

# BANK USE PLAN

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## 87TH AVENUE TOWNHOMES

REVISED NOVEMBER 2022

SEPTEMBER 2022



**Soundview  
Consultants**

Environmental Assessment  
Planning + Land Use Solutions

# **BANK USE PLAN**

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## **87TH AVENUE TOWNHOMES**

**REVISED NOVEMBER 22, 2022**

**SEPTEMBER 15, 2022**

### **PROJECT LOCATION**

4112 AND 4018 87<sup>TH</sup> AVENUE NORTHEAST  
MARYSVILLE, WASHINGTON 98270

### **PREPARED FOR**

**MIKE REID**  
**REID DEVELOPMENT GROUP, LLC**  
PO BOX 1930  
WOODINVILLE, WASHINGTON 98072

### **PREPARED BY**

**SOUNDVIEW CONSULTANTS LLC**  
2907 HARBORVIEW DRIVE  
GIG HARBOR, WASHINGTON 98335  
(253) 514-8952



**Soundview  
Consultants**

Environmental Assessment  
Planning + Land Use Solutions

## Executive Summary

Soundview Consultants LLC (SVC) has been assisting PNW Investors, LLC (Applicant) with a conceptual mitigation plan for a proposed residential development of an approximately 12.85-acre site located at 4112 and 4018 87<sup>th</sup> Avenue Northeast in the City of Marysville, Washington. The subject property consists of three parcels situated in the Northwest ¼ of Section 1, Township 29 North, Range 5 East, W.M. (Snohomish County Tax Parcel Numbers 00590700021202, 00590700021300, and 00590700022000).

SVC investigated the subject property for the presence of potentially-regulated wetlands, waterbodies, fish and wildlife habitat, and/or priority species in August and December of 2021. A formal groundwater monitoring study was completed in late winter and early spring 2022. Using current methodology, the site investigation and formal hydrology monitoring identified two potentially-regulated wetlands (Wetlands A and B) on the subject property. Wetlands A and B are classified as Category III wetlands, which are subject to standard 75-foot buffers per Marysville Municipal Code (MMC) 22E.010.100(4). An additional 15-foot building setback is required from the edge of all critical area buffers per MMC 22E.010.380. No other potentially-regulated wetlands, waterbodies, fish and wildlife habitat, or priority species were identified within 300 feet of the subject property.

The Applicant proposes 188 townhomes with internal access roads and stormwater infrastructure. The project was carefully designed to fully utilize the developable upland area on the site; however, wetlands encumber the western portion of the site which inhibits site access. The City of Marysville is requiring frontage improvements and extending 40<sup>th</sup> Street Northeast through the center of the property to connect with 87<sup>th</sup> Avenue Northeast. Further, two additional access roads north of the proposed right-of-way cannot be eliminated or modified to shift lot locations outside of identified critical areas as they will connect to future residential developments to meet the City's needs. Additionally, the existing road alignments were determined to be the only feasible option that allows for a wide enough curvature for safe vehicle access on the northwestern portion of the site. The density of units proposed is also consistent with the goals of the Growth Management Act under RCW 36.70A.020, which clearly states primary development goals of concentrating urban growth within incorporated areas to limit urban sprawl in adjacent unincorporated areas which has the potential to directly impact high value critical areas or larger undisturbed tracts. There are no other sites in the vicinity that are available to the Applicant that would result in less impacts to critical areas, as all of the sites in the immediate vicinity are already fully developed or are also equally encumbered with critical areas. To allow enough room for the proposed lots to meet density requirements and associated access roads, stormwater infrastructure, and open space requirements, full site utilization is necessary and the total fill of Wetlands A and B is unavoidable. To minimize impacts to critical areas, alternate access road routes were considered; however, the current design meets road connection requirements by the City of Marysville. Further, leaving a small remnant wetland area is less ecologically beneficial due to the inherent takeover of invasive species, trash and debris, and isolation in the landscape.

Compensatory mitigation for the total fill of Wetlands A and B will be provided through the purchase of mitigation bank credits from the Snohomish Basin Wetland Mitigation Bank (SBMB). Utilization of a mitigation bank is the most ecologically practicable mitigation option as full site development to meet market demand inhibits onsite mitigation, and offsite permittee-responsible mitigation is problematic for the small area of required mitigation necessary. The small area of impacts to low

functioning wetland areas is better provided through a larger scale program with watershed-level goals and more robust, established resources to ensure mitigation success. The project is anticipated to result in a net increase in ecological functions within the Snohomish River watershed (Water Resource Inventory Area 7) when compared to the existing degraded, isolated wetlands proposed to be impacted.

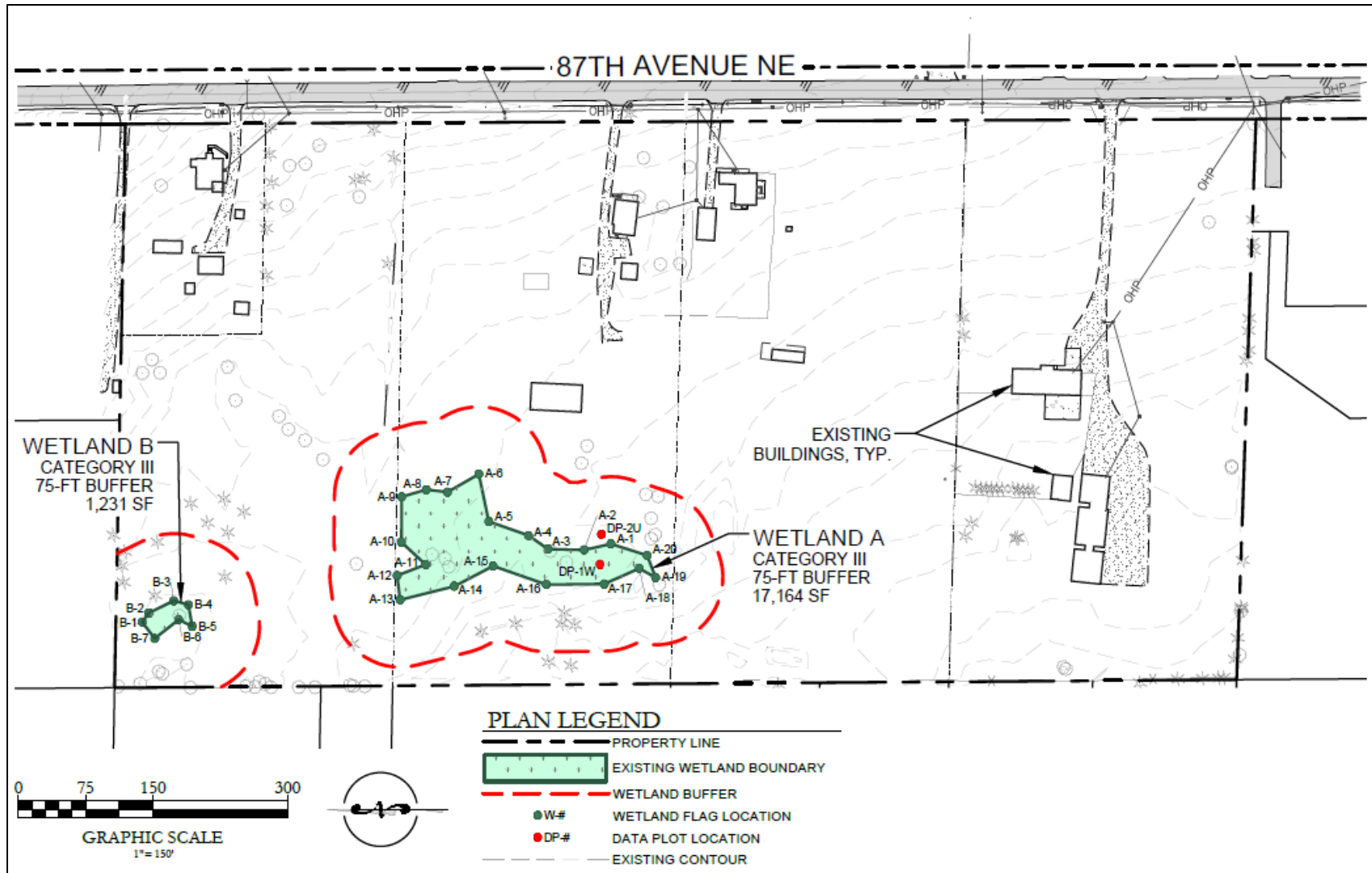
The table below identifies the onsite critical areas and summarizes the potential regulatory status by local, state, and federal agencies.

