



Soundview Consultants LLC

Environmental Assessment • Planning • Land Use Solutions

2907 Harborview Dr., Suite D, Gig Harbor, WA 98335

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

Technical Memorandum

To: Emily Morgan, City of Marysville

Project Number: 1908.0007

From: Jon Pickett, Soundview Consultants LLC

Date: August 9, 2022

**Re: Response to City of Marysville Comments
Groundhog PRD, PA22-019**

Dear Ms. Morgan,

Soundview Consultants LLC (SVC) has been assisting Groundhog Land Development Company, LLC (Applicant) with a conceptual mitigation plan for a proposed residential development of an approximately 4.64-acre site located at 5110 83rd Avenue Northeast in the City of Marysville, Washington. The subject property consists of one parcel situated in the Southeast ¼ of Section 35, Township 30 North, Range 5 East, W.M. (Snohomish County Tax Parcel Number 00590700010500). This Technical Memorandum has been prepared in response to the City of Marysville (City) comments, dated July 25, 2022 (City of Marysville, 2022). Below are the City's comments (*italicized*) followed by SVC's responses.

- 1) *Pursuant to MMC 22E.010.120(3)(c) for wetland mitigation ratios, Category III wetlands require mitigation of ratios of 2:1 for enhancement areas along with 1:1 for re-establishment or creation of buffers.*

Provide an addendum to the Conceptual Mitigation Plan that clarifies that these required ratios would be satisfied through onsite compensatory mitigation and off-site contribution to the SBMB.

Compensation for the direct and indirect wetland impacts will be provided through the purchase of mitigation bank credits from the Snohomish Basin Mitigation Bank (SBMB). Onsite mitigation actions are limited to non-compensatory buffer restoration/enhancement in accordance with MMC 22E.010.100(3). While wetlands proposed to be impacted are Category III wetlands, per MMC 22E.010.130(2), replacement ratios for wetland mitigation bank credits will be consistent with the Snohomish Basin Mitigation Bank Instrument document in accordance with US Army Corps of Engineer and the Environmental Protection Agencies final rule, which takes into account the wetland rating/category (Habitat Bank LLC, 2016).

Resource Impact	Bank Credits Per Resource Impact
Wetland, Category I	Case by case
Wetland, Category II	1.2
Wetland, Category III	1.0
Wetland, Category IV	.85
Critical Area Buffer	Case by case

In addition, indirect wetland impacts are compensated at half the standard ratio of direct impacts in accordance with agency guidance (WSDOE et al, 2021). Mitigation ratios outlined in MMC 22E.010.120(3)(c) apply to permittee-responsible compensatory mitigation, and onsite buffer restoration/enhancement is proposed in accordance with MMC 22E.010.100(3) as existing onsite buffers are degraded. As all proposed impacts are compensated for through the use of the SBMB and onsite buffer enhancement/restoration is a non-compensatory action, wetland mitigation ratios outlined in MMC 22E.010.120(3)(c) do not apply.

Please do not hesitate to contact me with any question or concerns you may have.

Sincerely,



Jon Pickett
Associate Principal
Office: 253.514.8952
jon@soundviewconsultants.com

References

City of Marysville. 2022. *PA22-019 – Groundhog PRD – Technical Review 2*. July 25, 2022

Habitat Bank LLC. 2016. *Snohomish Basin Mitigation Bank – Mitigation Banking Instrument*. Amended December 15, 2016.

Soundview Consultants (SVC). 2022. *Conceptual Mitigation Plan: Prospector 6*. July 20, 2022.

WSDOE, USACE, and EPA Region 10. 2021. *Wetland Mitigation in Washington State—Part 1: Agency Policies and Guidance (Version 2)*. Washington State Department of Ecology Publication #21-06-003.