

Comments Provided by Confluence Environmental Company (CEC) Memo titled "Vector Development Company Freeman Road Logistics Warehouse: Third-Party Review of Critical Areas Report" and dated March 4, 2022.

Response to Comments:

CEC: Per PMC 21.06.530(1)(a), a detailed description of the critical areas and buffers on or adjacent to the project site is required. The report did not identify any critical areas on the adjacent WSDOT property (parcel numbers 0420201110 and 0420201111), beyond stating that "No wetlands were observed east of the Study Area, but some wetlands could potentially be present farther from the Study Area to the east within the WSDOT right-of-way, but those areas were not assessed as they are presumed to be addressed as part of the WSDOT SR 167 Extension project currently in planning and design stages" (Anchor 2021). However, wetland conditions were observed on at least 1 of these parcels during the site visit on December 9, 2021 (see the Site Visit Results section). Additionally, per Figure 2 and as described in the previous section, the offsite water feature is being considered a stream by WSDOT (2022) and pending confirmation by WDFW.

**Anchor QEA: Preliminary information is included in the Critical Area Report (CAR) on critical areas present on the WSDOT right-of-way based on draft documentation prepared by WSDOT and their consultant. WSDOT is working with WDFW to conduct a critical areas assessment on parcel numbers 0420201110 and 0420201111. Once the findings of WSDOT/WDFW are finalized and shared with Anchor QEA, they will be incorporated into the final Freeman Logistics Critical Area Report (CAR). This will include all determinations of offsite wetlands, streams, and associated buffers.**

CEC: Please identify and describe critical areas and buffers adjacent to the project property, including a delineation of the portion of the wetland within 300-feet of the project property, and rate the wetland per the most current Washington Department of Ecology Wetland Rating System for Western Washington [per PMC21.06.910(3)] to ensure that the proposed project will not impact the wetland buffer if it extends onto the site. Because information about wetlands and streams adjacent to the project site will be documented through WSDOT, the applicant should request this information and the report should be updated accordingly.

**Anchor QEA: Regarding parcel numbers 0420201110 and 0420201111, Anchor QEA has requested that the City of Puyallup share the findings of the WSDOT/WDFW study and that they be made available as soon as is feasible. As above, preliminary findings are included based on draft WSDOT reporting, but the findings will be updated and incorporated into the final Freeman Logistics CAR following finalization by WSDOT.**

CEC: Additionally, wetland conditions were visually identified to the northwest of the project property on the western edge of Freeman Road E. Although the wetland buffer would be truncated at the roadway, briefly describe the wetland on the west side of Freeman Road E to meet the requirements of PMC 21.06.530(1)(a).

**Anchor QEA: Permission to access parcel number 0420174032 was not provided to Anchor QEA. A brief description of potential offsite wetlands located on this parcel is provided in the revised CAR Section 3.2.**

CEC: Wetland conditions were also identified on site at SP-4. Provide additional information and rationale to confirm that this area is or is not a wetland.

**Anchor QEA: A rationale for considering this on-site disturbed area located at the east side of parcel number 0420174075 as an artificial wetland is provided in Section 3.2. A delineation of the artificial Wetland B was provided during Anchor QEA's March 2022 field investigation.**

CEC: Pursuant to PMC 21.06.530(1)(b) please update the development proposal site plan to show the proposed development footprint and clearing limits, and all critical areas and buffer including buffers from adjacent parcel once the offsite wetland conditions and buffers are identified and described.

**Anchor QEA: The development site plans have been updated to account for buffers that extend onto the Study Area, including the development footprint and clearing limits, and all known critical areas. Preliminary buffers from off-site features on the WSDOT right-of-way are shown in these figures, which may need to be updated once Anchor QEA has been provided the final WSDOT report.**

CEC: Per PMC 21.06.530(1)(c) provide a description of the proposed storm water management plan for the development and consideration of impacts to drainage alterations is required.

**Anchor QEA: The stormwater plans for the project are being prepared by Barghausen Consulting Engineers, Inc. and are being submitted concurrent with this Report. Stormwater impacts to critical areas will be addressed in Anchor QEA's final CAR.**

CEC: Note that a plan for compensatory storage of flood waters and impacts to downstream waterbodies must also be addressed, as outlined in the following section.

