WETLAND AND FISH AND WILDLIFE HABITAT ASSESSMENT REPORT

SMOKEY POINT BLVD

OCTOBER 2023

Soundview Consultants
Environmental Assessment
Planning + Land Use Solutions

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SMOKEY POINT BLVD

OCTOBER 10, 2023

PROJECT LOCATION

14821 AND 14919 SMOKEY POINT BLVD;
14805 AND 14925 35TH AVENUE NE; AND
3470 152ND STREET NE
MARYSVILLE, WA 98271

PREPARED FOR

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PREPARED BY

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Environmental Assessment
Planning + Land Use Solutions

Executive Summary

Soundview Consultants LLC (SVC) has been assisting Ideal Industrial Park, LLC (Applicant) to provide a wetland and fish and wildlife habitat assessment to support industrial redevelopment of a 10.15-acre site located at 14821 and 14919 Smokey Point Blvd, 14925 and 14805 35th Avenue NE, And 3470 152nd Street NE in unincorporated Snohomish County within the City of Marysville, Washington. The subject property consists of six parcels that are situated in the Southwest ¼ of Section 33, Township 31 North, Range 05 East, W.M (Snohomish County Tax Parcel Numbers 31053300202200, 31053300201500, 31053300202400, 31053300202300, 31053300202500 and 31053300300600).

The subject property was previously investigated by Sewall Consulting, Inc. in December 2021 and August 2022 (Sewall Consulting, 2022a; Sewall Consulting, 2022b). The results of these investigations determined that there are no potentially-regulated wetlands, streams, or other fish and wildlife habitat conservation areas present onsite, and identified two non-regulated ditches; one on the eastern property boundary and one on the southern property boundary. In response to these assessments, The City of Marysville issued a technical review letter to the Applicant, which included a comment from WDFW stating that the prior critical area reports appeared insufficient and did not provide enough information regarding the unregulated ditch on the southern boundary of the subject property (Marysville Community Development, 2023). WDFW stated that the ditch had known fish use, and required a protective buffer to ensure no negative impacts occur; however, in the same review letter, City staff noted the presence of a fish screen downstream of the subject property.

SVC investigated the subject property for the presence of potentially-regulated wetlands, streams, and other fish and wildlife habitat conservation areas during the summer of 2023. Using current methodology, the site investigation confirmed a lack of onsite wetland presence. In addition, no streams or other potentially regulated fish and wildlife habitat conservation areas were identified onsite. SVC did confirm the presence of two artificially constructed ditches; one along the eastern boundary of the subject property extending north offsite, and one originating offsite from the east and extending along the southeast boundary of the subject property. The identified ditches have been assessed previously, and the City of Marysville has previously agreed with determinations that they are artificially and intentionally constructed features that are not regulated under Marysville Municipal Code (MMC) (Marysville Community Development, 2022). In addition, several jurisdictional determinations have been issued for segments of the ditches upstream and downstream of the site, where the U.S Army Corps of Engineers (USACE) determined that the ditches are not regulated Waters of the U.S (WOTUS) (NWS-2021-516; NWS-2022-544). Furthermore, in an NWP previously issued for a project downstream of the site, WDFW determined that an HPA is not required for work along the ditch system due to the presence of a fish screen that precludes fish access (NWS-2013-0058). No other potentially-regulated critical areas were observed within 300-feet of the subject property.

The Applicant proposes industrial redevelopment of the subject property with warehouses, site access and parking, stormwater infrastructure, utilities, and associated infrastructure. The ditches identified onsite are not regulated by the City of Marysville, the USACE, or WDFW. In addition, they are not likely regulated by the Washington State Department of Ecology (WSDOE) as they are artificially constructed channels; however, confirmation is needed to determine if any permitting is required for the proposed development.

Table of Contents

Figures

Tables

Appendices

Chapter 1. Introduction

Soundview Consultants LLC (SVC) is assisting Ideal Industrial Park, LLC (Applicant) with a wetland and fish and wildlife habitat assessment to support the commercial redevelopment of a 10.15-acre site located at 14821 and 14919 Smokey Point Boulevard, 14805 and 14925 35th Avenue Northeast, and 3470 152nd Street Northeast in the City of Marysville, Washington. The subject property consists of one six parcels situated in the Northwest ¼ of Section 33, Township 31 North, Range 05 East, W.M. (Snohomish County Parcel Numbers 31053300202200, 31053300201500, 31053300202400, 31053300202300, 31053300202500 and 31053300300600).

The purpose of the wetland and fish and wildlife habitat assessment report is to identify the presence of potentially regulated wetlands, waterbodies, and other fish and wildlife habitat conservation areas that may be found on or near the subject property.

This report provides conclusions, recommendations, and preliminary specifications regarding:

- Site description and area of assessment;
- Background research and identification of potentially regulated critical within the vicinity of the proposed project;
- Identification, delineation, and assessment of potentially regulated wetlands and other aquatic features;
- Identification and assessment of potentially regulated fish and wildlife habitat;
- Existing site map detailing identified critical areas and standard buffers; and
- Supplemental information necessary for regulatory review.

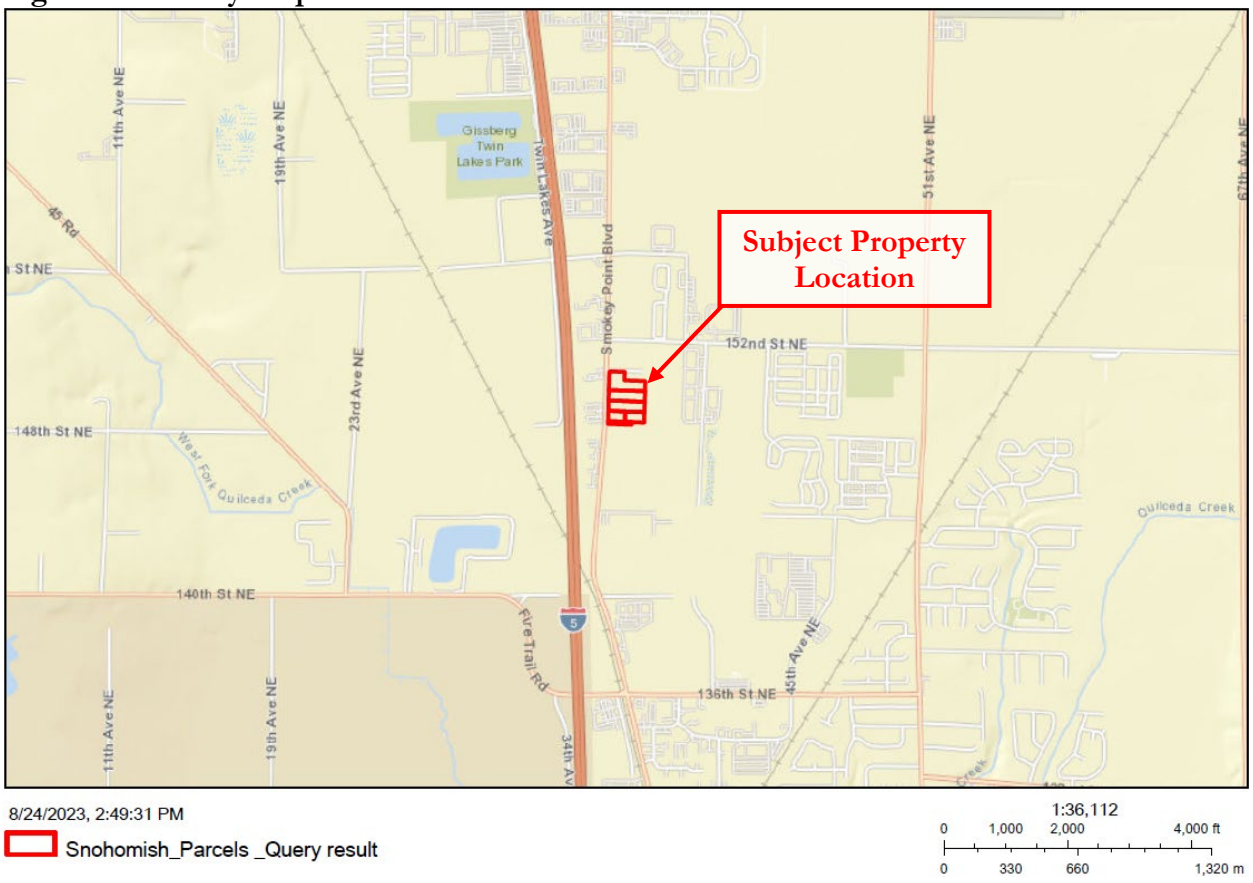
Chapter 2. Proposed Project

2.1 Location

The subject property is located at 14821 and 14919 Smokey Point Boulevard, 14805 and 14925 35th Avenue Northeast, and 3470 152nd Street Northeast in the City of Marysville, Washington (Figure 1). The subject property consists of six parcels that are situated in the Southwest ¼ of Section 33, Township 31 North, Range 05 East, W.M (Snohomish County Tax Parcel Numbers 31053300202200, 31053300201500, 31053300202400, 31053300202300, 31053300202500 and 31053300300600).

