



July 27, 2026

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

Re: Todd Street Storage Yard (PLPSP20260067) Third Party Review

Dear Nabila:

Confluence Environmental Company (Confluence) has reviewed the Critical Areas Report (CAS) submitted by Habitat Technologies for the Todd Road Storage Yard project PLPSP20260067 located at 212 and 302 Todd Road, Puyallup, Washington (Parcels 0420222028 and 0420222008) (Habitat Technologies 2025a).

COMPLETENESS REVIEW

Confluence found that the CAS report was complete according to the regulations outlined in Puyallup Municipal Code (PMC) Chapter 21.06 for Critical Areas Regulations.

TECHNICAL REVIEW

Confluence agrees with the stream typing and the wetland boundary. However, Confluence disagrees with the wetland rating and buffer determination summarized in the table on page 4 and the statement on page 11 that the wetland has been previously verified as a Category III wetland. These statements also do not agree with the wetland rating form provided in Appendix B. Confluence conducted several site visits to off-site wetland in 2024 and 2025 as part of other development proposals for 212 and 320 Todd Road (PRGR20230114 and PLCUV20240004, respectively). During both reviews, the off-site wetland was determined to be a Category II wetland, with a total score of 21 points and a habitat rating score of 6 points, which requires a 150-foot buffer. Habitat Technologies prepared the critical areas assessment for 320 Todd Road, which has the correct wetland rating and associated buffer width (Habitat Technologies 2025b).

Please revise the CAS report on page 4 to match the results in the rating form and page 11 to state the wetland has been previously determined to be a Category II wetland.

The buffer restoration plan needs to include the objective of the restoration plan and describe the area (in square feet or acreage) of buffer that will be restored.

SUMMARY

The following corrections are required:

- Revise the report to be consistent in identifying the wetland as a Category II wetland.
- Revise the report to be consistent in identifying the wetland buffer as 150 feet.
- Revise the report to include the objective of the buffer restoration plan.

Respectfully yours,



KERRIE McARTHUR, PWS, CERP, FP-C

Managing Senior Biologist

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REFERENCES

Habitat Technologies. 2025a. Environmentally critical areas assessment and stream/wetland corridor buffer restoration program: Parcels 0420222028 and 0420222008 - 212 and 302 Todd Road NE, City of Puyallup, Pierce County, Washington. Prepared for Ms. Catherine Dwyer by Habitat Technologies, Puyallup, Washington.

Habitat Technologies. 2025b. Environmentally critical areas assessment: Parcel 0420222005 - 320 Todd Road NE, City of Puyallup, Pierce County, Washington. Prepared for Ms. Catherine Dwyer by Habitat Technologies, Puyallup, Washington.

King County. 2026. Critical areas mitigation guidelines. Available at:

<https://cdn.kingcounty.gov/-/media/king-county/depts/local-services/permits/building-land-use-permits/c/critical-areas-mitigation-guidelines.pdf?rev=3591279095174052a5fab0f5cce52d9b&hash=6350D09A1250602EEE9C82C2E4F72EC7> (accessed on July 23, 2026).