CONFLUENCE
ENVIRONMENTAL COMPANY

November 1, 2023

Ms. Nabila Comstock, Assistant Planner
City of Puyallup Planning Services
City of Puyallup
333 S Meridian
Puyallup, WA 98371

**Re: Third Party Review of "Wetland, Stream, and Fish and Wildlife Habitat Assessment: PSE Todd Road," August 2023**

Dear Nabila:

Confluence Environmental Company (Confluence) has reviewed the –Wetland, Stream, and Fish and Wildlife Habitat Assessment: PSE Todd Road August 2023 report submitted by Soundview Consultants for the Puget Sound Energy (PSE) Operational Training Center project # PLPSP20230096 located at 325 Todd Road Northwest, Puyallup, Washington (Parcel 0420211030) (Soundview Report; Soundview Consultants 2023).

## COMPLETENESS REVIEW

Confluence found that the Soundview Report was incomplete according to the regulations outlined in Puyallup Municipal Code (PMC) Chapter 21.06 for Critical Areas Regulations. The following element was missing from the report: Current wetland data forms; data forms provided in the report are from October 2016.

## TECHNICAL REVIEW

Confluence conducted a wetland reconnaissance on the project property on October 17, 2023, to determine whether the boundaries of Wetland A reported in the Soundview Report were accurately delineated.

### Methods

This section describes the methods used to identify the presence or absence of wetlands.

For this reconnaissance effort, Confluence evaluated the presence or absence of hydric soil and wetland hydrology indicators at test plot locations across the site to determine if the areas represented by the test plots were wetland or upland. Vegetation data were not collected at the time of Confluence's site visit, although the site was fully vegetated with herbaceous plants. The

2016 data forms provided in the CAS report noted that the areas consisted of >90% bare ground, which does not represent current conditions. Additionally, the vegetation observed by Confluence would have likely passed the dominance test, but this was a reconnaissance effort and not a complete delineation. Test plot locations and presence or absence of hydric soil and wetland hydrology indicators were recorded using a handheld GPS.

To assess whether there are possible wetlands with buffers encroaching from adjacent properties, Confluence modified the methods described by the Corps (Corps 1987, 2010). The modified method identified the presence or absence of visual wetland indicators. If hydrophytic vegetation was dominant and visual indicators of wetland hydrology were observed, then hydric soils were assumed to be present.

## Results

### *Wetlands*

Confluence observed an area likely to be wetland to the west of the property. No test plots were evaluated in this possible off-site wetland because Confluence did not have access to the properties on which it is located. According to the Cowardin classification system (FGDC 2013), this wetland is palustrine emergent. The Soundview Report does not discuss this wetland, nor is there any discussion of whether the wetland's buffer could encroach onto the subject property. The report should be updated to include a discussion of the off-site wetland, including a preliminary wetland rating and determination of the associated wetland buffer.

Confluence established 6 test plots (CEC-1 through CEC-6) adjacent to the on-site data plots identified in the 2023 Soundview Report (Figure 1). A summary of our findings compared to the findings in the Soundview Report is provided in Table 1.

**Table 1. Confluence hydric soils results in comparison to Soundview Report results**

| Soundview Consultants Results | | Confluence Results | |
|---|---|---|---|
| Data Plot | Hydric Soils Present | Corresponding Test Plot | Hydric Soils Present |
| DP-8 | No | CEC-1 | Yes |
| DP-8 | No | CEC-2 | Yes |
| DP-5U | No | CEC-3 | Yes |
| DP-18U | No | CEC-4 | Yes |
| DP-7U | No | CEC-5 | No |
| DP-11U | No | CEC-6 | Yes |

Confluence observed hydric soil indicators at all of the test plots except CEC-5. At test plot CEC-1, one primary wetland hydrology indicator, oxidized rhizospheres along living roots, was

also observed. No other wetland hydrology indicators were observed at test plots at the time of the site visit.

The Soundview Report documented relic redox features at data plots but observed no other additional redox features except at the 1 wetland data point (DP-15). Confluence also observed relic redox features, but these were intermixed with current redox features (concentrations in the matrix and pore linings). Current redox features observed by Confluence could be attributed to change in hydrology at the site after the 2016 data were collected.

Based on the data we collected, Confluence does not agree with the on-site Wetland A boundary as delineated in the Soundview Report. Based on the dates on the data forms, the wetland determination data collected by Soundview were not collected in the last 5 years and do not accurately represent current site conditions, including hydric soil indicators and presence of vegetation.

Additional deficiencies of the 2023 Soundview Report are as follows:

- The existing conditions figure (Sheet 1) and existing conditions (Aerial) have multiple data points with the same number (DP-8), and the naming conventions are not uniform (i.e., W-10 and DP-15W).
- Additional site visits were mentioned in the 2023 report (2018, 2022, and 2023), but the report does not state the purpose of those site visits or what data were collected, nor does the report provide the data (or a summary of the data) from these site visits.
- The description of Wetland A should include the total size of the wetland, not just the size of the wetland on-site.
- Data forms DP-14 through DP-19) are missing. Forms for DP-1 through DP-13 are included in Appendix D of the report, but the figures show DP-1 through DP-19.

### *Wetland Rating*

Confluence reviewed the wetland rating form for Wetland A in Appendix E of the Soundview Report. As previously stated, the wetland data forms are from October 2016. The wetland rating form appears to also be based on data collected in 2016 and is therefore not consistent with current conditions at the site. Based on the conditions that Confluence observed, we disagree with the following rating form questions:

- D 2.1 – Roadside ditches discharge into Wetland A; therefore, the wetland receives stormwater discharges and this question should be scored as 1 point. Please update the rating form and adjust scoring accordingly.
- D 4.3 – The contributing basin appears to be between 10 and 100 times the total size of Wetland A. It looks like the contributing basin calculation may have been based on the on-site portion of Wetland A and not its total size. Please double check the calculations and update the rating form and adjust scoring accordingly.
- D 5.1 – Roadside ditches discharge into Wetland A; therefore, the wetland receives stormwater discharges and this question should be scored as 1 point. Please update the rating form and adjust scoring accordingly.

## SUMMARY

In summary, Confluence does not agree with the conclusions of the Soundview Report. The data forms used to determine Wetland A boundaries and associated wetland rating form are from 7 years ago (2016) and are not consistent with current conditions observed during the reconnaissance conducted by Confluence. Confluence recommends the following corrections to the 2023 Soundview Report:

- Provide updated wetland determination forms from site visits after 2018, if conducted.
- Update report to discuss what data were collected during other site visits.
- Conduct another site visit to determine the eastern wetland boundary, with updated wetland delineation forms that reflect current site conditions.
- Include a discussion of the off-site wetland to the west, including wetland rating and associated buffer.
- Update the Wetland A rating forms, as appropriate.

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

Respectfully yours,

**KERRIE McARTHUR, PWS, CERP, FP-C**
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## REFERENCES

FGDC (Federal Geographic Data Committee). 2013. Classification of wetlands and deepwater habitats of the United States. Second Edition. Wetlands Subcommittee, Federal Data Committee and U.S. Fish and Wildlife Service, Publication FGDC-STD-004-2013, Washington, D.C.

Soundview Consultants. 2023. Wetland, stream, and fish and wildlife habitat assessment: PSE Todd Road. Prepared for Trammel Crow, Seattle, WA, by Soundview Consultants, Gig Harbor, WA.

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