



Soundview Consultants LLC

Environmental Assessment • Planning • Land Use Solutions

2907 Harborview Drive, Gig Harbor, WA 98335

Phone: (253) 514-8952 Fax: (253) 514-8954

Technical Memorandum

To: Lis Soldano, Marysville 172nd Development LLC

File Number: 2300.0001

From: Matt DeCaro, Soundview Consultants LLC
Rachael Hyland, Soundview Consultants LLC

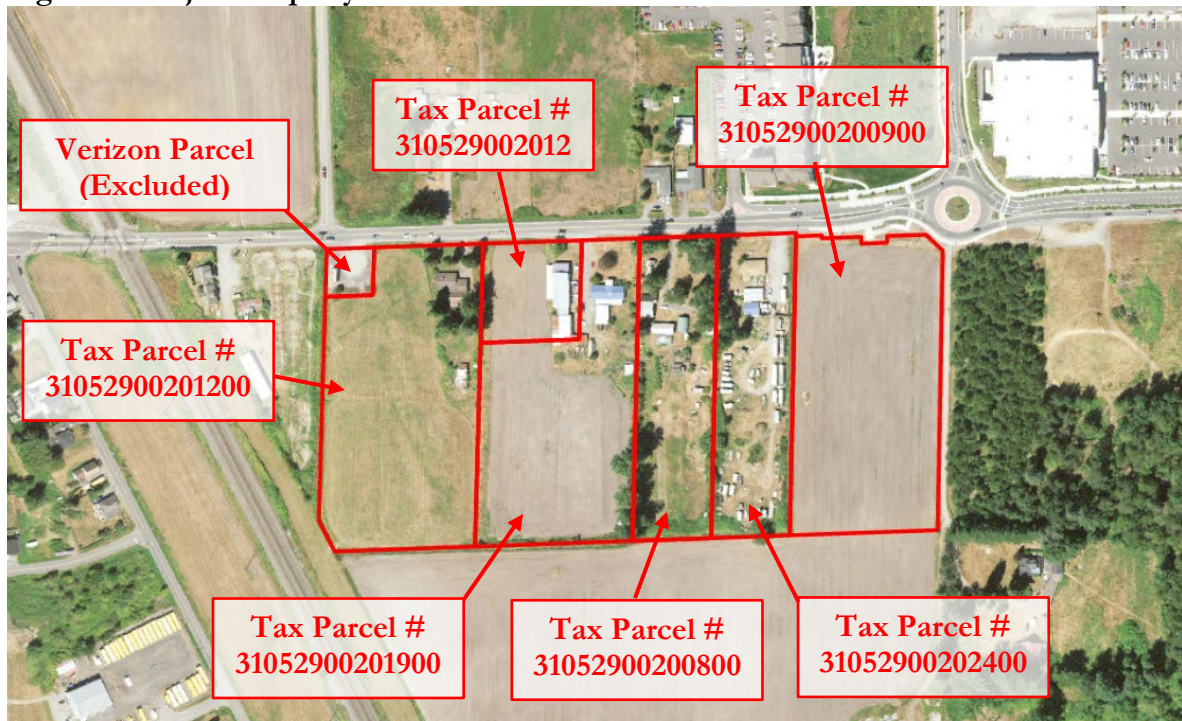
Date: March 15, 2022

Re: Wetland and Fish and Wildlife Habitat Assessment File Review
1930, 2008, 2104, and 2124 172nd Street NE, Marysville, Washington 98271

Dear Ms. Soldano,

Soundview Consultants LLC (SVC) is supporting Marysville 172nd Development LLC with environmental planning for a 17.14-acre site located at 1930, 2008, 2104, and 2124 172nd Street Northeast in the City of Marysville, Washington (Figure 1). The subject property consists of six parcels situated in the Northwest ¼ of Section 29, Township 31 North, Range 05 East, W.M (Snohomish County Tax Parcel Numbers: 31052900201200, 31052900201100, 31052900201900, 31052900200800, 31052900202400, and 31052900200900). SVC conducted a file review of wetland and fish and wildlife habitat documentation for the subject property.

Figure 1. Subject Property Location.



Background Data

SVC conducted background research using Snohomish County and City of Marysville Geographic Information System (GIS) data, Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) and SalmonScape mapping tools, U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI), Washington Department of Natural Resources (DNR) water typing system, and Natural Resource Conservation Service (NRCS) soil survey (Attachment A).

The USFWS NWI map (Attachment A1), DNR stream typing map (Attachment A2 and A3), WDFW PHS map (Attachment A4), and WDFW SalmonScape map (Attachment A5) do not identify any potentially regulated wetlands, streams, or priority habitats or species on or within 150 feet of the subject property.

The City of Marysville stream and wetland inventory (Attachment A6) does not identify any potential wetlands or streams onsite; however, two potential wetlands are identified immediately offsite, adjacent to the southeast and southwest corners of the subject property. The Snohomish County critical areas map (Attachment A7) identifies one potential wetland on the western and southern portions of the subject property and extending offsite to the south. It should be noted that this potential wetland shape is based on remote sensing-based wetland models and not field verified. Additional potential wetland areas are identified offsite to the north, east, and west within 150 feet of the subject property.

The NRCS soil survey map (Attachment A8) identifies two soil series on the subject property: Custer fine sandy loam (13) and Kitsap silt loam, 0 to 8 percent slopes (27). Custer fine sandy loam is listed as partially (90 percent) hydric on the Snohomish County Hydric Soils List; additionally, as much as 5 percent of mapped areas may contain inclusions of hydric Norma soils (NRCS, n.d.). Kitsap silt loam, 0 to 8 percent slopes is listed as non-hydric, but as much as 5 percent of mapped areas may contain inclusions of hydric Bellingham soils (NRCS, n.d.).

Prior Studies

The subject property and adjacent areas within 200 feet were previously investigated by Sewall Wetland Consulting, Inc. for the presence of potentially regulated wetlands, streams, and fish and wildlife habitat between February and May 2017 and February and May 2019 (Attachment B). The results of these site investigations are documented in four critical area reports summarized below (Table 1). All four of the critical area reports have been verified by the City of Marysville (City) (Attachment C).

Table 1. Summary of Subject Property Tax Parcels and Critical Area Reports and Reviews

Current Snohomish County Tax Parcel Number	Critical Area Report	City of Marysville Review Letter
31052900200900	RE: Parcel #31052900200900 – Critical Area Report (Sewall Wetland Consulting, 2017)	Re: Sather – Critical Areas Confirmation, CAR 18001 (City of Marysville, 2018)
31052900201200	RE: Parcel #31052900201200 – Critical Area Report (Sewall Wetland Consulting, 2019a)	Re: CAR 19-008 “Ricardi” Wetland determination (City of Marysville, 2019)
31052900202400	RE: Parcel #31052900202400 – Critical Area Report (Sewall Wetland Consulting, 2019b)	RE: Shloredt Critical Areas Determination (CAR22-001) (City of Marysville, 2022)
31052900201100, 31052900201900, 31052900200800	RE: Parcels #31052900200800, #31052900201900, #31052900201100, & #31042900202600 – Critical Area Report (Sewall Wetland Consulting, 2021)	Re: Counsellor and Harvey Critical Areas Confirmation, CAR 21012 (City of Marysville, 2021)

The site investigations concluded that no wetlands, streams, or buffers exist onsite. Wetland determinations were made using the routine approach described in the *1987 Corps of Engineers Wetland Delineation Manual* (Environmental Laboratory, 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region* (Version 2.0) (USACE, 2010). Due to the presence of a disturbed plant community dominated by facultative species and mapped hydric soil (Custer series) onsite, the site investigations included hydrology monitoring during the growing season to determine if wetland hydrology criteria were met onsite. Several soil pits and piezometers were monitored on a weekly basis between February and May of 2017 and February and May of 2019, and in general no water table or saturation were observed within 12 inches of the soil surface during the monitoring efforts. Due to the lack of wetland hydrology throughout the growing season, it was determined that no wetlands were present onsite (Sewall Wetland Consulting, 2017, 2019a, 2019b, and 2021).

Onsite agricultural ditches are described in the critical area reports (Sewall, 2017, 2019a, 2019b, and 2021). The ditch system includes five ditches that extend north to south, four of which are onsite and one of which is immediately offsite adjacent to the property’s western boundary. These ditches connect to a ditch extending east to west along the southern boundary of the subject property. This southern ditch then drains into an offsite ditch located near the southwest corner of the subject property. This offsite ditch is located parallel to the offsite railroad tracks west of the subject property and is oriented in a northwest to southwest direction.

Regulatory Considerations

The four prior critical area reports concluded that there are no wetlands, streams, or buffers onsite. All of the prior critical area reports (Sewall Wetland Consulting, 2017, 2019a, 2019b, and 2021) were confirmed by the City of Marysville in letters dated July 10, 2018 (*Sather – Critical Areas Confirmation CA 18001*), July 17, 2019 (*CAR 19-008 “Ricardi” Wetland determination*), December 7, 2021 (*Counselor and Harvey Critical Areas Confirmation CAR 21012*), and February 18, 2022 (*Shloredt Critical Areas Determination (CAR22-001)*) (City of Marysville, 2018; 2019; 2022; and 2022).

The City's confirmation letters identify the presence of the onsite ditches and generally state that alteration of the ditches will need approval or verification of non-jurisdictional status by the United States Army Corps of Engineers (USACE) and/or the Washington State Department of Ecology (WSDOE) due to their connectivity to the West Fork of Quilceda Creek offsite to the south of the subject property. [A DNR stream typing map depicting the proximity of the subject property to West Fork Quilceda Creek is provided in Attachment A4; the West Fork of Quilceda Creek is located at least 2,180 linear feet downgradient of the subject property]. The City's earliest confirmation letter (City of Marysville, 2018) identified that there is an existing agricultural ditch along the edge of the western boundary of tax parcel number 31052900200900. This letter states that per Marysville Municipal Code (MMC) 22E.010.190(2)(a), activities involving artificially created habitat, including drainage ditches, are exempt from the provisions of MMC 22E.010 (Critical Areas Management) provided they are conducted using best management practices.

USACE reviewed segments of the onsite ditch system in two approved jurisdictional determinations (AJDs) (Attachment D). NWS-2019-857 (USACE, 2019) reviewed the onsite, north-south ditch on the western boundary of tax parcel number 31052900200900 and the eastern extent of the east-west ditch on the southern boundary of tax parcel number 31052900202400. NWS-2021-151 (USACE, 2021a) reviewed the offsite ditch immediately adjacent to the western boundary of the subject property and the remaining length of the east-west ditch on the southern boundary of the subject property (Attachment E). The AJDs determined that the ditches were not regulated as waters of the U.S. The AJDs described the construction of the ditches for agricultural and stormwater conveyance and noted that flow within the ditches is likely ephemeral. Additionally, the AJDs described that the ditches are not relocated tributaries, were not excavated within a tributary, do not abut wetlands, and were not created from wetlands (USACE, 2019 and USACE, 2021a). NWS-2021-151 noted the connectivity of the ditch system to the West Fork of Quilceda Creek. A set of fish screens prevent fish from the West Fork of Quilceda Creek from traveling into this ditch system, and the Washington State Department of Fish and Wildlife (WDFW) considers the fish screens to be the end of a natural stream channel (USACE, 2021a).

Three of the north-south ditches onsite were not included in the USACE AJDs. However, these three north-south ditches drain to the east-west ditch on the southern boundary that was determined to be non-jurisdictional by USACE. In a December 2, 2008 memorandum from the Environmental Protection Agency (EPA) and USACE, joint guidance is provided that describes waters that are to be regulated under section 404 of the CWA (USACE, 2008). This memorandum was amended on February 2, 2012 where the EPA and USACE issued a final guidance letter on waters protected by the CWA. The 2012 guidance describes the following waters where jurisdiction would be asserted: 1) traditional navigable waters, 2) interstate waters, 3) wetlands adjacent to traditional navigable waters, 4) non-navigable tributaries of traditional navigable waters that are relatively permanent meaning they contain water at least seasonally (e.g. typically three months and does not include ephemeral waters), and 5) wetlands that directly abut permanent waters. The regulated waters are those associated with naturally occurring waters and water courses and not artificial waters (i.e. stormwater pond outfalls). The 2012 guidance identifies thirteen waters or areas where jurisdiction will not be asserted, including ditches that are excavated wholly in uplands, drain only uplands or non-jurisdictional waters, and have no more than ephemeral flow.

Historical aerial photos show that the site has been an agricultural site since at least 1954. The three north-south ditches are visible as linear features on aerial photographs and were likely artificially excavated to support drainage on the subject property. These ditches are located at least 2,180 linear feet from the West Fork of Quilceda Creek. USACE determined that the other onsite ditches likely

convey ephemeral flows, were not excavated within tributaries, did not abut wetlands, and were not created from wetlands. As artificially excavated features with ephemeral flows, the three north-south ditches are not likely to be considered waters of the U.S.

According to the City's confirmation letter for tax parcel numbers 31052900201100, 31052900201900, and 31052900200800 (City of Marysville, 2021), WSDOE reviewed the critical area report (Sewall, 2021) for this portion of the subject property and provided concurrence with the report's findings that there are no wetlands, streams, or buffers on this portion of the subject property. No other review by WSDOE of the prior critical area reports has been provided.

WSDOE regulates surface waters of the state under RCW 90.48 and WAC 173-201A for potential impacts to water quality. WAC-173-201A-020 provides definitions of surface waters of the state and states that surface waters of the state include:

“ . . . lakes, rivers, ponds, streams, inland waters, saltwaters, wetlands and all other surface waters and water courses within the jurisdiction of the state of Washington.”

The prior critical area reports (Sewall, 2017, 2019a, 2019b, and 2021) did not identify any wetlands or streams onsite. However, the onsite ditches are likely regulated as waters of the state by WSDOE because they convey surface waters and are connected to the West Fork of Quilceda Creek. Direct impacts to or in-water work within the ditches would therefore likely require permitting with WSDOE via an Administrative Order to ensure that the work meets state water quality standards.

Conclusions

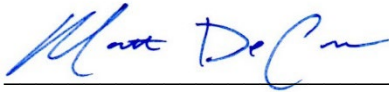
No potentially regulated wetlands, streams, other fish and wildlife habitat conservation areas, or buffers were identified on the subject property in prior critical area reports (Sewall, 2017, 2019a, 2019b, and 2021) . Several artificially excavated agricultural ditches were identified throughout the subject property. These ditches are part of one ditch system that drains offsite to the south and is connected to the West Fork of Quilceda Creek. Fish screens have been installed downgradient of the subject property to prevent fish access into the ditch system, and WDFW considers the fish screens to be the end of a natural stream channel (USACE, 2021a).

The City has reviewed the four prior critical area reports for the subject property (City of Marysville, 2018; 2019; 2021; and 2022) and verified that no wetlands or streams are present on tax parcels numbers 31052900200900, 31052900201200, 31052900201100, 31052900201900, 31052900200800, and 31052900202400. The City's letters generally state that review of the onsite ditches by USACE or WSDOE is needed prior to land disturbing activities that affect the ditches.

USACE has reviewed segments of the ditch system along the western boundary of tax parcel number 31052900200900, the southern boundary of the subject property, and immediately offsite to the west of the subject property in two AJDs. These ditch segments were determined to be non-jurisdictional and excluded from waters of the U.S. (USACE, 2019 and USACE, 2021a). Three additional onsite north-south ditches drain into the ditch segments determined to be non-jurisdictional by USACE but were not included in the USACE AJDs. These additional ditches are similarly artificially created and are not likely to be considered waters of the U.S. The ditches convey surface water and are likely regulated by WSDOE as surface waters of the state. Direct impacts or in-water work would therefore likely require permitting with WSDOE to ensure that the work meets state water quality standards.

If you have questions, please contact us at your earliest convenience.

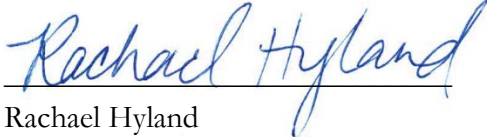
Sincerely,



Matt DeCaro
Associate Principal

March 15, 2022

Date



Rachael Hyland
Senior Environmental Scientist

March 15, 2022

Date

References

- City of Marysville. 2018. RE: *Sather- Critical Areas Confirmation CAR 18001*. Marysville, Washington. June 10, 2018.
- City of Marysville. 2019. RE: *CAR 19-008 "Ricardi" Wetland Determination – 4.55 acres site located at 1930 172nd St NE (AF #31052900201200)*. Marysville, Washington. July 17, 2019.
- City of Marysville. 2021. RE: *Counsellor and Harvey Critical Areas Confirmation CAR 21012*. Marysville, Washington. December 7, 2021.
- City of Marysville. 2022. RE: *Shloredt Critical Areas Determination (CAR22-001) – 2124 172nd St. NE*. Marysville, Washington. February 18, 2022.
- Debose, Alfonso and M. W. Klungland. 1983. *Soil Survey of Snobomish 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.
- Environmental Laboratory. 1987. *Corps of Engineers Wetlands Delineation Manual*. Technical Report Y-87-1, US Army Engineer Waterways Experiment Station, Vicksburg, Mississippi.
- Marysville Municipal Code. 2021. *Chapter 22E.10 – Critical Areas Management*. Website: <https://www.codepublishing.com/WA/Marysville/#!/Marysville22E/Marysville22E010.html#22E.010>. Current through November 22, 2021.
- Natural Resources Conservation Services (NRCS). N.d. *Soil Data Access Hydric Soils List* (Soil Data Access Live). Website: https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcseprd1316620.html.
- Sewall Wetland Consulting. 2017. RE: *Parcel #31052900200900 – Critical Area Report*. Fall City, Washington. September 19, 2017.
- Sewall Wetland Consulting. 2019a. RE: *Parcel #31052900201200 – Critical Area Report*. Fall City, Washington. June 28, 2019.
- Sewall Wetland Consulting. 2019b. RE: *Parcel #31052900202400 – Critical Area Report*. Fall City, Washington. June 28, 2019.
- Sewall Wetland Consulting. 2021. RE: *Parcels #31052900200800, #31052900201900, #31052900201100, & #31052900202600 – Critical Area Report*. Marysville, Washington. September 7, 2021.
- United States Army Corps of Engineers (USACE). 2008. *Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in Rapanos v. United States & Carabell v. United States*. EPA/USACE. December 2, 2008.
- USACE. 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region* (Ver2.0), ed. J.S. Wakeley, R.W. Lichvar, and C.V. Noble. ERDC/EL TR-10-3. U.S. Army Engineer Research and Development Center. Vicksburg, Mississippi.

USACE and Environmental Protection Agency (EPA). 2012. Guidance on Identifying Waters Protected by the Clean Water Act. EPA/USACE. February 17, 2012.

USACE. 2019. *Interim Approved Jurisdictional Determination NWS-2019-857*. Seattle, Washington. November 19, 2019.

USACE 2021a. *Approved Jurisdictional Determination Form (Interim) NWS-2021-151*. Seattle, Washington. April 12, 2021.

USACE 2021b. *Reference: NWS-2021-151 - Sather B, LLC (AJD Request)*. Seattle, Washington. April 13, 2021.

Attachment A – Background Information

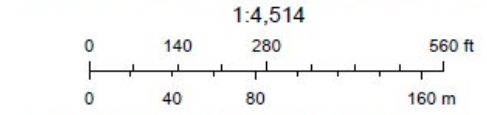
This attachment includes a USFWS NWI Map (A1); DNR Stream Typing Map (A2 and A3); WDFW PHS Map (A4); WDFW SalmonScape Map (A5); City of Marysville Stream and Wetland Inventory (A6); Snohomish County Critical Areas Map (A7); NRCS Soil Survey map (A8); and Snohomish County Contours Map (A9).

Attachment A1 – USFWS NWI Map



5/25/2021, 12:14:38 PM

- | | | |
|--------------------------------|-----------------------------------|-----------------|
| Snohomish_Parcels_Query result | Estuarine and Marine Wetland | Freshwater Pond |
| Wetlands | Freshwater Emergent Wetland | Lake |
| Estuarine and Marine Deepwater | Freshwater Forested/Shrub Wetland | Other |



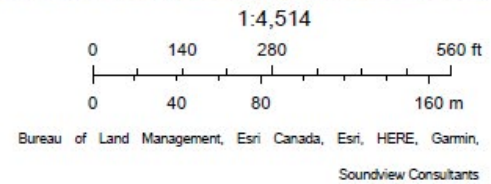
U.S. Fish and Wildlife Service, National Standards and Support Team,
Soundview Consultants

Attachment A2 – DNR Stream Typing Map

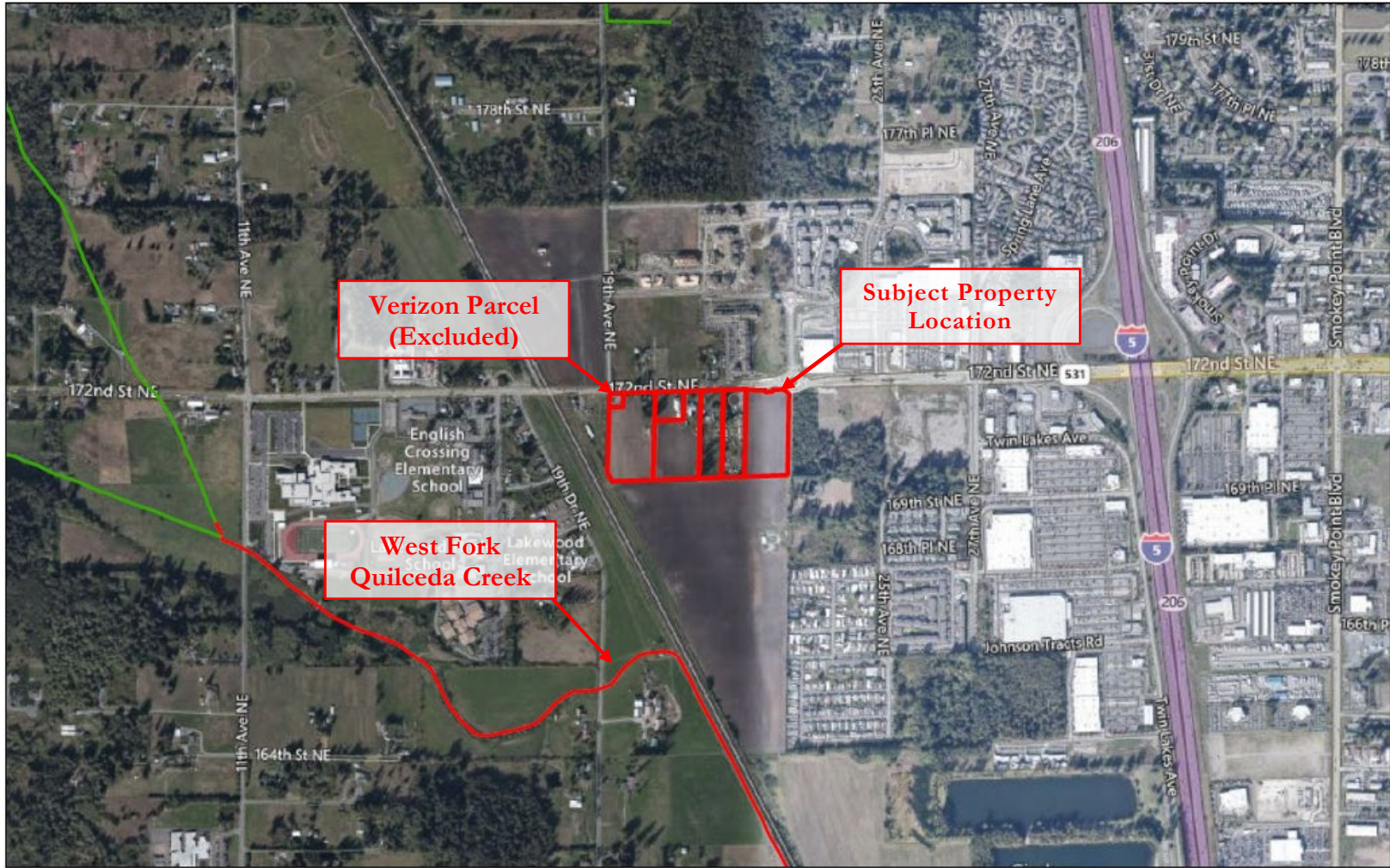


5/25/2021, 12:05:30 PM

 Snohomish_Parcels_Query result



Attachment A3 – DNR Stream Typing Map



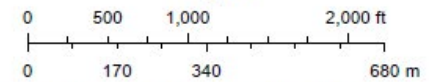
2/9/2022, 10:58:54 AM

Snohomish_Parcels_Query result — Type N, Np, Ns

DNR - Stream Typing - Watercourses (DNR)

