Preliminary Critical Area Report and Conceptual Mitigation

Prepared For

City of Marysville 501 Delta Avenue Marysville, WA 98270

December 15, 2023

Marysville Riverwalk Project





EXECUTIVE SUMMARY

PROJECT NAME: Marysville Riverwalk

LOCATION: The project is located at 80 Columbia Avenue and 60 State Avenue, in Marysville, WA, within the NW 1/4 of Section 33 of Township 30N, Range 05E, W.M (the Site). It also includes portions of 13 residential parcels the City acquired as part of the 1st Street bypass project in 2019.

CLIENT: City of Marysville

PROPOSED PROJECT: The City of Marysville proposes a water-dependent mixed-use development on the Ebey Slough waterfront to realize its vision for downtown Marysville as presented in the 2019 Downtown Master Plan.

The proposed project is a mixed-use development including multi-family luxury apartments, a hotel, restaurants, a sports facility, a public plaza, and open space connections to the Ebey Waterfront trail and connecting commercial uses.

PRELIMINARY DETERMINATION: Three wetlands, one stream, and the Ebey Slough shoreline were identified directly adjacent to or within the project corridor. The wetlands and streams are summarized below.

Wetland Classification Buffer Wetland Wetlanda Local Width Cowardin^b **HGM Ecology**^c Size (acre) urisdiction^d (feet)e WL1 PEM1Ch Depressional Category III 18+/-Category III 75 WL2 **PEMIC** Depressional Category III Category III 2.5+/-75 Freshwater Tidal WL3 E2EM1N Category II Category II 0.75+/-25 Fringe

Table 1. Wetlands within the Project Vicinity.

Table 4.	Streams	within	the	Proi	iect (Corrido	ır
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Stream Name	DNR Water Type	City of Marysville Buffer Width (feet)
Ebey Slough	Type S	70' under Marysville SMP
Stream 1	Type F	150'

IMPACTS: The impact consists of filling 2,000 square feet of Category III wetland and 16,400 square feet its associated buffer, and placing 6,800 square feet (500 linear feet) of Type F stream into an appropriately sized pipe.

Table 5. Impact Summary

Impact Area	Category	Total Impact Area (acres)
Wetland "WL2"	Category III Wetland	0.05
WL2 Buffer	Category III Wetland Buffer	0.38
Stream 1	Type F Stream	0.16



MITIGATION: Purchase appropriate quantity of mitigation bank credits within an approved mitigation bank in the area.

TABLE OF CONTENTS

1.0 INTRODUCTION	
2.1 Project Location	
2.2 STUDY AREA	
3.0 METHODS	
3.1 Wetland Review	
3.2 STREAM REVIEW	
3.3 Species and Habitats of Interest	
4.0 EXISTING CONDITIONS	
4.1 LANDSCAPE SETTING	Δ
4.2 WETLANDS	
4.2.1 Overview	
4.2.2 Vegetation	
4.2.3 Soils	
4.2.4 Hydrology	
4.2.5 Wetland Functions	
4.2.6 Wetland Buffers	<i>E</i>
4.3 STREAMS	
4.3.1 Ebey Slough	
4.3.2 Stream 1	
5.0 SPECIES AND HABITATS OF INTEREST	
6.0 IMPACT ASSESSMENT	
6.1 Project Purpose and Description	
6.2 IMPACT ANALYSIS	
6.2.1 Water Quality Improvements	
6.2.2 Fish and Wildlife Functions Impacts	
6.2.3 Hydrologic Functions	
6.2.4 Cumulative Impacts	
7.0 MITIGATION	
7.1 Mitigation Sequencing	
7.1.1 Avoid	
7.1.2 Minimize	
7.1.3 Rectify	
7.1.4 Reduce	
7.1.5 Compensate	
8.0 CONCEPTUAL MITIGATION STRATEGY	13
8.1 Stream Channel Restoration	Error! Bookmark not defined
8.2 WETLAND ENHANCEMENT	Error! Bookmark not defined
8.3 Monitoring, Maintenance, and Bonding	13
8.3 BANK USE CREDITS	17