To access the subject property from I-5 North, take Exit 202 for 116th St NE. Keep left at the fork to continue toward 116th St NE. Continue straight onto 116th St NE then turn right onto 34th Ave NE. At the traffic circle, take the 1st exit and stay on 34th Ave NE. Continue for 0.9 miles and turn right onto 136th St NE then take the first left onto Old Highway 99/Smokey Point Blvd/State Ave. Continue to follow Smokey Point Blvd for 0.9 miles and the destination will be on the right.

Figure 1. Vicinity Map.



2.2 Proposed Project

The Applicant proposes industrial redevelopment of the subject property with warehouses, site access and parking, stormwater infrastructure, utilities, and associated infrastructure.

Chapter 3. Methods

SVC investigated and assessed any potentially regulated wetlands, waterbodies, and other fish and wildlife habitat conservation areas on and within 300 feet of the subject property in the summer of 2023. All determinations were made using observable vegetation, hydrology, and soils in conjunction with data from the U.S. Geological Survey (USGS) topographic map, the Natural Resource Conservation Service (NRCS) Soil Survey, U.S. Fish and Wildlife (USFWS) National Wetland Inventory (NWI), Marysville and Snohomish County Geographic Information Systems (GIS) data, Washington Department of Fish and Wildlife (WDFW) Priority Habitats and Species (PHS) mapping tool, WDFW and Northwest Indian Fisheries Commission (NWIFC) Statewide Integrated Fish Distribution (SWIFD) mapping tool, and various orthophotographic resources. Appendix A contains further details for the methods and tools used to prepare this report.

Wetland presence/absence was determined using the routine approach described in the U.S. Army Corps of Engineers (USACE) *Wetlands Delineation Manual* (Environmental Laboratory, 1987) and modified according to the guidelines established in the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region* (Version 2.0) (USACE, 2010) and *Field Indicators of Hydric Soils in the United States* (NRCS, 2018). Prior precipitation conditions and seasonal timing of site investigations were considered in evaluations for wetland hydrology indicators. Orange surveyor's flagging was labeled alpha-numerically and tied to 3-foot lath or vegetation at formal sampling locations to mark the points where detailed data was collected (DP-1 to DP-2). Additional tests pits were excavated at regular intervals throughout the site to further confirm onsite wetland absence.

Surface waters were assessed utilizing definitions established in the Revised Code of Washington (RCW) 90.58.030(2)(b), WAC 173-22-030(5), and Marysville Municipal Code (MMC) 22E.010.210.1.

The fish and wildlife habitat assessment was conducted during the same site visits by qualified fish and wildlife biologists. The experienced biologists made visual observations using stationary and walking survey methods for both aquatic and upland habitats noting any special habitat features or direct and indirect signs of fish and wildlife activity (e.g. nesting, foraging, and migration/movement). Special attention was given to assessing the presence of fish and wildlife habitat conservation areas designated under MMC 22E.010.170.

Chapter 4. Existing Conditions

4.1 Landscape Setting

The subject property is currently undeveloped and is located in a mixed residential, commercial, and industrial setting in the City of Marysville (Figure 2). The subject property is zoned Light Industrial and is currently cleared and graded/modified in preparation for development, except for a small lawn area on the northwest portion of the site. The subject property is bound by Smokey Point Boulevard to the west, abuts 150th Place Northeast and a mix of commercial and residential lots to the north, and vacant lots to the east and south. Topography onsite is generally flat and manipulated due to ongoing site grading and earthwork. The average elevation throughout the site is approximately 100 feet above mean sea level (amsl). A Snohomish County Contours Map is provided in Attachment B1. The subject property is located in the Snohomish watershed (Water Resource Inventory Area 7).

Figure 2. Aerial View of the Subject Property

4.2 Soils

The NRCS Soil Survey of Snohomish County, Washington identifies one soil series on the subject property: Custer fine sandy loam (13). A soil map is provided in Appendix B2. Below is a detailed description of the soil profile:

Custer fine sandy loam (13)
According to the NRCS survey, Custer fine sandy loam is a very deep, poorly drained soil formed in glacial outwash. In a typical profile, the surface layer is about 9 inches thick and consists of a dark grayish brown fine sandy loam. The upper subsoil is about 7 inches thick and consists of a loamy fine sand. The lower subsoil is about 19 inches thick and consists of gray and olive sand with iron-cemented concretions that form a discontinuous hardpan. Custer fine sandy loam is listed as 85 percent hydric by on the Snohomish County Hydric Soils list (NRCS, N.d).

4.3 Critical Area Inventories

The City of Marysville critical areas map (Appendix B3) does not identify any regulated wetlands or streams onsite. The Snohomish County critical areas map (Appendix B4) identifies one potential wetland offsite to the north, north of 150th Place Northeast, within 300 feet of the subject property. In addition, one potential fish-habitat (Type F) stream is identified along the eastern property boundary, extending west from the southeast corner of the site, and one potential non-fish habitat, seasonal (Type Ns) stream is identified along the southern boundary of the subject property. The USFWS NWI map (Appendix B5) identifies potential streams features in the same locations as the County. The WDFW PHS map (Appendix B6) and WDFW and NWIFC SWIFD map (Appendix B7) identify documented presence of coastal cutthroat trout in the potential stream along the eastern property boundary. In addition, WDFW and the NWIFC identify the potential stream as gradient accessible for coho, Chinook, chum, and pink salmon and steelhead trout. DNR stream typing map (Appendix B8) identifies a potential Type N (non-fish) stream along the southern property boundary and a potential Type U (unknown) stream along the eastern property boundary. However, the City of Marysville identifies both potential waterbodies as non-regulated features. No other potential wetlands, streams, or other fish and wildlife habitat conservation areas are identified on or within 300 feet of the subject property.

4.4 Precipitation

Precipitation data was obtained from the National Oceanic and Atmospheric Administration (NOAA) weather station at Seattle-Tacoma Airport in order to obtain percent of normal precipitation during and preceding the investigation. A summary of data collected is provided in Table 1.

Table 1. Precipitation Summary[1].

Date	Day Of	Day Before	1 Week Prior	2 Weeks Prior	Last 30 days (Observed/Normal)	Year to Date (Observed/Normal)[2]	Percent of Normal[3]
8/16/23	0.00	0.00	0.00	0.04	0.13/0.65	14.15/21.23	20/67

1. Precipitation volume provided in inches. Data obtained from NOAA (http://w2.weather.gov/climate/xmacis.php?wfo=sew) for SeaTac airport.
2. Year-to-Date precipitation is for the calendar year from January 1st to the onsite date.
3. Percent of normal is for the last 30 days and year to date.

Precipitation levels during the August 2023 site visit were below the statistical normal range (70 to 130 percent of normal) for both the prior 30 days (20 percent of normal) and the 2023 calendar year (67 percent of normal). Given that the month of August is typically one of the driest times of year in the Pacific Northwest region, this precipitation data suggests that hydrologic conditions encountered during the time of the site investigation were relatively normal for the time of year. Such conditions were considered in making professional wetland determinations.

4.5 Prior Studies

The three southernmost parcels (Parcels 31053300201500, 31053300202500, and 31053300300600) of the subject property were previously investigated by Sewall Consulting, Inc. on December 3, 2021; the results of this assessment are documented in a report titled *Critical Areas Report (SWC Job #21-180)* prepared January 10, 2022 (Sewall Consulting, 2022a). An additional investigation of the remaining parcels was completed by Sewall Consulting, Inc. on August 11, 2022. The results of the second investigation are documented in a report titled *Critical Areas Report (SWC Job #22-164)* prepared August 15, 2022 (Sewall Consulting, 2022b). The results of these investigations determined that there are no potentially-regulated wetlands, streams, or other fish and wildlife habitat conservation areas present onsite, and identified two non-regulated ditches; one on the eastern property boundary and one on the southern property boundary.

The City of Marysville issued a technical review letter to the Applicant on July 20, 2023, titled *Ideal Industrial Park – Technical Review 1, PA 23010* (Marysville Community Development Department, 2023). The technical review letter included a comment from WDFW stating that the prior critical area reports appeared insufficient and did not provide enough information regarding the unregulated ditch on the southern boundary of the subject property. WDFW stated that the ditch had known fish use, and required a protective buffer to ensure no negative impacts occur; however, in the same review letter, City staff noted that this ditch is located upstream of an installed fish screen.