— Type F

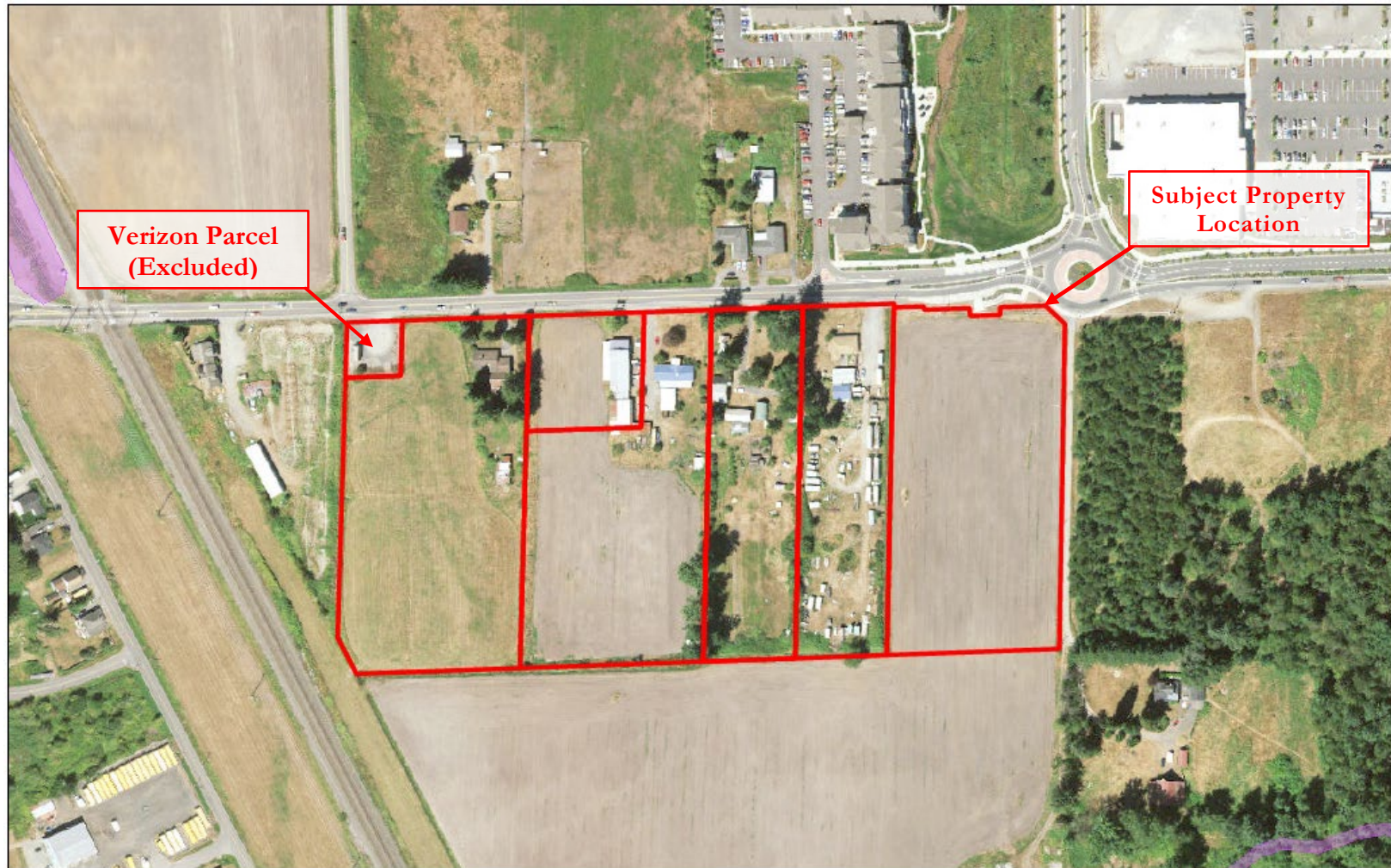
1:18,056



© 2022 Microsoft Corporation © 2022 Maxar ©CNES (2022) Distribution

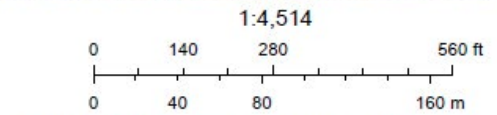
Soundview Consultants

Attachment A4 – WDFW PHS Map



5/25/2021, 12:24:32 PM

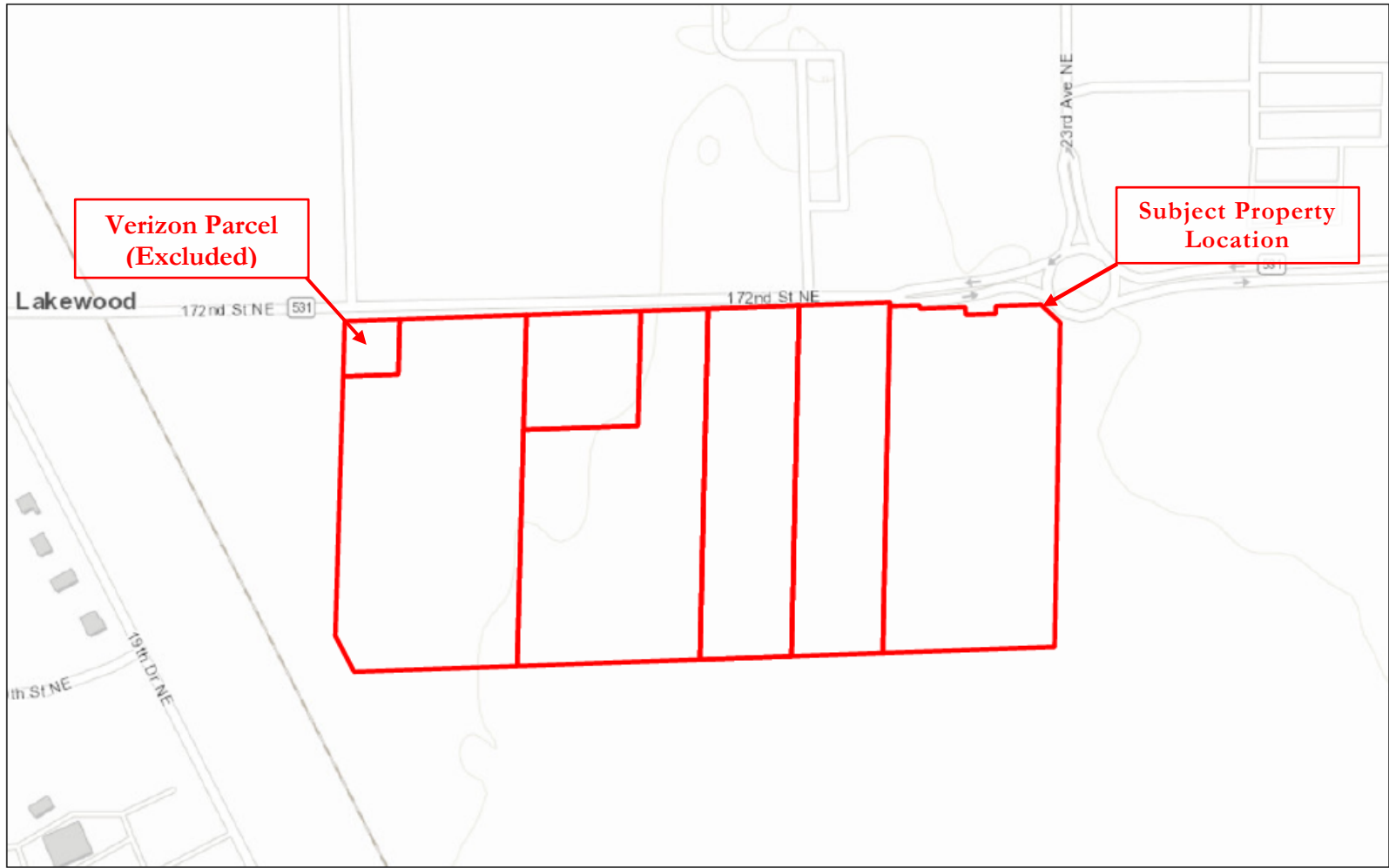
- | | | |
|---------------------|-------------------------------|-----------------------|
| ● PHS Public Points | — PHS Public Polygon Outlines | ■ PHS Public Polygons |
| — PHS Public Lines | □ AS MAPPED | ■ AS MAPPED |
| | □ Masked | ■ SECTION |





Bureau of Land Management, Esri, Canada, Esri, HERE, Garmin,

Soundview Consultants

Attachment A5 – WDFW SalmonScape Map

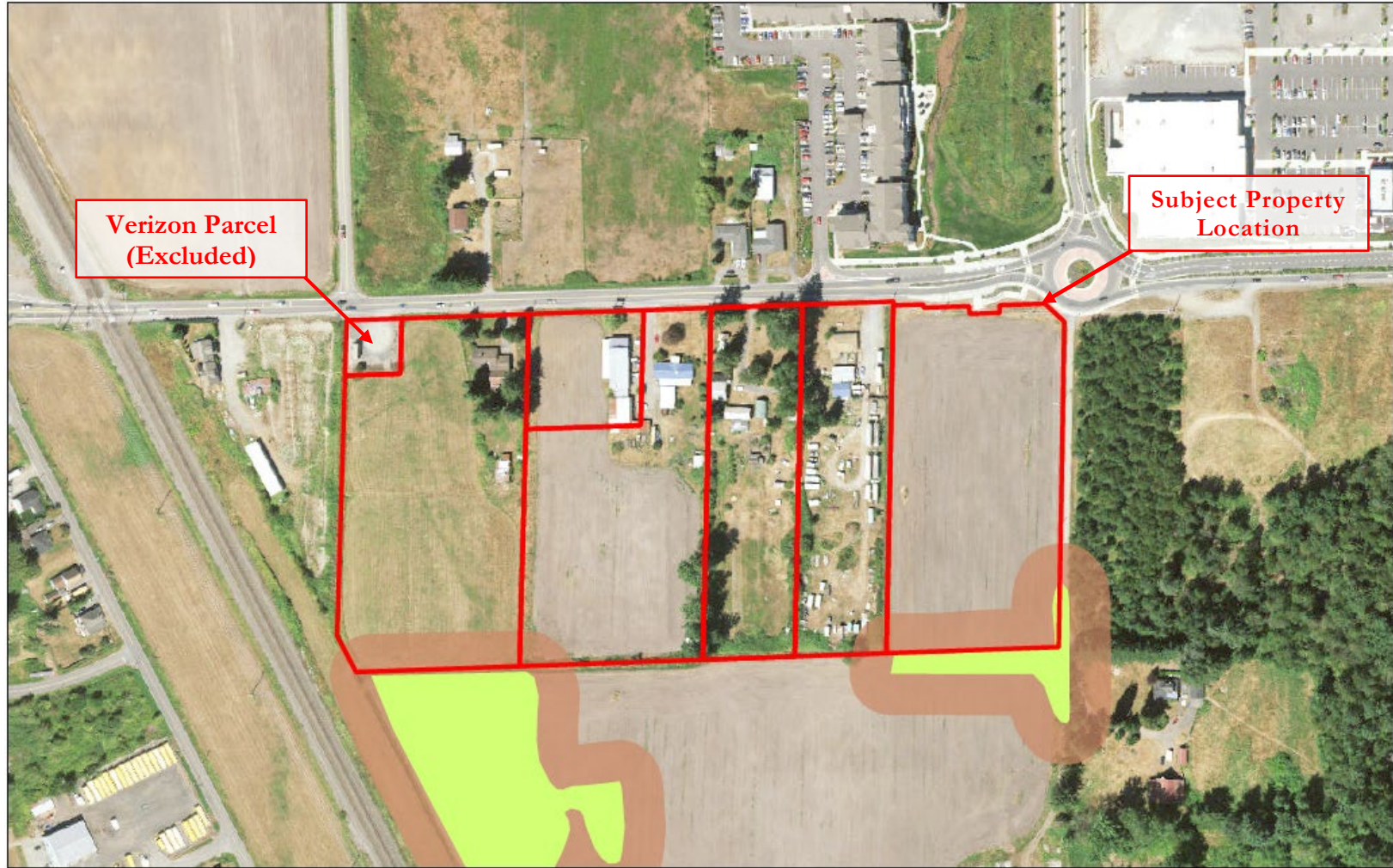


5/25/2021, 12:04:41 PM

-  Snohomish_Parcels_Query result
-  All SalmonScape Species

1:4,514
0 140 280 560 ft
0 40 80 160 m
Bureau of Land Management, Esri Canada, Esri, HERE, Garmin,
Soundview Consultants

Attachment A6 – City of Marysville Stream and Wetland Inventory



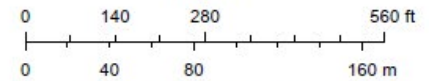
5/25/2021, 12:10:50 PM

Snohomish_Parcels_Query result Marysville_Delineated wetland buffers

Marysville_Delineated wetlands

category 3 - 75' buffer

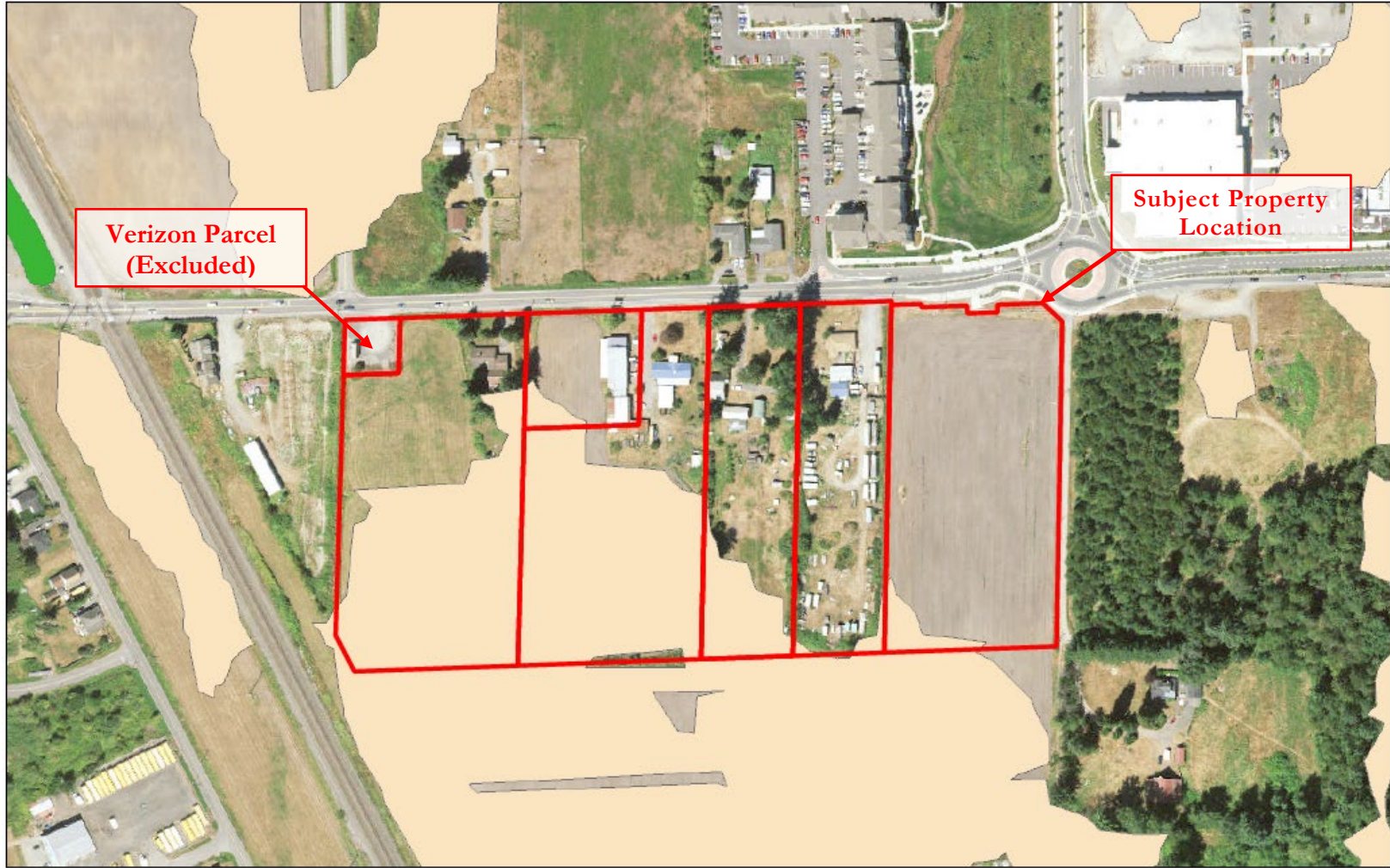
1:4,514



Bureau of Land Management, Esri Canada, Esri, HERE, Garmin,

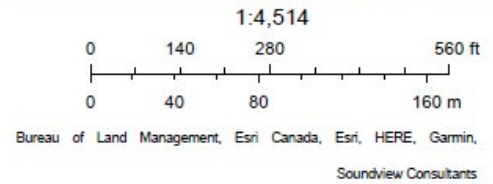
Soundview Consultants

Attachment A7 – Snohomish County Critical Areas Map



5/25/2021, 12:13:09 PM

- Snohomish Parcels _Query result
- Remote Sensing-based Wetland Model
- Planning Development and Services Wetland Inventory
- Tulalip Wetlands Moderate
- Critical
- Snohomish County Wetland Inventory
- High



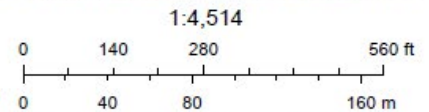
Attachment A8 – NRCS Soil Survey Map



5/25/2021, 12:18:27 PM

- Snohomish_Parcels_Query result
- USA Soils Map Units

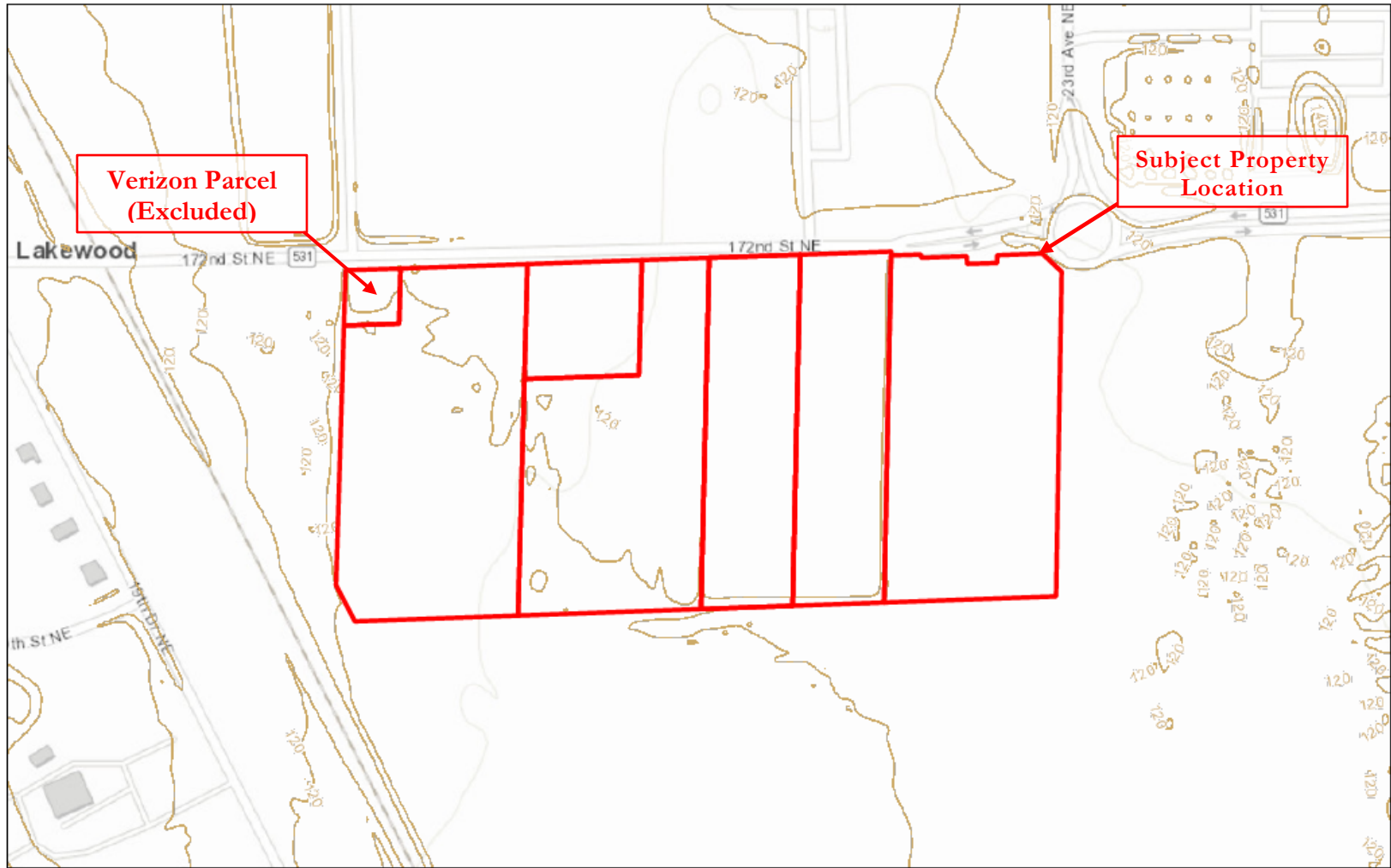
13: Custer fine sandy loam
 27: Kitsap silt loam, 0 to 8 percent slopes




Source: USDA NRCS, Esri, Bureau of Land Management, Esri Canada, Esri,

Soundview Consultants

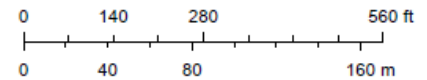
Attachment A9 – Snohomish County Contours Map



5/25/2021, 12:01:46 PM

 Snohomish_Parcels_Query result

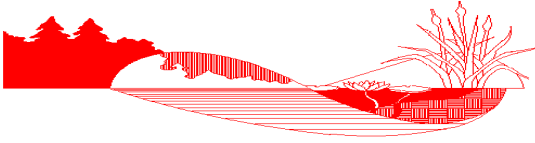
1:4,514



Bureau of Land Management, Esri Canada, Esri, HERE, Garmin,

Soundview Consultants

Attachment B – Prior Critical Area Reports



Sewall Wetland Consulting, Inc.

PO Box 880
Fall City, WA 98024

Phone: 253-859-0515

September 19, 2017

Land Technologies, Inc.
18820 3rd Ave NE
Arlington WA 98223

RE: Parcel #31052900200900 – Critical Area Report
City of Marysville, Washington
SWC Job #16-187

This report describes our observations of any jurisdictional wetlands, streams or buffers on or within 200' of (Parcel #31052900200900) located on the south side of SR 531 in the City of Marysville, Washington (the "site"). The site is located in Section 29, Township 31 North, Range 5 east of the W.WM.

The site is an irregular shaped 4.42 acre agricultural property used for growing hay, corn and other crops.

METHODOLOGY

Ed Sewall of Sewall Wetland Consulting, Inc. inspected the site between February and May 30 of 2017.

The site was reviewed using methodology described in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory, 1987), and the *Western Mountains, Valleys and Coast region Supplement* (Version 2.0) dated June 24, 2010, as required by the US Army Corps of Engineers.



Given the mapped Custer soil series on the site, hydrology monitoring in the early growing season was deemed the only way to determine if wetland hydrology exists on this agricultural field.

Previous information from NRCS indicates that there is such a high degree of disturbance to historical hydrology of the Custer soils in the vicinity of the site that the only sure determination if the soil was hydric was to observe wetland hydrology in the early growing season over the required period of time.

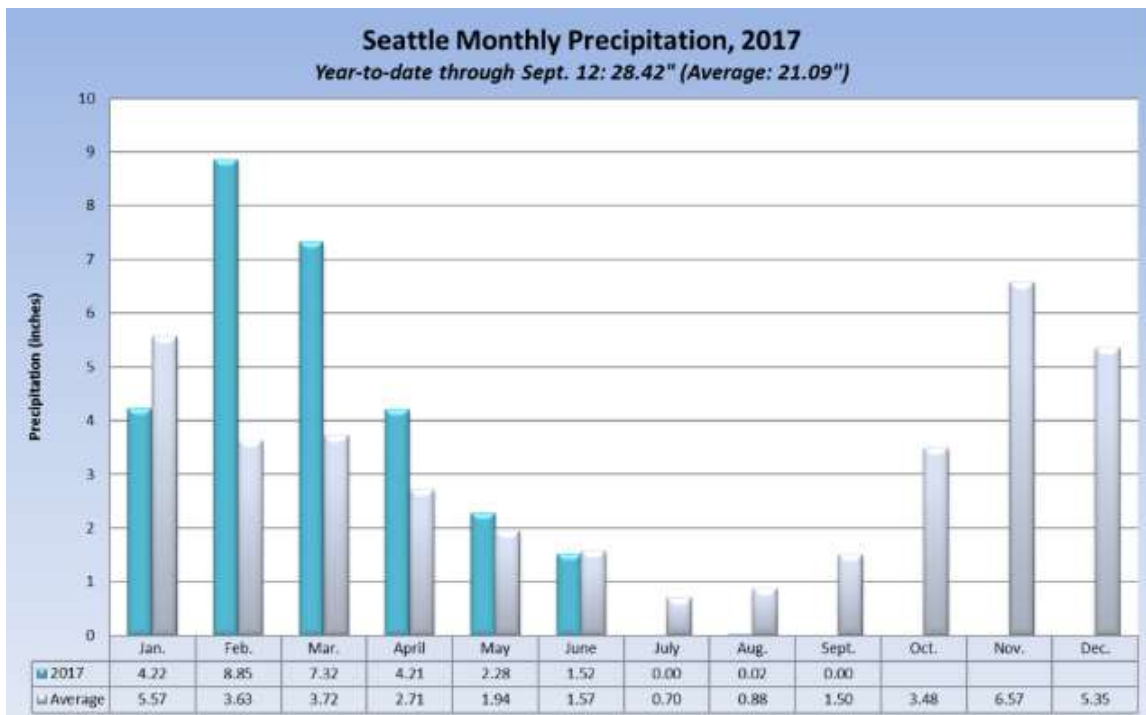
The presence of wetland hydrology is the driving force behind wetland presence, without wetland hydrology, an area does not meet wetland criteria. Therefore, only areas on the site that contain all three parameters during the early growing season meet the definition of a wetland. Areas that do not have hydrology do not meet wetland criteria and are considered upland.

In order to determine what portion of the site contained wetland hydrology, an analysis of wetland hydrology was conducted throughout the site.

Site Hydrology Monitoring Methods

A total of 14 data points (soil pits) were sampled to determine if wetland vegetation, soils and hydrology was present on the site within 12” of the soil surface.

The site was visited between February 21th and May 30 of 2017 to collect hydrology data.



Rainfall in the region for the period from January-May for 2017 was well above normal rainfall as is shown in the graph on page 3 of this report. As a result, we would expect the sites hydrology to be wetter than normal in the period that we did the monitoring of the data points.

At each sample point soil pit was excavated -18" deep. At each pit observations of the level of standing water and/or soil saturation (if any) were recorded.

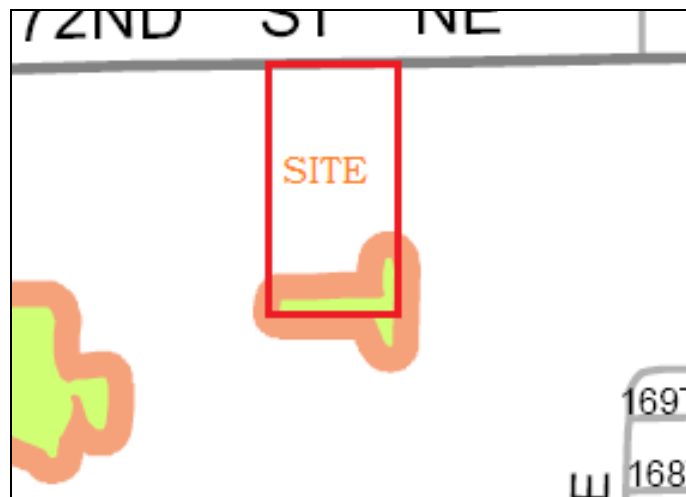
OBSERVATIONS

Existing Site Documentation.

Prior to visiting the site, a review of several natural resource inventory maps was conducted. Resources reviewed included the City of Marysville Critical Areas map, National Wetland Inventory Map, the NRCS Soil Survey online mapping and Data, WADNR Fpars stream mapping and the WDFW Priority Habitats mapping website.

City of Marysville Critical Areas Map

According to the City of Marysville Critical Areas Maps, there is a wetland located along the south end of the site. This corresponds possibly to old drainage ditches that previously existed on the site.