<b>Wetland Name</b>	<b>Size Onsite</b>	<b>Category/ Type<sup>1</sup></b>	<b>Regulated Under MMC Chapter 22E.010</b>	<b>Regulated Under RCW 90.48</b>	<b>Regulated Under Clean Water Act</b>
Wetland A	17,164 SF	III	Yes	Yes	Not Likely
Wetland B	1,231 SF	III	Yes	Yes	Not Likely

Note:

1. Current Washington State Department of Ecology (WSDOE) wetland rating system (Hruby, 2014) per MMC 22E.010.060.

# Site Map



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# Chapter 1. Regulatory Considerations

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The site investigation in August and December of 2021 and formal groundwater study identified two potentially-regulated wetlands (Wetlands A and B) on the subject property. No other potentially-regulated wetlands, waterbodies, fish and wildlife habitat, or priority species were identified within 300 feet of the subject property during the site investigations.

## 1.1 Local Considerations

### 1.1.1 Buffer Standards

MMC 22E.010.060(1) has adopted the current wetland rating system for western Washington (Hruby, 2014). Category III wetlands generally provide moderate levels of function and have typically been disturbed in some ways and/or more isolated in the landscape than Category I or II wetlands. Category III wetlands score between 16 and 19 points on the *Revised Washington State Wetland Rating System for Western Washington* (Hruby, 2014). Category IV wetlands generally provide low levels of function and are typically more disturbed, smaller, and/or more isolated in the landscape than Category I, II, or III wetlands. Wetlands A and B are classified as Category III wetlands, which are subject to standard 75-foot buffers per MMC 22E.010.100(4). An additional 15-foot building setback is required from the outer edge of all critical area buffers per MMC 22E.010.380.

### 1.1.2 Mitigation Sequencing

The proposed townhome redevelopment will result in necessary and unavoidable direct wetland impacts. Impacts to Category III wetlands and their associated buffers are permitted provided that the activity will be designed to ensure no net loss of critical area functions and values. Mitigation sequencing per MMC 22E.010.110(1) is outlined below for the proposed project.

1. *Avoiding impacts altogether by not taking a certain action or parts of an action.*

The Applicant proposes 188 townhomes with internal access roads and stormwater infrastructure. The project was carefully designed to fully utilize the developable upland area on the site; however, wetlands encumber the western portion of the site which inhibits site access. The City of Marysville is requiring frontage improvements and extending 40<sup>th</sup> Street Northeast through the center of the property to connect with 87<sup>th</sup> Avenue Northeast. Further, two additional access roads north of the proposed right-of-way cannot be eliminated or modified to shift lot locations outside of identified critical areas as they will connect to future residential developments to meet the City's needs. Additionally, the existing road alignments were determined to be the only feasible option that allows for a wide enough curvature for safe vehicle access on the northwestern portion of the site. The density of units proposed is also consistent with the goals of the Growth Management Act under RCW 36.70A.020, which clearly states primary development goals of concentrating urban growth within incorporated areas to limit urban sprawl in adjacent unincorporated areas which has the potential to directly impact high value critical areas or larger undisturbed tracts. There are no other sites in the vicinity that are available to the Applicant that would result in less impacts to critical areas, as all of the sites in the immediate vicinity are already fully developed or are also equally encumbered with critical areas. To allow enough room for the proposed lots to meet density requirements and associated access roads, stormwater infrastructure, and open space requirements, full site utilization is necessary and the total fill of Wetlands A and B is unavoidable.

- 2. Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts.*

As described above, the total fill of Wetland A and B are unavoidable and necessary for the townhome development. To minimize impacts to critical areas, alternate access road routes were considered; however, the current design meets road connection requirements by the City of Marysville. Further, leaving a small remanent wetland area is less ecologically beneficial due to the inherent takeover of invasive species, trash and debris, and isolation in the landscape.

- 3. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.*

The direct impacts will be compensated through the purchase of mitigation bank credits from the Snohomish Basin Mitigation Bank (SBMB). Onsite compensation is not an ecologically practicable option due to the inherent takeover of non-native invasive plants and the isolated geographic location in the peak of the sub-basin, which limits the potential for providing greater ecological functions and values. Utilization of a mitigation bank is the most ecologically practicable mitigation option as full site development to meet market demand inhibits onsite mitigation. The small area of impacts to low functioning wetland areas is better provided through a larger scale program with watershed-level goals and more robust, established resources to ensure mitigation success.

- 4. Reducing or eliminating the impact over time by preservation and maintenance operations.*

The wetlands created through the purchase of mitigation bank credits from the SBMB will be higher functioning than the small, low-functioning wetland areas onsite proposed to be impacted. The created wetlands will be maintained and monitored through the mitigation banking program for an appropriate timeline to ensure success of the mitigation actions.

- 5. Compensating for the impact by replacing or providing substitute resources or environments.*

The necessary and unavoidable fill of Category III wetlands (Wetlands A and B) will be compensated through the purchase of mitigation bank credits from the SBMB as onsite compensatory mitigation is not possible due to the spatial requirements of the mitigation area and associated buffers which will impact the development feasibility of this site. As such, the use of a mitigation bank was determined to be the best strategy that will result in a net gain in ecological functions within the Snohomish watershed over the existing isolated and degraded condition of the existing onsite wetlands that will be impacted.

- 6. Monitoring the impact and taking appropriate corrective measures.*

Compensatory mitigation for the total fill of onsite Wetlands A and B will be entirely provided through the purchase of mitigation bank credits from the SBMB and therefore, will not require permittee-responsible mitigation monitoring.

### **1.1.3 Mitigation Performance Standards**

According to MMC 22E.010.120, adverse impacts to wetland functions and values shall be mitigated. Mitigation actions shall be implemented in the preferred sequence identified in MMC 22E.010.110(1) (see Section 1.1.2 above). Proposals which include less preferred or compensatory mitigation shall demonstrate that:



1. *All feasible and reasonable measures will be taken to reduce impacts and losses to the original wetland;*

See responses to criteria 1 and 2 under Section 1.1.2 above for details regarding avoidance and minimization measures for the project.

2. *No overall net loss will occur in wetland functions, values and acreage; and*

Compensatory mitigation for the total fill of Wetland A and B will be provided through the purchase of mitigation bank credits from the SBMB. The project will utilize a mitigation ratio of 1:1 for Category III wetland impacts to ensure no net loss of functions, values, and acreage as determined by the mitigation bank (Habitat Bank & Talasaea Consultants, 2016). The wetlands created through the mitigation banking program will be higher value than the low-functioning wetlands proposed to be impacted.