In addition to the investigations that have occurred onsite, SVC previously supported with site investigations and permitting for Northsound Industrial project (Parcel Number 31053300303100). The property is located southeast of the southern ditch further downstream where the ditch converges with Hayho Creek. The results of the site investigation are documented in the *Wetland and Fish and Wildlife Habitat Assessment – Marysville Industrial* prepared March 25, 2022 (SVC, 2022). During the investigation, SVC determined the ditch was artificially and intentionally constructed from uplands, and did not meet the criteria to be regulated as a stream or wetland. In addition, a fish screen was identified near the confluence with Hayho Creek that was intentionally installed to prevent fish from accessing and becoming stranded in the ditches, and therefore, the ditches should not be considered regulated fish and wildlife habitat conservation areas. The City of Marysville issued a confirmation letter agreeing with SVC's determinations dated April 27, 2022 (Marysville Community Development Department, 2022).

On August 28, 2013, the USACE issued a Nationwide Permit (NWP) for the Pacific Coast Feather project site, located adjacent to the southeast corner of the subject property (NWS-2013-00538). The NWP was issued to support the installation of a culvert on a portion of the southern ditch downstream of the subject property. At the time the permit was issued, the ditch was considered a regulated Water of the United States (WOTUS) due to the presence of a surface water connection to Hayho Creek. The NWP included a letter from WDFW, where they indicated that no HPA was required due to the presence of a fish screen that prevents fish from accessing the ditch system.

In the time that has lapsed since the NWP was issued for the Pacific Coast Feather project, several NWPs have been issued by the USACE updating the regulator status of the ditches onsite. In an approved jurisdictional determination (AJD) issued for the Northsound Industrial Project on July 16, 2021 (NWS-2021-516), the USACE determined that segments of the southern ditch near its confluence with Hayho Creek is not a regulated WOTUS as both the ditch and Hayho Creek are artificially constructed channels that are not subject to tidal ebb and flow, have no potential to be used in interstate or foreign commerce, did not relocate a tributary, and were not constructed in a tributary

or adjacent wetland. On February 8, 2022, the USACE issued an AJD for a property located approximately 373 feet north of the northeast corner of the subject property along 152nd Street Northeast (NWS-2022-544), where they confirmed portions of the eastern ditch upstream of the subject property are not a regulated WOTUS as the ditch was determined to be an artificial channel excavated from uplands that was not a relocated tributary and was not constructed in a tributary or adjacent wetland. Both jurisdictional determinations are considered valid for up to 5 years from the date issued. Given these determinations and the deregulation of Hayho Creek by the USACE, the onsite ditches are not anticipated to be regulated by the USACE.

Chapter 5. Results

During the summer 2023 site investigation, SVC confirmed a lack of onsite wetlands, streams, and fish and wildlife habitat conservation areas. Two artificially excavated ditches (Ditches Y and Z) were identified on the eastern and southern boundaries of the subject property. No other potentially regulated wetlands, streams, or other fish and wildlife habitat conservation areas were identified on or within 300 feet of the subject property.

5.1 Upland Characterization

Grading and earthwork to support commercial redevelopment of the subject property began prior to the summer of 2023. As such, the southern two-thirds of the subject property is largely unvegetated except for strips along the eastern and southern property boundary that are characterized by sparse tree cover and non-native invasive species, including Himalayan blackberry (*Rubus armeniacus*), cutleaf blackberry (*Rubus laciniatus*), and reed canarygrass (*Phalaris arundinacea*). The northern third of the site is developed with a small outbuilding and has also been partially graded; however, patches of unmaintained lawn area dominated by colonial bentgrass (*Agrostis capillaris*) and orchard grass (*Dactylis glomerata*).

Two data plots (DP-1 and DP-2) were collected during the site investigation to confirm onsite wetland absence. One in the low point of an excavated ditch on the southern property boundary (DP-1) and one in the unmaintained lawn area on the northwest portion of the subject property (DP-2). A figure depicting the location of the data plots is provided in Attachment C. Photographs of the two data plots are provided in Attachment D. A copy of the data forms is provided in Attachment E.

Neither of the data plots met wetland criteria. Both data plots met hydrophytic vegetation criteria through the dominance test due to the presence of typical facultative vegetation present in both uplands and wetlands. However, DP-1 was collected in an artificially excavated ditch that maintains temporary hydrology following precipitation events sufficient to support facultative wetland (FACW) species, including hardhack (*Spiraea douglasii*) as well as facultative upland species including cutleaf blackberry. DP-2 met the dominance test due to a predominance of colonial bentgrass, a facultative species; however, other species observed at this location were facultative upland plants. Neither of the data plots met hydric soil or wetland hydrology criteria. Soils at DP-1 were dark brown (10YR 2/2) to a depth of 14 inches below ground surface (bgs) and lacked redoximorphic features or depletions required to meet hydric soil indicators. Two secondary hydrology indicators, geomorphic position and FAC-neutral test, was observed. Therefore, hydrology criteria was indirectly met at DP-1, but the lack of hydric soil at this location indicates that not all three wetland criteria are present, and the area likely supports winter or ephemeral hydrology. Soils at DP-2 were too bright (10YR 3/3 overlying 10YR 3/4) to meet hydric soil criteria, and no primary or secondary wetland hydrology indicators were observed.

5.2 Non-Regulated Ditches

Two non-regulated ditches were identified on the subject property. One ditch originates along the southern boundary of the subject property on the southeast portion of the site and extends east for approximately 220 feet before continuing offsite, where it eventually converges with Hayho Creek approximately 0.63 mile east of the subject property. The second ditch originates north of the subject

property and extends south along the eastern boundary of the subject property for approximately 515 feet, converging with the southern ditch on the southeast corner of the site. Critical area inventories prepared by Snohomish County and WDFW identify the ditches as potentially regulated streams with documented fish use; however, the City identifies them as non-regulated features and previously confirmed that downstream segments of the southern ditch were artificially and intentionally constructed from uplands to support agricultural practices (Marysville Community Development, 2022). In addition, WDFW previously determined that an HPA application was not needed for in-water work in segments of the southern ditch downstream of the subject property due to the presence of a fish screen intentionally placed to prevent fish from becoming stranded in the ditch network (NWP-2013-0058). As the onsite ditches appear to have been artificially and intentionally excavated from uplands and the downstream fish screen precludes these ditch segments from being utilized by fish, the ditches are not anticipated to be regulated as types waterbodies or fish habitat.

5.3 Fish and Wildlife Habitat Conservation Areas

Per MMC 22E.010.170, the City provides regulations for the protection of primary fish and wildlife habitat conservation areas and habitats and species of local importance identified by the City. Primary fish and wildlife habitat conservation areas include: habitats with federally designated endangered, threatened, and candidate species and state designated endangered, threatened, and sensitive species which have a primary association, state designated priority habitats and areas that are associated with state designated species, naturally occurring ponds under 20 acres, lakes, ponds, streams, and rivers planted with game fish by a government or tribal entity, state natural area preserves and natural resource conservation areas, areas of rare plant species and high quality ecosystems as documented by the State Department of Natural Resources Heritage Program, land that provides essential connections between habitat blocks and open space that is designated by WDFW as a priority habitat in association with state designated species, and streams.

No typed streams or other likely regulated waterbodies were identified on or within 300 feet of the subject property. WDFW identifies the presence of cutthroat trout in the non-regulated ditch along the eastern boundary of the subject property. In addition, the ditch is identified as gradient accessible for coho, Chinook, chum, and pink salmon and steelhead trout. However, as noted in section 4.5 and 5.2, a fish screen is present downstream of the subject property that prevents fish from entering the ditches along the property boundaries. As such, the ditches onsite do not provide habitat for ESA-listed salmonids and are not regulated fish and wildlife habitat conservation areas.

According to the USFWS IPaC mapping database, marbled murrelet (*Brachyramphus marmoratus*), yellow-billed cuckoo (*Coccyzus americanus*), and bull trout (*Salvelinus confluentus*) have the potential to occur within 300 feet of the subject property. As noted above, the downstream fish screen precludes fish use of the onsite ditches, therefore bull trout are not likely present.

