

GECCO

Gribble Environmental Consulting Company

November 21, 2017

Camnel Properties, LLC 24329 HWY 99 Edmonds, WA 98020

RE: Camnel Site Commercial Development Wetland and Stream Determination, Marysville, WA

Project No: PA-16049

Tax ID: 31052800301200, 31052800300300, 31052800300600, SW corner of 31052800300100

Project Name: Camnel Properties Smokey Point Blvd. Commercial Development **Project Area/Location:** – 16100 Smokey Point Blvd, Marysville, Snohomish County, WA

Project Area Size: ~ 18.02 acres

Introduction

Gribble Environmental Consulting Co. (GECCO) was hired to determine the presence and classification of wetlands and streams on the subject property located at, 16100 Smokey Point Boulevard, Marysville, in Snohomish County, Washington (S28/T31N/R5E, W.M.). The on-site investigative work was performed by GECCO on between November 16-19, 2017. The determination includes the review of a previous determination of a portion of the property performed by Sound Ecological Solutions in July of 2016, and to address comments of Washington Department of Ecology as stated in the January 6, 2017 letter.

On-site development activities fall under the local jurisdiction of the City of Marysville. Wetland and stream classification and buffer criteria for the subject parcels are based on policies contained in the City of Marysville Municipal Code, Chapter 22E.010 (Critical Areas Regulations). In addition to the City of Marysville, on-site development activities could also be regulated by the U.S. Army Corps of Engineers (ACOE), The Washington State Department of Ecology (DOE), and the Washington Department of Fish and Wildlife (WDFW).

The City of Marysville requires that all Critical Areas be identified and delineated prior to development of a site. The analyses of wetlands conducted on the site were based on methods outlined in the 1987 U.S. Army Corps of Engineers Wetlands Delineation Manual (Technical Report Y-87-1) and the Regional Supplement to the Corp of Engineers Wetland Delineation Manual: Western Mountains, Valleys and coast Region (Version 2.0/May 2010), per WAC 173-22-035. Wetland boundaries were determined based on the presence of positive indicators of hydrology, hydric soils and hydrophytic vegetation. All three parameters must be present for an area to be a jurisdictional wetland. Any jurisdictional wetlands on the subject property were classified per the Washington State Wetland Rating System (2004, updated 2014) per the revised SCC 30.62A.140(2). Streams were classified based on the water typing criteria adopted by the State of Washington in June of 1993 (WAC 222-16-030) and SCC 30.62A.230.

Public Resource Document Review

Public resource documents pertinent to the site were reviewed to provide information regarding soils, vegetation, hydrology, wetlands, streams, and threatened/endangered species. Sources reviewed include:

- Soil Survey of Snohomish County Area, Washington, USDA Natural Resource Conservation Service (NRCS), Map No. 19, 1983.
- National Wetlands Inventory Map (NWI), USDI Fish and Wildlife Service (FWS), Snohomish County (S28/T31N/R5E, W.M).

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- Forest Practice Base Map, (S28/T31N/R5E, W.M). Washington Department of Natural Resources, July 25, 2016.
- Historical aerial photographs, Google Earth, 1990 to 2017.

The Snohomish County Soil Survey for this area has mapped the site as Custer Fine Sandy Loam in the western and northwestern portion of the site, and Norma Loam in the southeastern portion of the site. Both Custer and Norma series soils are listed as hydric soils within Snohomish County.

The National Wetlands Inventory map for this site shows no wetlands or streams on the subject property.

The Forest Practices Base Map shows a Type Ns stream located at the south property boundary, and a Type NS stream located more than 1,000 feet to the east of the property. The map shows a Type F stream located more than 1,000 feet to the southeast of the subject property.

Aerial photos of the site show the subject parcel as partially developed in the southwest corner of the site with a gravel parking area and road, and a powerline easement located along the south property boundary. The aerial photos show that the remainder of the site is undeveloped forest land, with scrub/shrub vegetation located within the powerline easement.

General Site Investigation

The site is located in a commercial area. The site consists of four contiguous parcels approximately 18 acres in area. The site is bordered to the west by Smokey Point Boulevard and commercial development, to the north and east by undeveloped forest and scrub-shrub land, and to the south by actively cultivated agricultural land and a multi-family development. The site is primarily undeveloped second/third growth forest, with the exception of an area located at the southwest corner, where a large fenced gravel parking/work area is located, and along the south boundary where powerlines and an associated road and gravel work area is located. Scrub/shrub vegetation is located within the powerline easement. Soil observed on site appears to match the mapped Custer and Norma soil, or its inclusions.

Hydrology was not observed on the site during site evaluation, which has followed several weeks of significant precipitation. Ponding was observed off-site on the first day of site evaluation within depressions in a dirt road, and are likely due to compaction within the road. Ponding dissipated within 2 days, as observed during the following site visits. A ditch/agricultural swale was observed along the south property boundary. The ditch extends from Smokey Point way, and becomes an intermittent swale between the on-site dirt road and the adjacent cultivated field. An access road to the cultivated field extends from the on-site dirt road to the field, and bisects the swale. No culverts are present within the road.