3. *The restored, created or enhanced wetland will be as persistent and sustainable as the wetland it replaces.*

The wetlands created through the purchase of credits from the SBMB will be much higher functioning than the existing degraded, isolated onsite wetlands that will be impacted. The 199-acre Snohomish Basin Bank in Snohomish County consists of wetland re-establishment, wetland rehabilitation, restored floodplain, and associated upland/wetland buffer areas which will establish ideal habitat conditions for a wide range of fish and wildlife species, more than what could be provided onsite in an isolated landscape setting.

#### **1.1.4 Wetland Mitigation Banks**

Per MMC 22E.010.130, when mitigation bank use is proposed it shall be conducted in accordance with the following requirements:

1. *Credits from a wetland bank may be approved for use as compensation for unavoidable impacts to wetlands when:*
  - a. *The bank is certified under Chapter 173-700 WAC*

The Snohomish Basin Mitigation Bank was certified for use on August 12, 2005.

- b. *The community development director determines that the wetland mitigation bank provides appropriate compensation for the authorized impacts; and*

The necessary and unavoidable fill of Category III Wetlands A and B will be compensated through the purchase of mitigation bank credits from the SBMB. The City of Marysville allows the use of mitigation banks under MMC 22E.010.130. Utilization of a mitigation bank is the most ecologically practicable mitigation option as full site development to meet market demand inhibits the space required to provide onsite mitigation. In addition, the use of a mitigation bank will likely provide a higher level of ecological lift than small onsite or offsite, in-kind permittee responsible mitigation especially with the established resources for maintenance and monitoring over a longer term to ensure success of the mitigation actions. As such, the use of a mitigation bank will result in a net gain in ecological functions within the Snohomish watershed over the existing degraded, isolated conditions of the existing wetlands that will be impacted

c. *The proposed use of credits is consistent with the terms and conditions of the bank's certification.*

The purchase of credits will be consistent with the terms and conditions of the bank's certification.

2. *Replacement ratios for projects using bank credits shall be consistent with the terms and conditions of the bank's certification.*

The Category III wetland fill will be compensated at a 1 to 1 ratio for mitigation bank credit purchase as outlined in bank's certification (Habitat Bank & Talasaea Consultants, 2016).

3. *Credits from a certified wetland mitigation bank may be used to compensate for impacts located within the service area specified in the bank's certification. In some cases, bank service areas may include portions of more than one adjacent drainage basin for specific wetland functions.*

The purchase of credits from the SBMB will be utilized to compensate for the total fill Category III onsite wetlands (Wetland A - B) as the site is located within the service area in WRIA 7 – Snohomish. The purchase of credits will result in much higher functioning wetlands when compared to the existing degraded, isolated wetlands that will be impacted.

## 1.2 State and Federal Considerations

In a December 2, 2008 memorandum from the Environmental Protection Agency (EPA) and U.S. Army Corps of Engineers (USACE), joint guidance is provided that describes waters that are to be regulated under section 404 of the Clean Water Act (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 memorandum further goes on to describe waters where jurisdiction would likely require further analysis: 1) Tributaries to traditional navigable waters or interstate waters, 2) Wetlands adjacent to jurisdictional tributaries to traditional navigable waters or interstate waters, and 3) Waters that fall under the “other waters” category of the regulations.

In addition, the 2012 guidance identifies thirteen waters or areas where jurisdiction will not be asserted: 1) Wet areas that are not tributaries or open waters and do not meet the agencies regulatory definition of “wetlands”, 2) Waters excluded from coverage under the CWA by existing regulations, 3) Waters that lack a “significant nexus: where one is required for a water to be jurisdictional, 4) Artificially irrigated areas that would revert to upland if the irrigation ceased, 5) Artificial lakes or ponds created by excavating and/or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing, 6) Artificial reflecting pools or swimming pools excavated in uplands, 7) Small ornamental waters created by excavating and/or diking dry land to retain water for primarily aesthetic reasons, and puddles, 8) Water-filled depressions

created incidental to construction activity, 9) Groundwater, including groundwater drained through subsurface drainage systems, 10) Erosional features (gullies and rills), 11) Non-wetland swales, 12) Ditches that are excavated wholly in uplands, drain only uplands or non-jurisdictional waters, and have no more than ephemeral flow, and 13) Ditches that do not contribute flow, either directly or through other waterbodies, to a traditional navigable water, interstate water, or territorial sea.

Wetlands A and B are not likely regulated by USACE as the wetlands appear to be isolated in upland areas with no surface water connections and/or potential significant nexus to jurisdictional waters. However, due to the project timeline, these wetlands are assumed jurisdictional by USACE. Additionally, Wetlands A and B are considered natural waters that are likely regulated by WSDOE through the Revised Code of Washington (RCW) 90.48.

## Chapter 2. Mitigation Bank Use Plan

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The compensatory mitigation actions for the project attempt to strike a balance between achieving project goals as well as a positive result in terms of ecological lift. In general, joint USACE and EPA rules have been established that require more careful mitigation planning efforts utilizing a watershed approach in site selection, establishment of enforceable performance standards, and preference for use of mitigation banks or ILF's wherever most ecologically practicable (USACE & EPA, 2008). The wetland impacts and compensatory mitigation actions closely adhere to these rules while also utilizing the best available science (Granger et al., 2005; Hruby et al., 2009; Sheldon et al., 2005; WSDOE et al., 2006; and WSDOE et al., 2021).

### 2.1 Purpose and Need

The purpose of the proposed project is to provide additional housing units in Snohomish County to alleviate the shortage of residences in the greater Seattle area. According to the 2015 City of Marysville Comprehensive Plan, the 2035 population target will generate a housing need, requiring an additional 10,513 housing units. The proposed project will maximize onsite area to provide 188 townhomes, which will support the demand for housing in a growing city.

### 2.2 Description of Impacts

The Applicant proposes 188 townhomes with internal access roads and stormwater infrastructure. The project was carefully designed to fully utilize the developable upland area on the site; however, wetlands encumber the western portion of the site which inhibits site access. The City of Marysville is requiring frontage improvements and extending 40<sup>th</sup> Street Northeast through the center of the property to connect with 87<sup>th</sup> Avenue Northeast. Further, two additional access roads north of the proposed right-of-way cannot be eliminated or modified to shift lot locations outside of identified critical areas as they will connect to future residential developments to meet the City's needs. Additionally, the existing road alignments were determined to be the only feasible option that allows for a wide enough curvature for safe vehicle access on the northwestern portion of the site. The density of units proposed is also consistent with the goals of the Growth Management Act under RCW 36.70A.020, which clearly states primary development goals of concentrating urban growth within incorporated areas to limit urban sprawl in adjacent unincorporated areas which has the potential to directly impact high value critical areas or larger undisturbed tracts. There are no other sites in the vicinity that are available to the Applicant that would result in less impacts to critical areas, as all of the sites in the immediate vicinity are already fully developed or are also equally encumbered with critical areas. To allow enough room for the proposed lots to meet density requirements and associated access roads, stormwater infrastructure, and open space requirements, full site utilization is necessary and the total fill of Wetlands A and B is unavoidable. To minimize impacts to critical areas, alternate access road routes were considered; however, the current design meets road connection requirements by the City of Marysville. Further, leaving a small remanent wetland area is less ecologically beneficial due to the inherent takeover of invasive species, trash and debris, and isolation in the landscape. A wetland function impact analysis is provided below.