9.0	LIMITATIONS	14
10.0	REFERENCES	15
LIST	Γ OF FIGURES	
	RE 1. VICINITY MAP.	
FIGUR	re 2. Existing Conditions Map	6
FIGUR	RE 3. SITE PLAN AND CONCEPTUAL MITIGATION PLAN.	10
LIST	Γ OF TABLES	
TABLE	e 1. Wetlands within the Project Vicinity	5
TABLE	e 2. Dominant Vegetation Observed at Each Wetland	6
	e 3. Primary Hydrologic Inputs Observed at Each Wetland	
TABLE	e 4. Streams within the Project Corridor	8

APPENDICES

APPENDIX A Wetland Rating Forms



ACRONYMS AND ABBREVIATIONS

DNR Washington Department of Natural Resources
Ecology Washington State Department of Ecology

ESA Endangered Species Act

HGM hydrogeomorphic wetland classification

LRR land resource area
MLRA major land resource area

MP milepost

NOAA National Oceanic and Atmospheric Administration

NRCS Natural Resources Conservation Service

NWI National Wetlands Inventory
OHWM ordinary high water mark
PEM palustrine emergent
PHS priority habits and species

ROW right-of-way

USFWS US Fish and Wildlife Service USGS US Geological Survey

WMVC Western Mountains, Valleys, and Coast

(regional supplement to the USACE Wetland Delineation Manual)

WDFW Washington State Department of Fish and Wildlife

WRIA water resource inventory area



1.0 INTRODUCTION

This report provides an assessment of wetlands, streams and fish and wildlife habitat areas within the study area for the Marysville Riverwalk project. It also includes a description of existing conditions anticipated impacts, and a conceptual mitigation approach to compensate for proposed impacts on critical area and fish and wildlife habitat functions and values.

The information provided in this report was based on the review of available online public resources and a site visit to evaluate the existing conditions. This report is prepared for the City of Marysville to use during site planning and permitting procedures.

All waters identified in this report are assumed to be under US Army Corps of Engineers (Corps), Washington State Department of Ecology (Ecology), and Washington Department of Fish and Wildlife jurisdictions. Buffers are regulated by the City of Marysville.

2.0 REVIEW AREA

2.1 Project Location

The project is located at 80 Columbia Avenue and 60 State Avenue, in Marysville, WA, within the NW 1/4 of Section 33 of Township 30N, Range 05E, W.M (the Site). It also includes portions of 13 residential parcels the City acquired as part of the 1st Street bypass project in 2019. See Figure 1 on the next page for a view of the project's vicinity.

2.2 Study Area

The study area includes the project boundary and areas within 300 feet surrounding it. We did not access off-site conditions beyond what could be observed from public roads and across property or fence lines. We used aerial photograph interpretations and published inventories to assess conditions beyond the public rights-of-way.





Figure 1. Vicinity Map.



3.0 METHODS

Our methods included review of existing databases to gather information on topography, drainage patterns, soils, vegetation, and potential or known wetlands and streams in the project vicinity and a site investigation to verify conditions. The information and conclusions are based on the professional judgment of Perteet ecological staff using readily available information. Wetland field delineations and determination data collection are imminent during later project application reviews.

The following resources were reviewed:

- National Wetlands Inventory (NWI) maps (US Fish and Wildlife Service, 2023).
- NRCS Web Soil Survey for Snohomish County, Washington (NRCS, 2023) and Washington State Hydric Soils (NRCS, 2023).
- Wetlands of High Conservation Value and Washington State threatened, endangered, and sensitive plants (Washington State Department of Natural Resources [DNR], 2023).
- Federally listed threatened, endangered, or candidate wildlife species (Washington State Department of Fish and Wildlife [WDFW], 2018) and proposed and designated critical habitat (National Oceanic and Atmospheric Administration Fisheries, 2023).
- WDFW Priority Habitats and Species (WDFW, 2023).
- City of Marysville Critical Areas Map (Marysville, 2023).
- Washington State Department of Natural Resources (DNR) Forest Practices Application Mapping Tool.

The field visit for this assessment was completed on September 26, 2023, by Perteet ecological staff to evaluate the existing conditions and estimate the boundaries of regulated aquatic areas in the project area.