City of Marysville Critical Areas Map

National Wetlands Inventory (NWI)

The NWI map depicts no wetlands or streams on the site. A scrub-shrub wetland is indicated to the southeast of the site over 800' away.



Above: NWI Map of the area of the site.

Soil Survey

According to the NRCS Soil Mapper website, the site is mapped as Custer fine sandy loam. According to Soil Survey of Snohomish County Area, Washington (Debose and Klungland, 1983) the site is mapped as Custer fine sandy loams. Custer soils (soil unit #13) are poorly drained soils formed in outwash plains. According to local NRCS scientists, Custer soils have such a high degree of disturbance to historical hydrology in the vicinity of the site that the only sure determination if the soil was hydric was to observe wetland hydrology in the early growing season over the required continuous period of time.



Above: NRCS Soil map of the study area.

WADNR Fpars

The WADNR Fpars stream typing map for the site there are no streams on or near the site. The closest mapped stream is over 1,300' southwest of the site.



Above WDNR Fpars Stream Typing map.

WDFW Priority Habitats

According to the WDFW Priority Habitats mapping website, there are no priority habitats on or near the site. The closest mapped priority habitat is the same wetland depicted on the NWI map over 800' from the site.



Above: WDFW Priority Habitats Map of the site

Field observations

Uplands

The site is a relatively flat agricultural property with a slight slope to the south west. A gravel driveway border the east side of the site, a large agricultural field to the south, a drainage ditch along the western side of the site, and SR 531 to the north of the site.

The site is plowed and planted with either hay or crops like corn on an annual basis. At the time of our sampling the field was fallow and sparsely vegetated with a mix of weedy species and grasses including dead nettle (*Lamium* spp), dandelion (*Taraxacum officinale*), catch ear (*Hypochaeris radicata*), orchard grass (*Dactylis glomerata*), quackgrass (*Agropyron repens*), and ryegrass (*Lolium perenne*).

Soil pits excavated throughout the site generally consist of sandy loam soils similar to the Custer profile, with an A-horizon of sandy loam with colors of 10YR 3/2 and 2/2 down to 8-10" and an B-horizon of loamy sand with a color of 10YR 3/2-3/6.

During all of the site visits and review of all data points, no area on the site was found to contain wetland hydrology (see attached hydrology monitoring results). All soils pits were found to be moist during all site

visits with some saturation at depths of -14" or deeper. Given the extra wet spring we would expect saturation to be even deeper in a normal rainfall year.



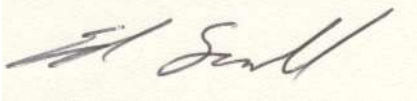
Above: Data point locations on the site

Conclusion

No wetlands, streams or buffers exist on the site.

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.

A handwritten signature in black ink on a light yellow background, appearing to read "Ed Sewall".

Ed Sewall
Senior Wetlands Ecologist PWS #212

Attached: Data Sheets

REFERENCES

Cowardin, L., V. Carter, F. Golet, and E. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Fish and Wildlife Service, FWS/OBS-79-31, Washington, D. C.

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1. U. S. Army Corps of Engineers Waterways Experiment Station, Vicksburg, Mississippi.

Muller-Dombois, D. and H. Ellenberg. 1974. Aims and Methods of Vegetation Ecology. John Wiley & Sons, Inc. New York, New York.

Munsell Color. 1988. Munsell Soil Color Charts. Kollmorgen Instruments Corp., Baltimore, Maryland.

National Technical Committee for Hydric Soils. 1991. Hydric Soils of the United States. USDA Misc. Publ. No. 1491.

Reed, P., Jr. 1988. National List of Plant Species that Occur in Wetlands: Northwest (Region 9). 1988. U. S. Fish and Wildlife Service, Inland Freshwater Ecology Section, St. Petersburg, Florida.

Reed, P.B. Jr. 1993. 1993 Supplement to the list of plant species that occur in wetlands: Northwest (Region 9). USFWS supplement to Biol. Rpt. 88(26.9) May 1988.

USDA NRCS & National Technical Committee for Hydric Soils, September 1995. Field Indicators of Hydric Soils in the United States - Version 2.1

City of Marysville Municipal Code

Sather North 5 acres

Sample Date 2017
Depth to saturated soil

Sample Point	2/21	3/8	3/21	4/4	4/11	4/18	4/24	5/9	5/23
1	-17	-16	-14	m	m	m	m	m	m
2	m	m	m	m	m	m	m	m	m
3	-16	m	m	m	m	m	m	m	m
4	m	m	m	m	m	m	m	m	m
5	m	m	m	m	m	m	m	m	m
6	m	m	m	m	m	m	m	m	m
7	m	m	m	m	m	m	m	m	m
8	m	m	m	m	m	m	m	m	m
9	m	m	m	m	m	m	m	m	m
10	-18	-16	m	m	m	m	m	m	m
11	m	m	m	m	m	m	m	m	m
12	m	m	m	m	m	m	m	m	m
13	m	m	m	m	m	m	m	m	m
14	m	m	m	m	m	m	m	m	m

m = moist

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

Project/Site: Sethu North 5 City/County: Marysville Sampling Date: 2-21-17
 Applicant/Owner: _____ State: WA Sampling Point: D-3
 Investigator(s): Ed Sewall Section, Township, Range: S24 T31 N R5E
 Landform (hillslope, terrace, etc.): _____ Local relief (concave, convex, none): _____ Slope (%): _____
 Subregion (LRR): _____ Lat: _____ Long: _____ Datum: _____
 Soil Map Unit Name: Custer NWI classification: _____
 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 <input checked="" type="checkbox"/> No _____	Hydric Soil Present? Yes <input checked="" type="checkbox"/> No _____	Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No _____	Remarks: <u>- Above normal rainfall plowed + cultivated field</u>
Is the Sampled Area within a Wetland? Yes _____ No <input checked="" type="checkbox"/>			

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1. _____	_____	_____	_____	Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A)
2. _____	_____	_____	_____	Total Number of Dominant Species Across All Strata: _____ (B)
3. _____	_____	_____	_____	Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B)
4. _____	_____	_____	_____	Prevalence Index worksheet:
5. _____	_____	_____	_____	Total % Cover of: _____ Multiply by: _____
= Total Cover				OBL species _____ x 1 = _____
= Total Cover				FACW species _____ x 2 = _____
= Total Cover				FAC species _____ x 3 = _____
= Total Cover				FACU species _____ x 4 = _____
= Total Cover				UPL species _____ x 5 = _____
= Total Cover				Column Totals: _____ (A) _____ (B)
= Total Cover				Prevalence Index = B/A = _____
= Total Cover				Hydrophytic Vegetation Indicators:
= Total Cover				Dominance Test is >30% _____
= Total Cover				Prevalence Index is $\leq 3.0^1$ _____
= Total Cover				Morphological Adaptations ² (Provide supporting data in Remarks or on a separate sheet) _____
= Total Cover				Wetland Non-Vascular Plants ³ _____
= Total Cover				Problematic Hydrophytic Vegetation ⁴ (Explain) _____
= Total Cover				Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic. _____
= Total Cover				Hydrophytic Vegetation Present? Yes _____ No <input checked="" type="checkbox"/>
= Total Cover				Remarks: _____

SOIL

Sampling Point: _____

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

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type	Loc ²	Texture	Remarks
10	10YR 2/2						Sandy loam	
18	10YR 3/4						loamy sand	

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

Hydrophytic Indicators: (applicable to all LRRs, unless otherwise noted): _____
 Indicators for Problematic Hydrophytic Soils:
 ___ Histosol (A1) ___ Sandy Redox (S5) ___ 2 cm Muck (A10)
 ___ Histic Epipedon (A2) ___ Stripped Matrix (S8) ___ Red Parent Material (TF2)
 ___ Black Histic (A3) ___ Loamy Mucky Mineral (F1) (except MLRA 1) ___ Other (Explain in Remarks)
 ___ Hydrogen Sulfide (A4) ___ Loamy Gleyed Matrix (F2)
 ___ Depleted Below Dark Surface (A11) ___ Depleted Matrix (F3)
 ___ Thick Dark Surface (A12) ___ Redox Dark Surface (F6) ___ Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.
 ___ Sandy Mucky Mineral (S1) ___ Depleted Dark Surface (F7)
 ___ Sandy Gleyed Matrix (S4) ___ Redox Depressions (F8)

Restrictive Layer (if present):
 Type: _____
 Depth (inches): _____ Hydric Soil Present? Yes _____ No _____

Remarks: Sandy custer soils

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required, check all that apply)	Secondary Indicators (2 or more required)
___ Surface Water (A1)	___ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)
___ High Water Table (A2)	___ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
___ Saturation (A3)	___ Drainage Patterns (B10)
___ Water Marks (B1)	___ Dry-Season Water Table (C2)
___ Sediment Deposits (B2)	___ Saturation Visible on Aerial Imagery (C8)
___ Drift Deposits (B3)	___ Geomorphic Position (D2)
___ Algal Mat or Crust (B4)	___ Presence of Reduced Iron (C4)
___ Iron Deposits (B5)	___ Shallow Aquitard (D3)
___ Surface Soil Cracks (B6)	___ Recent Iron Reduction in Filled Soils (C6)
___ Inundation Visible on Aerial Imagery (B7)	___ FAC-Neutral Test (D5)
___ Sparsely Vegetated Concave Surface (B8)	___ Stunted or Stressed Plants (D1) (LRR A)
	___ Other (Explain in Remarks)
	___ Raised Ant Mounds (D6) (LRR A)
	___ Frost-Heave Hummocks (D7)

Field Observations:
 Surface Water Present? Yes _____ No Depth (inches): _____
 Water Table Present? Yes _____ No Depth (inches): _____
 Saturation Present? Yes _____ No Depth (inches): _____ Wetland Hydrology Present? Yes _____ No
 (includes capillary fringe)
 Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available: _____

Remarks: no indicators

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

Project/Site: Sather North 5 City/County: Marysville Sampling Date: 2-21-17
 Applicant/Owner: _____ State: WA Sampling Point: DP#4
 Investigator(s): Ed Sewall Section, Township, Range: S29 T31 N15 E
 Landform (hillslope, terrace, etc.): _____ Local relief (concave, convex, none) _____ Slope (%): _____
 Subregion (LRR): _____ Lat: _____ Long: _____ Datum: _____
 Soil Map Unit Name: Custer NWI classification: _____
 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 <input type="checkbox"/> No <input checked="" type="checkbox"/>	Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes _____ No <input checked="" type="checkbox"/>
Remarks: <u>Above normal rainfall plowed + cultivated field</u>			

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____) Absolute % Cover: _____ Dominant Indicator Species? _____ Status: _____	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A) Total Number of Dominant Species Across All Strata: _____ (B) Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B)
1. _____ 2. _____ 3. _____ 4. _____ 5. _____ = Total Cover	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 = _____
Sapling/Shrub Stratum (Plot size: _____) _____ = Total Cover	Hydrophytic Vegetation Indicators: ___ 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.
1. _____ 2. _____ 3. _____ 4. _____ 5. _____ 6. _____ 7. _____ 8. _____ 9. _____ 10. _____ 11. _____ = Total Cover	Hydrophytic Vegetation Present? Yes _____ No _____
Herb Stratum (Plot size: _____) _____ = Total Cover	
1. _____ 2. _____ = Total Cover	
Woody Vine Stratum (Plot size: _____) _____ = Total Cover	
1. _____ 2. _____ = Total Cover	
% Bare Ground in Herb Stratum _____	
Remarks: <u>no veg</u>	

SOIL

Sampling Point: _____

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

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type	Loc	Texture	Remarks
10	10YR 3/2						Salty (m)	
18	10YR 2/4						Loamy (s)	

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

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

___ Histosol (A1)	___ Sandy Redox (S5)	___ 2 cm Muck (A10)
___ Histic Epipedon (A2)	___ Stripped Matrix (S8)	___ Rad Parent Material (TF2)
___ Black Histic (A3)	___ Loamy Mucky Mineral (F1) (except MLRA 1)	___ Other (Explain in Remarks)
___ Hydrogen Sulfide (A4)	___ Loamy Gleyed Matrix (F2)	
___ Depleted Below Dark Surface (A11)	___ Depleted Matrix (F3)	
___ Thick Dark Surface (A12)	___ Redox Dark Surface (F6)	
___ Sandy Mucky Mineral (S1)	___ Depleted Dark Surface (F7)	
___ Sandy Gleyed Matrix (S4)	___ Redox Depressions (F8)	

Restrictive Layer (if present):
Type: _____
Depth (inches): _____

Hydric Soil Present? Yes _____ No _____

Remarks: Salty custer soils

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required, check all that apply)	Secondary Indicators (2 or more required)
___ Surface Water (A1)	___ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)
___ High Water Table (A2)	___ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
___ Saturation (A3)	___ Drainage Patterns (B10)
___ Water Marks (B1)	___ Dry-Season Water Table (C2)
___ Sediment Deposits (B2)	___ Saturation Visible on Aerial Imagery (C9)
___ Drift Deposits (B3)	___ Oxidized Rhizospheres along Living Roots (C3)
___ Algal Mat or Crust (B4)	___ Presence of Reduced Iron (C4)
___ Iron Deposits (B5)	___ Recent Iron Reduction in Tilled Soils (C6)
___ Surface Soil Cracks (B6)	___ Stunted or Stressed Plants (D1) (LRR A)
___ Inundation Visible on Aerial Imagery (B7)	___ Other (Explain in Remarks)
___ Sparsely Vegetated Concave Surface (B8)	___ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present? Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____
Water Table Present? Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____
Saturation Present? Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____

Wetland Hydrology Present? Yes _____ No

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

Remarks: no indicators

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

Project/Site: Sethu North 5 City/Country: Marysville Sampling Date: 2-21-17
 Applicant/Owner: _____ State: WA Sampling Point: DPH 5
 Investigator(s): Ed Sewall Section, Township, Range: S29 T31N R5E
 Landform (hillslope, terrace, etc.): _____ Local relief (concave, convex, none): _____ Slope (%): _____
 Subregion (LRR): _____ Lat: _____ Long: _____ Datum: _____
 Soil Map Unit Name: Custer NWI classification: _____
 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 <input checked="" type="checkbox"/>	is the Sampled Area within a Wetland?	Yes _____ No <input checked="" type="checkbox"/>
Hydric Soil Present?	Yes _____ No <input checked="" type="checkbox"/>		
Wetland Hydrology Present?	Yes _____ No <input checked="" type="checkbox"/>		
Remarks: <u>- Above normal rainfall plowed + cultivated field</u>			

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:	
1. _____				Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A)	
2. _____				Total Number of Dominant Species Across All Strata: _____ (B)	
3. _____				Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B)	
4. _____				= Total Cover	
Shrub/Strub Stratum (Plot size: _____)				Prevalence Index worksheet:	
1. _____				Total % Cover of: _____ Multiply by: _____	
2. _____				OBL species _____ x 1 = _____	
3. _____				FACW species _____ x 2 = _____	
4. _____				FAC species _____ x 3 = _____	
5. _____				FACU species _____ x 4 = _____	
				UPL species _____ x 5 = _____	
				Column Totals: _____ (A) _____ (B)	
				Prevalence Index = B/A = _____	
Herb Stratum (Plot size: _____)				Hydrophytic Vegetation Indicators:	
1. <u>Taraxacum officinale</u>	<u>15</u>		<u>NI</u>	Dominance Test is >50%	
2. <u>Echin purpureum</u>	<u>10</u>		<u>POU</u>	Prevalence Index is <3.0	
3. _____				Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)	
4. _____				Wetland Non-Vascular Plants	
5. _____				Problematic Hydrophytic Vegetation (Explain)	
6. _____				Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.	
7. _____					
8. _____					
9. _____					
10. _____					
11. _____					
Woody Vine Stratum (Plot size: _____)				Hydrophytic Vegetation Present?	
1. _____				Yes _____ No <input checked="" type="checkbox"/>	
2. _____					
% Bare Ground in Herb Stratum _____ = Total Cover					
Remarks: _____					

SOIL

Sampling Point: _____

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

Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type	Loc		
5	<u>10YR2/2</u>						<u>Sandy lo</u>	
12	<u>10YR3/2</u>						<u>10YR 3md</u>	
18	<u>10YR3/6</u>						<u>10YR 3ult</u>	

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

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

___ Histosol (A1)	___ Sandy Redox (S5)	___ Indicators for Problematic Hydric Soils: ___ 2 cm Muck (A10)
___ Hist. Epipedon (A2)	___ Stripped Matrix (S6)	___ Red Parent Material (TF2)
___ Black Histic (A3)	___ Loamy Mucky Mineral (F1) (except MLRA 1)	___ Other (Explain in Remarks)
___ Hydrogen Sulfide (A4)	___ Loamy Gleyed Matrix (F2)	
___ Depleted Below Dark Surface (A11)	___ Depleted Matrix (F3)	
___ Thick Dark Surface (A12)	___ Redox Dark Surface (F6)	
___ Sandy Mucky Mineral (S1)	___ Depleted Dark Surface (F7)	
___ Sandy Gleyed Matrix (S4)	___ Redox Depressions (F8)	

Restrictive Layer (if present):
 Type: _____
 Depth (inches): _____
 Hydric Soil Present? Yes _____ No _____

Remarks: Sandy custer soils

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required, check all that apply)	Secondary Indicators (2 or more required)
___ Surface Water (A1)	___ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)
___ High Water Table (A2)	___ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
___ Saturation (A3)	___ Drainage Patterns (B10)
___ Water Marks (B1)	___ Dry-Season Water Table (C2)
___ Sediment Deposits (B2)	___ Saturation Visible on Aerial Imagery (C9)
___ Drift Deposits (B3)	___ Oxidized Rhizospheres along Living Roots (C3)
___ Algal Mat or Crust (B4)	___ Presence of Reduced Iron (C4)
___ Iron Deposits (B5)	___ Recent Iron Reduction in Tilled Soils (C6)
___ Surface Soil Cracks (B6)	___ Stunted or Stressed Plants (D1) (LRR A)
___ Inundation Visible on Aerial Imagery (B7)	___ Other (Explain in Remarks)
___ Sparsely Vegetated Concave Surface (B8)	___ Frost-Heave Hummocks (D7)

Field Observations:

Surface Water Present?	Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____
Water Table Present?	Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____
Saturation Present? (includes capillary fringe)	Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____

Wetland Hydrology Present? Yes _____ No

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

Remarks: No indicators

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

Project/Site: Sethu North 5 City/County: Marysville Sampling Date: 2-21-17
 Applicant/Owner: _____ State: WA Sampling Point: DP# 8
 Investigator(s): Ed Sewall Section, Township, Range: S29 T31N R5E
 Landform (Hillslope, terrace, etc.): _____ Local relief (concave, convex, none): _____ Slope (%): _____
 Subregion (LRR): _____ Lat: _____ Long: _____ Datum: _____
 Soil Map Unit Name: Custer NWI classification: _____
 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 <input checked="" type="checkbox"/> No _____	Hydric Soil Present? Yes <input checked="" type="checkbox"/> No _____	Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No _____	Remarks: <u>Above normal rainfall plowed + cultivated field</u>
In the Sampled Area within a Wetland? Yes _____ No <input checked="" type="checkbox"/>			

VEGETATION - Use scientific names of plants.

<p>Tree Stratum (Plot size: _____) Absolute % Cover: _____ Dominant Species? _____ Indicator Status _____</p> <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>Sapling/Shrub Stratum (Plot size: _____) _____ = Total Cover</p> <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>5. _____</p> <p>Herb Stratum (Plot size: _____) _____ = Total Cover</p> <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>5. _____</p> <p>6. _____</p> <p>7. _____</p> <p>8. _____</p> <p>9. _____</p> <p>10. _____</p> <p>11. _____</p> <p>Woody Vine Stratum (Plot size: _____) _____ = Total Cover</p> <p>1. _____</p> <p>2. _____</p> <p>% Bare Ground in Herb Stratum _____ = Total Cover</p>	<p>Dominance Test worksheet:</p> <p>Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A)</p> <p>Total Number of Dominant Species Across All Strata: _____ (B)</p> <p>Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B)</p> <p>Prevalence Index worksheet:</p> <p>Total % Cover of: _____ Multiply by: _____</p> <p>OBL species _____ x 1 = _____</p> <p>FACW species _____ x 2 = _____</p> <p>FAC species _____ x 3 = _____</p> <p>FACU species _____ x 4 = _____</p> <p>LPL species _____ x 5 = _____</p> <p>Column Totals: _____ (A) _____ (B)</p> <p>Prevalence Index = B/A = _____</p> <p>Hydrophytic Vegetation Indicators:</p> <p>— Dominance Test is >30%</p> <p>— Prevalence Index is <3.0¹</p> <p>— Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)</p> <p>— Wetland Non-Vascular Plants¹</p> <p>— Problematic Hydrophytic Vegetation¹ (Explain)</p> <p>¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.</p> <p>Hydrophytic Vegetation Present? Yes _____ No <input checked="" type="checkbox"/></p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

SOIL

Sampling Point: _____

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

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type	Loc ²	Texture	Remarks
0	10YR2/2						1cm	
18	10YR3/6						1cm	

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

Hydric Soil Indicators: (Applicable to all soils; unless otherwise noted; ¹Indicators for Problematic Hydric Soils¹)

— Histosol (A1)	— Sandy Redox (S5)	— 2 cm Muck (A10)
— Histic Epipedon (A2)	— Stripped Matrix (S6)	— Rad Parent Material (TF2)
— Black Histic (A3)	— Loamy Mucky Mineral (F1) (except MLRA 1)	— Other (Explain in Remarks)
— Hydrogen Sulfide (A4)	— Loamy Gleyed Matrix (F2)	
— Depleted Below Dark Surface (A11)	— Depleted Matrix (F3)	
— Thick Dark Surface (A12)	— Redox Dark Surface (F8)	¹ Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.
— Sandy Mucky Mineral (S1)	— Depleted Dark Surface (F7)	
— Sandy Gleyed Matrix (S4)	— Redox Depressions (F6)	

Restrictive Layer (if present):

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes _____ No _____

Remarks: Custer soils

HYDROLOGY

Wetland Hydrology Indicators:

<p>Primary Indicators (minimum of one required, check all that apply)</p> <p>— Surface Water (A1)</p> <p>— High Water Table (A2)</p> <p>— Saturation (A3)</p> <p>— Water Marks (B1)</p> <p>— Sediment Deposits (B2)</p> <p>— Drift Deposits (B3)</p> <p>— Algal Mat or Crust (B4)</p> <p>— Iron Deposits (B5)</p> <p>— Surface Soil Cracks (B6)</p> <p>— Inundation Visible on Aerial Imagery (B7)</p> <p>— Sparsely Vegetated Concave Surface (B8)</p>	<p>Secondary Indicators (2 or more required)</p> <p>— Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)</p> <p>— Soft Crust (B11)</p> <p>— Aquatic Invertebrates (B13)</p> <p>— Hydrogen Sulfide Odor (C1)</p> <p>— Oxidized Rhizospheres along Living Roots (C3)</p> <p>— Presence of Reduced Iron (C4)</p> <p>— Recent Iron Reduction in Tilled Soils (C6)</p> <p>— Stunted or Stressed Plants (D1) (LRR A)</p> <p>— Other (Explain in Remarks)</p>	<p>— Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)</p> <p>— Drainage Patterns (B10)</p> <p>— Dry-Season Water Table (C2)</p> <p>— Saturation Visible on Aerial Imagery (C8)</p> <p>— Geomorphic Position (D2)</p> <p>— Shallow Aquitard (D3)</p> <p>— FAC-Neutral Test (D6)</p> <p>— Raised Ant Mounds (D6) (LRR A)</p> <p>— Frost-Heave Hummocks (D7)</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Field Observations:

Surface Water Present? Yes _____ No Depth (inches): _____

Water Table Present? Yes _____ No _____ Depth (inches): _____

Saturation Present? Yes _____ No Depth (inches): _____

(includes capillary fringe)

Wetland Hydrology Present? Yes _____ No

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

Remarks:

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

Project/Site: Sather North 5 City/County: Marysville Sampling Date: 2-21-17
 Applicant/Owner: _____ State: WA Sampling Point: DP# 9
 Investigator(s): Ed Sewall Section, Township, Range: S29 T31N R5E
 Landform (hilllope, terrace, etc.): _____ Local relief (concave, convex, none): _____ Slope (%): _____
 Subregion (LRR): _____ Lat: _____ Long: _____ Datum: _____
 Soil Map Unit Name: Custer NWI classification: _____
 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 <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes _____ No <input checked="" type="checkbox"/>
Hydric Soil Present? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	
Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	
Remarks: <u>- Above normal rainfall plowed + cultivated field</u>	

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1. _____	_____	_____	_____	Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A)
2. _____	_____	_____	_____	Total Number of Dominant Species Across All Strata: _____ (B)
3. _____	_____	_____	_____	Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B)
4. _____	_____	_____	_____	Prevalence Index worksheet:
5. _____	_____	_____	_____	Total % Cover of: _____ Multiply by: _____
= Total Cover				OBL species _____ x 1 = _____
= Total Cover				FACW species _____ x 2 = _____
= Total Cover				FAC species _____ x 3 = _____
= Total Cover				FACU species _____ x 4 = _____
= Total Cover				UPL species _____ x 5 = _____
= Total Cover				Column Totals: _____ (A) _____ (B)
= Total Cover				Prevalence Index = B/A = _____
= Total Cover				Hydrophytic Vegetation Indicators:
= Total Cover				Dominance Test is >50%
= Total Cover				Prevalence Index is ≤3.0 ¹
= Total Cover				Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet)
= Total Cover				Wetland Non-Vascular Plants ¹
= Total Cover				Problematic Hydrophytic Vegetation ¹ (Explain)
= Total Cover				Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
= Total Cover				Hydrophytic Vegetation Present? Yes _____ No _____
= Total Cover				% Bare Ground in Herb Stratum _____
= Total Cover				Remarks:

SOIL

Sampling Point: _____

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

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type ¹	Loc ²	Texture	Remarks
12	10YR2/2						loam	
18	2.5Y 4/4						subly loam	

Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains, ²Location: PL=Pore Lining, M=Matrix, ³Indicators for Problematic Hydric Soils³

___ Histosol (A1)	___ Sandy Redox (S5)	___ 2 cm Muck (A10)
___ Hiatic Epipedon (A2)	___ Stripped Matrix (S8)	___ Red Parent Material (TF2)
___ Black Hiatic (A3)	___ Loamy Mucky Mineral (F1) (except MLRA 1)	___ *Other (Explain in Remarks)
___ Hydrogen Sulfide (A4)	___ Loamy Gleyed Matrix (F2)	
___ Depleted Below Dark Surface (A11)	___ Depleted Matrix (F3)	
___ Thick Dark Surface (A12)	___ Redox Dark Surface (F6)	Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.
___ Sandy Mucky Mineral (S1)	___ Depleted Dark Surface (F7)	
___ Sandy Gleyed Matrix (S4)	___ Redox Depressions (F8)	

Restrictive Layer (if present):
 Type: _____
 Depth (inches): _____ Hydric Soil Present? Yes _____ No _____

Remarks: Custer subly loam

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required, check all that apply)	Secondary Indicators (2 or more required)
___ Surface Water (A1)	___ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)
___ High Water Table (A2)	___ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
___ Saturation (A3)	___ Dry-Season Water Table (C2)
___ Water Marks (B1)	___ Drainage Patterns (B10)
___ Sediment Deposits (B2)	___ Aquatic Invertebrates (B13)
___ Drift Deposits (B3)	___ Hydrogen Sulfide Odor (C1)
___ Algal Mat or Crust (B4)	___ Oxidized Rhizospheres along Living Roots (C3)
___ Iron Deposits (B5)	___ Presence of Reduced Iron (C4)
___ Surface Soil Cracks (B6)	___ Recent Iron Reduction in Tilled Soils (C6)
___ Inundation Visible on Aerial Imagery (B7)	___ Stunted or Stressed Plants (D1) (LRR A)
___ Sparsely Vegetated Concave Surface (B8)	___ Other (Explain in Remarks)
	___ Frost-Heave Hummocks (D7)

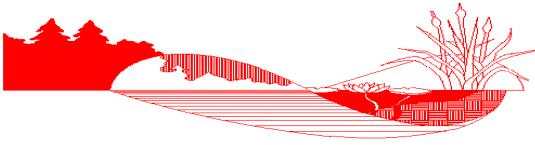
Field Observations:

Surface Water Present? Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____	Wetland Hydrology Present? Yes _____ No <input checked="" type="checkbox"/>
Water Table Present? Yes _____ No _____	Depth (inches): _____	
Saturation Present? Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____	

(includes capillary fringe)

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

Remarks:



Sewall Wetland Consulting, Inc.

