Sewall Wetland Consulting, Inc.
PO Box 880
Fall City, WA 98024
Phone: 253-859-0515

October 31, 2022

Chris Holland
Planning Manager
City of Marysville – Community Development
501 Delta Avenue
Marysville, Washington 98270

RE: Buffer Averaging – 104th Street LLC/Dells Nursery
City of Marysville #PA22041
SWC Job #20-149

Dear Chris,

This letter is an analysis of the proposed buffer averaging of the 104th Street LLC/Dells Nursery proposed buffer averaging plan as depicted on the Land Technologies Sheet P1 of the 104th Street LLC Preliminary Site Plan, located at 4131 104th Street NE in the City of Marysville, Washington (the "site").

The site pan depicts a structure with associated parking areas and infrastructure. On the east side the site. The proposed plan depicts the structure intruding into the Category II 100' buffer a total of 3,022sf. As compensation, the area will be averaged as allowed by Code by adding 4,809sf of buffer just north of the structure.

City of Marysville Municipal Code Chapter 22E.010.100.5 states;

(5) Buffer widths may be modified by averaging buffer widths as set forth herein:

> (a) Buffer width averaging shall be allowed only where the applicant demonstrates to the community development department that the averaging will not impair or reduce the habitat, water quality purification and enhancement, storm water detention, ground water recharge, shoreline protection and erosion protection and other functions of the wetland and buffer, that lower-intensity land uses would be located adjacent to areas where buffer width is reduced, and that the total area contained within the buffer after averaging is no less than that contained within the standard buffer prior to averaging;

Response: The proposed area of buffer reduction is generally in the open, area with little native woody vegetation. Most of this area has blackberry patches and is grass covered with typical pasture grasses and weeds. The area to be added is generally pasture like and will require enhancement plantinngs. This reduction will not impact the various functions the buffer performs protecting the wetland. The proposed averaging will

include planting degraded portions of the buffer in the area of the reduction and buffer addition to improve buffer functions. This will be depicted on a Buffer Averaging and Enhancement plan to be provided once this concept is approved.

> (b) Buffer reductions may be allowed for wetlands; provided, that the applicant demonstrates the proposal meets criteria in subsections (5)(b)(i) through (iii) and either (iv) or (v) of this section. Buffer width reduction proposals that meet the criteria as determined by the director shall be reduced by no more than 25 percent of the required buffer and shall not be less than 25 feet in width.
>
> > (i) The buffer area meets buffer area planting requirements in subsection (3) of this section and MMC 22E.010.150 and has less than 15 percent slopes; and

Response: The proposed area of reduction is <15% slopes and will be planted with native vegetation where needed. The minimum buffer width is 80' which is 80% of the standard 100' width.

> > (ii) A site-specific evaluation and documentation of buffer adequacy is based on consideration of the best available science as described in MMC 22E.010.040; and

Response: As previously described, portions of the buffer are degraded and will be enhanced with a buffer enhancement plan meeting Best Available Science following approval of this proposed averaging.

> > (iii) Buffer width averaging as outlined in subsection (5)(a) of this section is not being utilized; and either
>
> > (iv) The subject property is separated from the wetland by preexisting, intervening, and lawfully created structures, public roads, or other substantial preexisting intervening improvements; and the intervening structures, public roads, or other substantial improvements are found to separate the subject upland property from the wetland due to their height or width, preventing or impairing the delivery of buffer functions to the wetland, in which cases the reduced buffer width shall reflect the buffer functions that can be delivered to the wetland; or

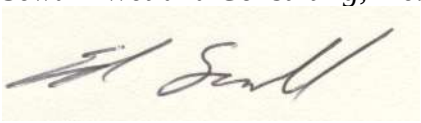
Response: As previously described, portions of the buffer are degraded from past use as lawn and pasture, which is a "preexisting improvement". These separate the proposed improvement from the functioning buffer. These areas will be planted as previously described in the proposed averaging plan to increase buffer functions of these degraded areas.

(v) The wetland scores four points or less for wildlife habitat in accordance with the rating system applied in MMC 22E.010.060, and mitigation is provided based on MMC 22E.010.150, 22E.010.370, and Table 2 of this section, when determined appropriate based on the evaluation criteria in subsection (5)(b)(ii) of this section.

Response: NA not being utilized as the wetland scores 7 habitat points.

If you have any questions in regards to this report or need additional information, please feel free to contact me at (253) 859-0515 or at esewall@sewallwc.com .

Sincerely,
Sewall Wetland Consulting, Inc.



Ed Sewall
Senior Wetlands Ecologist PWS #212