Marbled murrelet that occur in the state of Washington are year-round residents on coastal waters and primarily feed in waters within 500 feet of the shore out to 1.2 miles from shore at depths of less than 100 feet; preferred pray is includes small fish and crustaceans although nestlings may feed on larger fish (WDFW, 1991). Nests and roosts are found in mature and old growth forests of western Washington. Nest trees are typically greater than thirty-two inches diameter at breast height (DBH), with nesting preferences on large flat conifer branches, often covered in moss (WDFW, 1991). Marbled murrelets have been observed in the largest numbers near the coastal waters surrounding the Olympic Peninsula, and are more sparsely distributed elsewhere in this region. The subject property

and surrounding areas are extensively developed with a mix of residential, commercial, and industrial land uses and lack forest habitat or trees meeting the size requirements for nesting or roosting marbled murrelet. In addition, the subject property is located over 8.5 miles east of Puget Sound where marbled murrelet feed. As such, no habitat for marbled murrelet is present on or within 300 feet of the subject property.

Yellow-billed cuckoo habitat consists of low to mid-level riparian forests dominated by cottonwoods and willows. Additional riparian species may include ash, walnut, mesquite, and tamarisk. Breeding cuckoos prefer larger and wider patches of riparian habitat. Habitat assessments of yellow-billed cuckoo from California indicate that suitable habitat is approximately 100 to 198 acres and wider than 200 meters; marginal habitat is approximately 20 to 100 acres and 100 to 200 meters wide; and unsuitable habitat is smaller than approximately 37 acres and less than 100 meters wide (Wiles & Kalasz, 2017). Twenty sightings have been confirmed in Washington between the 1950s and 2017; none of these sightings were breeding birds. Further, sixteen of these twenty sightings were east of the Cascades, and the sighted birds were likely vagrants or migrants (Wiles & Kalasz, 2017). No riparian forests are present on or within 300 feet of the subject property. As such, no suitable habitat for yellow-billed cuckoo is present on or within 300 feet of the subject property.

Chapter 6. Regulatory Considerations

During the summer 2023 site investigation, SVC confirmed a lack of onsite wetlands, streams, and fish and wildlife habitat conservation areas. Two artificially excavated ditches (Ditches Y and Z) were identified on the eastern and southern boundaries of the subject property. No other potentially regulated wetlands, streams, or other fish and wildlife habitat conservation areas were identified on or within 300 feet of the subject property.

6.1 Local Considerations

The City of Marysville has previously confirmed and agreed with determinations that the ditches identified onsite were artificially and intentionally constructed from uplands, and do not meet the criteria to be regulated as wetlands or streams. As such, no protective buffers or building setbacks are required, and therefore not mitigation is required.

6.2 State and Federal Considerations

On January 18, 2023, USACE and EPA published a revised definition of "Waters of the United States" (USACE and EPA, 2023a). The revised rule became effective on March 20, 2023. On May 25, 2023, the U.S. Supreme Court issued a decision affecting the definition of Waters of the United States in *Sackett Et Ux. V Environmental Protection Agency Et Al.* On August 29, 2023, the US EPA and USACE issued a final rule to amend the final "Revised Definition of 'Waters of the United States'" rule. Under the 2023 revised rule, Waters of the United States is described as follows (USACE and EPA, 2023b):

(a) Waters of the United States means:

> *(1) Waters which are: (i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; (ii) The territorial seas; or (iii) Interstate waters, including interstate wetlands;*
>
> *(2) Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (a)(5) of this section;*
>
> *(3) Tributaries of waters identified in paragraph (a)(1) or (2) of this section: that are relatively permanent, standing or continuously flowing bodies of water; or;*
>
> *(4) Wetlands adjacent to the following waters: (i) Waters identified in paragraph (a)(1) of this section; or (ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;*
>
> *(5) Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) of this section: that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section;*

(b) The following are not "waters of the United States" even where they otherwise meet the terms of paragraphs (a)(2) through (5) of this section:

> *(1) Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;*

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

(3) Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;

(4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;

(5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;

(6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;

(7) Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and

(8) Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.

The USACE previously issued AJDs for portions of the onsite ditch system upstream and downstream of the subject property. Both of these determinations were issued prior to the 2023 revisions to the definition of a WOTUS. The onsite ditches are ephemeral features that only contain flowing water following during the winter wet season or periods of above average precipitation, during which time they flow into Hayho Creek. As such, it is likely excluded from federal regulation under category (b)(3) above. Furthermore, Hayho Creek was previously deregulated by USACE as an artificial and intentionally created water feature, and therefore the immediate downstream water is also unlikely to be regulated as a WOTUS.

Due to the presence of a fish screen installed intentionally to prevent fish from becoming stranded in the ditch system that extends onsite, the onsite ditches are not regulated by WDFW and no HPA is required for any in-water work that may be required to support the proposed development. The identified ditches were artificially and intentionally constructed from uplands to support agricultural practices, and as such are not anticipated to be regulated by WSDOE under RCW 90.48.

Chapter 7. Closure

The findings and conclusions documented in this report have been prepared for specific application to this project. They have been developed in a manner consistent with that level of care and skill normally exercised by members of the environmental science profession currently practicing under similar conditions in the area. Our work was also performed in accordance with the terms and conditions set forth in our proposal. The conclusions and recommendations presented in this report are professional opinions based on an interpretation of information currently available to us and are made within the operation scope, budget, and schedule of this project. No warranty, expressed or implied, is made. In addition, changes in government codes, regulations, or laws may occur. Due to such changes, our observations and conclusions applicable to this project may need to be revised wholly or in part.

All features identified by SVC are based on conditions present at the time of the site inspection and considered preliminary until validated by the jurisdictional agencies. Validation of the absence of critical areas on and within 300 feet of the subject property by the regulating agency provides a certification, usually written, that the site is free of regulated features until a specific date or until the regulations are modified. Only the regulating agencies can provide this certification.

Development activities on a site five years after the completion of this wetland and fish and wildlife habitat assessment report may require reassessment of the site. In addition, changes in government codes, regulations, or laws may occur. Due of such changes, our observations and conclusions applicable to this site may need to be revised wholly or in part.

Chapter 8. References

Debose, Alfonso and M. W. Klungland. 1983. *Soil Survey of Snohomish County Area, Washington*. Soil Conservation Service United States Department of Agriculture, Soil Conservation Service, in cooperation with the Washington Agricultural Experiment Station. Natural Resource Conservation Service.

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Appendix A — Methods and Tools

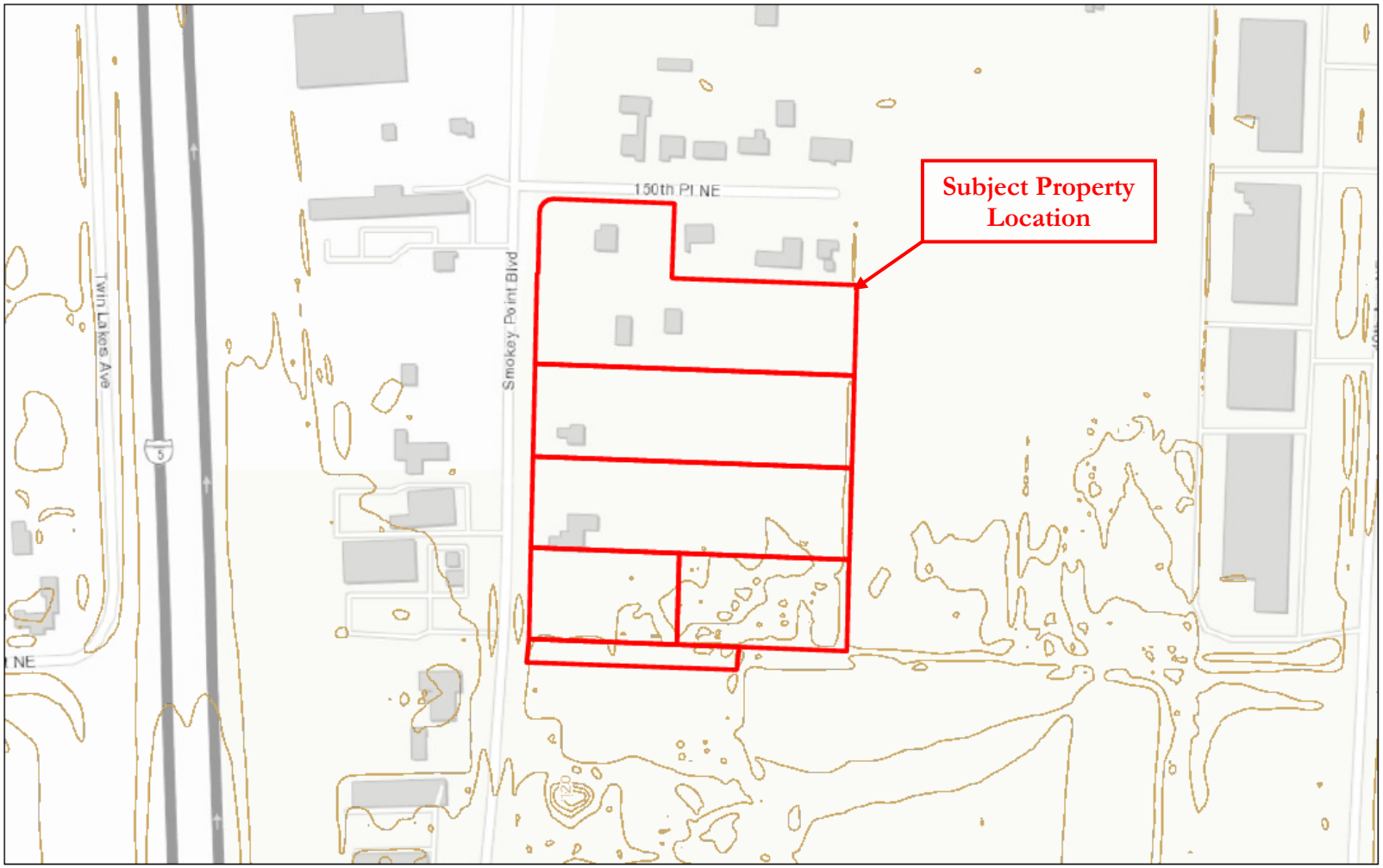
Table A1. Methods and tools used to prepare the report.

