



January 22, 2024

Ms. Rachael Brown, 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, Revised December 2023”

Dear Rachael:

Confluence Environmental Company (Confluence) has reviewed the response to comments, dated December 20, 2023 (Technical Memorandum; Soundview 2023a), and the report “Wetland, Stream, and Fish and Wildlife Habitat Assessment: PSE Todd Road, Revised December 2023” (Revised Soundview Report; Soundview 2023b) submitted by Soundview Consultants LLC (Soundview) for the Puget Sound Energy (PSE) Operational Training Center project #PLPSP20230096 located at 325 Todd Road Northwest, Puyallup, Washington (Parcel 0420211030).

COMPLETENESS REVIEW

Confluence found that the Revised Soundview Report was complete according to the requirements outlined in Puyallup Municipal Code (PMC) Chapter 21.06 for critical areas reports.

TECHNICAL REVIEW

Wetland A Boundary

As reported in Confluence’s review of the original Soundview Report (Soundview Consultants LLC 2023c), we conducted a wetland reconnaissance on the project property on October 17, 2023 to determine whether the boundary of Wetland A was accurately delineated (Confluence 2023). During this reconnaissance, we identified several areas with hydric soils (redox concentrations present, not just relic concretions) in the vicinity of Soundview’s data plot (DP) locations. However, only one of Confluence’s test pits (CEC-1) had wetland hydrology indicators present (Table 1).

Table 1. Confluence hydric soils and wetland hydrology indicator results in comparison to original Soundview Report results

Soundview Results			Confluence Results		
Data Plot*	Hydric Soils Present	Hydrology Indicators Present	Corresponding Test Plot	Hydric Soils Present	Hydrology Indicators Present
DP-16U	No	No	CEC-1	Yes	Yes
DP-12U	No	No	CEC-2	Yes	No
DP-5U	No	No	CEC-3	Yes	No
DP-18U	No	No	CEC-4	Yes	No
DP-1U	No	No	CEC-5	No	No
DP-11U	No	No	CEC-6	Yes	No

* Data Plot numbers updated to reflect corrected map

The Technical Memorandum and Revised Soundview Report clarify the various site visits that have been conducted since 2016, in part to verify the presence or absence of wetland hydrology. In addition, the Technical Memorandum provides photo documentation of test pits with no groundwater east and south of CEC-1. It appears that this site has some difficult soils with somewhat inconclusive soil indicators; therefore, the presence or absence of wetland hydrology indicators is more indicative in determining the wetland boundary.

However, the report is still unclear about when and where wetland hydrology data were collected. Table 2 summarizes Confluence’s best guess of when the DPs were surveyed based on the Revised Soundview Report and data forms. As stated previously, DP locations not revisited after 2016 are more than 5 years old, and the data is therefore no longer valid (Confluence 2023). The Revised Soundview Report does not provide any wetland determination forms or summary tables for data collected in 2022, despite the report stating that, “Due to the age of the delineation, the wetland boundary was verified in fall of 2022, with an additional hydrology check in early winter 2023.” Based on this statement, wetland hydrology data should have been collected in 2022. Confluence understands that wetland determination forms may not have been completed for every DP to verify wetland boundaries, but at a minimum, field notes should have been taken. A new table in the report summarizing the year(s) when DPs (or nearby areas) were evaluated and whether wetland hydrology was observed during those years would be one way to document data collected without using wetland determination forms.

Table 2. Confluence’s estimate of years data plots were surveyed

Data Plot	Year(s) Surveyed
DP-1U	2016
DP-2U	2016

DP-3U	2016
DP-4U	2016
DP-5U	2016
DP-6U	2016
DP-7U	2016
DP-8U	2016
DP-9U	2016
DP-10U	2016
DP-11U	2016 2023
DP-12U	2016
DP-13U	2016
DP-14U	2018 2023
DP-15W	2018 2023
DP-16U	2018 2023*
DP-17U	2018
DP-18U	2018
DP-19U	2018
* Data were collected in January and December 2023	

Wetland Rating

Confluence reviewed the Technical Memorandum and wetland rating form for Wetland A in Appendix E of the Revised Soundview Report. Based on the additional information provided, we agree with the response to question D 4.3. However, we still disagree with the following rating form questions:

- D 2.1 – Roadside ditches discharge into Wetland A. We agree that the pipe in the western portion of Wetland A is an outlet. However, runoff from the eastern half of 4th Street NW adjacent to the wetland flows east into the wetland; therefore, the wetland receives stormwater discharges and this question should be scored as 1 point. Please update the rating form and adjust scoring accordingly. We recognize that the addition of 1 point does not change the overall rating (M) for landscape potential.
- D 5.1 – see comment under D 2.1. The wetland receives stormwater discharges, and this question should be scored as 1 point. We recognize that the addition of 1 point does not change the overall rating (M) for landscape potential.

There is no rating form labeled as Wetland 1 in Appendix E of the Revised Soundview Report. However, there is a second Wetland A rating form dated December 2023 with a rating of Category III. Based on the text in the report, Wetland 1 is a Category III wetland. Confluence is assuming that this second Wetland A rating form, is mislabeled as Wetland A and should be labeled as the rating form for Wetland 1. If this rating form is for wetland 1, Confluence agrees with the rating form. Please revise the rating form to reflect the correct wetland name.

Confluence reviewed the wetland rating form for off-site Wetland 2 in Appendix E of the Soundview Report. Based on the conditions that Confluence observed, we agree the rating.

SUMMARY

In summary, at this time Confluence cannot agree with the conclusions of the Revised Soundview Report. Many of the data forms used to determine Wetland A boundaries are outdated. Confluence recommends the following corrections to the Revised Soundview Report:

- Provide a table summarizing when DPs were evaluated and whether wetland hydrology indicators were observed.
- Correctly label Wetland 1 rating forms.

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

Confluence (Confluence Environmental Company). 2023. Third party review of “wetland, stream, and fish and wildlife habitat assessment: PSE Todd Road,” August 2023. Letter to Ms. Nabila Comstock, City of Puyallup Planning Services. November 1, 2023.

Soundview (Soundview Consultants LLC). 2023a. Response to third party review comments 325 Todd Road Northwest, Puyallup Washington # PLPSP20230096. Technical memorandum

prepared for Trammel Crow, Seattle, WA, by Soundview Consultants LLC, Gig Harbor, WA. December 20, 2023.

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

Soundview. 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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