



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office 3190 160th SE Bellevue, Washington 98008-5452 (425) 649-7000

August 10, 2018

Cheryl Dungan
City of Marysville Community Development Department
80 Columbia Avenue
Marysville, WA 98270

RE: Ecology Review for Sather Property

Dear Ms. Dungan:

Thank you for requesting my technical assistance with a wetland dispute on the Sather property located in the City of Marysville. Based on my review of the project documentation, it appears there are no wetlands on this property.

Literature Sources Reviewed

The project submittal reviewed by the Washington Department of Ecology (Ecology) included:

- *Critical Area Report for Sather Property*, prepared by Sewall Wetland Consulting, Inc., dated July 9, 2018.
- *Critical Area Report for Sayani Property*, prepared by Sewall Wetland Consulting, Inc., dated July 20, 2018.
- *Wetland Delineation Report of Barclays North Property*, prepared by Wetland Resources, Inc., dated March 31, 2005.
- *Wetland Verification of Barclays North Property*, prepared by Adolfson Associates, Inc., dated May 31, 2005.

Project Location and Description

The Sather property is located south of SR 531 and east of the Burlington Northern Santa Fe (BNSF) railroad tracks. This roughly triangular property (Parcel nos. 310529002001300 and 310529002001401) is 36.4 acres in size and has historically been used for agricultural production of hay, oats, and corn.

In 2005, Wetland Resources identified four wetlands (Wetlands A, B, C, and Z) and four streams on the Sather property. This consisted of two Category III wetlands (Wetlands A and Z), two Category IV wetlands (Wetlands B and C), one Class II stream, and three Class III streams. Adolfson Associates verified all four wetlands and enlarged the boundaries of Wetlands A and Z.

Sewall Wetland Consulting conducted hydrology monitoring from 47 soil pits on the Sather property during the early growing season (February to May) in 2017 and 2018. None of these monitoring wells met the hydrology criteria, so no wetlands were identified on the property.

Sewall Wetland Consulting also conducted hydrology monitoring on the Sayani property immediately south of the Sather property during the early growing season (February to May) in 2018. A Category IV scrub-shrub wetland (Wetland O) was delineated at the northwest corner of the Sayani property, but it did not extend onto the Sather property due to a drainage ditch.

Ecology Findings

I reviewed the background literature sources cited in the consultant reports that indicate wetlands may be present on the Sather property, which included:

- National Wetland Inventory map showing palustrine emergent wetland at south end of property.
- Soil survey map showing hydric soils (Terric Medisaprists and Custer fine sandy loam) on the property.
- City of Marysville critical area map that shows two largest wetlands delineated by Wetland Resources in 2005 and the West Fork of Quilceda Creek.

The Adolfson Associates verification letter indicates there are at least six ditches that drain the farm field. A review of Google Earth historical aerial photos show these six ditches (oriented east/west) connected to a larger ditch (oriented north/south) paralleling the BNSF railroad tracks. All of these ditches drain to the West Fork of Quilceda Creek, but screens installed on culverts underneath the BNSF tracks prevent fish access to the farm field.

The hydrology monitoring that Sewall Wetland Consulting conducted indicates two areas of the Sather property (Points 9-12 and 44-46) had saturated soils during the early growing season. These two relatively wetter areas correspond to Wetlands A and Z delineated by Wetland Resources. Although the ditches appear to effectively drain the Sather property, there are some wetter areas in the northwest and southwest corners.

Ecology Recommendations

The wetland delineation conducted by Wetland Resources is more than 13 years old, and Ecology only accepts delineations performed in the last five years. The hydrology monitoring conducted by Sewall Wetland Consulting is the most current and scientifically

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rigorous study done on this property. Therefore, I concur with the Sewall Wetland Consulting finding that no wetlands occur on the Sather property.

If you have any questions or would like to discuss my comments, please give me a call at (425) 649-7199 or send an email to Doug.Gresham@ecy.wa.gov.

Sincerely,

A handwritten signature in black ink that reads "Doug Gresham". The signature is written in a cursive, flowing style.

Doug Gresham, PWS
Wetland Specialist
Shorelands and Environmental Assistance Program