Parameter	Method or Tool	Website	Reference
Wetland Determination	USACE 1987 Wetland Delineation Manual	http://el.erdc.usace.army.mil/elpubs/pdf/wlman87.pdf	**Environmental Laboratory.** 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1, US Army Engineer Waterways Experiment Station, Vicksburg, Mississippi.
	Western Mountains, Valleys, and Coast Region Regional Supplement	http://www.usace.army.mil/Portals/2/docs/civilworks/regulatory/reg_supp/west_mt_finalsupp.pdf	**U.S. Army Corps of Engineers.** 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0)*, ed. J. S. Wakeley, R. W. Lichvar, and C. V. Noble. ERDC/EL TR-10-3. Vicksburg, MS: U.S. Army Engineer Research and Development Center.
Plant Indicator Status	2020 National Wetland Plant List	https://www.fws.gov/wetlands/documents/National-Wetland-Plant-List-2020-Wetland-Ratings.pdf	**U.S. Army Corps of Engineers.** 2020. National Wetland Plant List, version 3.5.
Plant Names and Identification	USDA Plant Database	http://plants.usda.gov/	Website.
	Flora of the Pacific Northwest	http://www.pnwherbaria.org/florapnw.php	**Hitchcock**, C.L. & A. Cronquist, Ed. by D. Giblin, B. Ledger, P. Zika, and R. Olmstead. 2018. Flora of the Pacific Northwest, 2nd Edition. U.W. Press and Burke Museum. Seattle, Washington.
Soils Data	NRCS Soil Survey	http://websoilsurvey.nrcs.usda.gov/app/	Website GIS data based upon: **Debose A., and Klungland, M.W.** 1983. Soil Survey of Snohomish County Area, Washington. United States Department of Agriculture, Soil Conservation Service in cooperation with Washington State Department of Natural Resources, and Washington State University, Agriculture Research Center. Washington, D.C.
	Soil Data Access Hydric Soils List	https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcseprd1316620.html	**Natural Resources Conservation Service.** N.d. Soil Data Access Hydric Soils List (Soil Data Access Live).
	Soil Color Charts		**Munsell®** Color. 2000. Munsell® Soil Color Charts. New Windsor, New York.
	Field Indicators of Hydric Soils	https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_053171.pdf	**NRCS.** 2018. *Field Indictors of Hydric Soils in the United States, Version 8.2. L.M. Vasialas, G.W. Hurt, and C.V. Noble (eds.).* USDA, NRCS, in cooperation with the National Technical Committee for Hydric Soils.
Threatened and Endangered Species	Washington Natural Heritage Program	http://data-wadnr.opendata.arcgis.com/datasets/wnhp-current-element-occurrences	**Washington Natural Heritage Program**. Endangered, threatened, and sensitive plants of Washington. Washington State Department of Natural Resources, Washington Natural Heritage Program, Olympia, WA
	Washington Priority Habitats and Species	http://wdfw.wa.gov/hab/phspage.htm	**Priority Habitats and Species (PHS) Program** Map of priority habitats and species in project vicinity. Washington Department of Fish and Wildlife.
Species of Local Importance	WDFW GIS Data	http://wdfw.wa.gov/mapping/salmonscape/	Website
Report Preparation	Marysville Municipal Code (MMC)	https://www.codepublishing.com/WA/Marysville/#!/Marysville22E/Marysville22E010.html#22E.010	MMC Chapter 22E.10 – Critical Areas Management

Appendix B — Background Information

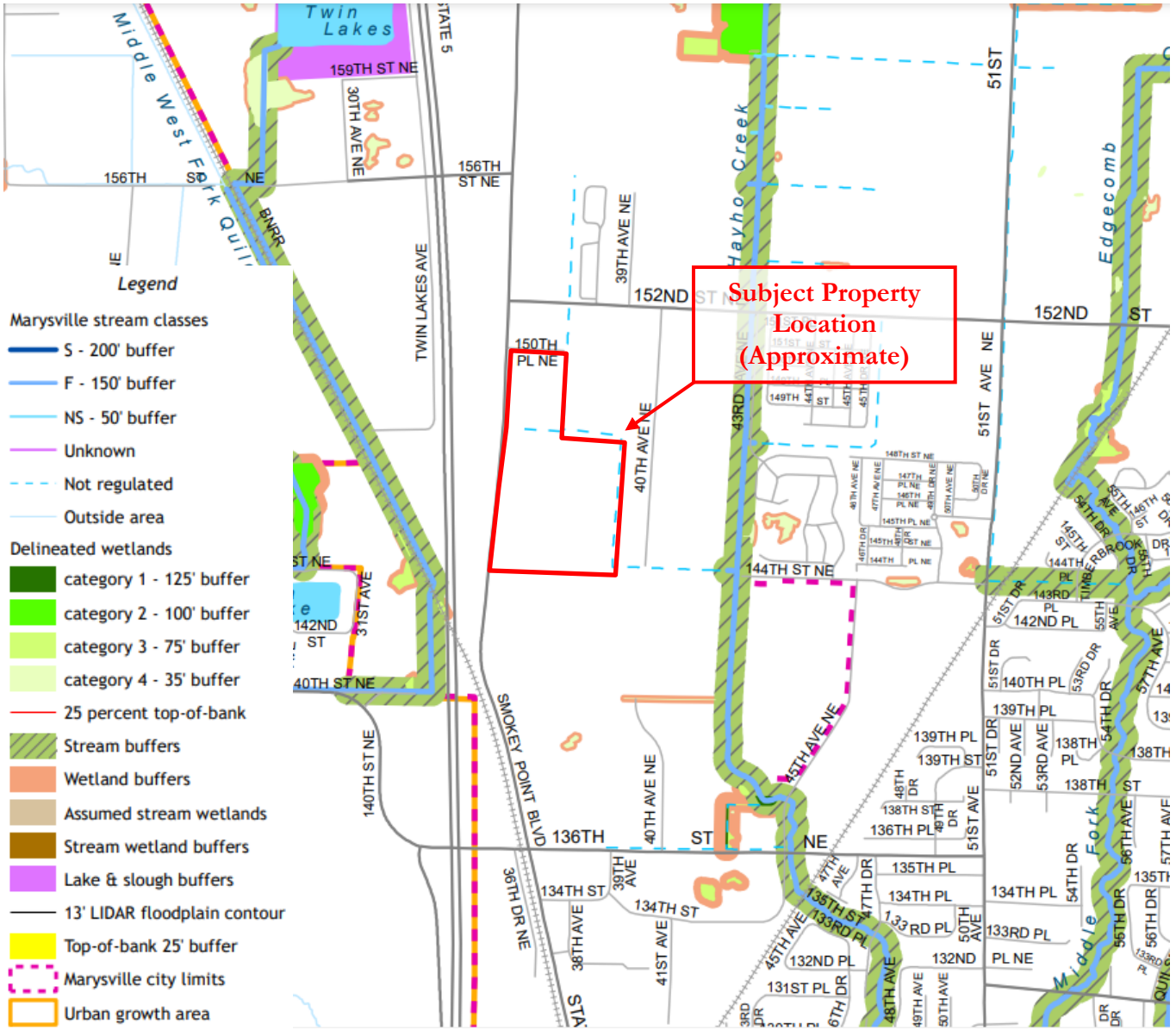
This appendix includes a Snohomish County Contours Map (B1), NRCS Soil Survey Map (B2), City of Marysville Critical Areas Map (B3), Snohomish County Critical Areas Map (B4), USFWS NWI Map (B5), WDFW PHS Map (B6), WDFW and NWIFC SWIFD Map (B7), and DNR Stream Typing Map (B8).