- **Water Quality:** The wetlands to be filled are depressional wetlands that exhibit primarily seasonal saturation and seasonal flooding. In general, the wetlands provide only a moderate water quality improvement potential as the units lack an outlet (Wetland B) or have an intermittently flowing

outlet (Wetland A) and are in close proximity to land uses that generate pollutants. Additionally, impaired waters are located in the sub-basin. However, these functions are limited by a lack of other pollutant inputs. With the purchase of credits from the SBMB, the project will result in a net increase in water quality functions for the Snohomish watershed.

- **Hydrologic:** The primary sources of hydrology for the identified wetlands are direct precipitation, surface sheet flow from adjacent uplands, and a seasonally high groundwater table. These wetlands provide moderate water quality improvement potential due to a lack an outlet (Wetland B) or intermittent outlet (Wetland A), proximity to land uses that generate excess runoff, proximity to intensive land uses, and the presence of flooding issues in a sub-basin further down gradient from the unit. However, hydrologic functions are limited due to minimal depth of storage and contribution to storage in the watershed. Given these characteristics, the use of a mitigation bank will likely increase hydrologic functions within the Snohomish watershed.
- **Habitat:** Wetlands A and B provide very minimal habitat functions due to the disturbed nature of the wetlands, lack of interspersion of habitat, and a lack of priority habitats and special habitat features which decreases habitat complexity and suitability. Due to the low-functioning habitat conditions, the wetland fill will result in limited habitat removal, and additional wetland habitat functions will be replaced and increased via the use of a mitigation bank within the Snohomish watershed.

## 2.3 Mitigation Bank Use

Joint USACE and EPA rules (USACE & EPA, 2008) and interagency guidance (WSDOE & USACE 2006; Hruby et al., 2009) require more careful mitigation planning efforts utilizing a watershed approach in site selection, establishment of enforceable performance standards, and preference for use of mitigation banks or ILFs wherever most ecologically practicable. Wetlands A and B do not provide critical wetland functions as they are small and isolated in the landscape, degraded by regular mowing, and presence of non-native invasive reed canarygrass. Onsite permittee-responsible mitigation is not feasible as full site development to meet market demand inhibits onsite mitigation. Offsite permittee-responsible mitigation is problematic for the small area of required mitigation necessary. In addition, non-native invasive vegetation is likely to take over such a small mitigation area for any type of permittee-responsible mitigation. The small area of impacts to low functioning wetland areas is better provided through a larger scale program with watershed-level goals and more robust, established resources to ensure mitigation success. The project site is located within the service area for the SBMB (refer to Appendix B), and credits are available for purchase based on recent email communication with the bank sponsor. Therefore, compensatory mitigation for the total fill of Wetlands A and B will be provided through the purchase of mitigation bank credits from the SBMB as it is considered the most ecologically preferable option. The wetlands created through mitigation banking will have much higher habitat value than the small areas of onsite wetlands that will be filled. The project is anticipated to result in a net increase in ecological functions within the Snohomish River watershed (Water Resource Inventory Area 7) when compared to the existing degraded, isolated wetlands proposed to be impacted.

Wetland functions targeted for use in the SBMB include improving water quality, flood storage, flow reductions, and habitat for plant and animals on a 199-acre site focusing on wetland re-establishment, wetland rehabilitation, restoring floodplain, and associated upland/wetland buffer areas. The overarching mitigation goal of the SBMB is to protect and enhance salmonid populations using a watershed approach, which will in turn benefit other aquatic species. The purchase of mitigation

banking credits will allow the project to achieve no net loss of aquatic resource functions. The SBMB, administered by Mitigation Banking Services, creates a “comprehensive, equitable, and consistent” program to ensure successful mitigation actions. Oversight of this mitigation banking program is provided by an Interagency Review Team (IRT) that includes representatives from the USACE, WSDOE, tribes, and other federal, state, and local regulatory agencies.

The direct impacts will result in the purchase of 0.42 acre credits, as outlined in Table 1 below. The credits outlined below will be available for purchase from the SBMB.

**Table 1. Replacement Ratios and Calculation of Bank Credits Required**

Feature	Impact Area	WSDOE Rating <sup>1</sup>	Mitigation Ratio <sup>2</sup> (SBMB Credits Needed per Acre of Impacted Wetland) <sup>2</sup>	Total Bank Credits Needed (acres)
<b>Wetland A</b>	17,164 SF (0.39 ac)	III	1:1	0.39
<b>Wetland B</b>	1,231 SF (0.03 ac)	III	1:1	0.03
<b>Total:</b>	<b>18,395 (0.42 ac)</b>			<b>0.42</b>

Notes:

1. WSDOE rating according to Washington State wetland rating system for Western Washington – Revised (Hruby, 2014).
2. Credit calculation methods are derived from the SBMB MBI document

Negotiations of terms of the mitigation bank credit purchase will be made with IRT staff with preliminary approvals of the project by the agencies, after formal approval of the Mitigation Plan. Proof of credit purchase and transfer will be provided via a Statement of Sale from the Applicant. Prior to any impacts to wetlands, the Statement of Sale will be provided to the necessary regulatory agencies.

## Chapter 3. Closure

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

## Chapter 4. References

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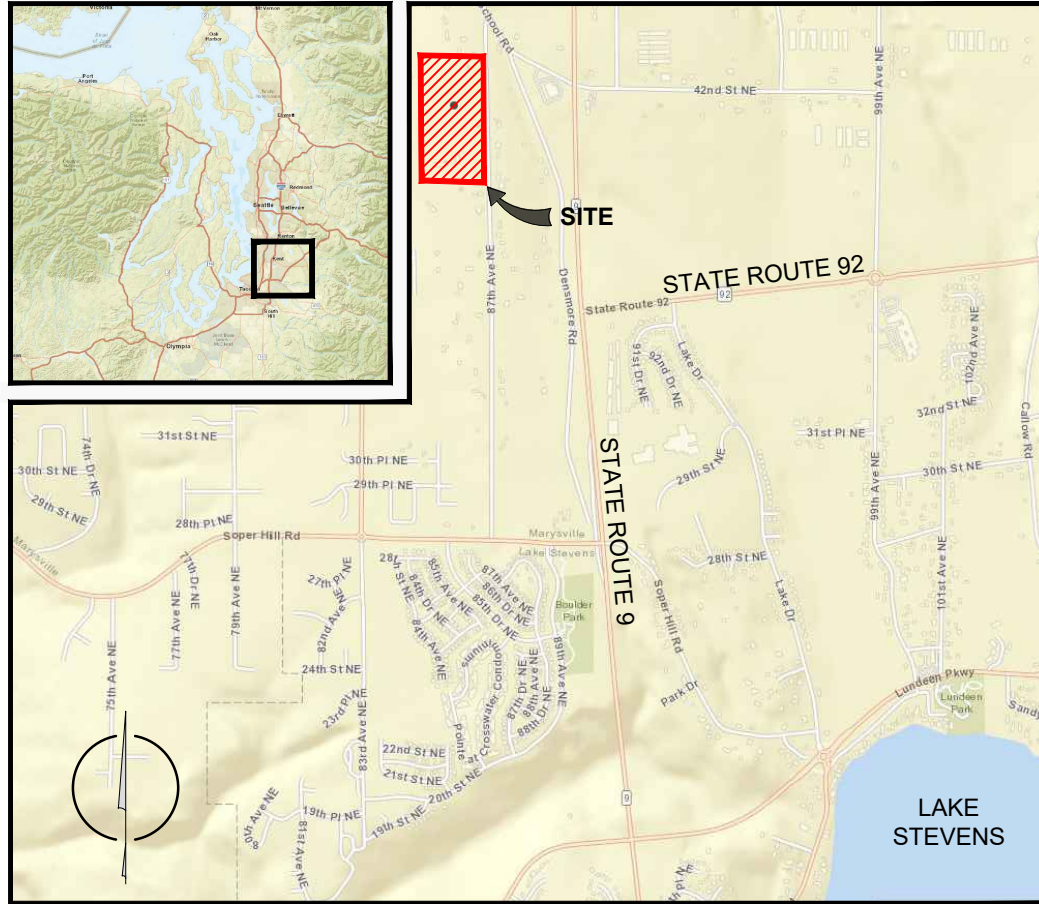
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# Appendix A — Existing Conditions and Proposed Exhibits