PO Box 880
Fall City, WA 98024

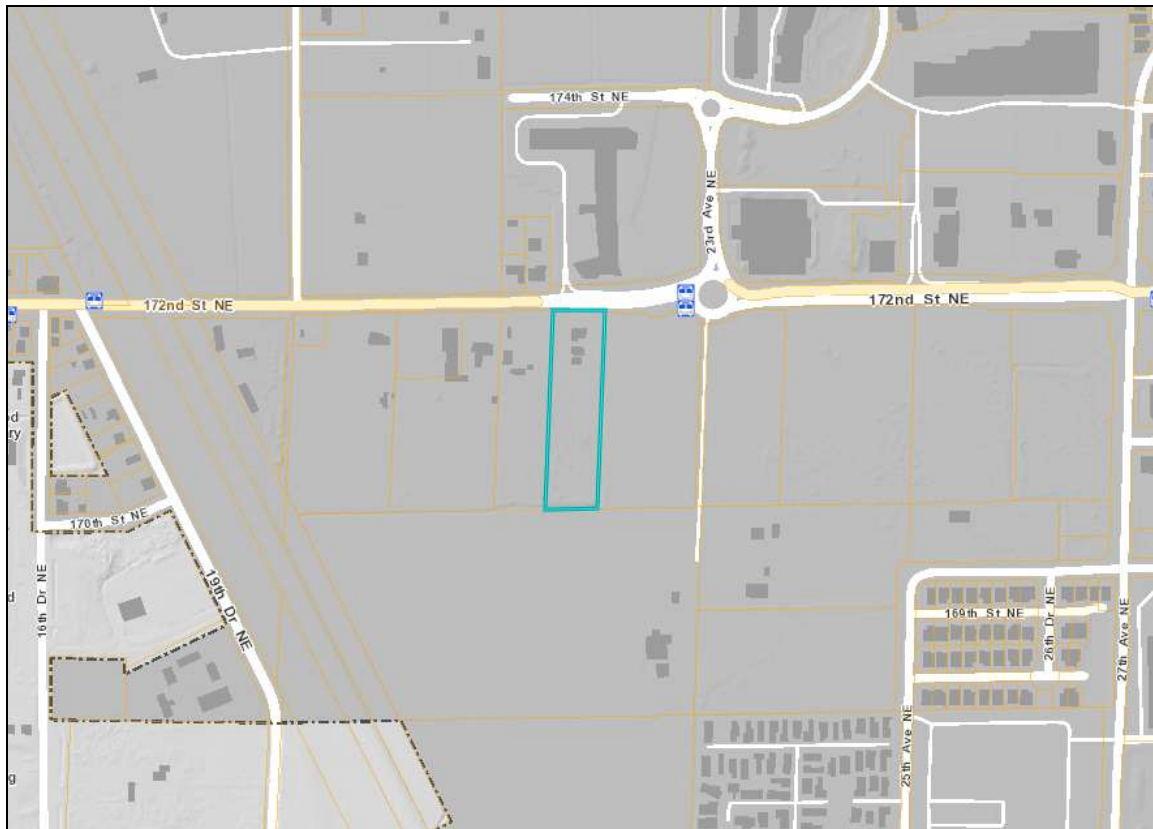
Phone: 253-859-0515

June 28, 2019

Schloredt Conrad Family Trust
PO Box 1267
Stanwood, WA 98292

RE: Parcel #31052900202400 – Critical Area Report
City of Marysville, Washington
SWC Job #19-120

This report describes our observations of any jurisdictional wetlands, streams or buffers on or within 200' of (Parcel #31052900202400) located at 2124 172nd Street NE, in the City of Marysville, Washington (the "site"). The site is located in the NW $\frac{1}{4}$ of Section 29, Township 31 North, Range 5 east of the W.W.M.



Above: Vicinity Map of the site.

The site is an irregular shaped 2.39 acre agricultural property used for growing hay, corn and other crops.

METHODOLOGY

Ed Sewall of Sewall Wetland Consulting, Inc. inspected the site between February and May of 2019.

The site was reviewed using methodology described in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory, 1987), and the *Western Mountains, Valleys and Coast region Supplement* (Version 2.0) dated June 24, 2010, as required by the US Army Corps of Engineers.



Above: 2017 aerial photograph of the site.

Given the mapped Custer soil series on part of the site, hydrology monitoring in the early growing season was deemed the only way to determine if wetland hydrology exists on this agricultural field.

Previous information from NRCS indicates that there is such a high degree of disturbance to historical hydrology of the Custer soils in the vicinity of the site that the only sure determination if the soil was hydric was to observe wetland hydrology in the early growing season over the required period of time.

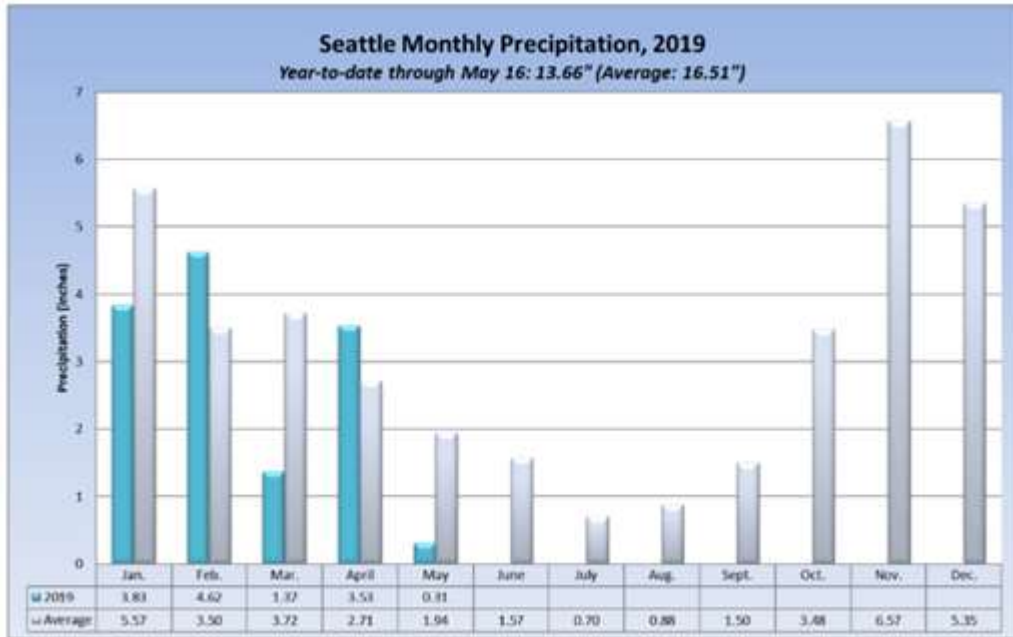
The presence of wetland hydrology is the driving force behind wetland presence, without wetland hydrology, an area does not meet wetland criteria. Therefore, only areas on the site that contain all three parameters during the early growing season meet the definition of a wetland. Areas that do not have hydrology do not meet wetland criteria and are considered upland.

In order to determine what portion of the site contained wetland hydrology, an analysis of wetland hydrology was conducted throughout the site.

Site Hydrology Monitoring Methods

A total of 7 data points (soil pits & piezometers) were sampled to determine if wetland vegetation, soils and hydrology was present on the site within 12" of the soil surface.

The site was visited between February 21th and May 3 of 2019 to collect hydrology data.



Rainfall in the region was above normal for February and April, January and April and less in May, but on average, rainfall was normal between Jan and May of 2018. Normal rainfall for this period is 17.57” and in 2018 18.53” of rain fell in this period, which slightly above normal (105%).

At each of the 7 sample points the level of standing water and/or soil saturation (if any) were recorded.

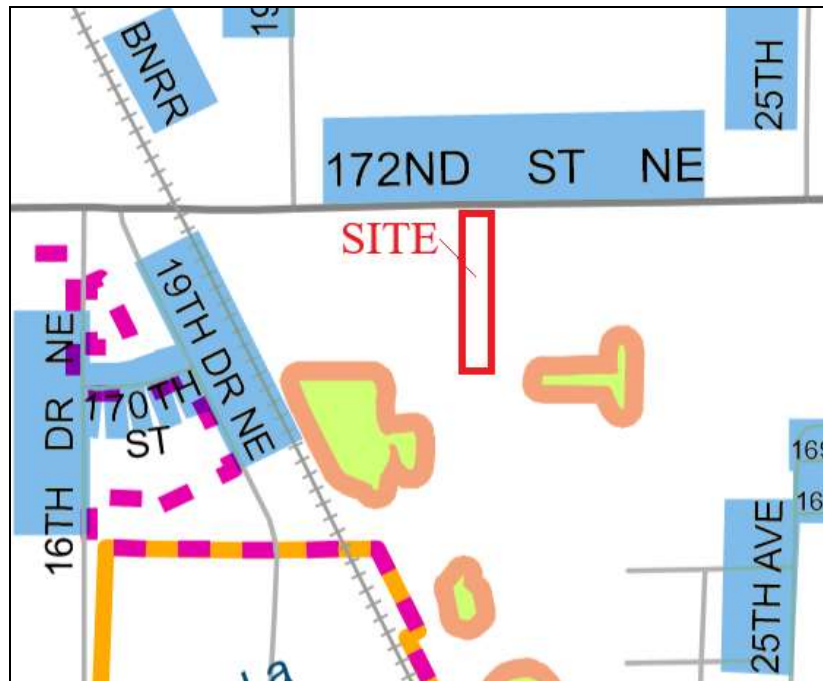
OBSERVATIONS

Existing Site Documentation.

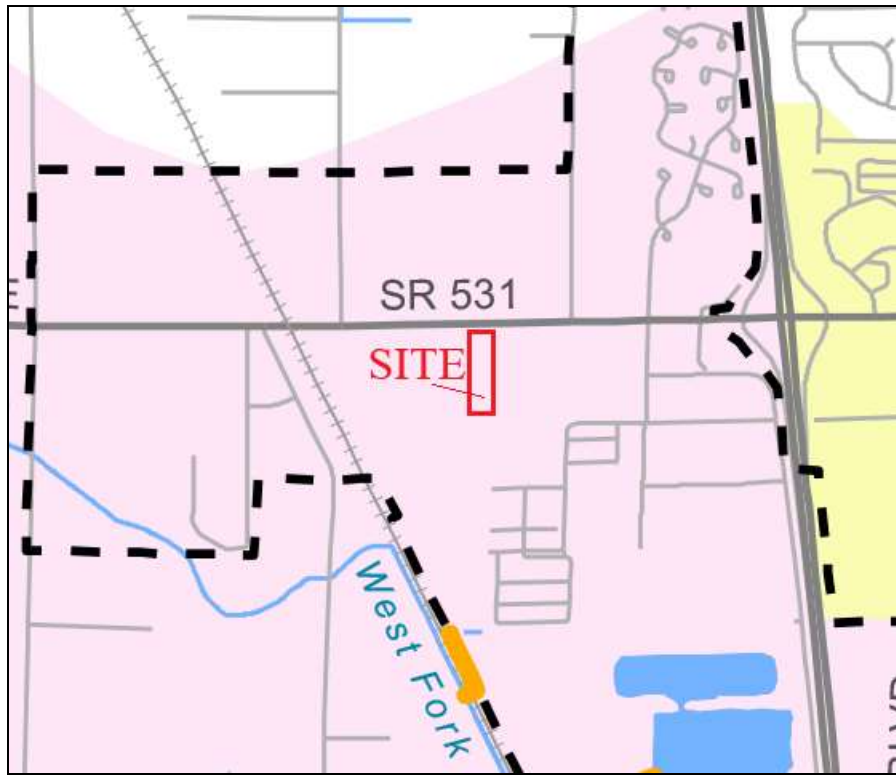
Prior to visiting the site, a review of several natural resource inventory maps was conducted. Resources reviewed included the City of Marysville Critical Areas map, National Wetland Inventory Map, the NRCS Soil Survey online mapping and Data, WADNR Fpars stream mapping and the WDFW Priority Habitats mapping website.

City of Marysville Critical Areas Map

According to the City of Marysville Critical Areas Maps, there are no wetlands or streams on the site. A wetland is mapped to the east and west of the site. However, from a previous study conducted by Sewall Wetland Consulting, Inc. of the Sather A, B&C properties to the east and south, these wetlands do not exist.



City of Marysville Critical Areas Map



Above: City of Marysville stream map.

National Wetlands Inventory (NWI)

The NWI map depicts no wetlands or streams on or near the site.



Above: NWI Map of the area of the site.

Soil Survey

According to the NRCS Soil Mapper website, the site is mapped as Custer fine sandy loam. According to Soil Survey of Snohomish County Area, Washington (Debose and Klungland, 1983), Custer soils (soil unit #13) are poorly drained soils formed in outwash plains. According to local NRCS scientists, Custer soils have such a high degree of disturbance to historical hydrology in the vicinity of the site that the only sure determination if the soil was hydric was to observe wetland hydrology in the early growing season over the required continuous period of time.



Above: NRCS Soil map of the study area.

WADNR Fpars

The WADNR Fpars stream typing map for the site there are no streams on or near the site. The closest mapped stream is over 1,000' south of the site.



Above WDNR Fpars Stream Typing map.

WDFW Priority Habitats

According to the WDFW Priority Habitats mapping website, there are no priority habitats on or near the site. The closest mapped priority habitat is a wetland (which does not exist) depicted in the middle of a plat approximately 1,000' southeast of the site.



Above: WDFW Priority Habitats Map of the site

Field observations

Uplands

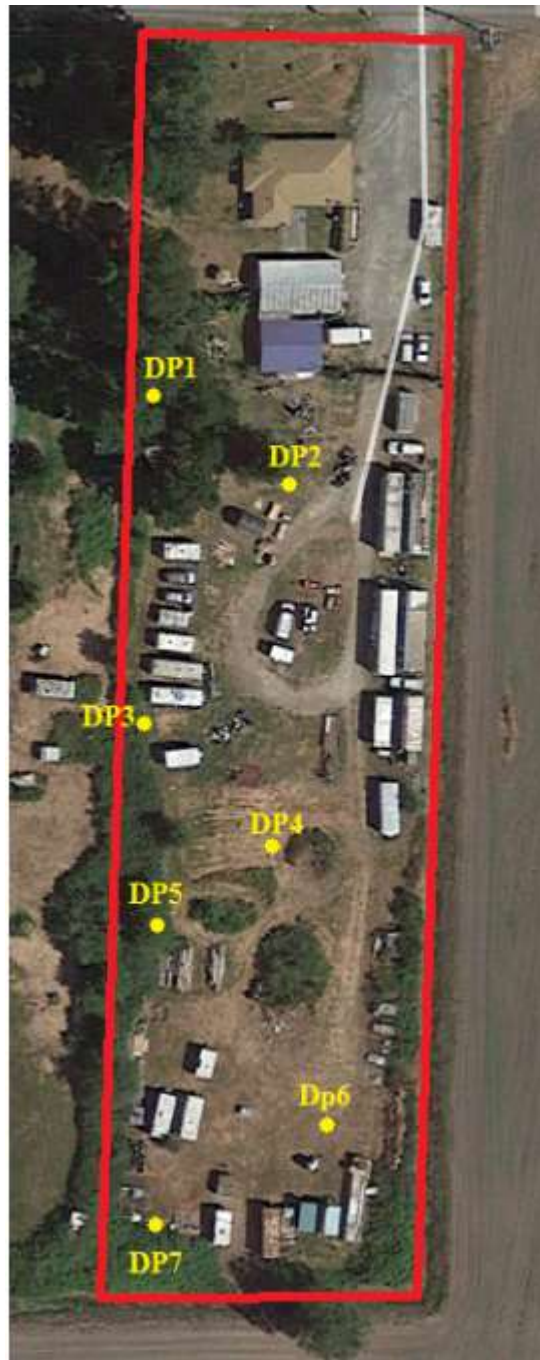
The site is a relatively flat, former agricultural property which contains a gravel driveway, single-family home and several outbuildings on the north end of the site. The remainder of the site is disturbed lands with numerous trailers/campers, old boats, cars and assorted materials scattered over the site. Soils are disturbed through most of the site with evidence of historic grading and scraping. Agricultural ditches border the east, west and south sides of the site.

Vegetation on the site is limited to patches of Himalayan blackberry and scotch broom along the perimeter of the site as well as a few scattered black cottonwoods along the southwest corner. The remainder of the site consists of landscaped/lawn area on the northern $\frac{1}{4}$ of the site and the

remainder a variety of weedy species and grasses including Canadian thistle, stinging nettle, Hawthorne, creeping buttercup, cats ear, dandelion, bentgrass, orchard grass, ryegrass, and velvet grass.

Soil pits excavated throughout the site generally consist of sandy loam soils similar to the Custer profile, with an A-horizon of sandy loam with colors of 10YR 3/2 and 2/2 down to 8-10" and a B-horizon of loamy sand with a color of 10YR 3/2-3/6. As previously mentions, in some areas the A-horizon had been scraped away and the remaining soil was a sandy loam with colors of 10YR 3/2-3/6.

During all of the site visits and review of all data points, no area on the site was found to contain wetland hydrology. All soils pits were found to be dry- moist during all other site visits with some saturation at depths of -18" or deeper during one site visit on March 14.



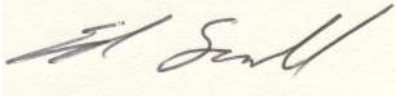
Above: Data point locations on the site

Conclusion

No wetlands, streams or buffers exist on the site.

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.

A handwritten signature in black ink on a light yellow background, appearing to read "Ed Sewall".

Ed Sewall
Senior Wetlands Ecologist PWS #212

Attached: Data Sheets
Hydrology data

REFERENCES

Cowardin, L., V. Carter, F. Golet, and E. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Fish and Wildlife Service, FWS/OBS-79-31, Washington, D. C.

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1. U. S. Army Corps of Engineers Waterways Experiment Station, Vicksburg, Mississippi.

Muller-Dombois, D. and H. Ellenberg. 1974. Aims and Methods of Vegetation Ecology. John Wiley & Sons, Inc. New York, New York.

Munsell Color. 1988. Munsell Soil Color Charts. Kollmorgen Instruments Corp., Baltimore, Maryland.

National Technical Committee for Hydric Soils. 1991. Hydric Soils of the United States. USDA Misc. Publ. No. 1491.

Reed, P., Jr. 1988. National List of Plant Species that Occur in Wetlands: Northwest (Region 9). 1988. U. S. Fish and Wildlife Service, Inland Freshwater Ecology Section, St. Petersburg, Florida.

Reed, P.B. Jr. 1993. 1993 Supplement to the list of plant species that occur in wetlands: Northwest (Region 9). USFWS supplement to Biol. Rpt. 88(26.9) May 1988.

USDA NRCS & National Technical Committee for Hydric Soils, September 1995. Field Indicators of Hydric Soils in the United States - Version 2.1

City of Marysville Municipal Code

Schluedt

M = moist
 d = dry
 -" = depth to soil sat.

Date 2019

Mon. Pt

2/21 3/7 3/14 3/20 3/26 4/4 4/12 4/19 4/26 5/3

1	d	d	M	M	M	d	M	d	d		
2	d	d	M	M	M	d	M	d	d		
3	d	d	-18	M	M	d	M	d	d		
4	d	d	M	M	M	d	M	d	d		
5	d	d	M	M	M	d	M	d	d		
6	d	d	M	M	M	d	M	d	d		
7	d	d	-18	M	M	d	M	d	d		

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

Project/Site: Schlorsdt City/County: Marysville Sampling Date: 2-21-19
 Applicant/Owner: _____ State: WA Sampling Point: DP#1
 Investigator(s): Ed Sewall Section, Township, Range _____
 Landform (hillslope, terrace, etc.): _____ Local relief (concave, convex, none): _____ Slope (%): _____
 Subregion (LRR): _____ Lat: _____ Long: _____ Datum: _____
 Soil Map Unit Name: Cueta NWI classification: _____
 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 <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	Hydric Soil Present? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks:			

VEGETATION - Use scientific names of plants.

<p>Tree Stratum (Plot size: _____) Absolute % Cover _____ Dominant Species? _____ Indicator Status _____</p> <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p>	<p>Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A) Total Number of Dominant Species Across All Strata: _____ (B) Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (A/B)</p>
<p>Shrub/Strawb Stratum (Plot size: _____) _____ = Total Cover</p> <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>5. _____</p>	
<p>Herb Stratum (Plot size: _____) _____ = Total Cover</p> <p>1. _____</p> <p>2. _____</p> <p>3. _____</p> <p>4. _____</p> <p>5. _____</p> <p>6. _____</p> <p>7. _____</p> <p>8. _____</p> <p>9. _____</p> <p>10. _____</p> <p>11. _____</p>	<p>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 = _____</p>
<p>Woody Vine Stratum (Plot size: _____) _____ = Total Cover</p> <p>1. _____</p> <p>2. _____</p>	<p>Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/></p>
<p>% Bare Ground in Herb Stratum _____ = Total Cover</p> <p>Remarks: <u>Disturbed garden area</u></p>	

SOIL

Sampling Point: _____

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

Depth (inches)	Matrix		Redox Features		Type	Loc	Texture	Remarks
	Color (moist)	%	Color (moist)	%				
10	10YR 3/2						Thin	
16	10YR 3/3						Soft to	

Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains, Location: PL=Pore Lining, M=Matrix
 Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.) Indicators for Problematic Hydric Soils:
 ___ Histosol (A1) ___ Sandy Redox (S5) ___ 2 cm Muck (A10)
 ___ Histic Epipedon (A2) ___ Stripped Matrix (S6) ___ Red Parent Material (TF2)
 ___ Black Histic (A3) ___ Loamy Mucky Mineral (F1) (except MLRA 1) ___ Other (Explain in Remarks)
 ___ Hydrogen Sulfide (A4) ___ Loamy Gleyed Matrix (F2)
 ___ Depleted Below Dark Surface (A11) ___ Depleted Matrix (F3)
 ___ Thick Dark Surface (A12) ___ Redox Dark Surface (F6) ___ Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.
 ___ Sandy Mucky Mineral (S1) ___ Depleted Dark Surface (F7)
 ___ Sandy Gleyed Matrix (S4) ___ Redox Depressions (F8)

Restrictive Layer (if present):
 Type: _____
 Depth (inches): _____ Hydric Soil Present? Yes No

Remarks: no indicators

HYDROLOGY

Wetland Hydrology Indicators:

<p>Primary Indicators (minimum of one required, check all that apply)</p> <p>___ 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 Surfaces (B8)</p>	<p>Secondary Indicators (2 or more required)</p> <p>___ 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)</p>	<p>___ 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)</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Field Observations:
 Surface Water Present? Yes No Depth (inches): _____
 Water Table Present? Yes No Depth (inches): _____
 Saturation Present? Yes No Depth (inches): _____ Wetland Hydrology Present? Yes No
 (includes capillary fringe)
 Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:
 Remarks: NO indicators

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

Project/Client: Schlodt State: WA Sampling Date: 2-21-19
 Applicant/Owner: Ed Sewell Section, Township, Range: _____
 Investigator: _____ Local relief (concave, convex, none): _____ Slope (%): _____
 Landform (hilltops, terraces, etc.): _____ Datum: _____
 Subregion (LIRS): _____
 Soil Map Unit Name: Cuepa NMT classification: _____
 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 Is the Sampled Area within a Wetland? Yes No
 Hydrophytic Soil Present? Yes No
 Wetland Hydrology Present? Yes No
 Remarks: _____

VEGETATION - Use scientific names of plants.