Appendix B1. Snohomish County Contours Map

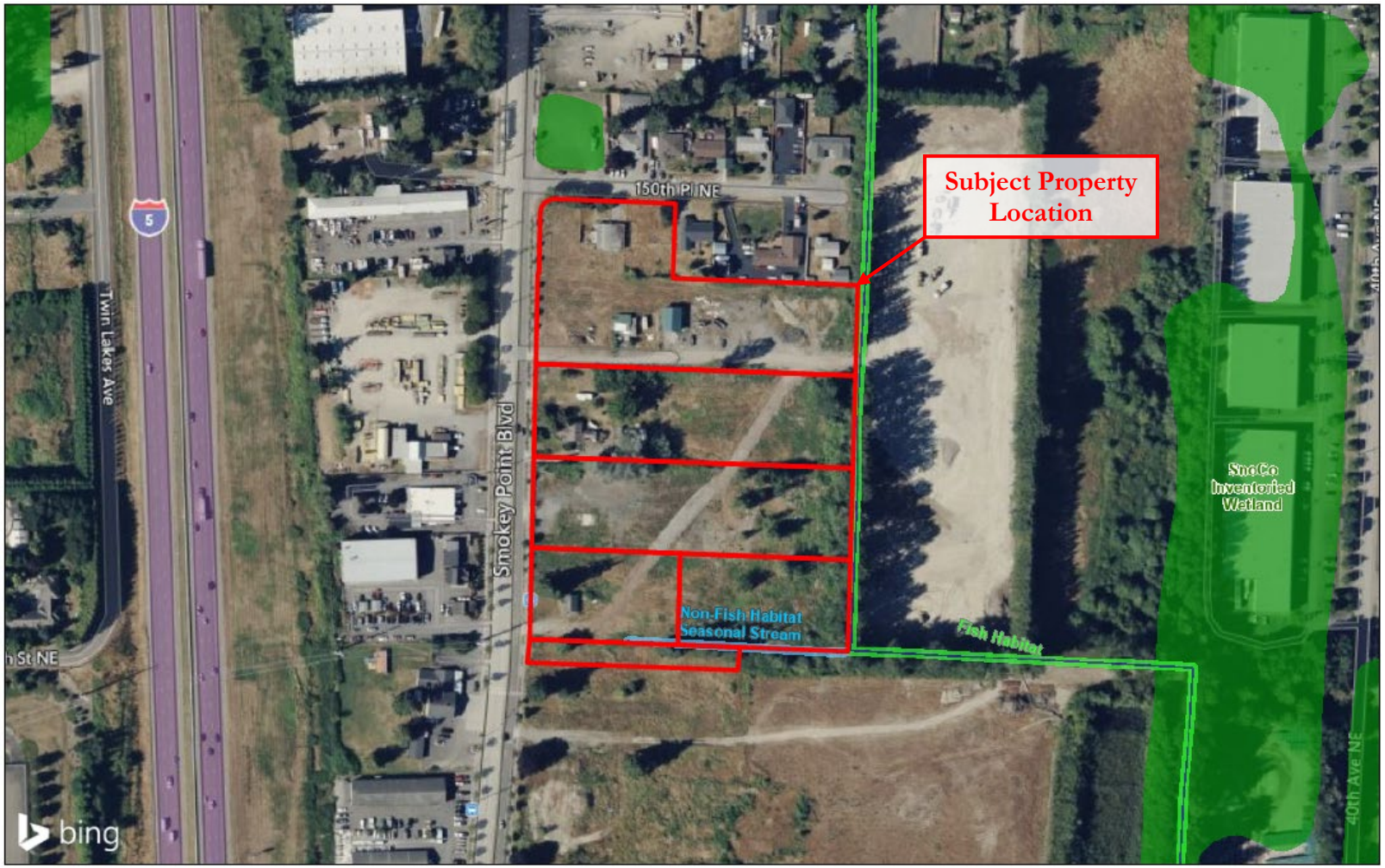


Appendix B2. NRCS Soil Survey Map

Appendix B3. City of Marysville Critical Areas Map



Appendix B4. Snohomish County Critical Areas Map



8/24/2023, 4:00:46 PM

Snohomish_Parcels _Query result

Snohomish County Wetland Inventory

Snohomish County Streams

Fish Habitat

Non-fish Habitat Seasonal

1:4,514

0 140 280 560 ft

0 40 80 160 m

Soundview Consultants

Appendix B5. USFWS NWI Map

Appendix B6. WDFW PHS Map

Priority Habitats and Species on the Web

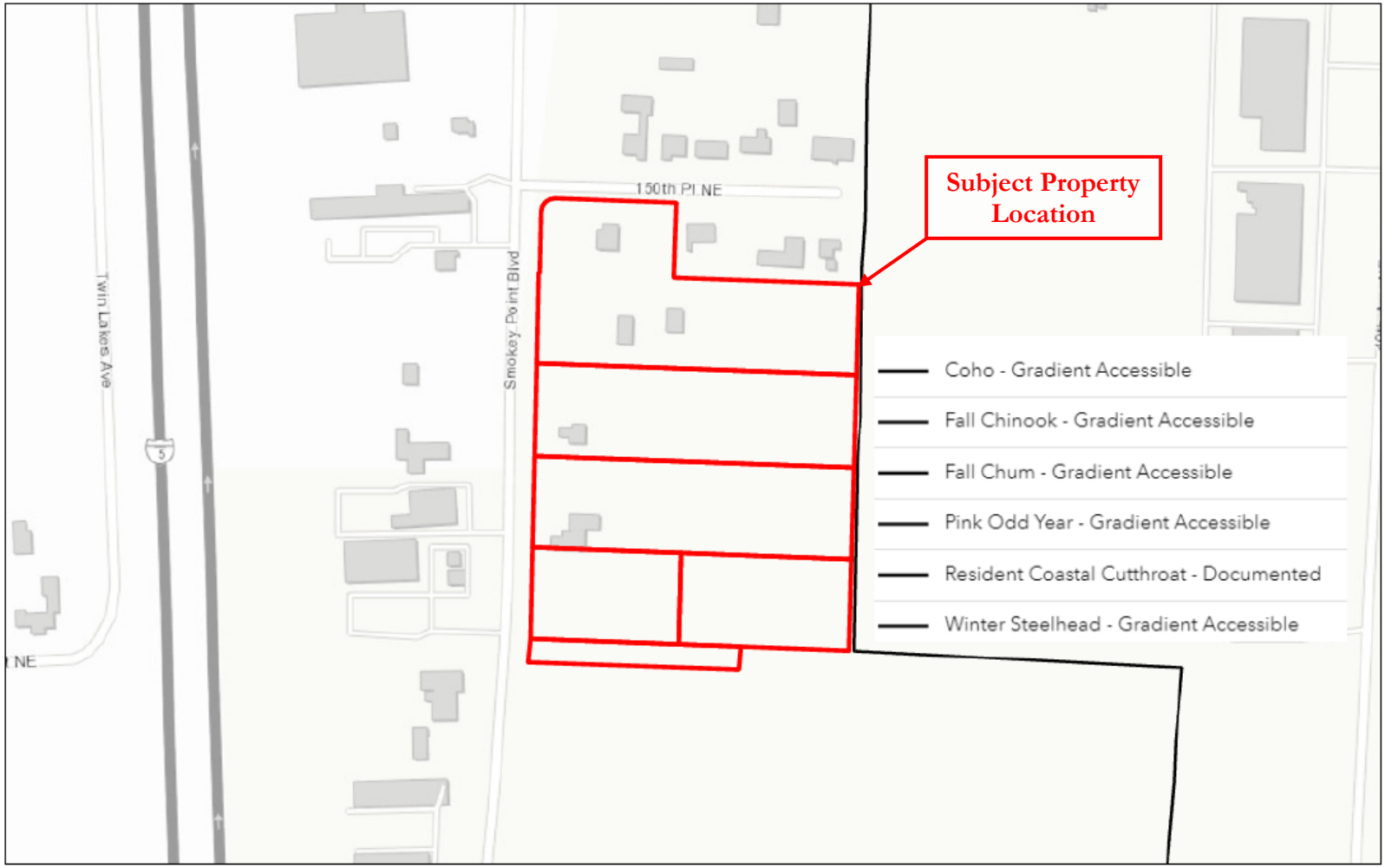
PHS Species/Habitats Overview:

Occurence Name	Federal Status	State Status	Sensitive Location
Resident Coastal Cutthroat	N/A	N/A	No

PHS Species/Habitats Details:

Resident Coastal Cutthroat	
Scientific Name	*Oncorhynchus clarki*
Priority Area	Occurrence/Migration
Accuracy	NA
Notes	LLID: 1221722481267, Fish Name: Cutthroat Trout, Run Time: Unknown or not Applicable, Life History: Unknown
Source Record	34853
Source Dataset	SWIFD
Federal Status	N/A
State Status	N/A
PHS Listing Status	PHS Listed Occurrence
Sensitive	N
SGCN	N
Display Resolution	AS MAPPED
More Info	http://wdfw.wa.gov/wlm/diversty/soc/soc.htm
Geometry Type	Lines

Appendix B7. WDFW and NWIFC SWIFD Map



Appendix B8. DNR Stream Typing Map

Appendix C — Existing Conditions

EXISTING CONDITIONS

Soundview Consultants LLC
Environmental Assessment • Planning • Land Use Solutions
2907 Harborview Dr., Suite D, Gig Harbor, WA 98335
Phone: (253) 514-8952 Fax: (253) 514-8954
www.soundviewconsultants.com

SMOKEY POINT BLVD

14821 & 14919 SMOKEY POINT BLVD,
14925 & 14805 35TH AVENUE NE,
3470 152ND STREET NE
MARYSVILLE, WA 98271
SNOHOMISH COUNTY PARCEL NUMBERS:
31053300202200, 31053300201500, 31053300202400, 31053300202300, 31053300202500 & 31053300300600

DATE:	8/22/2023
JOB:	2630.0001
BY:	DDS
SCALE:	1 " = 130 '
FIGURE NO.	1

Appendix D – Site Photos

Existing Conditions at DP-1

DP-1 Soil Profile

DP-1 Soil Pit

Existing Conditions at DP-2

DP-2 Soil Profile

DP-2 Soil Pit

Existing Conditions on Southern Two-Thirds of Subject Property

Existing Conditions on Northern Third of Subject Property

Northern Segment of Ditch of Eastern Portion of Subject Property

Southern Segment of Ditch on Eastern Boundary of Subject Property

Ditch on Southern Boundary of Subject Property

Appendix E — Data Forms

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: 2630.0001 Smokey Pointy Blvd City/County: Marysville/Snohomish Sampling Date: 8/16/2023

Applicant/Owner: Ideal Industrial Park, LLC State: WA Sampling Point: DP-1

Investigator(s): Ryan Krapp Section, Township, Range: 33, 31N, 05E

Landform (hillslope, terrace, etc.): Swale Local relief (concave, convex, none): Concave Slope (%): 1

Subregion (LRR): A2 Lat: 48.130520 Long: -122.18147896 Datum: WGS 84

Soil Map Unit Name: Custer fine sandy loam NWI classification: Riverine

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☐ No ☒ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☒ No ☐ Hydric Soil Present? Yes ☐ No ☒ Wetland Hydrology Present? Yes ☒ No ☐	**Is the Sampled Area within a Wetland?** Yes ☐ No ☒

Remarks:
Not all three wetland criteria met, lacking hydric soils. Data collected in ephemeral ditch on southern property boundary. Hydrologic conditions drier than normal (20 percent of normal for prior 30 days and 67 percent of normal for calendar year)

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30 ft)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
	0	= Total Cover	
Sapling/Shrub Stratum (Plot size: 30 ft)			
1. Spiraea douglasii	70	Yes	FACW
2. Rubus laciniatus	15	No	FACU
3. Rubus armeniacus	10	No	FAC
4.			
5.			
	95	= Total Cover	
Herb Stratum (Plot size: 10 ft)			
1. Cirsium arvense	65	Yes	FAC
2. Phalaris arundinacea	60	Yes	FACW
3. Lotus corniculatus	20	No	FAC
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
	145	= Total Cover	
Woody Vine Stratum (Plot size: 30 ft)			
1.			
2.			
	0	= Total Cover	

% Bare Ground in Herb Stratum 0

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 3 (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species _____	x 1 = _____
FACW species _____	x 2 = _____
FAC species _____	x 3 = _____
FACU species _____	x 4 = _____
UPL species _____	x 5 = _____
Column Totals: _____ (A)	_____ (B)

Prevalence Index = B/A = _____

Hydrophytic Vegetation Indicators:

- ☐ Rapid Test for Hydrophytic Vegetation
- ☒ Dominance Test is >50%
- ☐ Prevalence Index is ≤3.0[1]
- ☐ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
- ☐ Wetland Non-Vascular Plants[1]
- ☐ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes ☒ No ☐**

Remarks:
Hydrophytic vegetation criteria met through the Dominance Test.

SOIL

Sampling Point: DP-1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 - 14	10YR 2/2	100	-	-	-	-	SaLo	Fine sandy loam

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1) (**except MLRA 1**)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ☐ 2 cm Muck (A10)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: None

Depth (inches): --

Hydric Soil Present? Yes ☐ No ☒

Remarks:

No hydric soil criteria met.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Surface Soil Cracks (B6)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Water-Stained Leaves (B9) (**except MLRA 1, 2, 4A, and 4B**)
- ☐ Salt Crust (B11)
- ☐ Aquatic Invertebrates (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Oxidized Rhizospheres along Living Roots (C3)
- ☐ Presence of Reduced Iron (C4)
- ☐ Recent Iron Reduction in Tilled Soils (C6)
- ☐ Stunted or Stressed Plants (D1) (**LRR A**)
- ☐ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ☐ Water-Stained Leaves (B9) (**MLRA 1, 2, 4A, and 4B**)
- ☐ Drainage Patterns (B10)
- ☐ Dry-Season Water Table (C2)
- ☐ Saturation Visible on Aerial Imagery (C9)
- ☒ Geomorphic Position (D2)
- ☐ Shallow Aquitard (D3)
- ☒ FAC-Neutral Test (D5)
- ☐ Raised Ant Mounds (D6) (**LRR A**)
- ☐ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present? Yes ☐ No ☒ Depth (inches): None

Water Table Present? Yes ☐ No ☒ Depth (inches): None

Saturation Present? (includes capillary fringe) Yes ☐ No ☒ Depth (inches): None

Wetland Hydrology Present? Yes ☒ No ☐

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

Wetland hydrology criteria met indirectly through secondary indicators D2 and D5.

WETLAND DETERMINATION DATA FORM – Western Mountains, Valleys, and Coast Region

Project/Site: 2630.0001 Smokey Pointy Blvd City/County: Marysville/Snohomish Sampling Date: 8/16/2023

Applicant/Owner: Ideal Industrial Park, LLC State: WA Sampling Point: DP-2

Investigator(s): Ryan Krapp Section, Township, Range: 33, 31N, 05E

Landform (hillslope, terrace, etc.): Flats Local relief (concave, convex, none): None Slope (%): 0

Subregion (LRR): A2 Lat: 48.132160 Long: -122.18281239 Datum: WGS 84

Soil Map Unit Name: Custer fine sandy loam NWI classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ☐ No ☒ (If no, explain in Remarks.)

Are Vegetation _____, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☒ No ☐ Hydric Soil Present? Yes ☐ No ☒ Wetland Hydrology Present? Yes ☐ No ☒	**Is the Sampled Area within a Wetland?** Yes ☐ No ☒

Remarks: **Not all three wetland criteria met; only hydrophytic vegetation indicators observed. Data collected in maintained lawn are on northwest portion of subject property.Hydrologic conditions drier than normal (20 percent of normal for prior 30 days and 67 percent of normal for calendar year)**

VEGETATION – Use scientific names of plants.

Tree Stratum (Plot size: 30 ft)	Absolute % Cover	Dominant Species?	Indicator Status
1.			
2.			
3.			
4.			
	0 = Total Cover		
Sapling/Shrub Stratum (Plot size: 30 ft)			
1.			
2.			
3.			
4.			
5.			
	0 = Total Cover		
Herb Stratum (Plot size: 10 ft)			
1. Agrostis capillaris	80	Yes	FAC
2. Dactylis glomerata	10	No	FACU
3. Rumex acetosella	5	No	FACU
4. Plantago lanceolata	5	No	FACU
5.			
6.			
7.			
8.			
9.			
10.			
11.			
	100 = Total Cover		
Woody Vine Stratum (Plot size: 30 ft)			
1.			
2.			
	0 = Total Cover		

% Bare Ground in Herb Stratum 0

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species	x 1 =
FACW species	x 2 =
FAC species	x 3 =
FACU species	x 4 =
UPL species	x 5 =
Column Totals: (A)	(B)

Prevalence Index = B/A = _____

Hydrophytic Vegetation Indicators:

- ☐ Rapid Test for Hydrophytic Vegetation
- ☒ Dominance Test is >50%
- ☐ Prevalence Index is ≤3.0[1]
- ☐ Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
- ☐ Wetland Non-Vascular Plants[1]
- ☐ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes ☒ No ☐**

Remarks: Hydrophytic vegetation criteria met through the Dominance Test due to a dominance of facultative grass species.