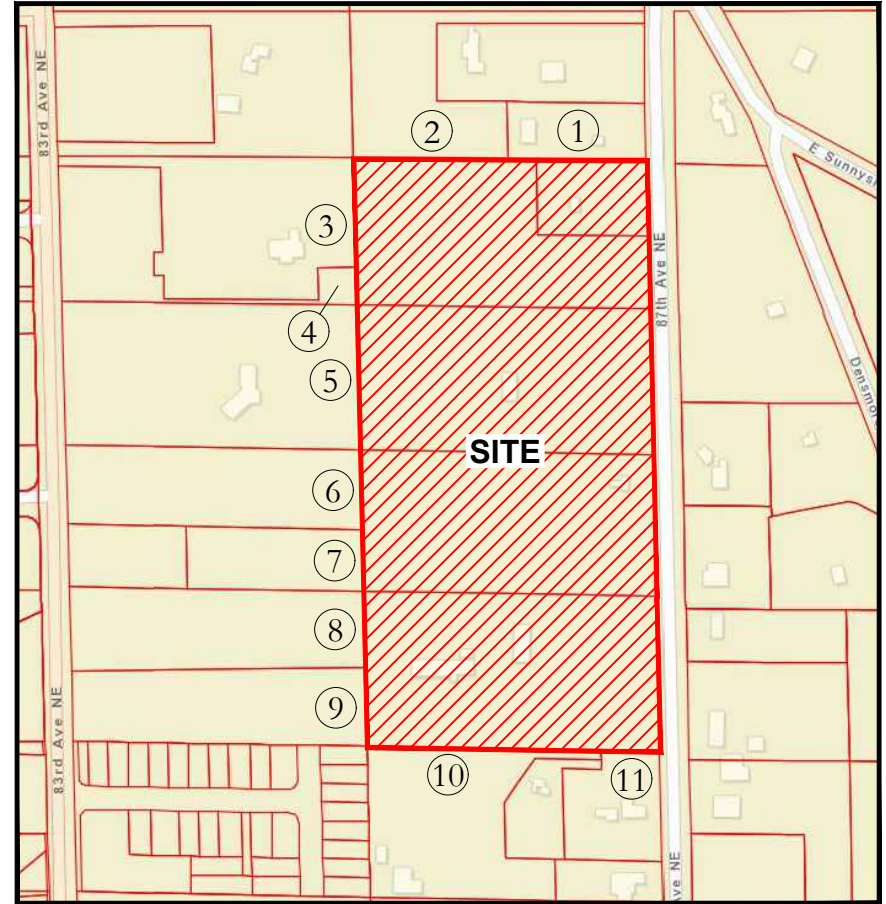
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# 87TH AVE TOWNHOMES - VICINITY MAP



## VICINITY MAP

SOURCE: ESRI, OSM, USGS



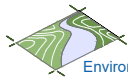
## ADJACENT OWNERSHIP

SOURCE: SNOHOMISH COUNTY

- |                                    |                                 |
|------------------------------------|---------------------------------|
| 1. LIPPINCOTT TANNER D             | 7. KEYSTONE LAND LLC            |
| 2. VASIL JAMES A & PARKER CHERYL D | 8. KEYSTONE LAND LLC            |
| 3. GREEN DONNA MARIE               | 9. KEYSTONE LAND LLC            |
| 4. DEAD KEVIN J & EFTMAN-DEAN LISA | 10. WILLIAMS KEVYN R & ANETTE S |
| 5. BICKFORD MICHAEL & MARY         | 11. PINNELL JENNIFER J          |
| 6. SKIFFINGTON INVESTMENTS LLC     |                                 |

4112 AND 4018 87TH AVE NE MARYSVILLE, WA 98270	
THE NW ¼ OF SECTION 01, TOWNSHIP 29N, RANGE 5E, W.M.	
SNOHOMISH COUNTY PARCEL NUMBERS: 00590700021202, 00590700021300, and 0590700022000	
LAT: 48.03369° N	LON: -122.115499° W

REFERENCE # --	
APPLICANT: PNW INVESTORS LLC.	
PROPOSED PROJECT: PROPOSED RESIDENTIAL DEVELOPMENT	
IN: MARYSVILLE	NEAR: --



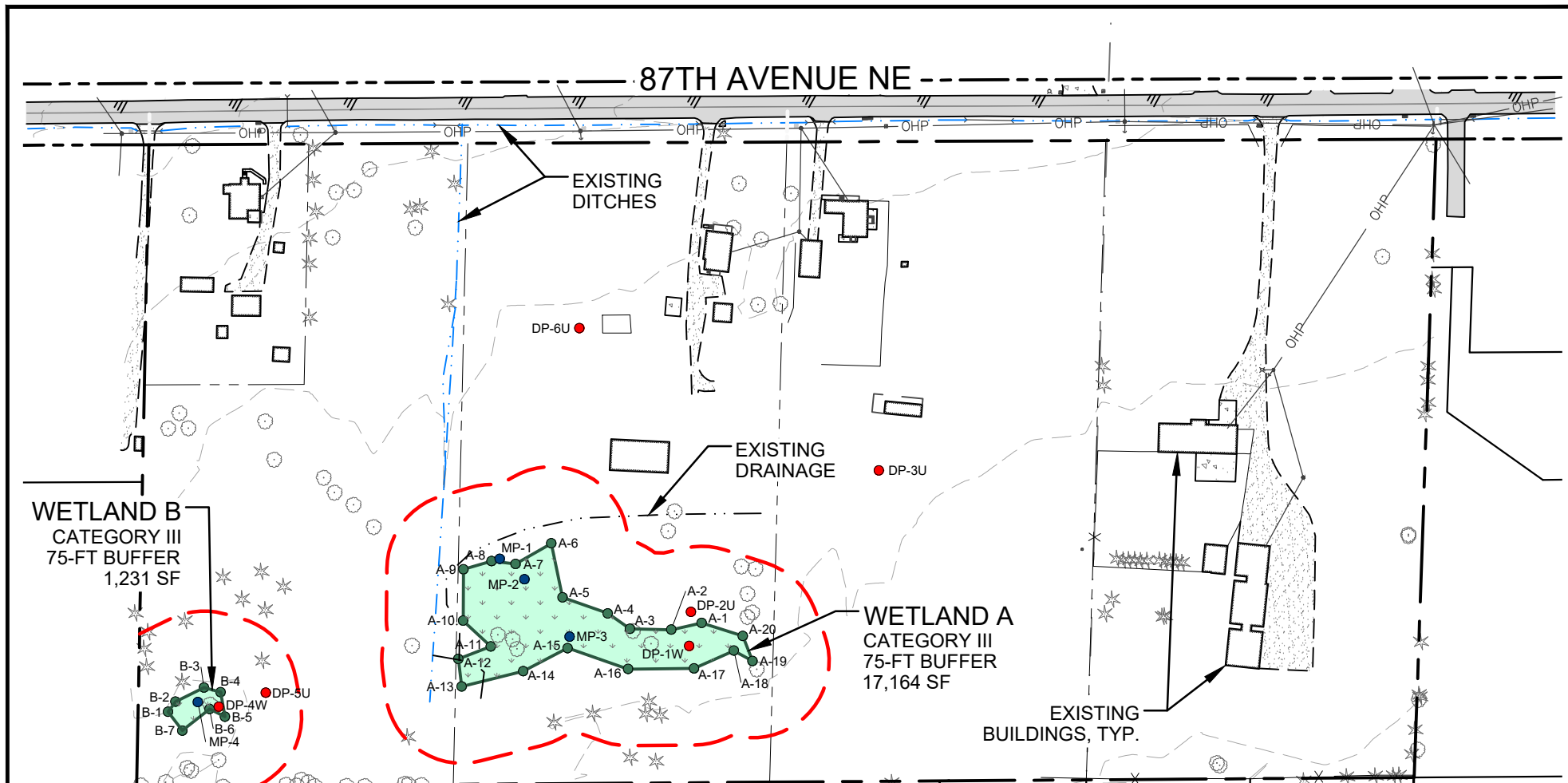
**Soundview Consultants LLC**  
Environmental Assessment • Planning • Land Use Solutions