Tree Shrub (Prior to)	Absolute % Cover	Dominant Indicator Species	Dominance Test
1. _____	_____	_____	(A) _____
2. _____	_____	_____	(B) _____
3. _____	_____	_____	(AB) _____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____
Wetland Herb Stratum (Prior to)	_____	_____	_____
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____

US Army Corps of Engineers Western Mountains, Valleys, and Coast - Instream Version

SOIL

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)
 Depth (inches): _____ Mark: _____ Section Features: _____
 Color (moist): 10YR2/2 Color (dry): 10YR3/4 Texture: Silty loam
 Moisture: _____
 Location: PL-Pans (Living, Moisture)
 Indicators for Problematic Hydro Soils:
 - 2 cm Muck (A10)
 - Red Parent Material (F2)
 - Other (Explain in Remarks)

Type: G-Concentration, D-Distillation, RM-Reduced Matrix, CP-Covered or Coated Signal Grains
 Indicators for Problematic Hydro Soils:
 - Sandy Factor (S5)
 - Slipped Matrix (S8)
 - Lumpy Mucky Matrix (F1) (except MLBA 1)
 - Root Parent Material (F2)
 - Other (Explain in Remarks)
 - Hydrogen Sulfide (A4)
 - Depressed Sealer Dirt Surface (A11)
 - Rotten Dark Surface (F6)
 - Thick Duff Surface (A12)
 - Sandy Mucky Mineral (S1)
 - Depressed Dark Surface (F7)
 - Sandy Clayed Matrix (S4)
 - Rotten Depressions (F9)
 - Resealed Layer (if present): _____
 Type: _____
 Depth (inches): _____
 Hydrology Present? Yes No

Remarks: No indicators

HYDROLOGY

Wetland Hydrology Indicators:
 - 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 (B6) _____
 - Inundation Visible on Aerial Imagery (B7) _____
 - Sparsely Vegetated Concrete Surfaces (B8) _____
 - Surface Water Present? Yes No
 - Water Table Present? Yes No
 - Saturation Present? Yes No
 - Inundation Visible on Aerial Imagery (B7) _____
 - Sparsely Vegetated Concrete Surfaces (B8) _____
 - Water-Stamped Leaves (B9) (except MLBA 1, 2, 4A, and 4B)
 - Soil 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 (C5) _____
 - Stunted or Stressed Plants (D1) (LRR A) _____
 - Other (Explain in Remarks) _____
 - Secondary Indicators (if or more possible):
 - Water-Stamped Leaves (B9) (MLBA 1, 2, 4A, and 4B)
 - Drainage Patterns (B10)
 - Dry-Season Water Table (C2)
 - Saturation Visible on Aerial Imagery (C6)
 - Geomorphologic Position (D2)
 - Shallow Aquifers (D3)
 - FAC-Natural Test (D5)
 - Stunted or Stressed Plants (D6) (LRR A)
 - Frock-Heave Hummocks (D7)

Field Observations:
 - Surface Water Present? Yes No Depth (inches): _____
 - Water Table Present? Yes No Depth (inches): _____
 - Saturation Present? Yes No Depth (inches): _____
 - Inundation Visible on Aerial Imagery (B7) _____
 - Sparsely Vegetated Concrete Surfaces (B8) _____
 - Wetland Hydrology Present? Yes No
 - Discrete Flooded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:
 Remarks: No indicators

US Army Corps of Engineers Western Mountains, Valleys, and Coast - Instream Version

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

Project Site: Schlondt County: Marysville Sampling Date: 2-21-19

Applicant/Owner: Ed Seewald State: WA Sampling Point: D177

Investigator(s): Ed Seewald Section, Township, Range: _____

Soil Map Unit Name: Cushu Local relief (convex, concave, none): _____ Slope (%): _____ Datum: _____

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? Yes No (If needed, explain any answers in Remarks.)

Are Vegetation, Soil, or Hydrology relatively problematic? Yes No (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 Is the Sampled Area within a Wetland? Yes No

Hydro Soil Present? Yes No

Wetland Hydrology Present? Yes No

Remarks: _____

VEGETATION - Use scientific names of plants.

1. Tree Stratum (Plot size: _____) Abundant Dominant Indicator % Cover: _____ Status? Stable (A)

2. _____ (B)

3. _____ (A/B)

4. _____

5. _____

6. _____

7. _____

8. _____

9. _____

10. _____

11. _____

Moist-Mix Stratum (Plot size: _____) % Base Ground in Herb Stratum _____

Remarks: _____

Hydrophytic Vegetation Present? Yes No

Hydro Soil Present? Yes No

Wetland Hydrology Present? Yes No

Remarks: _____

US Army Corps of Engineers Western Mountains, Valleys, and Coast - Intertin Version

SOIL

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

Depth (inches): 16 Moisture 20-31 Soil Exposure dry Remarks: _____

Color (Munsell): _____

Texture: _____

Structure: _____

Location: PL-200a Living, M-200a

Indicators for Problematic Hydrology Soils:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

HYDROLOGY

Wetland Hydrology Indicators:

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

Wetland Hydrology Indicators: (Check all that apply.)

US Army Corps of Engineers Western Mountains, Valleys, and Coast - Intertin Version

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

Project Site: Schlerdt City/County: Maricopa State: WA Sampling Date: 2-21-15
 Applicant/Owner: Ed Seaman Section, Township, Range: WA Sampling Point: DPT 7
 Investigation(s): ED Seaman Local relief (concave, convex, none): _____ Slope (%): _____
 Landform (hilltop, terrace, etc.): _____ Long: _____ Datum: _____
 Subregion (LWR): _____ Lat: _____ NWR classification: _____
 Soil Map Unit Name: Cushu
 Are climatic/hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are "Normal Circumstances" present? Yes No
 Are "Natural Circumstances" present? Yes No (If no, explain in Remarks.)
 Are "Natural Circumstances" present? Yes No (If needed, explain any arrows in Remarks.)

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

Hydrophytic Vegetation Present? Yes No Is the Sampled Area within a Wetland? Yes No
 Hydric Soil Present? Yes No
 Wetland Hydrology Present? Yes No
 Remarks: _____

VEGETATION - Use scientific names of plants.

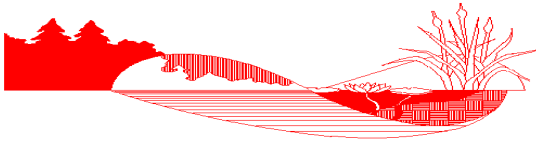
Tree/Shrub (Plot size)	Absolute % Cover	Dominant Indicator Species?	Stability
1. _____	_____	_____	_____
2. _____	_____	_____	_____
3. _____	_____	_____	_____
4. _____	_____	_____	_____
5. _____	_____	_____	_____
6. _____	_____	_____	_____
7. _____	_____	_____	_____
8. _____	_____	_____	_____
9. _____	_____	_____	_____
10. _____	_____	_____	_____
11. _____	_____	_____	_____
Wood/Vine Stratum (Plot size)	_____	_____	_____
1. _____	_____	_____	_____
2. _____	_____	_____	_____
% Bare Ground in Herb Stratum	_____	_____	_____
Remarks:	_____		

SOIL

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)
 Depth (Jug): 10/12/3/2 Mott: _____
 Color (Munsell): 10YR 3/2 Soil: _____
 Color (Munsell): _____ Soil: _____
 Location: PL-SPON Living, Mottless
 Indicators for Problematic Hydrology Soils:
 Type: C-Concentration, D-Disturbance, S-Saturated, G-Gravel or Coarse Sand Grains, L-Lowland, PL-SPON Living, Mottless
 Hydric Soil Indicators: (Applicable to all LWRs, unless otherwise noted)
 - Histosol (A1) _____
 - Sandy Surface (SB) _____
 - Hemic Epithem (A2) _____
 - Shipped Matrix (SB) _____
 - Black Muck (A3) _____
 - Loamy Mucky Muck (F1) (except MLRA 1) _____
 - Hydrogen Sulphide (A4) _____
 - Depleted Matrix (F2) _____
 - Darkened Surface Dark Surface (A11) _____
 - Depleted Matrix (F3) _____
 - Thick Dark Surface (A12) _____
 - Redox Dark Surface (R) _____
 - Sandy Mucky Mineral (B1) _____
 - Sandy Gleyed Matrix (B4) _____
 - Redox Depressions (F9) _____
 Restrictive Layer (if present): _____
 Type: _____
 Depth (inches): _____
 Hydric Soil Present? Yes No
 Remarks: no indicators

HYDROLOGY

Wetland Hydrology Indicators:
 E-Obvious Evidence (Minimum of one required, check all that apply)
 - Surface Water (A1) _____
 - High Water Table (A2) _____
 - Saturation (A3) _____
 - Water Marks (B1) _____
 - Drift Deposits (B2) _____
 - Algal Mat or Crust (B4) _____
 - Iron Deposits (B6) _____
 - Surface Soil Cracks (B8) _____
 - Irrigation Visible on Aerial Imagery (B7) _____
 - Sparsely Vegetated Concave Surfaces (B9) _____
 Field Observations:
 - Surface Water Present? Yes No Depth (inches): _____
 - Water Table Present? Yes No Depth (inches): _____
 - Saturation Present? Yes No Depth (inches): _____
 - (Include all other field observations)
 Describe Restricted Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:
 Secondary Indicators (2 or more required)
 - Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) _____
 - Drainage Patterns (B10) _____
 - Dry-Season Water Table (C2) _____
 - Saturation Visible on Aerial Imagery (C9) _____
 - Gammagrass Position (D2) _____
 - Shallow Aquifer (D3) _____
 - FAC Neutral Test (D5) _____
 - Raised Air Mounds (D6) (LWR A) _____
 - Frost-Heave Hummocks (D7) _____
 Wetland Hydrology Present? Yes No
 Remarks: No indicators



Sewall Wetland Consulting, Inc.

PO Box 880
Fall City, WA 98024

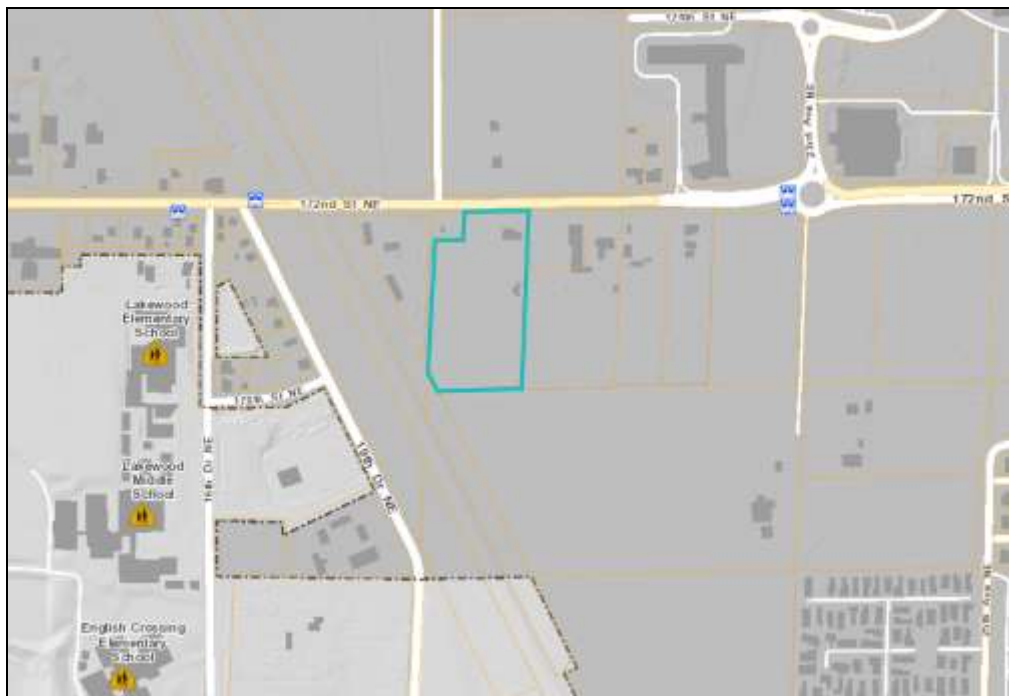
Phone: 253-859-0515

June 28, 2019

Cassie Lee Riccardi
PO Box 2590
Homer AK, 99603

RE: Parcel #31052900201200 – Critical Area Report
City of Marysville, Washington
SWC Job #19-109

This report describes our observations of any jurisdictional wetlands, streams or buffers on or within 200' of (Parcel #31052900201200) located at 1930 172nd Street NE, in the City of Marysville, Washington (the "site"). The site is located in the NW $\frac{1}{4}$ of Section 29, Township 31 North, Range 5 east of the W.W.M.



Above: Vicinity Map of the site.

The site is an irregular shaped 4.55 acre agricultural property with a single family home and barn, as well as area used for growing hay, corn and other crops.

METHODOLOGY

Ed Sewall of Sewall Wetland Consulting, Inc. inspected the site between February and May of 2019.

The site was reviewed using methodology described in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory, 1987), and the *Western Mountains, Valleys and Coast region Supplement* (Version 2.0) dated June 24, 2010, as required by the US Army Corps of Engineers.



Above: 2017 aerial photograph of the site.

Given the mapped Custer soil series on part of the site, hydrology monitoring in the early growing season was deemed the only way to determine if wetland hydrology exists on this agricultural field.

Previous information from NRCS indicates that there is such a high degree of disturbance to historical hydrology of the Custer soils in the vicinity of the site that the only sure determination if the soil was hydric was to observe wetland hydrology in the early growing season over the required period of time.

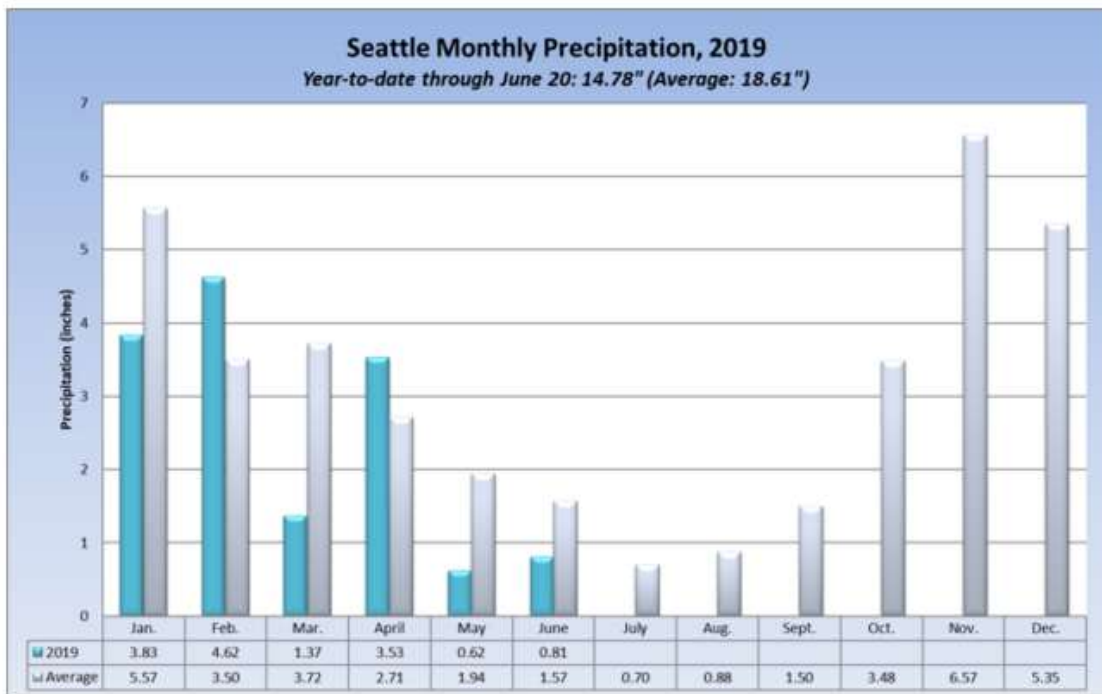
The presence of wetland hydrology is the driving force behind wetland presence, without wetland hydrology, an area does not meet wetland criteria. Therefore, only areas on the site that contain all three parameters during the early growing season meet the definition of a wetland. Areas that do not have hydrology do not meet wetland criteria and are considered upland.

In order to determine what portion of the site contained wetland hydrology, an analysis of wetland hydrology was conducted throughout the site.

Site Hydrology Monitoring Methods

A total of 9 data points (soil pits & piezometers) were sampled to determine if wetland vegetation, soils and hydrology was present on the site within 12" of the soil surface.

The site was visited between February 21th and May 3 of 2019 to collect hydrology data.



Rainfall in the region was above normal for February and April, January and April and less in May, but on average, rainfall was normal between Jan and May of 2018. Normal rainfall for this period is 17.57" and in 2018 18.53" of rain fell in this period, which slightly above normal (105%).

At each of the 9 sample points a 3" diameter piezometer was to a depth of -18". At each pit observations of the level of standing water and/or soil saturation (if any) were recorded.

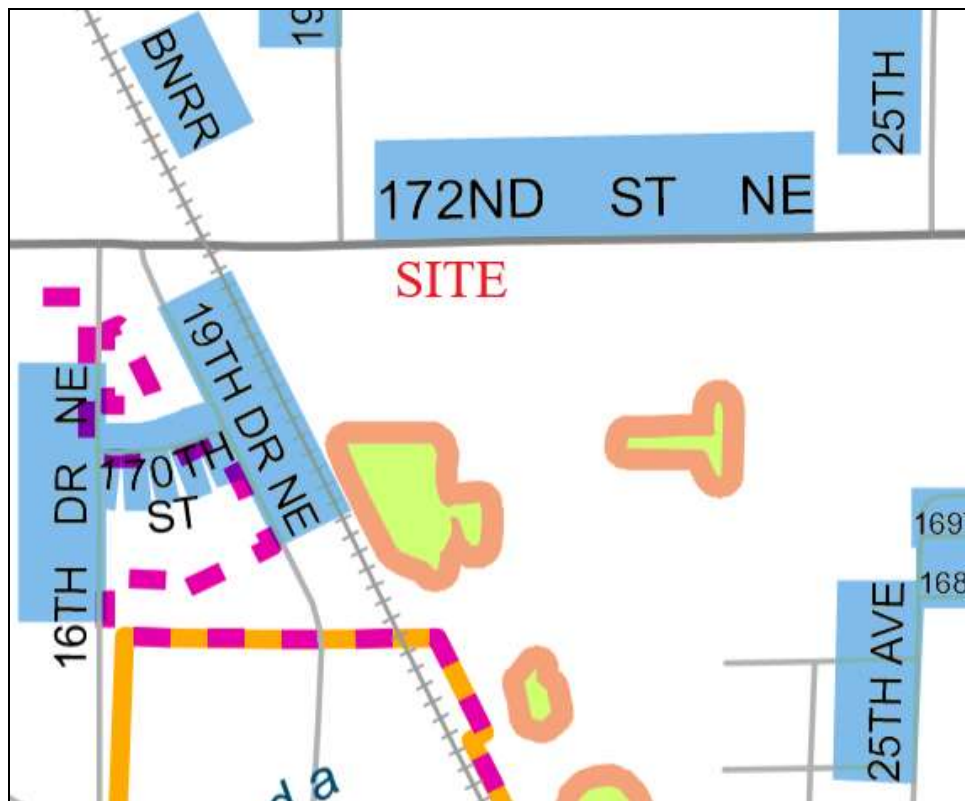
OBSERVATIONS

Existing Site Documentation.

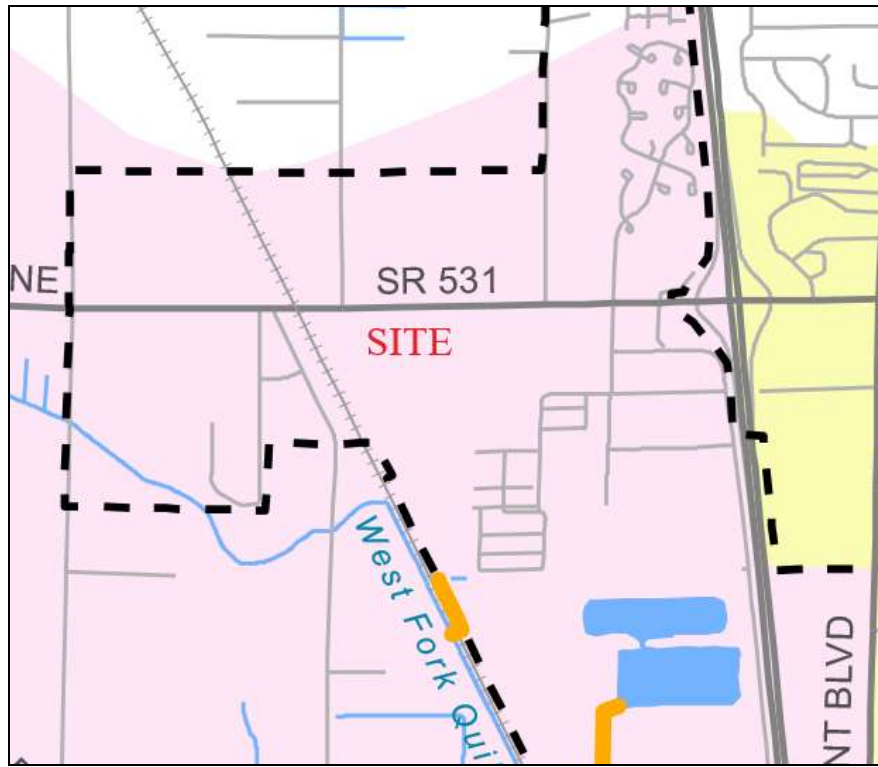
Prior to visiting the site, a review of several natural resource inventory maps was conducted. Resources reviewed included the City of Marysville Critical Areas map, National Wetland Inventory Map, the NRCS Soil Survey online mapping and Data, WADNR Fpars stream mapping and the WDFW Priority Habitats mapping website.

City of Marysville Critical Areas Map

According to the City of Marysville Critical Areas Maps, there are no wetlands or streams on the site. A wetland is mapped to the south of the site. However, from a previous study conducted by Sewall Wetland Consulting, Inc. of the Sather B&C properties to the south, this wetland does not exist.



City of Marysville Critical Areas Map



Above: City of Marysville stream map.

National Wetlands Inventory (NWI)

The NWI map depicts no wetlands or streams on or near the site.



Above: NWI Map of the area of the site.

Soil Survey

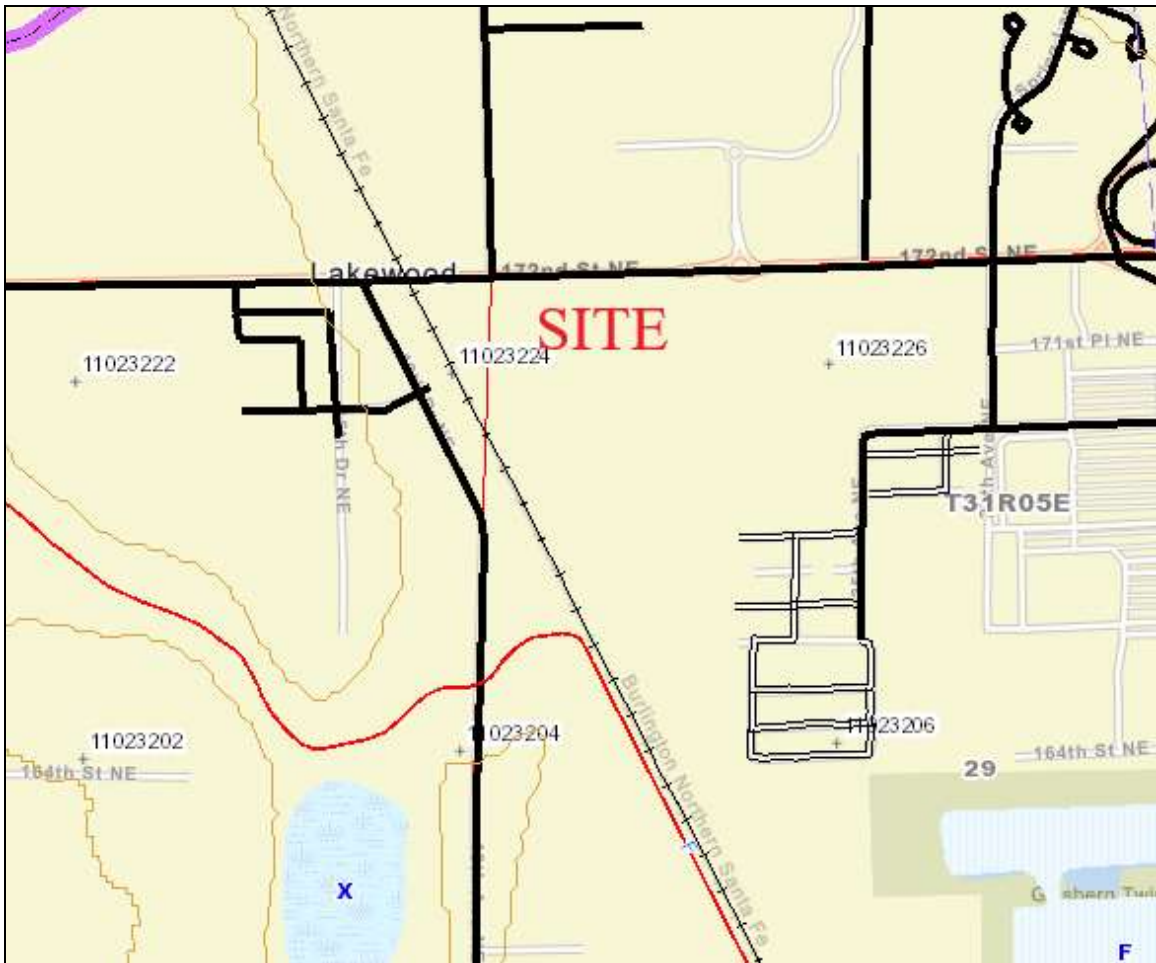
According to the NRCS Soil Mapper website, the site is mapped as Kitsap silt loam on the west, and on the eastern half, Custer fine sandy loam. According to Soil Survey of Snohomish County Area, Washington (Debose and Klungland, 1983) Kitsap silt loam is a moderately well drained soil formed in glacial lakebed deposits. Custer soils (soil unit #13) are poorly drained soils formed in outwash plains. According to local NRCS scientists, Custer soils have such a high degree of disturbance to historical hydrology in the vicinity of the site that the only sure determination if the soil was hydric was to observe wetland hydrology in the early growing season over the required continuous period of time.



Above: NRCS Soil map of the study area.

WADNR Fpars

The WADNR Fpars stream typing map for the site there are no streams on or near the site. The closest mapped stream is over 1,000' south of the site.



Above WDNR Fpars Stream Typing map.

WDFW Priority Habitats

According to the WDFW Priority Habitats mapping website, there are no priority habitats on or near the site. The closest mapped priority habitat is a wetland depicted on the NWI map over 700' west of the site.



Above: WDFW Priority Habitats Map of the site

Field observations

Uplands

The site is a relatively flat agricultural property with a slight slope to the south west. A single-family home and several agricultural outbuildings are located on the north end of the site. The remainder of the site is an agricultural field. An informal farm road passes through the site to the south. Agricultural ditches border the west and south sides of the site. The site is bordered by 172nd Street NE on the north, single family/agricultural property to the east, the Sather property to the south which is currently farmed, and a utility building and single-family structure to the west.

The site is plowed and planted with either hay or crops like corn on an annual basis. At the time of our sampling the field was planted in ryegrass (*Lolium perenne*).

Soil pits excavated throughout the site generally consist of sandy loam soils similar to the Custer profile, with an A-horizon of sandy loam with colors of 10YR 3/2 and 2/2 down to 8-10" and a B-horizon of loamy sand with a color of 10YR 3/2-3/6.

During all of the site visits and review of all data points, no area on the site was found to contain wetland hydrology with the exception of Well #6 which was saturated at -12" on one site visit on March 14th which had followed some heavy rainfall (see attached hydrology monitoring results). All soils pits were found to be dry- moist during all other site visits with some saturation at depths of -14" or deeper almost entirely on the one site visit on March 14.



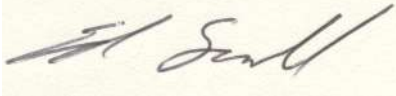
Above: Data point locations on the site

Conclusion

No wetlands, streams or buffers exist on the site.