The vegetation on the site consists of forest habitat over the majority of the site, and scrub/shrub habitat located along the south portion of the site within the powerline easement. The overstory of the forest habitat is dominated by paper birch (*Betula papyrifera*, FAC) and bitter cherry (*Prunus emarginata*, FACU); Douglas fir (*Pseudotsuga menziesii*, FACU), cascara (*Rhamnus purshiana*, FAC-), white pine (*Pinus monticola*, FACU), and red alder (*Alnus rubra*, FAC) are common; and western hemlock (*Tsuga heterophylla*, FACU), black cottonwood (*Populus trichocarpa*, FAC) and sitka spruce (*Picea sitchensis*, FAC) are scattered. The understory is dominated by salmonberry (*Rubus spectabilis*, FAC) salal (*Gaultheria shallon*, FACU) red huckleberry (*Vaccinium parvifolium*, FACU), beaked hazelnut (*Corylus cornuta*, FACU), pacific trailing blackberry (*Rubus ursinus*, FACU), sword fern, (*Polystichum munitum*, FACU) and bracken fern (*Pteridium aquilinium*, FACU), while indian plum (*Oemleria cerasiformis*, FACU), vine maple (*Acer circinatum*, FAC-), Douglas spirea (*Spirea douglasii*, FACW) are common to scattered. The scrub/shrub habitat located within the powerline easement is dominated by Douglas spirea, salal, evergreen blackberry (*Rubus laciniatus*, FACU), Scotch broom (Cytisus scoparius, N/I) and pacific trailing blackberry. Scotch broom has not been given an indicator status, however, it is an aggressive non-native species that is typically found in upland communities.

Stream and Wetland Determination

A portion of the site (parcel 31052800301200) was previously evaluated in 2016 by Sound Ecological Solutions, LLC. Per the Wetland Reconnaissance letter dated July 24, 2016, no wetlands or streams were observed. During that evaluation, vegetation was observed to be dominated by upland species, and lacked hydrologic or hydric soil criteria to qualify as wetland habitat. The ditch located at the south boundary of the site was observed to be an agricultural swale, and not a stream. Washington Department of Ecology comments state that based on the lack of data sheets, mapped soil on the site, and personal knowledge of DOE Staff that wetlands are known to be present in the area. In addition, DOE Staff stated that a stream is mapped at the south boundary of the site, and that a stream is present at the north boundary of the site based on personal knowledge of the area.

During the on-site evaluation by GECCO, the entire site was evaluated for indicators of hydrophytic vegetation, hydric soil and wetland hydrology, and data was collected as five specific soil log locations. The site was evaluated following an extended period of precipitation and no indicators of wetland hydrology were observed on the site. Ponding was observed off-site to the east in areas of compaction on a dirt road, but does not extend beyond the road, is man-made, and dissipated within 2 days during the site evaluation, and does not meet wetland hydrology criteria. The soil observed on the site consisted of sand and loamy sand, with a matric chroma of dark yellowish brown (10YR 4/6) to very dark grayish brown above grayish brown to light olive brown soil. Indicators of hydric soil were not observed on the site. The vegetation within the forest habitat is dominated by Facultative-Upland species. Douglas spirea, a wetland indicator species, was observed in quantities more than "scattered" mainly in areas continuously disturbed within the powerline easement, or in areas also disturbed by frequent unauthorized camping, and was accompanied by dense evergreen blackberry, salal and pacific trailing blackberry, all upland indicator species. Pacific trailing blackberry, an upland indicator species, was found growing densely throughout the site, with the exception of areas disturbed by frequent unauthorized camping. Based on the upland vegetation dominance throughout the site, the lack of hydric soil and hydrology indicators, no wetlands were observed on the site.

The ditch/swale located along the south boundary of the site is a man-made agricultural swale, and is not hydrologically connected to a stream, as it is bisected by a road, with no culvert or other means of connection, and therefore, does not meet the criteria of a stream. No stream was observed in the northern portion of the site, or within 300 feet of the north boundary of the proposed development. Aerial photos indicate a ditch is located more than 550 feet from the site at the south boundary of a housing development, and at the northern boundary of Parcel 31052800300100, however, only the southwest corner of this parcel is within the site (proposed development), and does not include the portion of that parcel in which a stream may be located. The off-site ditch may be hydrologically connected to a Ns stream to the east, and may qualify as a Type Ns stream, however, due to the distance of more than 550 feet from the site, it was not evaluated for the purpose of this project and will not be affect by the project.

Conclusions

Based on the lack of wetland indicators, and lack of hydrologic connectivity to streams, GECCO concurs with the conclusions of Sound Ecological Solutions, that no wetlands or streams are located on or within the vicinity of the proposed development. Therefore, the proposed development will not create impacts to streams wetlands, or their buffers, and no mitigation should be required.

Disclaimer

It should be recognized that the delineation/determination of wetland boundaries and functional values are inexact sciences. Individual professionals will often disagree on the precise location of wetland or stream boundaries, or the functional values of a specific habitat. The final determination of wetland and stream boundaries is the responsibility of the resource agencies that regulate activities in and around wetlands and streams. Accordingly, all wetland and stream delineations performed for this study, as well as the conclusions drawn in this report, should be reviewed by the appropriate regulatory agencies prior to any detailed site planning or construction activities.

Within the limitations of schedule, budget, and scope-of-work, we warrant that this study was conducted in accordance with generally accepted environmental science practices, including the technical guidelines and criteria in effect at the time this study was performed. The results and conclusions of this report represent the authors' best professional

judgment, based upon information provided by the project proponent in addition to that obtained during the course of this study. No other warranty, expressed or implied, is made.

If you have any further questions, please contact Karin Gribble at (360) 422-5144.

Sincerely,

Karin L. Gribble

Gribble Environmental Consulting Company (GECCO)

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Encl: Determination Sketch

Data sheets

Soil Log Location map/aerial photo



Storm water from 40th Ave W onto site, creating scour



Storm water from 40th Ave W overflows from storm drain, flows across road to corner of Jahn property, creates scour, flows to center of yard.