2907 HARBORVIEW DRIVE  
GIG HARBOR, WASHINGTON 98335  
WWW.SOUNDVIEWCONSULTANTS.COM

P. 253.514.8952  
F. 253.514.8954

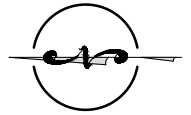
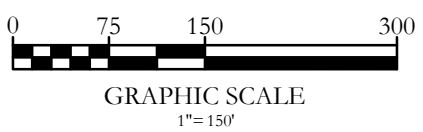
DATE: 11/30/2022
JOB: 1167.0008
BY: MW
SCALE: AS SHOWN
SHEET: 1

# 87TH AVE TOWNHOMES - EXISTING CONDITIONS



## PLAN LEGEND

- PROPERTY LINE
- EXISTING WETLAND BOUNDARY
- WETLAND BUFFER
- W-# WETLAND FLAG LOCATION
- DP-# DATA PLOT LOCATION
- MP-# MONITORING POINT LOCATION



4112 AND 4018 87TH AVE NE MARYSVILLE, WA 98270	
THE NW ¼ OF SECTION 01, TOWNSHIP 29N, RANGE 5E, W.M.	
SNOHOMISH COUNTY PARCEL NUMBERS: 00590700021202, 00590700021300, and 0590700022000	
LAT: 48.03369° N	LON: -122.115499° W

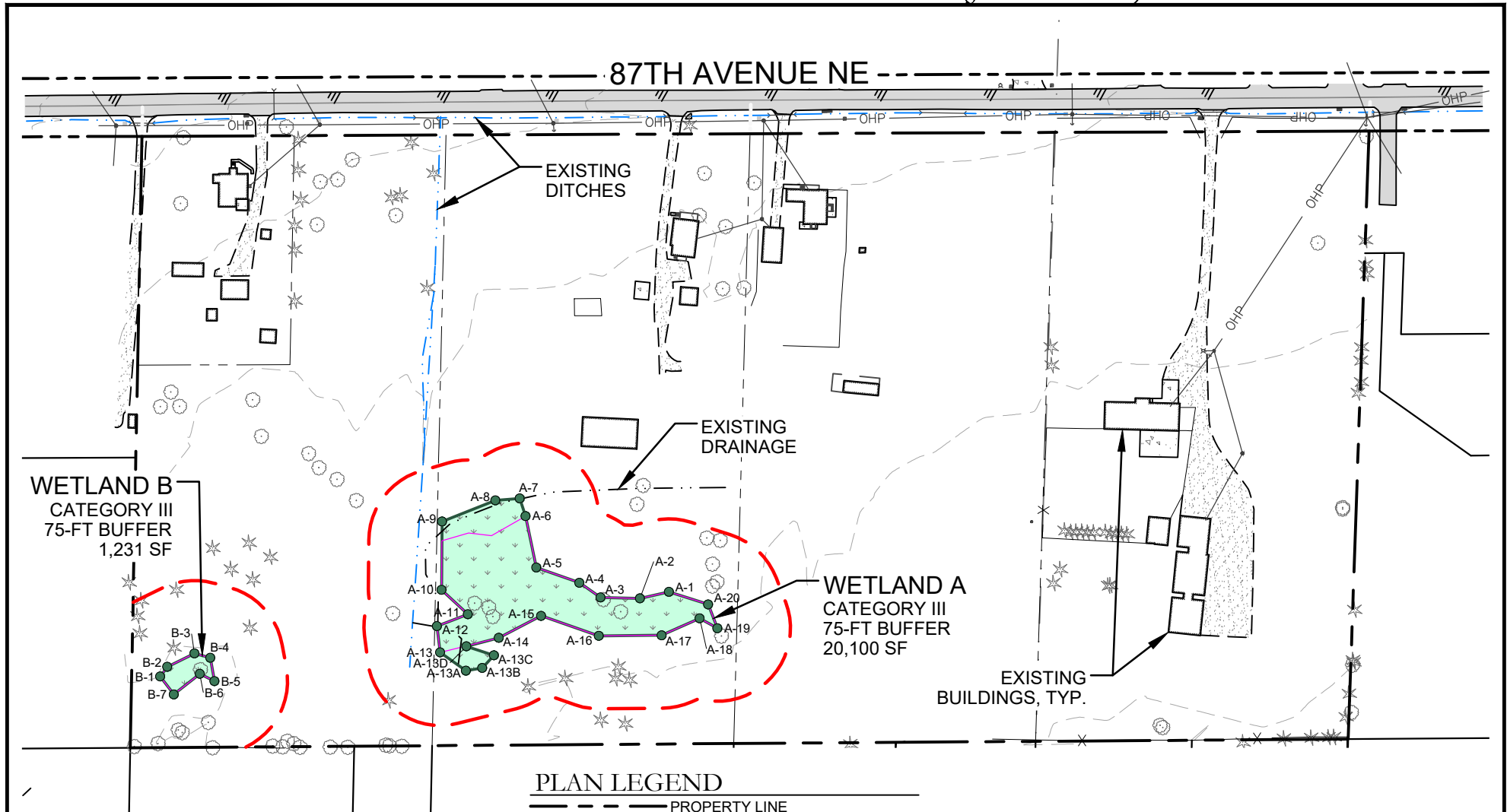
REFERENCE # --
APPLICANT: PNW INVESTORS LLC.
PROPOSED PROJECT: PROPOSED RESIDENTIAL DEVELOPMENT
IN: MARYSVILLE    NEAR: --

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GIG HARBOR, WASHINGTON 98335    F. 253.514.8954  
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DATE: 11/30/2022
JOB: 1167.0008
BY: MW
SCALE: AS SHOWN
SHEET: 2

# 87TH AVE TOWNHOMES - EXISTING CONDITIONS (JAN. 2022)

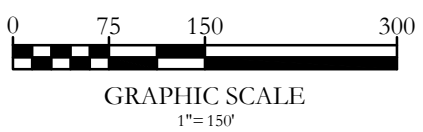


**WETLAND B**  
 CATEGORY III  
 75-FT BUFFER  
 1,231 SF

**WETLAND A**  
 CATEGORY III  
 75-FT BUFFER  
 20,100 SF

**PLAN LEGEND**

- PROPERTY LINE
- WETLAND BOUNDARY (JAN. 2022)
- WETLAND BUFFER
- W-# WETLAND FLAG LOCATION
- WETLAND BOUNDARY (REVISED)



4112 AND 4018 87TH AVE NE  
 MARYSVILLE, WA 98270

THE NW ¼ OF SECTION 01,  
 TOWNSHIP 29N, RANGE 5E, W.M.