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.

A handwritten signature in black ink on a light yellow background, appearing to read "Ed Sewall".

Ed Sewall
Senior Wetlands Ecologist PWS #212

Attached: Data Sheets
Hydrology data

REFERENCES

Cowardin, L., V. Carter, F. Golet, and E. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Fish and Wildlife Service, FWS/OBS-79-31, Washington, D. C.

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1. U. S. Army Corps of Engineers Waterways Experiment Station, Vicksburg, Mississippi.

Muller-Dombois, D. and H. Ellenberg. 1974. Aims and Methods of Vegetation Ecology. John Wiley & Sons, Inc. New York, New York.

Munsell Color. 1988. Munsell Soil Color Charts. Kollmorgen Instruments Corp., Baltimore, Maryland.

National Technical Committee for Hydric Soils. 1991. Hydric Soils of the United States. USDA Misc. Publ. No. 1491.

Reed, P., Jr. 1988. National List of Plant Species that Occur in Wetlands: Northwest (Region 9). 1988. U. S. Fish and Wildlife Service, Inland Freshwater Ecology Section, St. Petersburg, Florida.

Reed, P.B. Jr. 1993. 1993 Supplement to the list of plant species that occur in wetlands: Northwest (Region 9). USFWS supplement to Biol. Rpt. 88(26.9) May 1988.

USDA NRCS & National Technical Committee for Hydric Soils, September 1995. Field Indicators of Hydric Soils in the United States - Version 2.1

City of Marysville Municipal Code

Riccardi

Date 2019

M = moist
d = dry
" = depth to soil set.

Mon. Pt 2/21 3/7 3/14 3/20 3/26 4/4 4/12 4/19 4/26 5/3

1	d	d	-14"	d	m	d	-14	m	d	d
2	d	d	-18"	d	m	d	m	m	d	d
3	d	d	-17"	d	m	d	m	m	d	d
4	d	d	-16"	d	m	d	m	m	d	d
5	d	d	-18"	d	m	d	m	m	d	d
6	d	d	-12"	d	m	d	m	m	d	d
7	d	d	-18	d	m	d	m	m	d	d
8	d	d	-18	d	m	d	m	m	d	d
9	d	d	-18	d	m	d	m	m	d	d

Soil Temp
C -18°
40.1° 40.8° 40.0° 40.6° 42°

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

Project/Site: Riccardi City/County: Marysville Sampling Date: 2-21-19
 Applicant/Owner: _____ State: WA Sampling Point: D#1
 Investigator(s): Ed Sewall Section, Township, Range: S29 T31N R5E
 Landform (hillslope, terrace, etc.): _____ Local relief (concave, convex, none): _____ Slope (%): _____
 Subregion (LRR): _____ Let: _____ Long: _____ Datum: _____
 Soil Map Unit Name: _____ NWI classification: _____
 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 <input type="checkbox"/> No <input checked="" type="checkbox"/>	Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Remarks:
is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet:
1. _____				Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A)
2. _____				Total Number of Dominant Species Across All Strata: <u>0</u> (B)
3. _____				Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A/B)
4. _____				
= Total Cover				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:				
Dominance Test is >50% <input type="checkbox"/>				
Prevalence Index is >3.0 <input type="checkbox"/>				
Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet) <input type="checkbox"/>				
Wetland Non-Vascular Plants <input type="checkbox"/>				
Problematic Hydrophytic Vegetation (Explain) <input type="checkbox"/>				
Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic. <input type="checkbox"/>				
Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
% Bare Ground in Herb Stratum _____ = Total Cover				
Remarks:				

SOIL

Sampling Point: _____

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

Depth (inches)	Matrix		Redox Features		Type	Loc ²	Texture	Remarks
	Color (moist)	%	Color (moist)	%				
<u>12</u>	<u>10YR 2/2</u>						<u>com</u>	
<u>16</u>	<u>10YR 3/4</u>						<u>very sand</u>	

Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=Covered or Coated Sand Grains, ²Location: PL=Pipe Lining, M=Matrix

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

___ Histosol (A1)	___ Sandy Radox (S5)	___ 2 cm Muck (A10)
___ Histic Epipedon (A2)	___ Stripped Matrix (S6)	___ Red Parent Material (TF2)
___ Black Histic (A3)	___ Loamy Mucky Mineral (F1) (except MLRA 1)	___ Other (Explain in Remarks)
___ Hydrogen Sulfide (A4)	___ Loamy Gleyed Matrix (F2)	
___ Depleted Below Dark Surface (A11)	___ Depleted Matrix (F3)	
___ Thick Dark Surface (A12)	___ Radox Dark Surface (F6)	
___ Sandy Mucky Mineral (S1)	___ Depleted Dark Surface (F7)	
___ Sandy Gleyed Matrix (S4)	___ Radox Depressions (F8)	

¹Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):
 Type: _____
 Depth (inches): _____ Hydric Soil Present? Yes No

Remarks:

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required, check all that apply)		Secondary Indicators (2 or more required)
___ Surface Water (A1)	___ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)	___ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
___ High Water Table (A2)	___ Salt Crust (B11)	___ Drainage Patterns (B10)
___ Saturation (A3)	___ Aquatic Invertebrates (B13)	___ Dry-Season Water Table (C2)
___ Water Marks (B1)	___ Hydrogen Sulfide Odor (C1)	___ Saturation Visible on Aerial Imagery (C9)
___ Sediment Deposits (B2)	___ Oxidized Rhizospheres along Living Roots (C3)	___ Geomorphic Position (D2)
___ Drift Deposits (B3)	___ Presence of Reduced Iron (C4)	___ Shallow Aquitard (D3)
___ Algal Mat or Crust (B4)	___ Recent Iron Reduction in Tilled Soils (C5)	___ FAC-Neutral Test (D6)
___ Iron Deposits (B5)	___ Stunted or Stressed Plants (D1) (LRR A)	___ Raised Ant Mounds (D6) (LRR A)
___ Surface Soil Cracks (B6)	___ Other (Explain in Remarks)	___ Frost-Heave Hummocks (D7)
___ Inundation Visible on Aerial Imagery (B7)		
___ Sparsely Vegetated Concave Surface (B8)		

Field Observations:

Surface Water Present? Yes No Depth (inches): _____
 Water Table Present? Yes No Depth (inches): _____
 Saturation Present? Yes No Depth (inches): _____ Wetland Hydrology Present? Yes No
 (includes capillary fringe)

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

Remarks:

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

Project/Site: Riccardi City/County: Marysville Sampling Date: 2-21-19
 Applicant/Owner: _____ State: WA Sampling Point: DPS
 Investigator(s): Ed Sewall Section, Township, Range: S29 T31N R5E
 Landform (hillslope, terrace, etc.): _____ Local relief (concave, convex, none): _____ Slope (%): _____
 Subregion (LRR): _____ Lat: _____ Long: _____ Datum: _____
 Soil Map Unit Name: _____ NW1 classification: _____
 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 <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	Hydroic Soil Present? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	Wetland Hydrology Present? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: _____			

VEGETATION - Use scientific names of plants.

Type Stratum (Plot size: _____)	Absolute % Cover	Dominant Species?	Indicator Status	Dominance Test worksheet: Number of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A)
1. _____	_____	_____	_____	Total Number of Dominant Species Across All Strata: <u>0</u> (B)
2. _____	_____	_____	_____	
3. _____	_____	_____	_____	
4. _____	_____	_____	_____	
_____ = Total Cover				Percent of Dominant Species That Are OBL, FACW, or FAC: <u>0</u> (A/B)
5. _____	_____	_____	_____	
6. _____	_____	_____	_____	
7. _____	_____	_____	_____	
_____ = Total Cover				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) _____
8. _____	_____	_____	_____	
9. _____	_____	_____	_____	
10. _____	_____	_____	_____	
_____ = Total Cover				Prevalence Index = B/A = _____ Hydrophytic Vegetation Indicators: Dominance Test is >90% Prevalence Index is <3.0 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 hydroic soil and wetland hydrology must be present, unless disturbed or problematic.
11. _____	_____	_____	_____	
12. _____	_____	_____	_____	
13. _____	_____	_____	_____	
_____ = Total Cover				Hydrophytic Vegetation Present? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>
_____ = Total Cover				
% Bare Ground in Herb Stratum _____				
Remarks: _____				

SOIL

Sampling Point: _____

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

Depth (inches)	Matrix Color (moist)	%	Rodex Features Color (moist)	%	Type ¹	Loc ²	Texture	Remarks
12	10A2/2							
16	10A2/3							

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

Hydroic Soil Indicators: (Applicable to all LRRs, unless otherwise noted.) Indicators for Problematic Hydroic Soils³:

Histosol (A1)	Sandy Rodox (B6)	2 cm Muck (A10)
Histic Epipedon (A2)	Striped Matrix (B8)	Red Parent Material (TF2)
Black Histic (A3)	Loamy Mucky Mineral (F1) (except MLRA 1)	Other (Explain in Remarks)
Hydrogen Sulfide (A4)	Loamy Gleyed Matrix (F2)	
Depleted Below Dark Surface (A11)	Depleted Matrix (F3)	
Thick Dark Surface (A12)	Rodox Dark Surface (F6)	
Sandy Mucky Mineral (B1)	Depleted Dark Surface (F7)	
Sandy Gleyed Matrix (B4)	Rodox Depressions (F8)	

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

Restrictive Layer (if present):
Type: _____
Depth (inches): _____
Hydroic Soil Present? Yes No

Remarks: no indicators

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required, check all that apply)	Secondary Indicators (2 or more required)
Surface Water (A1)	Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)
High Water Table (A2)	Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
Saturation (A3)	Salt Crust (B11)
Water Marks (B1)	Aquatic Invertebrates (B13)
Sediment Deposits (B2)	Hydrogen Sulfide Odor (C1)
Drift Deposits (B3)	Oxidized Rhizospheres along Living Roots (C3)
Algal Mat or Crust (B4)	Presence of Reduced Iron (C4)
Iron Deposits (B5)	Recent Iron Reduction in Tilled Soils (C5)
Surface Soil Cracks (B6)	Stunted or Stressed Plants (D1) (LRR A)
Inundation Visible on Aerial Imagery (B7)	Other (Explain in Remarks)
Sparingly Vegetated Concave Surface (B8)	Frost-Heave Hummocks (D7)

Field Observations:
 Surface Water Present? Yes No Depth (inches): _____
 Water Table Present? Yes No Depth (inches): _____
 Saturation Present? Yes No Depth (inches): _____
 Wetland Hydrology Present? Yes No

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

Remarks: no indicators

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

Project: Riccardi City/County: Marysville Sampling Date: 2-21-19
 Applicant/Owner: WAT Sampling Point: DP#7
 Investigator(s): Ed Seaman Section, Township, Range: S29 T31N R5E
 Latitude (NAD83, terrace, etc.): _____ Longitude (NAD83): _____
 Subregion (LRR): _____ Local relief (concave, convex, none): _____ Slope (N): _____
 Soil Map Unit Name: _____ Lat: _____ Long: _____ Disturb: _____

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks.)
 Are hydrologic conditions significantly disturbed? Yes No
 Are vegetation, soil, or hydrology naturally problematic? (If needed, explain any answers in Remarks.) Yes No

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

Hydrologic Vegetation Present? Yes No Is the sampled Area within a Wetland? Yes No
 Hydrologic Soil Present? Yes No
 Wetland Hydrology Present? Yes No
 Remarks: _____

VEGETATION - Use scientific names of plants.

Item Number	Plant Name	Abundance % Cover	Disturbance Indicator	Prevalence Index	Notes
1.	Tree Stratum (Plot size: _____)	_____	_____	_____	_____
2.	Shrub/Strawb. Stratum (Plot size: _____)	_____	_____	_____	_____
3.	Herb Stratum (Plot size: _____)	_____	_____	_____	_____
4.	Moist Vln. Stratum (Plot size: _____)	_____	_____	_____	_____
5.	% Bare Ground in Herb Stratum	_____	_____	_____	_____
6.	Remarks:	_____			

SON

Profile Description: Describe to the depth wanted to document the indicator or explain the absence of indicators.

Depth (Inches)	Moisture	Color (Munsell)	Texture	Remarks
14	Wet	10YR 3/1	Loam	
16	Wet	10YR 3/1	Loam	

Type: _____
 Depth (inches): _____
 Hydraulic Soil Present? Yes No
 Remarks: no indicator

HYDROLOGY

Indicator	Value	Remarks
Water-Soaked Leaves (B9) (except MLRA 1, 2, 4A, and 4B)	_____	Secondary Indicators (2 of 3 or more checked)
Surface Water (A1)	_____	Water-Soaked Leaves (B9) (MLRA 1, 2, 4A, and 4B)
High Water Table (A2)	_____	Drainage Patterns (B10)
Saturation (A3)	_____	Dry-Season Water Table (C2)
Water Marks (B1)	_____	Saturation Visible on Aerial Imagery (C3)
Sediment Deposits (B2)	_____	Geomorphic Position (C2)
Drift Deposits (B3)	_____	Shallow Aquifer (C3)
Agal Mat or Crust (B4)	_____	FAC-Natural Test (C3)
Iron Deposits (B5)	_____	Revised All Mounds (C3) (LRR A)
Surface Soil Cracks (B6)	_____	Shallow Aquifer (C3)
Inundation Visible on Aerial Imagery (B7)	_____	Revised All Mounds (C3) (LRR A)
Sparingly Vegetated Concave Surfaces (B8)	_____	Other (Explain in Remarks)
Field Observations:	_____	_____
Surface Water Present?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Depth (inches): _____
Water Table Present?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Depth (inches): _____
Saturation Present?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Depth (inches): _____
Soil Water Capacity (B10)	_____	_____
Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:	_____	
Remarks:	_____	

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

Project/Site: Piccardi City/County: Marysville Sampling Date: 2-21-19
 Applicant/Owner: Ed Sewall State: WA Sampling Point: PP#9
 Investigator(s): Ed Sewall Section Township Range: S29 T31N R5E
 Landowners (Allottees, tenants, etc.): _____ Local relief (concave, convex, none): _____ Slope (%): _____
 Subregion (LRR): _____ Loc: _____ Long: _____ Datum: _____
 Soil Map Unit Name: _____ NMR classification: _____
 Are climatic/hydrologic conditions on the site typical for this time of year? Yes No _____ (If no, explain in Remarks.)
 Are vegetation/soil/hydrology significantly disturbed? Yes No _____
 Are vegetation/soil/hydrology naturally problematic? Yes No _____ (If needed, explain any answers in Remarks.)

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

Hydrolytic Vegetation Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Is the sampled Area within a Wetland?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Hydric Soil Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Wetland Hydrology Present?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Remarks:			

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover: _____	Dominant Indicator Species: _____	Dominance Test worksheet: _____
1. _____	_____	_____	Number of Dominant Species That Are OBL, FACW, or FAC: _____ (A)
2. _____	_____	_____	Total Number of Dominant Species Across All Strata: _____ (B)
3. _____	_____	_____	Percent of Dominant Species That Are OBL, FACW, or FAC: _____ (AB)
4. _____	_____	_____	Prevalence Index worksheet: _____
Shrub/Strawb. Stratum (Plot size: _____)	Total % Cover of: _____	Multiplied by: _____	
1. _____	OBL species _____ x 1 = _____		
2. _____	FACW species _____ x 2 = _____		
3. _____	FAC species _____ x 3 = _____		
4. _____	FACU species _____ x 4 = _____		
5. _____	UPL species _____ x 5 = _____		
6. _____	Column Totals: _____ (A)		
7. _____	Prevalence Index = B/A = _____		
8. _____	Hydrophytic Vegetation Indicators: _____		
9. _____	Dominance Test is >= 90% _____		
10. _____	Prevalence Index is >= 0.1 _____		
11. _____	Morphological Adaptations: (Provide supporting data in Remarks or on a separate sheet) _____		
12. _____	Welland Non-Vascular Plants: _____		
13. _____	Problematic Hydrophytic Vegetation: (Explain) _____		
14. _____	Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic: _____		
15. _____	_____		
Wood/Very Shrub (Plot size: _____)	Total Cover: _____		
1. _____	_____		
2. _____	_____		
% Bare Ground in Herb Stratum	_____		
Remarks:			

SOIL

Profile Description: (Describe to the depth reached to obtain maximum indicator or complete the absence of indicators.)

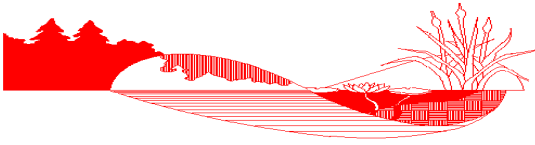
Depth (inches)	Moisture	Color (moist)	Color (dry)	Texture	Remarks
0-10	10YR 2/2	10YR 2/2	10YR 2/2	loam	
10-16	10YR 3/2	10YR 3/2	10YR 3/2	loam	
Type: C-Concentration, D-Distinction, EM-Reduced Moisture, CS-Covered or Coated Sand Grains, S-Solvents, PL-Root Lines, M-Mottling, Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.) Indicators for Problematic Hydric Soils:					
Hatched (A1) _____					
Sandy Rind (SB) _____					
Shrubby Rind (SR) _____					
Halo Epithem (A2) _____					
Bluish Hemic (A3) _____					
Loamy Mucky Mire (F1) (except MLRA 1) _____					
Loamy Gleyed Mire (F2) _____					
Dispersed Below Dark Surface (A11) _____					
Dispersed Mire (F3) _____					
Recent Dark Surface (F6) _____					
Thin Dark Surface (A12) _____					
Sandy Mucky Mineral (B1) _____					
Dispersed Dark Surface (F7) _____					
Sandy Gleyed Mire (B4) _____					
Rind or Depressions (F9) _____					
Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.					
Type: _____					
Depth (inches): _____					
Remarks: _____					
Hydric Soil Present? Yes _____ No <input checked="" type="checkbox"/>					

No indicators

HYDROLOGY

Wetland Hydrology Indicators:		Secondary Indicators (as applicable)	
Primary Indicators (Minimum of one required, check all that apply):		Water-Soaked Leaves (B6) (MLRA 1, 2, 4A, and 4B)	
Surface Water (A1) _____	High Water Table (A2) _____	Soil Crust (B11) _____	Drainage Patterns (B10) _____
Water Marks (B1) _____	Water Marks (B13) _____	Aquatic Invertebrates (C1) _____	Dry-Season Water Table (C2) _____
Soil Deposits (B2) _____	Soil Deposits (B3) _____	Coastal Rhizospheres along Living Roots (C3) _____	Saturation Visible on Aerial Imagery (C8) _____
Animal Nest or Crust (B4) _____	Animal Nest or Crust (B5) _____	Presence of Reduced Iron (C4) _____	Geomorphic Position (C9) _____
Surface Soil Cracks (B6) _____	Surface Soil Cracks (B7) _____	Recent Iron Reduction in Thin Soils (C5) _____	Shallow Aquifer (C6) _____
Inundation Visible on Aerial Imagery (B7) _____	Inundation Visible on Aerial Imagery (B8) _____	Stunted or Stunted Plants (D1) (LRR A) _____	FAC-Naked Test (C9) _____
Spanning Vegetated Concave Surfaces (B8) _____	Spanning Vegetated Concave Surfaces (B9) _____	Other (Explain in Remarks) _____	Robbed Air Mounds (D6) (LRR A) _____
Field Observations:		Other (Explain in Remarks) (D7) _____	
Surface Water Present? Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____	Water Table Present? Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____
Saturation Present? Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____	Saturation Visible? Yes _____ No <input checked="" type="checkbox"/>	Depth (inches): _____
Drainage Patterns (B10) _____	Drainage Patterns (B10) _____	Drainage Patterns (B10) _____	Drainage Patterns (B10) _____
Ditches (Record date (when gauge, monitoring well, aerial photos, previous inspections), if available)			
Remarks: _____			
Wetland Hydrology Present? Yes _____ No <input checked="" type="checkbox"/>			

No indicators



Sewall Wetland Consulting, Inc.

PO Box 880
Fall City, WA 98024

Phone: 253-859-0515

September 7, 2021

Councillor Family Revocable Trust
2104 172nd Street NE
Marysville, Washington 98711
&
William Harvey
PO Box 25
North Lakewood, Washington 98259

RE: Parcels #31052900200800, #31052900201900, #31052900201100
& #31052900202600 – Critical Area Report

City of Marysville, Washington
SWC Job #21-158

This report describes our observations of any jurisdictional wetlands, streams or buffers on or within 200' of Parcels #31052900200800, #31052900201900, #31052900201100 & #31052900202600, located on the south side of 172nd Street NE, in the City of Marysville, Washington (the "site"). The 5.78 acre site is located in the NW $\frac{1}{4}$ of Section 29, Township 31 North, Range 5 east of the W.W.M.



Above: Vicinity Map of the site.

The site is a rectangular shaped 5.78 acre group of abutting parcels which includes a single family home and agricultural outbuildings as well as mobile home on the east and several outbuildings, gardens and landscaped areas. The southern 2/3rds of the property are pasture areas that are regularly mowed. Several old ditches pass through the site in a north to south orientation as well as one larger ditch along the south which drains to the west. These ditches have been determined to be non-jurisdictional ditches by the US Army Corps of Engineers.

METHODOLOGY

Ed Sewall of Sewall Wetland Consulting, Inc. inspected the site between February and May of 2019 as well as the summer of 2021.

The site was reviewed using methodology described in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory, 1987), and the *Western Mountains, Valleys and Coast region Supplement* (Version 2.0) dated June 24, 2010, as required by the US Army Corps of Engineers.



Above: 2020 aerial photograph of the site.

Given the mapped Custer soil series on part of the site, hydrology monitoring in the early growing season was deemed the only way to determine if wetland hydrology exists on this agricultural field.

Previous information from NRCS indicates that there is such a high degree of disturbance to historical hydrology of the Custer soils in the vicinity of the site that the only sure determination if the soil was hydric was to observe wetland hydrology in the early growing season over the required period of time.

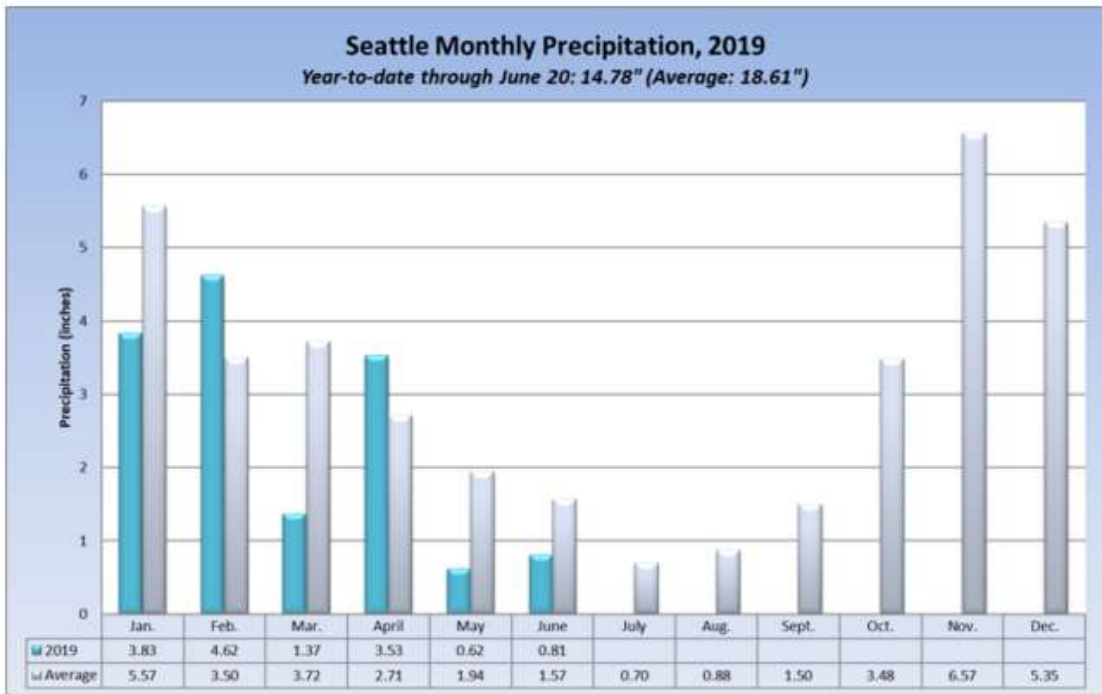
The presence of wetland hydrology is the driving force behind wetland presence, without wetland hydrology, an area does not meet wetland criteria. Therefore, only areas on the site that contain all three parameters during the early growing season meet the definition of a wetland. Areas that do not have hydrology do not meet wetland criteria and are considered upland.

In order to determine what portion of the site contained wetland hydrology, an analysis of wetland hydrology was conducted throughout the site.

Site Hydrology Monitoring Methods

A total of 10 data points (soil pits & piezometers) were sampled to determine if wetland vegetation, soils and hydrology was present on the site within 12" of the soil surface.

The site was visited between February 21th and May 3 of 2019 to collect hydrology data.



Rainfall in the region was above normal for February and April, January and April and less in May, but on average, rainfall was normal between Jan and May of 2018. Normal rainfall for this period is 17.57” and in 2018 18.53” of rain fell in this period, which slightly above normal (105%).

At each pit observations of the level of standing water and/or soil saturation (if any) were recorded.

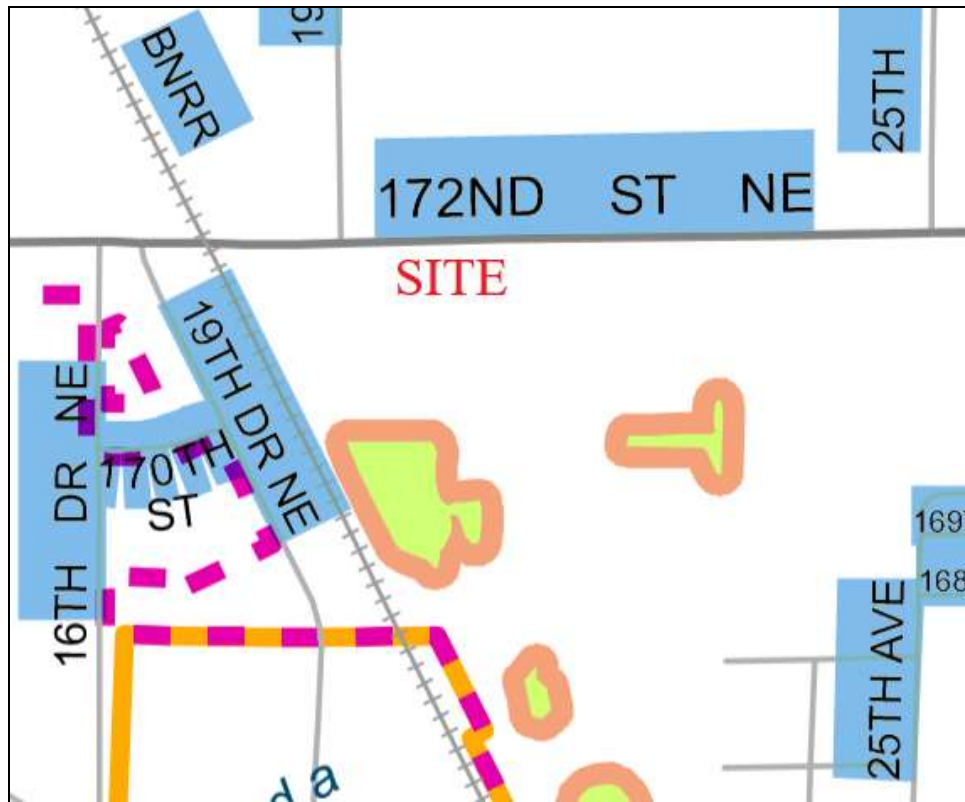
OBSERVATIONS

Existing Site Documentation.