**Anchor QEA: A Special Flood Hazard Areas Habitat Assessment is provided in Section 5.3 of the revised CAR.**

CEC: Pursuant to PMC 21.06.530(1)(d) please include the dates, names, and qualifications of the persons preparing the report and documentation of any fieldwork performed on the site.

**Anchor QEA: This information is provided in Section 1.2 of the revised CAR.**

CEC: Additionally, include any field data collected outside of the 3 DPs (i.e., any soil probe or observations recorded in field notes from elsewhere on the site).

**Anchor QEA: All field data and observations collected by Anchor QEA, including field notes and other field observations, have been included in the revised CAR.**

CEC: Per PMC 21.06.530(1)(e) a detailed assessment of the potential impacts to critical areas and buffers resulting from site development is required. Include assessment for any critical areas on the adjacent WSDOT parcels. If buffers from the adjacent WSDOT parcels could be impacted, provide an analysis of site development alternatives or avoidance and minimization measures per PMC 21.06.530(1)(f).

**Anchor QEA: As above, preliminary buffers using WSDOT's preliminary delineation boundaries have been included in the CAR. Once the findings of WSDOT are finalized and shared with Anchor QEA, they will be incorporated into the final CAR. This will include all determinations of offsite wetlands, streams, and associated buffers.**

CEC: The report states that "Potential wetland features were evaluated based on PMC wetland delineation criteria" (Anchor 2021). Per PMC 21.06.910, wetlands shall be delineated according to the technical wetland delineation manuals as required by the Revised Code of Washington 36.70A.175 and in accordance with the current manuals and regional supplements required by the Department of Ecology and the Army Corps of Engineers. To ensure that the methods used in creating the report follow the most current guidance documents, update the report to specifically cite the Ecology, Army Corps of Engineers, or other manuals and regional supplements used during the wetland determination process

**Anchor QEA: The revised CAR includes more specific language on methodology in Section 3.1:**

CEC: For clarity, elaborate on what was meant by the statement that the agricultural ditch is "hydraulically controlled", as stated on Page 4 of the report (Anchor 2021).

**Anchor QEA: This was intended to reflect that the ditch is used for drainage and irrigation, however, no water control structures or devices on-site or within observable proximity were identified, and therefore, this language has been removed from the revised CAR.**

CEC: New information recently provided by Vector Development Company shows the project will also propose a waterline in a new 40-foot wide waterline easement just off the project site to the southeast. From preliminary maps provided to the City of Puyallup, it appears that this waterline would extend along the southern edge of 19th Ave NW. As shown in the City of Puyallup Critical Areas Map and as noted in the report, a large field-verified wetland is present on the parcels south of

19th Ave NW (City of Puyallup 2021, Anchor 2021). This wetland has been identified as a priority aquatic habitat by WDFW (WDFW 2022). For any project development that is proposed to occur within the roadway of 19th Ave NW or south of this roadway within tax parcels 0420201114 or 0420201008, update the report to include a delineation of the offsite wetland; a determination of the buffer width; and an analysis of buffer impacts proposed by the project according to the proposed alignment. In addition to assessing wetland and wetland buffer impacts, update the report to include an assessment of the wildlife and wildlife habitat—including WDFW Priority Habitats and Species—for the entire priority aquatic habitat unit, as well as an assessment of proposed impacts to those wildlife and habitats.

**Anchor QEA: Anchor QEA's March 2022 field investigation included work to delineate, categorize and provide buffers to the offsite Wetland A located south of 19<sup>th</sup> Avenue NW at parcel numbers 0420201114 or 0420201008. Wetland buffers associated with this wetland are interrupted by a roadway (19th Avenue NW) that lies between the offsite wetland and the subject parcels. The easement is located outside of the wetland but within the wetland buffer, regardless of the wetland category.**

CEC: Historical data and site observations show flooding conditions on site. Since this meets the definition of flood prone areas and reasonably safe from flooding under PMC 21.07.030 the property is subject to the regulations of PMC Chapter 21.07. Please provide a separate floodplain/flood prone area habitat assessment that specifically identifies and discusses potential impacts to floodplain function on the site as well as impacts to Endangered Species Act-listed species in downstream, receiving water bodies that would result from the proposed changes to the flood prone area, as required under PMC 21.07.050(1)(c). This document should additionally include a discussion of the plan for compensatory storage of flood waters.

**Anchor QEA: A Special Flood Hazard Areas Habitat Assessment is provided in Section 5.3 of the revised CAR.**