SNOHOMISH COUNTY PARCEL NUMBERS: 00590700021202,  
 00590700021300, and 0590700022000

LAT: 48.03369° N      LON: -122.115499° W

REFERENCE # --

APPLICANT:  
 PNW INVESTORS LLC.

PROPOSED PROJECT:  
 PROPOSED RESIDENTIAL DEVELOPMENT

IN: MARYSVILLE      NEAR: --

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DATE: 11/30/2022

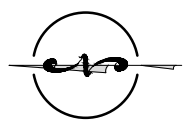
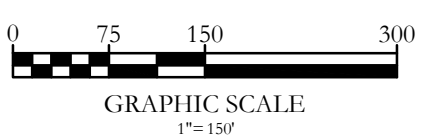
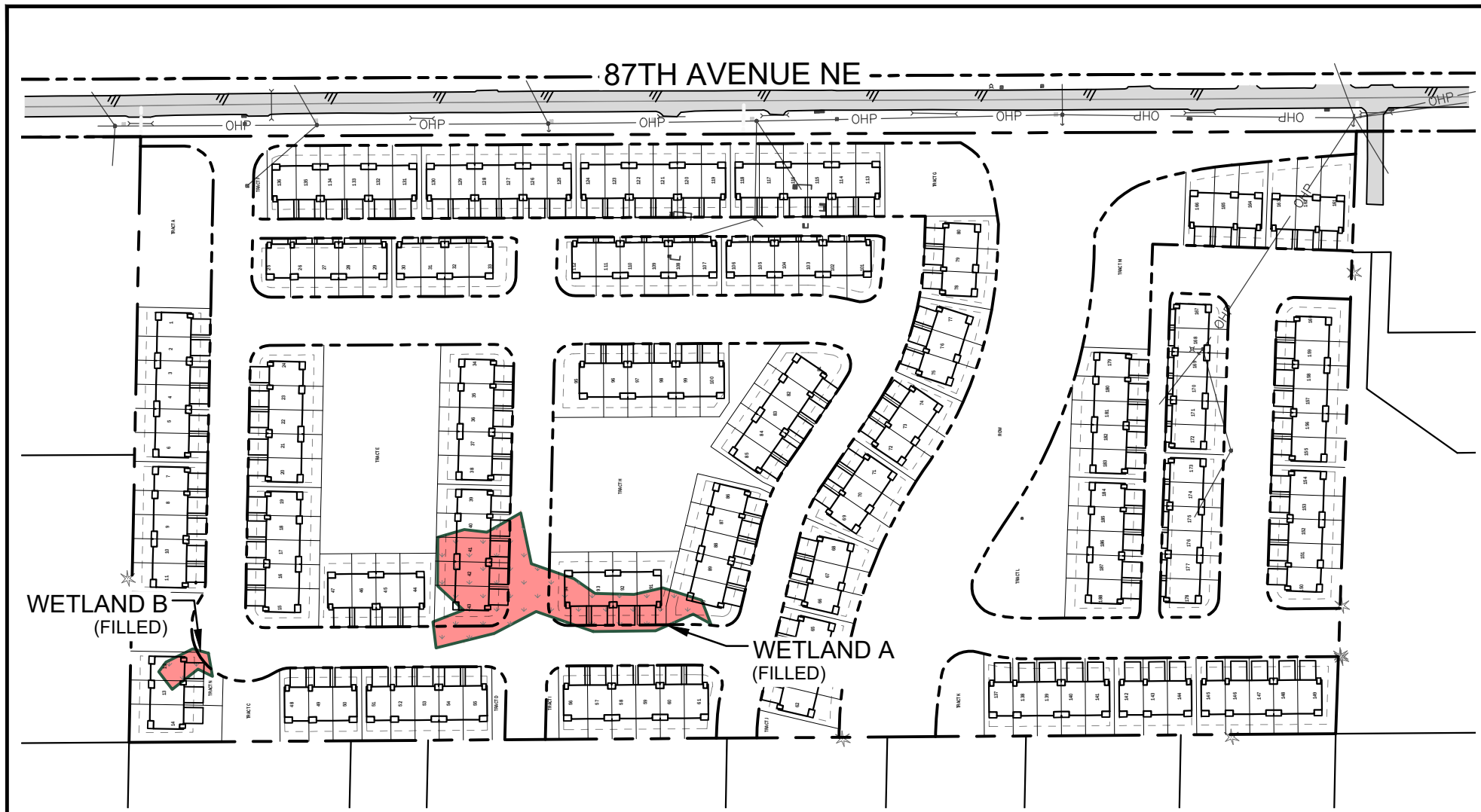
JOB: 1167.0008

BY: MW

SCALE: AS SHOWN

SHEET: **3**

# 87TH AVE TOWNHOMES - PROPOSED SITE PLAN & IMPACTS



## IMPACTS LEGEND

WETLAND A FILL	17,164 SF
WETLAND B FILL	1,231 SF
TOTAL WETLAND FILL:	18,395 SF

4112 AND 4018 87TH AVE NE  
MARYSVILLE, WA 98270

THE NW ¼ OF SECTION 01,  
TOWNSHIP 29N, RANGE 5E, W.M.

SNOHOMISH COUNTY PARCEL NUMBERS: 00590700021202,  
00590700021300, and 0590700022000

LAT: 48.03369° N      LON: -122.115499° W

REFERENCE # --

APPLICANT:  
PNW INVESTORS LLC.

PROPOSED PROJECT:  
PROPOSED RESIDENTIAL DEVELOPMENT

IN: MARYSVILLE      NEAR: --



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GIG HARBOR, WASHINGTON 98335      F. 253.514.8954

[WWW.SOUNDVIEWCONSULTANTS.COM](http://WWW.SOUNDVIEWCONSULTANTS.COM)