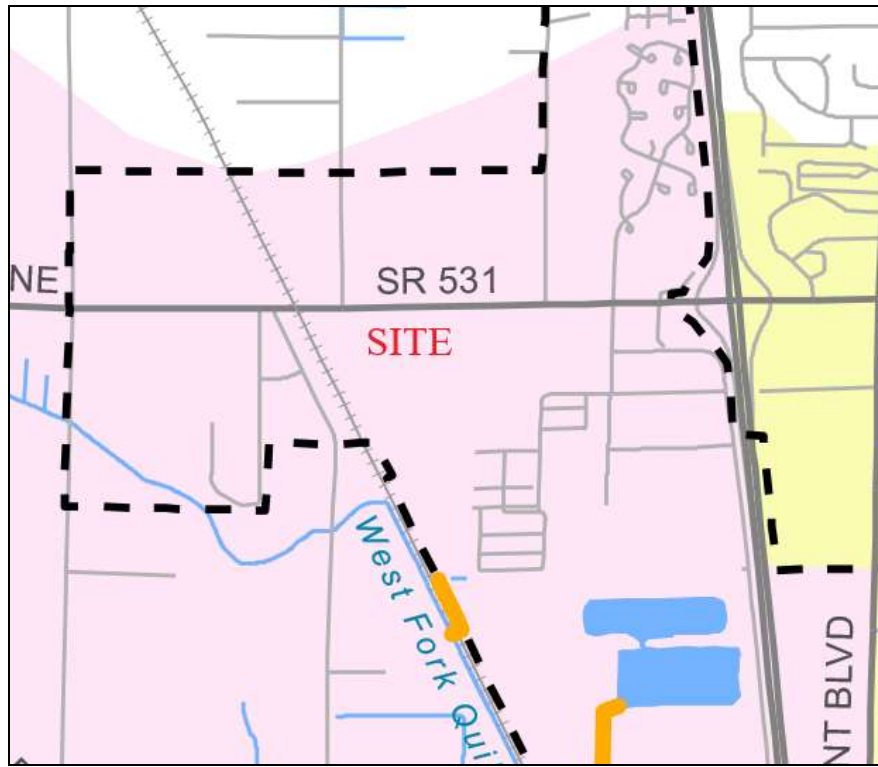
Prior to visiting the site, a review of several natural resource inventory maps was conducted. Resources reviewed included the City of Marysville Critical Areas map, National Wetland Inventory Map, the NRCS Soil Survey online mapping and Data, WADNR Fpars stream mapping and the WDFW Priority Habitats mapping website.

City of Marysville Critical Areas Map

According to the City of Marysville Critical Areas Maps, there are no wetlands or streams on the site. A wetland is mapped to the south of the site. However, from a previous study conducted by Sewall Wetland Consulting, Inc. of the Sather B&C properties to the south, this wetland does not exist.



City of Marysville Critical Areas Map



Above: City of Marysville stream map.

National Wetlands Inventory (NWI)

The NWI map depicts no wetlands or streams on or near the site.



Above: NWI Map of the area of the site.

Soil Survey

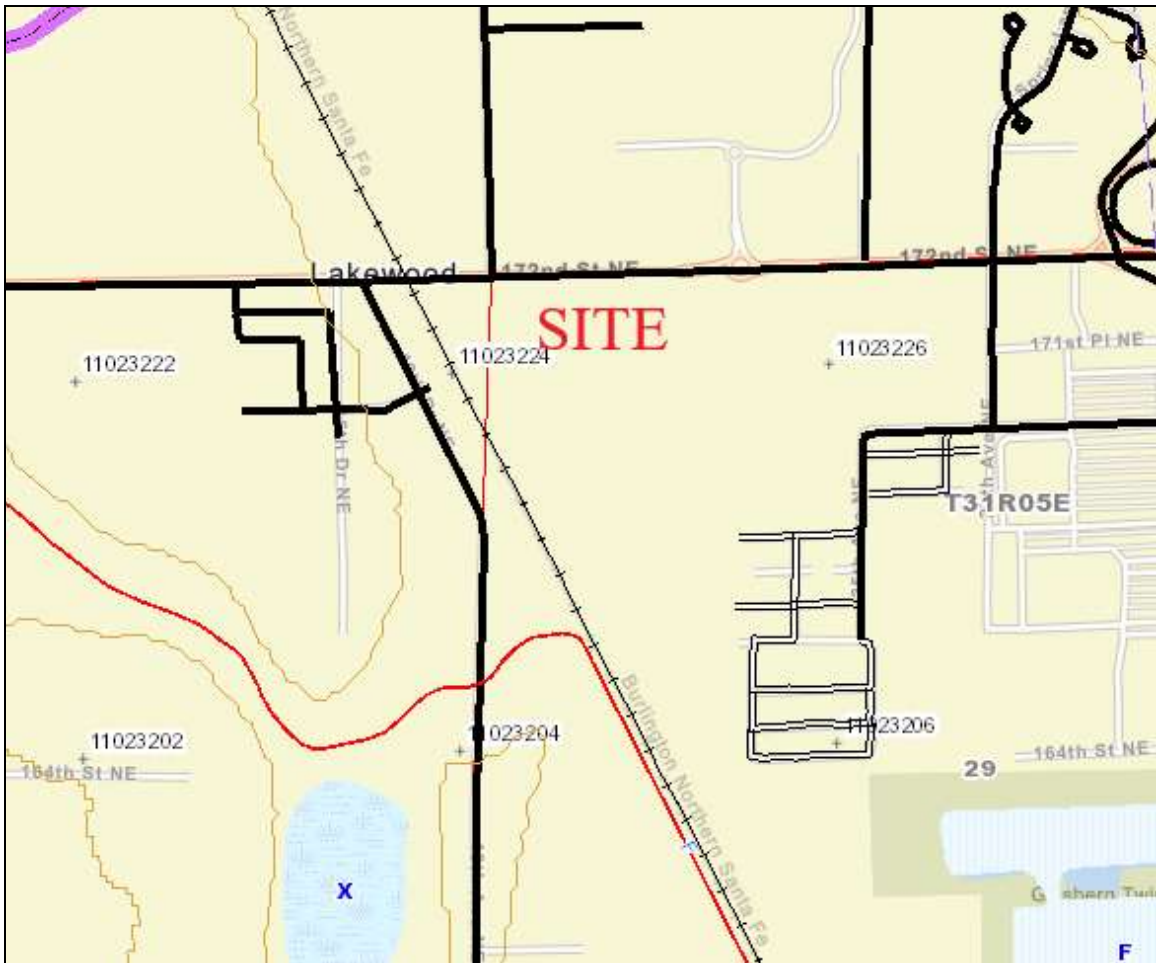
According to the NRCS Soil Mapper website, the site is mapped as Custer fine sandy loam. According to Soil Survey of Snohomish County Area, Washington (Debose and Klungland, 1983), Custer soils (soil unit #13) are poorly drained soils formed in outwash plains. According to local NRCS scientists, Custer soils have such a high degree of disturbance to historical hydrology in the vicinity of the site that the only sure determination if the soil was hydric was to observe wetland hydrology in the early growing season over the required continuous period of time.



Above: NRCS Soil map of the study area.

WADNR Fpars

The WADNR Fpars stream typing map for the site there are no streams on or near the site. The closest mapped stream is over 1,000' south of the site.



Above WDNR Fpars Stream Typing map.

WDFW Priority Habitats

According to the WDFW Priority Habitats mapping website, there are no priority habitats on or near the site. The closest mapped priority habitat is a wetland depicted on the NWI map over 700' west of the site.



Above: WDFW Priority Habitats Map of the site

Sewall Wetland Consulting Studies of surrounding parcels.

All of the parcels which surround the site have been reviewed, and studied for the presence of wetlands and streams by Sewall Wetland Consulting in the last few years. This includes the Riccardi site to the west (SWC, Inc. Study dated June 28, 2019), The Schloredt property to the east (SWC, Inc. Study also dated June 28, 2019), and the Sather B&C property to the south (SWC, Inc. Study dated July 9, 2018). None of these properties were found to have any wetlands streams or buffers on or near the site.

Field observations

Uplands

The site is a relatively flat agricultural property with a slight slope to the south. A single-family home, mobile home and several agricultural

outbuildings are located on the north end of the site. The remainder of the site is an agricultural field to include areas of abandoned cars, sheds and debris. There are two shallow north-south ditches passing through them. Several cottonwoods and douglas firs are located along the ditches.

The site is a mowed field and is vegetate with a mix of quackgrass, dandelion, white clover and cat's ear.

Soil pits excavated throughout the site generally consist of sandy loam soils similar to the Custer profile, comprised of a dry, sandy loam with colors of 7.5YR 2.5/3-10YR 3/3. No hydric indicators were noted on the site.

During all of the site visits and review of all data points, no area on the site was found to contain wetland hydrology or any soil saturation. All soils pits were found to be dry- moist during all site visits.



Above: Data point locations on the site

Conclusion

No wetlands, streams or buffers exist on the site.

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.

A handwritten signature in black ink on a light yellow background, appearing to read "Ed Sewall".

Ed Sewall
Senior Wetlands Ecologist PWS #212

Attached: Data Sheets
Hydrology data

REFERENCES

Cowardin, L., V. Carter, F. Golet, and E. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Fish and Wildlife Service, FWS/OBS-79-31, Washington, D. C.

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1. U. S. Army Corps of Engineers Waterways Experiment Station, Vicksburg, Mississippi.

Muller-Dombois, D. and H. Ellenberg. 1974. Aims and Methods of Vegetation Ecology. John Wiley & Sons, Inc. New York, New York.

Munsell Color. 1988. Munsell Soil Color Charts. Kollmorgen Instruments Corp., Baltimore, Maryland.

National Technical Committee for Hydric Soils. 1991. Hydric Soils of the United States. USDA Misc. Publ. No. 1491.

Reed, P., Jr. 1988. National List of Plant Species that Occur in Wetlands: Northwest (Region 9). 1988. U. S. Fish and Wildlife Service, Inland Freshwater Ecology Section, St. Petersburg, Florida.

Reed, P.B. Jr. 1993. 1993 Supplement to the list of plant species that occur in wetlands: Northwest (Region 9). USFWS supplement to Biol. Rpt. 88(26.9) May 1988.

USDA NRCS & National Technical Committee for Hydric Soils, September 1995. Field Indicators of Hydric Soils in the United States - Version 2.1

City of Marysville Municipal Code

Sewall Wetland Consulting, Inc. *Riccardi Parcel #31052900201200 Critical Areas Study*, dated 6-28-19

Sewall Wetland Consulting, Inc. *Schloredt Parcel #31052900202400 Critical Areas Study*, dated 6-28-19

Sewall Wetland Consulting, Inc. *Sather B & C Parcels #310529002001300 & 1401 Critical Areas Study*, dated 7-9-18

Councillar / Harvey

M = Moist
 d = Dry
 " = depth to soil sat.

Mon PT

Date 2019

2/21 3/7 3/14 3/20 3/26 4/4 4/12 4/19 4/26 5/3

	2/21	3/7	3/14	3/20	3/26	4/4	4/12	4/19	4/26	5/3
1	d	d	M	M	M	d	M	d	d	
2	d	d	M	M	M	d	M	d	d	
3	d	d	M	M	M	d	M	d	d	
4	d	d	M	M	M	d	M	d	d	
5	d	d	M	M	M	d	M	d	d	
6	d	d	M	M	M	d	M	d	d	
7	d	d	M	M	M	d	d	d	d	
8	d	d	M	M	M	d	d	d	d	
9	d	d	M	M	M	d	d	d	d	
10	d	d	M	M	M	d	d	d	d	

Attachment C – City Concurrence Letters



COMMUNITY DEVELOPMENT DEPARTMENT
80 Columbia Avenue ♦ Marysville, WA 98270
(360) 651-5100 ♦ (360) 651-5099 FAX

July 10, 2018

Merle Ash
Land Technologies, Inc.
18820 3rd Avenue NE
Arlington, WA 98223

Re: Sather – *Critical Areas Confirmation*
CAR 18001

Dear Merle,

The Community Development Department has reviewed the Critical Areas Report (CAR), dated September 19, 2017 and the CAR Addendum, dated June 18, 2018, both prepared by Sewall Wetland Consulting, Inc. Additionally, Community Development staff have visited the site on two separate occasions in order to observe existing conditions.

Based on the information submitted and on file with the City, and after conducting field visits the Community Development Department agrees that there are no regulated critical areas located on the Sather Property, located on the southwest corner of 172nd Street NE (SR 531) and 23rd Avenue NE and identified as Assessor's Parcel Number (APN) 31052900200900.

There is an existing agricultural ditch located on the western edge of the parcel. Pursuant to Marysville Municipal Code (MMC) 22E.010.190(2)(a) activities involving artificially created habitat, including drainage ditches are exempt from the provisions of MMC Chapter 22E.010 *Critical Areas Management*, provided they are conducted using best management practices. However, the provisions of the MMC do not exempt an applicant from complying with State and Federal regulations related to agricultural ditches.

The City has requested both Washington State Department of Ecology and The United States Army Corps of Engineers to review the application materials and provide comments related to the agricultural ditch, however, the City has not received a response to date. Therefore, prior to issuing any land disturbing activity permits related to the agricultural ditch, all State and Federal permits shall be obtained, as necessary.

If you have any questions regarding this critical areas confirmation, please contact me at cholland@marysvillewa.gov, or by phone at 360-363-8207.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Holland".

Chris Holland
Planning Manager

cc: Dave Koenig, CD Director



COMMUNITY DEVELOPMENT

80 Columbia Avenue ♦ Marysville, WA 98270
(360) 363-8100 ♦ (360) 651-5099 FAX

July 17, 2019

Merle Ash
18820 3rd Ave NE
Arlington, WA 98223

RE: CAR 19-008 "Ricardi" Wetland determination – 4.55 acres site located at 1930 172nd St NE
(AF# 31052900201200)

Dear Merle,

Upon review of the site and the report prepared by *Sewall Wetland Consulting*, dated June 28, 2019 it was determined that due to a lack of hydrology there are no wetlands present on the 4.55 acre site. The City concurs with the *Sewall Wetland Consulting's* report dated June 28, 2019.

Any ditches with a hydrological connection to the West Fork of Quilceda Creek may be considered Waters of the United States. Alteration of filling of these ditches will require either a USACE permit or a written determination from the USACE that the ditches are not jurisdictional. Prior to alteration of these ditches either a corp permit or jurisdictional determination will need to be submitted to the City.

If you have any questions, I can be reached Monday through Friday, 7:00 am to 3:30 pm at (360) 363-8206 or by e-mail at cdungan@marysvillewa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Cheryl Dungan".

Cheryl Dungan
Senior Planner



COMMUNITY DEVELOPMENT DEPARTMENT
80 Columbia Avenue ♦ Marysville, WA 98270
(360) 363-8100 ♦ (360) 651-5099 FAX

December 7, 2021

Ed Sewall
Sewall Wetland Consulting, Inc.
PO Box 880
Fall City, WA 98024

Re: Counsellor ↖ and Harvey Critical Areas Confirmation
CAR 21012

Dear Ed,

After conducting a site visit on Friday, December 3, 2021, and reviewing the Critical Areas Report (CAR), prepared by Sewall Wetland Consulting, Inc., dated September 7, 2021, the Community Development Department confirms that there are no regulated critical areas located at site addresses 2008 & 2104 172nd Street NE (SR 531), also identified as Assessor's Parcel Numbers (APNs) 31052900201100, 31052900201900, 31052900202600, 31052900200800.

Attached are comments from Doug Gresham, Wetland Specialist, Washington State Department of Ecology, agreeing with the CAR that there are no critical areas located on the above referenced parcels.

Critical Areas Confirmations are valid for a period of five (5) years from the date of confirmation. This Critical Areas Confirmation shall expire on December 7, 2026, unless the parcels are developed on or before the expiration date. If you have any questions regarding the City's review or confirmation, please contact me at 360.363.8207, or by e-mail at cholland@marysvillewa.gov.

Sincerely,

Chris Holland

Chris Holland
Planning Manager

cc: Haylie Miller, CD Director

Chris Holland

From: Gresham, Doug (ECY) <DGRE461@ECY.WA.GOV>
Sent: Friday, December 3, 2021 8:29 AM
To: Chris Holland
Subject: [External!] Councillor Critical Areas Review (CAR21012)

External Email Warning! Use caution before clicking links or opening attachments.

Chris,
I reviewed the critical area report and agree with the findings.

Doug Gresham, Wetland Specialist
Washington State Department of Ecology
PO Box 330316
Shoreline, WA 98133-9716
Office: (206) 594-0076 Cell: (425) 429-1846
Email: Doug.Gresham@ecy.wa.gov



We have moved!

Starting May 26, Ecology's Northwest Regional Office has moved to Shoreline:

- Mailing address: PO Box 330316, Shoreline, WA 98133-9716
- My new office phone #: 206-594-0076
- 24-hour reception line: 206-594-0000



MARYSVILLE
COMMUNITY
DEVELOPMENT

February 18, 2022

Ed Sewall/Sewall Wetland Consulting
PO Box 880
Fall City, WA 98024

Re.: Schloredt Critical Areas Determination (CAR22-001)
2124 172nd St. NE

Dear Mr. Sewall,

Based on consultation with the Department of Ecology, and review of the *Critical Areas Report* prepared by Sewall Wetland Consulting dated June 28, 2019, and review of other documents and resources, the City **concurs** with the findings of the report.

Please feel free to contact me at 360.363.8232 or kbird@marysvillewa.gov if you have any questions.

Sincerely,

Kathryn Bird

Kathryn Bird
Associate Planner

Cc: Chris Holland, Planning Manager

(360) 363-8100

Community
Development
80 Columbia Avenue
Marysville, WA 98270

Attachment D – Approved Jurisdictional Determinations



®

Regulatory Program



®

INTERIM APPROVED JURISDICTIONAL DETERMINATION FORM

U.S. Army Corps of Engineers

This form should be completed by following the instructions provided in the Interim Approved Jurisdictional Determination Form User Manual.

SECTION I: BACKGROUND INFORMATION

A. COMPLETION DATE FOR APPROVED JURISDICTIONAL DETERMINATION (AJD):

November 19, 2019

B. ORM NUMBER IN APPROPRIATE FORMAT (e.g., HQ-2015-00001-SMJ): NWS-2019-857

C. PROJECT LOCATION AND BACKGROUND INFORMATION:

State: Washington County/parish/borough: Snohomish City: Marysville

Center coordinates of site (lat/long in degree decimal format): Lat. 48.15191667, Long. -122.20055556.

Map(s)/diagram(s) of review area (including map identifying single point of entry (SPOE) watershed and/or potential jurisdictional areas where applicable) is/are: attached in report/map titled

Other sites (e.g., offsite mitigation sites, disposal sites, etc.) are associated with this action and are recorded on a different jurisdictional determination (JD) form. List JD form ID numbers (e.g., HQ-2015-00001-SMJ-1):

D. REVIEW PERFORMED FOR SITE EVALUATION:

Office (Desk) Determination Only. Date: 31 October 2019.

Office (Desk) and Field Determination. Office/Desk Dates: Field Date(s):

SECTION II: DATA SOURCES

Check all that were used to aid in the determination and attach data/maps to this AJD form and/or references/citations in the administrative record, as appropriate.

Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant. Title/Date: Critical Areas Report (dated 9 July 2018), Site Maps (dated 17 September 2019).

Data sheets prepared/submitted by or on behalf of the applicant/consultant.

Data sheets/delineation report are sufficient for purposes of AJD form. Title/Date: Critical Areas Report, Hydrology Monitoring Data, Wetland Determination Data Forms, Photographs, all dated 9 July 2018.

Data sheets/delineation report are not sufficient for purposes of AJD form. Summarize rationale and include information on revised data sheets/delineation report that this AJD form has relied upon:

Revised Title/Date:

Data sheets prepared by the Corps. Title/Date:

Corps navigable waters study. Title/Date:

CorpsMap ORM map layers. Title/Date:

USGS Hydrologic Atlas. Title/Date:

USGS, NHD, or WBD data/maps. Title/Date:

USGS 8, 10 and/or 12 digit HUC maps. HUC number:

USGS maps. Scale & quad name and date: Mount Vernon, WA 1911 (HTMC 1920 ed.) Scale 1:125000.

USDA NRCS Soil Survey. Citation:

USFWS National Wetlands Inventory maps. Citation:

State/Local wetland inventory maps. Citation:

FEMA/FIRM maps. Citation:

Photographs: Aerial. Citation: Google Earth Aerial Imagery 1990-2019. or Other. Citation:

LiDAR data/maps. Citation:

Previous JDs. File no. and date of JD letter:

Applicable/supporting case law:

Applicable/supporting scientific literature:

Other information (please specify):

SECTION III: SUMMARY OF FINDINGS

Complete ORM "Aquatic Resource Upload Sheet" or Export and Print the Aquatic Resource Screen from ORM for All Waters and Features, Regardless of Jurisdictional Status – Required

A. RIVERS AND HARBORS ACT (RHA) SECTION 10 DETERMINATION OF JURISDICTION:

"navigable waters of the U.S." within RHA jurisdiction (as defined by 33 CFR part 329) in the review area.

• **Complete Table 1 - Required**

NOTE: If the navigable water is not subject to the ebb and flow of the tide or included on the District's list of Section 10 navigable waters list, **DO NOT USE THIS FORM TO MAKE THE DETERMINATION.** The District must continue to follow the procedure outlined in 33 CFR part 329.14 to make a Section 10 RHA navigability determination.

B. CLEAN WATER ACT (CWA) SECTION 404 DETERMINATION OF JURISDICTION: "waters of the U.S." within CWA jurisdiction (as defined by 33 CFR part 328.3) in the review area. **Check all that apply.**

(a)(1): All waters which are currently used, 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. (Traditional Navigable Waters (TNWs))

• **Complete Table 1 - Required**

This AJD includes a case-specific (a)(1) TNW (Section 404 navigable-in-fact) determination on a water that has not previously been designated as such. Documentation required for this case-specific (a)(1) TNW determination is attached.

(a)(2): All interstate waters, including interstate wetlands.

• **Complete Table 2 - Required**

(a)(3): The territorial seas.

• **Complete Table 3 - Required**

(a)(4): All impoundments of waters otherwise identified as waters of the U.S. under 33 CFR part 328.3.

• **Complete Table 4 - Required**

(a)(5): All tributaries, as defined in 33 CFR part 328.3, of waters identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.

• **Complete Table 5 - Required**

(a)(6): All waters adjacent to a water identified in paragraphs (a)(1)-(a)(5) of 33 CFR part 328.3, including wetlands, ponds, lakes, oxbows, impoundments, and similar waters.

• **Complete Table 6 - Required**

Bordering/Contiguous.

Neighboring:

(c)(2)(i): All waters located within 100 feet of the ordinary high water mark (OHWM) of a water identified in paragraphs (a)(1)-(a)(5) of 33 CFR part 328.3.

(c)(2)(ii): All waters located within the 100-year floodplain of a water identified in paragraphs (a)(1)-(a)(5) of 33 CFR part 328.3 and not more than 1,500 feet of the OHWM of such water.

(c)(2)(iii): All waters located within 1,500 feet of the high tide line of a water identified in paragraphs (a)(1) or (a)(3) of 33 CFR part 328.3, and all waters within 1,500 feet of the OHWM of the Great Lakes.

(a)(7): All waters identified in 33 CFR 328.3(a)(7)(i)-(v) where they are determined, on a case-specific basis, to have a significant nexus to a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.

• **Complete Table 7 for the significant nexus determination. Attach a map delineating the SPOE watershed boundary with (a)(7) waters identified in the similarly situated analysis. - Required**

Includes water(s) that are geographically and physically adjacent per (a)(6), but are being used for established, normal farming, silviculture, and ranching activities (33 USC Section 1344(f)(1)) and therefore are not adjacent and require a case-specific significant nexus determination.

(a)(8): All waters located within the 100-year floodplain of a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3 not covered by (c)(2)(ii) above and all waters located within 4,000 feet of the high tide line or OHWM of a water identified in paragraphs (a)(1)-(a)(5) of 33 CFR part 328.3 where they are determined on a case-specific basis to have a significant nexus to a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.

• **Complete Table 8 for the significant nexus determination. Attach a map delineating the SPOE watershed boundary with (a)(8) waters identified in the similarly situated analysis. - Required**

Includes water(s) that are geographically and physically adjacent per (a)(6), but are being used for established, normal farming, silviculture, and ranching activities (33 USC Section 1344(f)(1)) and therefore are not adjacent and require a case-specific significant nexus determination.

C. NON-WATERS OF THE U.S. FINDINGS:

Check all that apply.