SOIL

Sampling Point: DP-2

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	Matrix %	Redox Features Color (moist)	Redox Features %	Type[1]	Loc[2]	Texture	Remarks
0 - 6	10YR 3/3	100	-	-	-	-	SaLo	Fine sandy loam
6 - 14	10YR 3/4	97	7.5YR 4/6	3	C	M	SaLo	Fine sandy loam

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1) (**except MLRA 1**)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ☐ 2 cm Muck (A10)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: None

Depth (inches): --

Hydric Soil Present? Yes ☐ No ☒

Remarks:

No hydric soil criteria met. Soils are too bright to meet hydric soil indicators.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Surface Soil Cracks (B6)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Water-Stained Leaves (B9) (**except MLRA 1, 2, 4A, and 4B**)
- ☐ Salt Crust (B11)
- ☐ Aquatic Invertebrates (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Oxidized Rhizospheres along Living Roots (C3)
- ☐ Presence of Reduced Iron (C4)
- ☐ Recent Iron Reduction in Tilled Soils (C6)
- ☐ Stunted or Stressed Plants (D1) (**LRR A**)
- ☐ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ☐ Water-Stained Leaves (B9) (**MLRA 1, 2, 4A, and 4B**)
- ☐ Drainage Patterns (B10)
- ☐ Dry-Season Water Table (C2)
- ☐ Saturation Visible on Aerial Imagery (C9)
- ☐ Geomorphic Position (D2)
- ☐ Shallow Aquitard (D3)
- ☐ FAC-Neutral Test (D5)
- ☐ Raised Ant Mounds (D6) (**LRR A**)
- ☐ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present? Yes ☐ No ☒ Depth (inches): None

Water Table Present? Yes ☐ No ☒ Depth (inches): None

Saturation Present? (includes capillary fringe) Yes ☐ No ☒ Depth (inches): None

Wetland Hydrology Present? Yes ☐ No ☒

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

No wetland hydrology criteria met. No primary or secondary hydrology indicators observed. Two or more secondary indicators are necessary to meet wetland hydrology criteria.

Appendix F — Biologist Qualifications

All field inspections, wetland and habitat assessments, and supporting documentation, including this ***Wetland and Fish and Wildlife Habitat Assessment Report*** prepared for the ***Smokey Point Blvd*** property were prepared by, or under the direction of, Jon Pickett of SVC. In addition, the site investigation was conducted by Ryan Krapp, and report preparation was completed by Morgan Kentch. Final quality assurance was completed by Rachael Hyland.

Jon Pickett

Principal
Professional Experience: 15 years

Jon Pickett is a Principal and Senior Scientist with a diverse background in environmental and shoreline compliance and permitting, wetland and stream ecology, fish and wildlife biology, mitigation compliance and design, and environmental planning and land use due diligence. Jon oversees a wide range of large-scale industrial, commercial, and multi-family residential projects throughout Western Washington, providing environmental permitting and regulatory compliance assistance for land use entitlement projects from feasibility through mitigation compliance. Jon performs wetland, stream, and shoreline delineations and fish & wildlife habitat assessments; conducts code and regulation analysis and review; prepares reports and permit applications and documents; provides environmental compliance recommendation; and provides restoration and mitigation design.

Jon earned a Bachelor of Science degree in Natural Resource Sciences from Washington State University and Bachelor of Science and Minor in Forestry from Washington State University. Jon has received 40-hour wetland delineation training (Western Mountains, Valleys, & Coast and Arid West Regional Supplements) and regularly performs wetland, stream, and shoreline delineations. Jon is a Whatcom County Qualified Wetland Specialist and Wildlife Biologist and is a Pierce County Qualified Wetland Specialist. He has been formally trained by WSDOE in the use of the Washington State Wetland Rating System 2014, How to Determine the Ordinary High-Water Mark (Freshwater and Marine), Using Field Indicators for Hydric Soils, and the Using the Credit-Debit Method for Estimating Mitigation Needs.

Ryan Krapp

Senior Environmental Scientist / Field Lead
Professional Experience: 10+ years

Ryan Krapp is a Senior Environmental Scientist and Field Lead with a background in conducting wetland delineations, habitat assessments, botanical surveys, avian surveys, threatened & endangered species surveys, and fisheries studies. He has considerable experience in production of Environmental Assessments and Biological Assessments and Evaluations under NEPA guidelines for projects regulated by the U.S. Forest Service, U.S. Army Corps of Engineers, and Bureau of Indian Affairs as well as leading Section 7 ESA consultation with the U.S. Fish and Wildlife Service. Project planning, permitting, and compliance are all part of his professional experiences and practices at SVC.

Ryan has managed environmental investigation projects including wetlands, streams, and critical habitats data collection on large pipeline corridors, overhead electrical transmission corridors, and oil/natural gas drilling development. He has extensive experience in utilizing GIS to collect, manage,

and analyze large volumes of spatial and temporal field data to aide in project management, monitoring, analysis, and mapping. In addition, he is a FAA trained recreational pilot and a PADI certified SCUBA diver with fresh and saltwater diving experience. Ryan is a USFWS-approved Mazama pocket gopher survey biologist.

Rachael Hyland, PWS, Certified Ecologist

Senior Environmental Scientist
Professional Experience: 10 years

Rachael Hyland is a Senior Environmental Scientist with extensive wetland and stream delineation and regulatory coordination experience. Rachael has a background in wetland and ecological habitat assessments in various states, most notably Washington, Connecticut, Massachusetts, Rhode Island, and Ohio. She has experience in assessing wetland, stream, riparian, and tidal systems, as well as complicated agricultural and disturbed sites. She currently performs wetland, stream, and shoreline delineations and fish and wildlife habitat assessments; conducts environmental code analysis; and prepares environmental assessment and mitigation reports, biological evaluations, and permit applications to support clients through the regulatory and planning process for various land use projects. She also has extensive knowledge of bats and their associated habitats and white nose syndrome (*Pseudogymnoascus destructans*), a fungal disease affecting bats which was recently documented in Washington.

Rachael earned a Bachelor of Science degree in Ecology and Evolutionary Biology from the University of Connecticut, with additional ecology studies at the graduate level. Rachael is a Professional Wetland Scientist (PWS #3480) through the Society of Wetland Scientists as well as a Certified Ecologist through the Ecological Society of America. She has completed 40-hour wetland delineation training for Western Mountains, Valleys, & Coast and Arid West Regional Supplement, in addition to formal training for the Northcentral and Northeast supplement, and experience with the Midwest, Eastern Mountains and Piedmont, and Atlantic and Gulf Coast supplements. She has also received formal training from the Washington State Department of Ecology in the Using the Revised 2014 Wetland Rating System for Western Washington, How to Determine the Ordinary High Water Mark, Navigating SEPA, Selecting Wetland Mitigation Sites Using a Watershed Approach, Wetland Classification, and Using the Credit-Debit Method for Estimating Mitigation Needs. Rachael has also received training from the Washington State Department of Transportation in Biological Assessment Preparation for Transportation Projects and is listed by WSDOT as a junior author for preparing Biological Assessments. Rachael is a Pierce County Qualified Wetland Specialist and Wildlife Biologist.

Morgan Kentch

Environmental Scientist
Professional Experience: 5 years

Morgan Kentch is an Environmental Scientist with a background in marine and freshwater ecology, wildlife and natural resource assessments, and monitoring wetland and riparian habitat restoration sites in the Pacific Northwest. Morgan has field experience conducting wetland, stream, and shoreline delineations and fish and wildlife habitat assessments in Washington State. She currently assists with performing wetland, stream, and shoreline delineations and fish and wildlife habitat assessments, conducting environmental code analysis, and preparing and/or providing final quality assurance/control for various types of scientific reports and permits for agency submittal.

Morgan earned her Bachelor of Science degree in Biology with Marine Emphasis from Western Washington University, Bellingham. There she received extensive, hands-on experience working in lab and field settings, conducting scientific background research, and performing statistical analyses. She has also received 40-hour wetland delineation training (Western Mountains, Valleys, and Coast and Arid West Regional Supplements) and has received formal training through the Washington State Department of Ecology and Coastal Training Program in Using the 2014 Wetland Rating System and How to Determine the Ordinary High Water Mark.