DATE: 11/30/2022

JOB: 1167.0008

BY: MW

SCALE: AS SHOWN

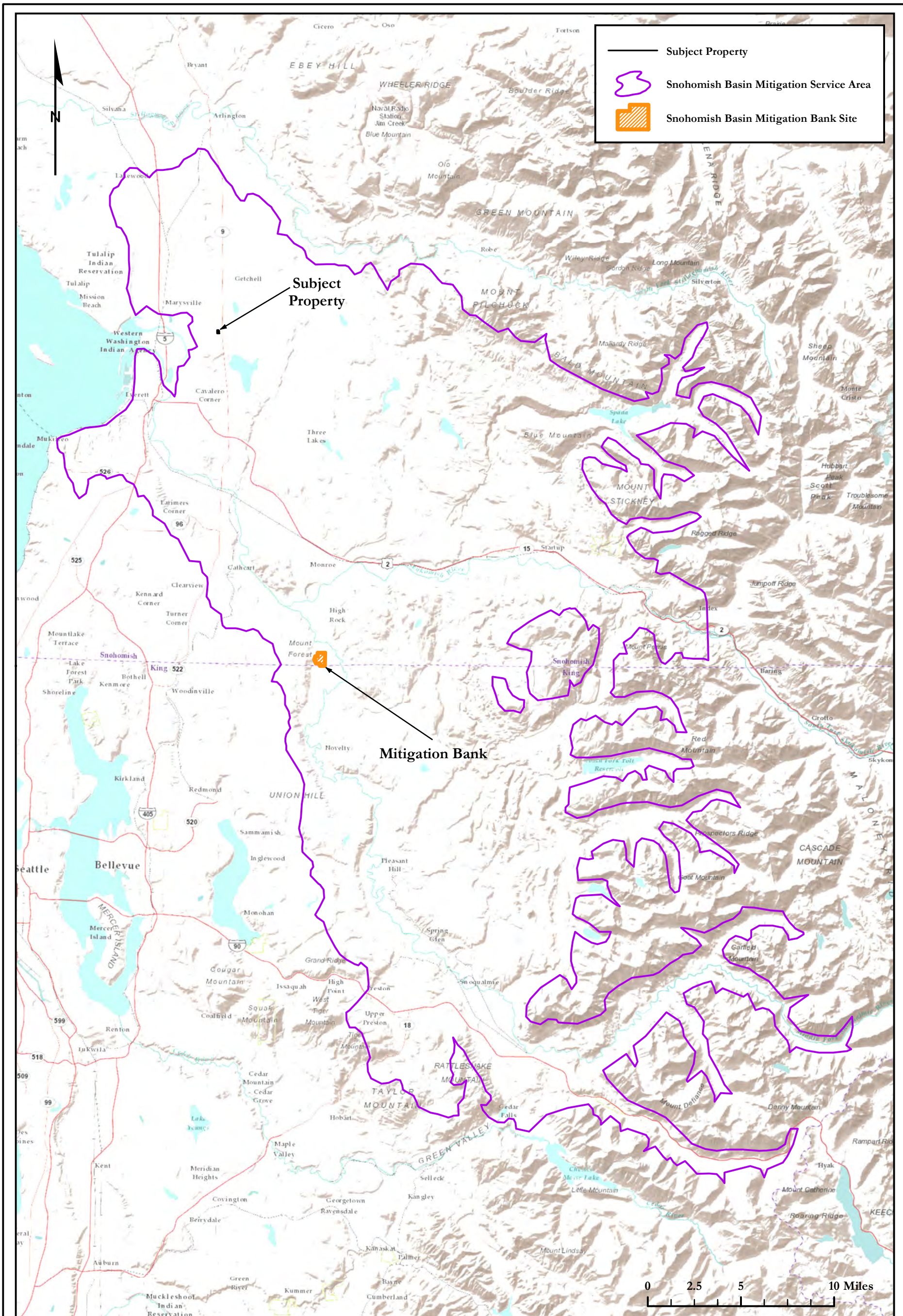
SHEET: 4

# **Appendix B — Mitigation Bank Service Area Exhibit**

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# MITIGATION BANK SERVICE AREA EXHIBIT




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

**87TH TOWNHOMES**  
 4112 & 4018 87TH AVE NE  
 MARYSVILLE, WA 98270

SNOHOMISH COUNTY PARCEL NUMBERS:  
 00590700021202, 00590700021300, & 00590700022000

DATE: 9/14/2022
JOB: 1167.0008
BY: DS
SCALE: 1" = 5 mi
FIGURE NO. 3 of 3



## Appendix C — Qualifications

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All field inspections, wetland delineations, habitat assessments, and supporting documentation, including this ***Bank Use Plan*** prepared for ***87th Avenue Townhomes*** site were prepared by, or under the direction of, Jon Pickett of SVC. In addition, report preparation was completed by Lauren Templeton, and additional project oversight and final quality assurance / quality control was completed by Kyla Caddey.

### Jon Pickett

Associate Principal

Professional Experience: 10+ years

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

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

### Kyla Caddey, PWS, Certified Ecologist

Senior Environmental Scientist

Professional Experience: 8 years

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Kyla Caddey is a Senior Environmental Scientist with a diverse background in stream and wetland ecology, wildlife ecology and conservation, wildlife and natural resource assessments and monitoring, and riparian habitat restoration at various public and private entities. Kyla has field experience performing in-depth studies in both the Pacific Northwest and Central American ecosystems which included various environmental science research and statistical analysis. Kyla has advanced expertise in federal- and state-listed endangered, threatened, and sensitive species surveys and assessment of aquatic and terrestrial systems throughout the Puget Sound region. She has completed hundreds of wetland delineations and has extensive knowledge and interest in hydric soil identification. As the senior writer, she provides informed project oversight and performs final quality assurance / quality control on various types of scientific reports for agency submittal, including: Biological



Assessments/Evaluations; Wetland, Shoreline, and Fish and Wildlife Habitat Assessments; Mitigation Plans, and Mitigation Monitoring Reports. She currently performs wetland, stream, and shoreline delineations and fish and wildlife habitat assessments; prepares scientific reports; and provides environmental permitting and regulatory compliance assistance to support a wide range of commercial, industrial, and multi-family residential land use projects.

Kyla earned a Bachelor of Science degree in Environmental Science and Resource Management from the University of Washington, Seattle with a focus in Wildlife Conservation and a minor in Quantitative Science. She has also completed additional coursework in Comprehensive Bird Biology from Cornell University. Ms. Caddey is a Certified Professional Wetland Scientist (PWS #3479) through the Society of Wetland Scientists and Certified Ecologist through the Ecological Society of America. She has received 40-hour wetland delineation training (Western Mtns, Valleys, & Coast and Arid West Regional Supplement), is a Pierce County Qualified Wetland Specialist and Wildlife Biologist, and is a USFWS-approved Mazama pocket gopher survey biologist. Kyla has been formally trained through the Washington State Department of Ecology, Coastal Training Program, and the Washington Native Plant Society in winter twig and grass, sedge, and rush identification for Western WA; Using the Credit-Debit Method in Estimating Wetland Mitigation Needs; How to Determine the Ordinary High Water Mark; Using Field Indicators for Hydric Soils; How to Administer Development Permits in Washington Shorelines; Puget Sound Coastal Processes; and Forage Fish Survey Techniques. Additionally, she has received formal training in preparing WSDOT Biological Assessments.

## **Lauren Templeton**

Environmental Scientist

Professional Experience: 4 years

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Lauren Templeton is an Environmental Scientist with a professional background in environmental planning, wetland science, stream ecology, water quality, natural resource assessments and monitoring, and NEPA compliance. Lauren has a background in wetland and biological assessments in various states, most notably Washington, Montana, Oregon, and New Mexico. Her project experience includes residential land use and developments, transportation, and water resources projects, working for federal, state, tribal, and private agencies. Lauren has experience developing various environmental documentation including environmental assessments, biological evaluations, mitigation reports, and permit applications at the federal, state and tribal levels. Additionally, Lauren has experience utilizing desktop and remote GIS software and equipment to collect and process data, perform data analysis, and develop delineation exhibits. Lauren currently performs wetland delineations, conducts environmental code analysis, and prepares various environmental compliance documentation including fish and wildlife habitat assessments, biological evaluations, and permit applications.

Lauren graduated from Western Washington University with a Bachelor of Arts in Environmental Science and Policy where she gained hands-on experience associated with water quality, statistical analysis, CERCLA projects, and ecological biomonitoring. Lauren has completed Basic Wetland Delineator Training with the Wetland Training Institute and received 40-hour USACE wetland delineation training. Lauren has been formally trained through the Washington State Department of Ecology, Coastal Training Program, How to Determine the Ordinary High Water Mark, Using the Washington State Wetland Rating System, and Using the Credit-Debit Method for Estimating Mitigation Needs. Additionally, Lauren has been trained through the Shipley Group on the National

Environmental Policy Act, Endangered Species Act, National Historic Preservation Act, and Administrative Record.