulations outlined in Puyallup Municipal Code (PMC) Chapter 21.06 for Critical Areas Regulations. The following elements were missing from the report: The qualifications of the person(s) preparing the report and analysis of their compliance with the city's Qualified Professional requirements (PMC 21.06.210 (108)).

TECHNICAL REVIEW

Confluence conducted a site visit to the project property on September 23, 2022. During this site visit, we confirmed no wetlands were present, as described in the report prepared by Beaver Creek (2022).

Confluence found the following inaccurate data in the wetland determination forms; however, these inaccuracies do not change the wetland determination or conclusions in the report.

- Form SP 1U – Vegetation section – Dominance Test Worksheet is incorrect. The vegetation passes dominance test (2 species with FAC indicator status, not 1).
- Form SP 2U – Vegetation section – Hydrophytic Vegetation Indicators and Present sections are incorrect. Per the Dominance Test Worksheet, hydrophytic vegetation is present.

While Confluence agrees with the conclusions of the Beaver Creek report (2022) that no wetlands are on-site or within 300 feet of the site, the report should be updated to include the qualifications of Mr. Heckert and correct the wetland determination data forms.

Confluence agrees with the conclusion that the project area is outside of the shoreline jurisdiction.

Additional information is needed to explain the conclusion that no impacts to floodplain habitat would occur. Specifically, the following additional information is needed:

- Details and discussion on how the 46-foot elevation was determined to be the flood elevation need to be added.
- A net 0 grade and fill is proposed for the project (as stated in the SEPA checklist) and the landscaping plans show plantings within the floodplain hatched as “disturbed site area landscaping”. Based on these documents, it appears that some disturbance within the floodplain will occur and could possibly include grading or a retaining wall to meet a net 0 grade and fill and meet elevation needs. Details and discussion should be added on how the project may affect floodplain functions when disturbance within the floodplain (as referenced in the landscape plans and inferred in the SEPA checklist) will occur.
- Based on the site plan, the proposed project is less than 10 feet from the 46-foot elevation, and in some areas (e.g., northwest corner), the parking lot edge may be 5 feet or less from the floodplain. Details and discussion should be added on how construction may affect floodplain functions when project structures are so close .
- The project may not meet building/structure setback requirements from the floodplain, causing indirect impacts to the floodplain. Additional details and discussion on how indirect impacts may affect the floodplain functions from the parking lot needs to be discussed.

Since Confluence agrees that no wetlands are within 300 feet of the project site and the project site is located outside of the shoreline jurisdiction, we recommend that a separate floodplain habitat assessment report be prepared to address the additional information requests.

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

Beaver Creek (Beaver Creek Environmental Services, Inc.) 2022. Wetland and drainage corridor evaluation and delineation parcels # 7845100032 and 0420271171, City of Puyallup, WA. Prepared for Taco Time NW, Renton, Washington, by Beaver Creek Environmental Services, Inc., Puyallup, Washington.

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