- The review area is comprised entirely of dry land.
- Potential-(a)(7) Waters: Waters that DO NOT have a significant nexus to a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.
- **Complete Table 9 and attach a map delineating the SPOE watershed boundary with potential (a)(7) waters identified in the similarly situated analysis. - Required**
- Includes water(s) that are geographically and physically adjacent per (a)(6), but are being used for established, normal farming, silviculture, and ranching activities (33 USC Section 1344(f)(1)) and therefore are not adjacent and require a case-specific significant nexus determination.
- Potential-(a)(8) Waters: Waters that DO NOT have a significant nexus to a water identified in paragraphs (a)(1)-(a)(3) of 33 CFR part 328.3.
- **Complete Table 9 and attach a map delineating the SPOE watershed boundary with potential (a)(8) waters identified in the similarly situated analysis. - Required**
- Includes water(s) that are geographically and physically adjacent per (a)(6), but are being used for established, normal farming, silviculture, and ranching activities (33 USC Section 1344(f)(1)) and therefore are not adjacent and require a case-specific significant nexus determination.
- Excluded Waters (Non-Waters of U.S.), even where they otherwise meet the terms of paragraphs (a)(4)-(a)(8):**
- **Complete Table 10 - Required**
- (b)(1): Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of the CWA.
- (b)(2): Prior converted cropland.
- (b)(3)(i): **Ditches with ephemeral flow that are not a relocated tributary or excavated in a tributary.**
- (b)(3)(ii): Ditches with intermittent flow that are not a relocated tributary, excavated in a tributary, or drain wetlands.
- (b)(3)(iii): Ditches that do not flow, either directly or through another water, into a water identified in paragraphs (a)(1)-(a)(3).
- (b)(4)(i): Artificially irrigated areas that would revert to dry land should application of water to that area cease.
- (b)(4)(ii): Artificial, constructed lakes and ponds created in dry land such as farm and stock watering ponds, irrigation ponds, settling basins, fields flooded for rice growing, log cleaning ponds, or cooling ponds.
- (b)(4)(iii): Artificial reflecting pools or swimming pools created in dry land.¹
- (b)(4)(iv): Small ornamental waters created in dry land.¹
- (b)(4)(v): Water-filled depressions created in dry land incidental to mining or construction activity, including pits excavated for obtaining fill, sand, or gravel that fill with water.
- (b)(4)(vi): Erosional features, including gullies, rills, and other ephemeral features that do not meet the definition of tributary, non-wetland swales, and lawfully constructed grassed waterways.¹
- (b)(4)(vii): Puddles.¹
- (b)(5): Groundwater, including groundwater drained through subsurface drainage systems.¹
- (b)(6): Stormwater control features constructed to convey, treat, or store stormwater that are created in dry land.¹
- (b)(7): Wastewater recycling structures created in dry land; detention and retention basins built for wastewater recycling; groundwater recharge basins; percolation ponds built for wastewater recycling; and water distributary structures built for wastewater recycling.
- Other non-jurisdictional waters/features within review area that do not meet the definitions in 33 CFR 328.3 of (a)(1)-(a)(8) waters and are not excluded waters identified in (b)(1)-(b)(7).
- **Complete Table 11 - Required.**

D. ADDITIONAL COMMENTS TO SUPPORT AJD:

¹ In many cases these excluded features will not be specifically identified on the AJD form, unless specifically requested. Corps Districts may, in case-by-case instances, choose to identify some or all of these features within the review area.

Jurisdictional Waters of the U.S.

Default field entry is "N/A". Delete "N/A" and fill out all fields in the table where applicable for waters/features present in the review area.

Table 1. (a)(1) Traditional Navigable Waters

(a)(1) Waters Name	(a)(1) Criteria	Rationale to Support (a)(1) Designation Include High Tide Line or Ordinary High Water Mark indicators, when applicable.
N/A	Choose an item.	N/A

Table 2. (a)(2) Interstate Waters

(a)(2) Waters Name	Rationale to Support (a)(2) Designation
N/A	N/A

Table 3. (a)(3) Territorial Seas

(a)(3) Waters Name	Rationale to Support (a)(3) Designation
N/A	N/A

Table 4. (a)(4) Impoundments

(a)(4) Waters Name	Rationale to Support (a)(4) Designation
N/A	N/A
N/A	N/A

Table 5. (a)(5) Tributaries

(a)(5) Waters Name	Flow Regime	(a)(1)-(a)(3) Water Name to which this (a)(5) Tributary Flows	Tributary Breaks	Rationale for (a)(5) Designation and Additional Discussion. Identify flowpath to (a)(1)-(a)(3) water or attach map identifying the flowpath; explain any breaks or flow through excluded/non-jurisdictional features, etc.
N/A	Choose an item.	N/A	Choose an item.	N/A
N/A	Choose an item.	N/A	Choose an item.	N/A
N/A	Choose an item.	N/A	Choose an item.	N/A
N/A	Choose an item.	N/A	Choose an item.	N/A

Table 6. (a)(6) Adjacent Waters

(a)(6) Waters Name	(a)(1)-(a)(5) Water Name to which this Water is Adjacent	Rationale for (a)(6) Designation and Additional Discussion. Identify the type of water and how the limits of jurisdiction were established (e.g., wetland, 87 Manual/Regional Supplement); explain how the 100-year floodplain and/or the distance threshold was determined; whether this water extends beyond a threshold; explain if the water is part of a mosaic, etc.
N/A	N/A	N/A
N/A	N/A	N/A
N/A	N/A	N/A
N/A	N/A	N/A

Table 7. (a)(7) Waters

SPOE Name	(a)(7) Waters Name	(a)(1)-(a)(3) Water Name to which this Water has a Significant Nexus	Significant Nexus Determination Identify SPOE watershed; discuss whether any similarly situated waters were present and aggregated for SND; discuss data, provide analysis, and summarize how the waters have more than speculative or insubstantial effect on the physical, chemical, or biological integrity of the (a)(1)-(a)(3) water, etc.
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

Table 8. (a)(8) Waters

SPOE Name	(a)(8) Waters Name	(a)(1)-(a)(3) Water Name to which this Water has a Significant Nexus	Significant Nexus Determination Identify SPOE watershed; explain how 100-yr floodplain and/or the distance threshold was determined; discuss whether waters were determined to be similarly situated to subject water and aggregated for SND; discuss data, provide analysis, and then summarize how the waters have more than speculative or insubstantial effect the on the physical, chemical, or biological integrity of the (a)(1)-(a)(3) water, etc.
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

Non-Jurisdictional Waters

Default field entry is "N/A". Delete "N/A" and fill out all fields in the table where applicable for waters/features present in the review area.

Table 9. Non-Waters/No Significant Nexus

SPOE Name	Non-(a)(7)/(a)(8) Waters Name	(a)(1)-(a)(3) Water Name to which this Water DOES NOT have a Significant Nexus	Basis for Determination that the Functions DO NOT Contribute Significantly to the Chemical, Physical, or Biological Integrity of the (a)(1)-(a)(3) Water. Identify SPOE watershed; explain how 100-yr floodplain and/or the distance threshold was determined; discuss whether waters were determined to be similarly situated to the subject water; discuss data, provide analysis, and summarize how the waters did not have more than a speculative or insubstantial effect on the physical, chemical, or biological integrity of the (a)(1)-(a)(3) water.
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

Table 10. Non-Waters/Excluded Waters and Features

Paragraph (b) Excluded Feature/Water Name	Rationale for Paragraph (b) Excluded Feature/Water and Additional Discussion.
Drainage Ditch along west side of Parcel #31052900200900 and south side of Parcel #31052900202400	The drainage ditch has ephemeral flow. Photographs provided by the applicant depict vegetation growing into the ditch, suggesting that water is not present for extended periods of time. Based on a review of Historic USGS Topography Maps dating back to 1911, there is no evidence of a tributary or other water feature being present at the project site historically. The on-site ditch does not abut wetlands. The ditch appears to have been constructed for agricultural purposes.

Table 11. Non-Waters/Other

Other Non-Waters of U.S. Feature/Water Name	Rationale for Non-Waters of U.S. Feature/Water and Additional Discussion.
N/A	N/A



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, SEATTLE DISTRICT
P.O. BOX 3755
SEATTLE, WASHINGTON 98124-3755

Regulatory Branch

April 13, 2021

Joel Hylback
Sather B, LLC
18820 3rd Avenue Northeast
Arlington, Washington 98223

Reference: NWS-2021-151
Sather B, LLC
(AJD Request)

Dear Mr. Hylback:

On April 12, 2021, we conducted a desk review of your Critical Areas Report dated July 9, 2018, for the property at Parcels 310529000201200, 310529000201300, and 310529000201401 at Marysville, Washington in response to your request for verification of the jurisdictional limits of waters of the U.S. in the review area as shown on the enclosed drawings dated January 8, 2021. The U.S. Army Corps of Engineers has determined that the ditch system depicted on the project drawings is not a water of the U.S. because it is an excluded non-water of the U.S. per 33 CFR Part 328.3 (b). As such, work that would occur within this area does not require Department of the Army authorization under Section 404 of the Clean Water Act. This determination applies only to the review area. Other waters and wetlands that may occur on this property outside the review area are not the subject of this determination.

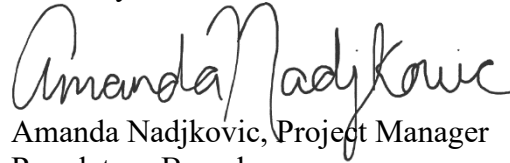
Other state and local regulations may still apply to the ditch system. For example, the Washington State Department of Ecology (Ecology) may regulate the ditch system. For information on how to obtain State approval for your project, you should contact Ecology's Federal Permit Coordinator at ecyrefedpermits@ecy.wa.gov or at (360) 407-6068. Information regarding State permitting requirements can also be found at the following website: <https://ecology.wa.gov/Water-Shorelines/Wetlands/Regulations>. We are sending a copy of this letter to Ecology and to the Environmental Protection Agency's Aquatic Resources Unit.

This approved jurisdictional determination is valid for a period of five years from the date of this letter unless new information warrants revisions of the determination. A copy of this jurisdictional determination, dated April 12, 2021, is enclosed and can be found on our website at www.nws.usace.army.mil select "Regulatory Branch, Permit Information" and then "Jurisdictional Determinations". If you object to this determination, you may request an administrative appeal under our regulations (33 Code of Federal Regulations, Part 331) as

described in the enclosed *Notification of Administrative Appeal Options and Process and Request for Appeal* form.

A copy of this letter with drawings will be furnished to Mr. Ed Sewall at esewall@sewallwc.com. If you have any questions, please contact Ms. Amanda Nadjkovic at amanda.n.nadjkovic@usace.army.mil or at (206) 316-3156.

Sincerely,

A handwritten signature in black ink that reads "Amanda Nadjkovic". The signature is written in a cursive style with a large initial 'A' and 'N'.

Amanda Nadjkovic, Project Manager
Regulatory Branch

Enclosures



**U.S. ARMY CORPS OF ENGINEERS
REGULATORY PROGRAM
APPROVED JURISDICTIONAL DETERMINATION FORM (INTERIM)
NAVIGABLE WATERS PROTECTION RULE**

I. ADMINISTRATIVE INFORMATION

Completion Date of Approved Jurisdictional Determination (AJD): 4/12/2021
 ORM Number: NWS-2021-151
 Associated JDs: NWS-2019-857; AJD dated 19 November 2019 for ditch segment along the western boundary of Parcel #31052900200900 and southern boundary of Parcel #31052900202400
 Review Area Location¹: State/Territory: Washington City: Marysville County/Parish/Borough: Snohomish
 Center Coordinates of Review Area: Latitude 48.15191667 Longitude -122.20055556

II. FINDINGS

- A. Summary:** Check all that apply. At least one box from the following list MUST be selected. Complete the corresponding sections/tables and summarize data sources.
- The review area is comprised entirely of dry land (i.e., there are no waters or water features, including wetlands, of any kind in the entire review area). Rationale: N/A or describe rationale.
 - There are “navigable waters of the United States” within Rivers and Harbors Act jurisdiction within the review area (complete table in Section II.B).
 - There are “waters of the United States” within Clean Water Act jurisdiction within the review area (complete appropriate tables in Section II.C).
 - There are waters or water features excluded from Clean Water Act jurisdiction within the review area (complete table in Section II.D).

B. Rivers and Harbors Act of 1899 Section 10 (§ 10)²

§ 10 Name	§ 10 Size	§ 10 Criteria	Rationale for § 10 Determination
N/A.	N/A.	N/A.	N/A.

C. Clean Water Act Section 404

Territorial Seas and Traditional Navigable Waters ((a)(1) waters): ³			
(a)(1) Name	(a)(1) Size	(a)(1) Criteria	Rationale for (a)(1) Determination
N/A.	N/A.	N/A.	N/A.

Tributaries ((a)(2) waters):			
(a)(2) Name	(a)(2) Size	(a)(2) Criteria	Rationale for (a)(2) Determination
N/A.	N/A.	N/A.	N/A.

Lakes and ponds, and impoundments of jurisdictional waters ((a)(3) waters):			
(a)(3) Name	(a)(3) Size	(a)(3) Criteria	Rationale for (a)(3) Determination
N/A.	N/A.	N/A.	N/A.

Adjacent wetlands ((a)(4) waters):			
(a)(4) Name	(a)(4) Size	(a)(4) Criteria	Rationale for (a)(4) Determination
N/A.	N/A.	N/A.	N/A.

¹ Map(s)/figure(s) are attached to the AJD provided to the requestor.

² If the navigable water is not subject to the ebb and flow of the tide or included on the District’s list of Rivers and Harbors Act Section 10 navigable waters list, do NOT use this document to make the determination. The District must continue to follow the procedure outlined in 33 CFR part 329.14 to make a Rivers and Harbors Act Section 10 navigability determination.

³ A stand-alone TNW determination is completed independently of a request for an AJD. A stand-alone TNW determination is conducted for a specific segment of river or stream or other type of waterbody, such as a lake, where upstream or downstream limits or lake borders are established. A stand-alone TNW determination should be completed following applicable guidance and should NOT be documented on the AJD Form.



**U.S. ARMY CORPS OF ENGINEERS
REGULATORY PROGRAM
APPROVED JURISDICTIONAL DETERMINATION FORM (INTERIM)
NAVIGABLE WATERS PROTECTION RULE**

D. Excluded Waters or Features

Excluded waters ((b)(1) – (b)(12)): ⁴			
Exclusion Name	Exclusion Size	Exclusion ⁵	Rationale for Exclusion Determination
Ditch System	3,582 linear feet	(b)(10) Stormwater control feature constructed or excavated in upland or in a non-jurisdictional water to convey, treat, infiltrate, or store stormwater runoff.	The subject ditch system was constructed to convey stormwater runoff. The subject ditch system is not a naturally occurring surface water channel and was not constructed in a tributary, does not relocate a tributary, and was not constructed in an adjacent wetland. The subject ditch system does not meet the conditions of paragraph (a)(2). See Section III.C. for additional details.

III. SUPPORTING INFORMATION

A. Select/enter all resources that were used to aid in this determination and attach data/maps to this document and/or references/citations in the administrative record, as appropriate.

- Information submitted by, or on behalf of, the applicant/consultant: [Parcels #310529002001300 & 1401 Critical Area Report dated 9 July 2018; Lakewood Sewer Main Extension JD Application dated 8 January 2021](#)

This information is sufficient for purposes of this AJD.

Rationale: [N/A](#)

- Data sheets prepared by the Corps: [Title\(s\) and/or date\(s\)](#).
- Photographs: [Aerial: Google Earth Aerial Imagery, accessed April 2021; Historic Aerial Imagery, accessed April 2021 via NETRonline](#)
- Corps site visit(s) conducted on: [Date\(s\)](#).
- Previous Jurisdictional Determinations (AJDs or PJDs): [ORM Number\(s\) and date\(s\)](#).
- Antecedent Precipitation Tool: [provide detailed discussion in Section III.B.](#)
- USDA NRCS Soil Survey: [USDA-NRCS Web Soil Survey for subject property accessed April 2021](#)
- USFWS NWI maps: [NWI Map for the subject property accessed April 2021](#)
- USGS topographic maps: [Mount Vernon, WA dated 1911; Marysville, WA dated 1941, 1943; Arlington West, WA dated 1956, 2011, 2017, 2020; Victoria, WA dated 1957; Port Townsend, WA dated 1975, 1993;](#)

Other data sources used to aid in this determination:

Data Source (select)	Name and/or date and other relevant information
USGS Sources	N/A.
USDA Sources	N/A.
NOAA Sources	N/A.
USACE Sources	N/A.
State/Local/Tribal Sources	WDFW Fish Passage Web App accessed April 2021; WDFW SalmonScape accessed April 2021

⁴ Some excluded waters, such as (b)(2) and (b)(4), may not be specifically identified on the AJD form unless a requestor specifically asks a Corps district to do so. Corps districts may, in case-by-case instances, choose to identify some or all of these waters within the review area.

⁵ Because of the broad nature of the (b)(1) exclusion and in an effort to collect data on specific types of waters that would be covered by the (b)(1) exclusion, four sub-categories of (b)(1) exclusions were administratively created for the purposes of the AJD Form. These four sub-categories are not new exclusions, but are simply administrative distinctions and remain (b)(1) exclusions as defined by the NWPR.



**U.S. ARMY CORPS OF ENGINEERS
REGULATORY PROGRAM
APPROVED JURISDICTIONAL DETERMINATION FORM (INTERIM)
NAVIGABLE WATERS PROTECTION RULE**

Data Source (select)	Name and/or date and other relevant information
Other Sources	EPA WATERS Feature Layer accessed April 2021 via Google Earth

B. Typical year assessment(s): N/A

C. Additional comments to support AJD:

The subject ditch flows south along the northern and western boundaries of the subject property before discharging to the West Fork of Quilceda Creek southwest of the site. Along the western boundary of the subject property, the ditch runs parallel to and east of existing railroad tracks. The subject ditch is an artificial drainage ditch that was constructed to convey stormwater from impervious surfaces on properties to the north of the site. The subject ditch is regulated as a Municipal Separated Storm Sewer System (MS4) through the City of Marysville Phase II NPDES permitting program. An MS4 is a conveyance that is owned by a public entity that discharges to waters of the U.S., is designed or used to collect or convey stormwater, is not a combined sewer, and is not part of a sewage treatment plant.

At the southwest corner of the site are a set of fish screens which prevent fish from traveling from the West Fork of Quilceda Creek into the subject ditch. There is a short segment of ditch that runs south of the screen before passing under the railroad tracks to the west. The WDFW considers the fish screens to be the end of a natural stream channel, with all fish bearing waters occurring south and west of the railroad tracks. The segment of the ditch south of the existing fish screens is not subject to this jurisdictional determination.

Based on a review of historic topographic maps, the subject ditch was not constructed in a tributary and did not relocate a tributary. The nearest potential water of the U.S., West Fork of Quilceda Creek, appears channelized along the western side of the railroad tracks, where it currently exists today, on historic topographic maps dated 1956. The subject ditch does not appear on any historic topographic maps, and no natural stream or waterbody existed historically in the subject ditch's current location. Based on this information, the subject ditch was not constructed in a tributary and did not relocate a tributary.

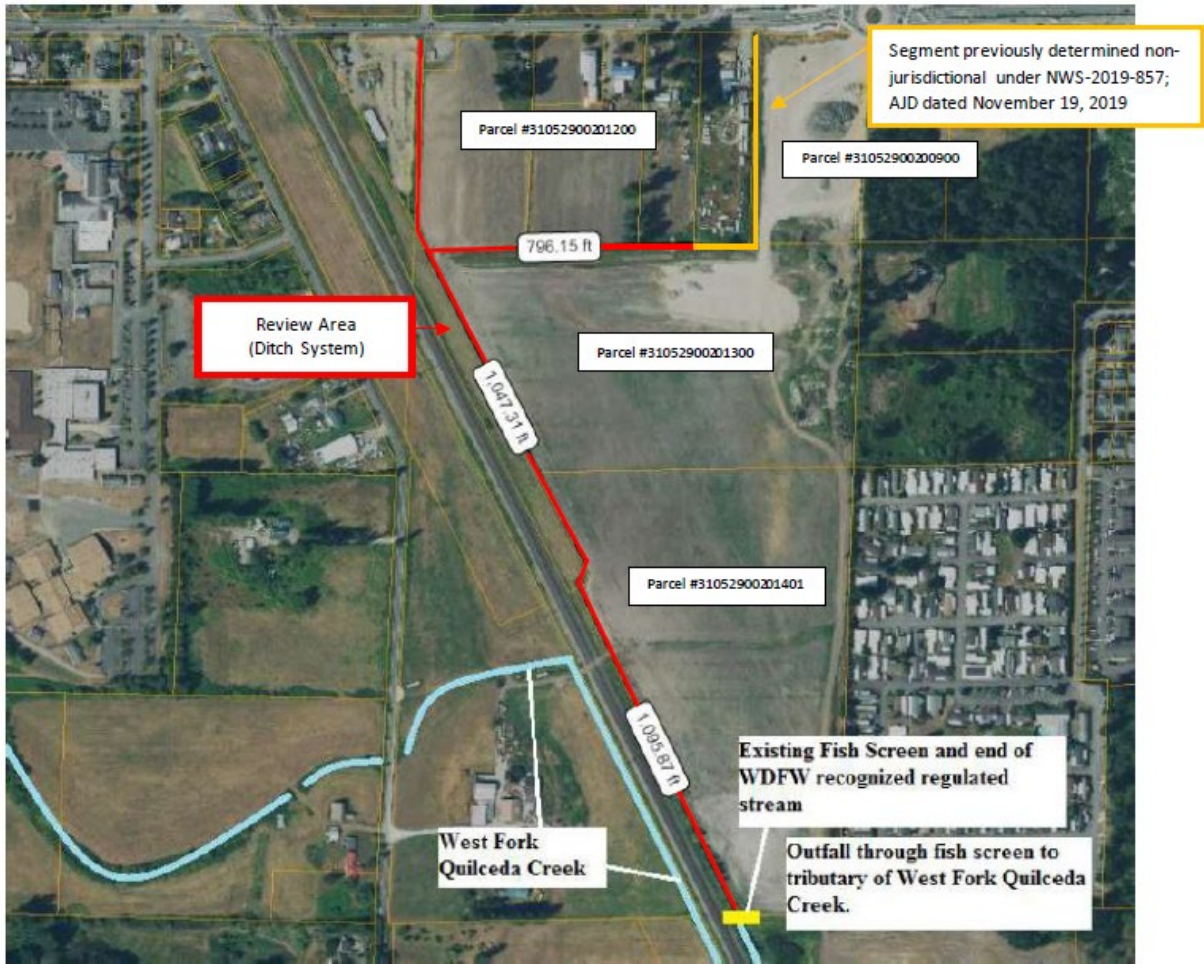
Sewall Wetland Consulting, Inc. conducted wetland studies on the entire subject property and did not identify any wetlands. Historic topographic maps do not depict historic wetlands at the subject property. Based on a review of aerial imagery, the site has been continuously farmed since the 1800s. The NWI map depicts an emergent wetland at the southern end of the subject property; however, presence of this wetland was not verified by the WDFW and mapping was based solely on aerial photograph interpretation. Sewall Wetland Consulting, Inc. provided wetland determination data forms for several data points within the area mapped as wetland on the NWI map, and the plots lacked the required hydrophytic vegetation, hydric soil, and wetland hydrology. The wetland determination data forms for the subject property also indicate the presence of active drainage tiles on the site which would effectively drain the site and preclude wetlands. In addition, the railroad tracks located along the western boundary of the property are depicted on the earliest historic topographic maps dating back to 1911. On all available historic topographic maps, the subject property is separated from the nearest potential water of the U.S. by the railroad tracks. It is likely that the railroad tracks would have prevented a hydrologic connection between any historic wetlands on the property and the nearest potential water of the U.S., thus historic wetlands would not have been considered adjacent. Based on this information, there is no evidence to support that the subject ditch was excavated within adjacent wetlands.



**U.S. ARMY CORPS OF ENGINEERS
REGULATORY PROGRAM
APPROVED JURISDICTIONAL DETERMINATION FORM (INTERIM)
NAVIGABLE WATERS PROTECTION RULE**

Based on the above information, the subject ditch is a stormwater control feature that was excavated in upland or non-jurisdictional waters to convey stormwater runoff. The subject ditch does not meet the conditions of paragraph (a)(2).

Attachment E – AJD Review Areas



AJD Request for ditch along Parcels #31052900201300 and #31052900201401
48.15191667, -122.20055556
Marysville, Washington

NWS-2021-151
Sather B, LLC
Page 1 of 1
January 8, 2021

Attachment F – Qualifications

All field inspections, jurisdictional wetland determinations, OHW determinations, habitat assessments, and supporting documentation, including this *Wetland and Fish and Wildlife Habitat Assessment File Review Technical Memorandum* prepared for the *Marysville 172nd Assemblage* site, were prepared by, or under the direction of, Matt DeCaro of SVC. In addition, report preparation was completed by Morgan Kentch, and quality assurance was completed by Rachael Hyland.

Matt DeCaro

Associate Principal

Professional Experience: 13 years

Matt DeCaro is an Associate Principal and Senior Scientist with a diverse background in environmental planning, wetland science, stream ecology, water quality, tree assessments, site remediation, NEPA compliance, and project management. He manages a wide range of industrial, commercial, and multi-family residential projects throughout Western Washington, providing environmental permitting and regulatory compliance assistance for land use projects from their planning stages through entitlement and construction. His local expertise, diverse professional background, and positive relationships with regulatory personnel are integral components of his successful project outcomes.

Matt earned a Bachelor of Science degree with a focus in Environmental Science from the Evergreen State College in Olympia, Washington, with additional graduate-level coursework and research in aquatic restoration and salmonid ecology. Matt has received 40-hour wetland delineation training (*Western Mountains, Valleys, & Coast and Arid West Regional Supplements*) and regularly performs wetland, stream, and shoreline delineations. Matt has been formally trained in the use of the *2014 Washington State Wetland Rating System* and *Determination of Ordinary High Water Mark* by WSDOE, and he is a Pierce County Qualified Wetland Specialist and Wildlife Biologist. He has attended USFWS survey workshops for multiple threatened and endangered species, and he is a Senior Author of WSDOT Biological Assessments. Matt holds 40-hour HAZWOPER training and has managed Phase I Environmental Site Assessments, subsurface investigations, and contaminant remediation projects throughout the Pacific Northwest. His diverse experience also includes NEPA compliance for federal permitting projects; noxious weed abatement; army ant research in the Costa Rican tropical rainforest; spotted owl surveys on federal and private lands; and salmonid spawning and migration surveys.

Rachael Hyland, PWS, Certified Ecologist

Senior Environmental Scientist

Professional Experience: 9 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) 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, and Wetland Classification. 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.

Morgan Kentch

Staff Scientist

Professional Experience: 3 years

Morgan Kentch is a Staff Scientist with a background in marine biology and both marine and freshwater ecology in Washington State. 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, and studying local marine and aquatic organisms and ecosystems. One of Morgan's more exceptional projects included monitoring a stream restoration project for the City of Bellingham by assessing stream habitat and biotic quality, collecting data, identifying local stream invertebrates, and writing a report outlining analyzed results. Morgan also participated in a study abroad program in La Paz, Baja California Sur, where she led an independent study on the effects of temperature on bioluminescent organisms in a local bay. Through this project, she demonstrated a strong understanding of collecting background research, following the scientific method, conducting scientific research, and writing a scientific paper formatted for journal submission.

Morgan currently assists in 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 has received wetland delineation training (Western Mtns, Valleys, & Coast and Arid West Regional Supplement), and has received formal training through the Washington State Department of Ecology and Coastal Training Program in Using the 2014 Wetland Rating System, How to Determine the Ordinary High Water Mark, and How to Conduct a Forage Fish Survey.