Wetland and stream assessment and report preparation follow policy and guidance under the Marysville Municipal Code Chapter 22E.

The City of Marysville buffers (Marysville, 2023) were applied to wetlands, streams, and other waters in the project, in conjunction with the Washington State Department of Natural Resources (DNR) Forest Practices Rules, water type classifications (DNR, 2023).

3.1 Wetland Review

Wetland indicators are determined using the routine methods described in the Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0) (WMVC Regional Supplement) (USACE 2010).

Wetlands were classified using the US Fish and Wildlife Service (USFWS) classification system (Cowardin) (USFWS 1979) and the hydrogeomorphic classification system (HGM) (Brinson 1993). Wetlands were rated using the Washington State Wetland Rating System for Western Washington: 2014 Update (Hruby 2014), as required by the Marysville Municipal Code (MMC), Chapter 22E.010 (Marysville, 2023).

The Marysville Municipal Code (MMC), Chapter 22E.010, was evaluated for wetland buffer requirements for wetlands near the project. Anticipated buffer widths range from 25 on wetlands associated with Ebey Slough to 75 feet on Category III wetlands.



3.2 Stream Review

Stream ordinary high water mark (OHWM) follows the USACE guidance for OHWM identification (USACE 2014) and Ecology's guidance for Determining the Ordinary High Water Mark for Shoreline Management Act Compliance in Washington State (Ecology 2016).

Fish presence was determined based on available WDFW Fish Passage Inventory (WDFW, 2023) and Fish Distribution data (WDFW and Northwest Indian Fisheries Commission, 2018).

Impaired waters, those on the 303(d) list or covered by a Total Maximum Daily Load (TMDL), in the study area were identified using Ecology's Water Quality Atlas website.

Special designations were determined using the Corps list of Navigable Waters of the United States in Washington State (Corps, 2008) and the National Wild and Scenic Rivers System website for Washington State.

3.3 Species and Habitats of Interest

Under federal Section 404 Clean Water Act Permitting, a separate Biological Assessment (BA) will address impacts to Endangered Species Act (ESA) federally listed threatened or endangered wildlife species and proposed and designated critical habitat, as needed. This report includes preliminary information regarding potential ESA species and habitat, Washington State threatened, endangered, or sensitive species, and habitats of interest that may occur in the project. The following data sources were reviewed for information on federally and state listed threatened, endangered, candidate, sensitive species, and species of concern (TES), as well as habitats of interest:

- Federally listed threatened, endangered, or candidate wildlife species (WDFW 2023) and proposed and designated critical habitat (NOAA 2023).
 WDFW Priority Habitats and Species (PHS) (WDFW 2023).
- Washington State threatened, endangered, and sensitive plants (DNR 2023).
- Wetlands of High Conservation Value (DNR 2023).

4.0 EXISTING CONDITIONS

4.1 Landscape Setting

The site is situated on low-lying topography along the northern side of the Ebey Slough Waterfront with minor variations in elevations just above sea level. Flood deposits and low river terraces are the predominant geomorphic features in the area. Ebey Slough is a significant water body, part of an extensive estuary system in the Snohomish River delta.

The dominant vegetation community in the area consists of wetland plants and species adapted to the coastal and estuarine environment, such as marsh grasses, sedges, thicket of blackberry and Douglas spiraea, as well as stands of willow, black cottonwood, and alder. However, the subject site has largely been denuded of native vegetation and gravel and asphalt cover more than 50% of it.



The current land use activities on-site include light industrial activities and the city of Marysville public works buildings and operations and maintenance center. Surrounding land uses include a mix of residential, commercial, and recreational areas. Waterfront locations often have parks, marinas, and other recreational amenities, such as the paved, publicly accessible Ebey Waterfront Trail.

Historical land uses and disturbances in the area include industrial activities, land reclamation, and the wastewater treatment facility. These historic land uses have altered the natural hydrology for development purposes. Such changes have resulted in limited protection of critical areas and their functions and values, which are at risk of further degradation as development expands into the area.

4.2 Wetlands

4.2.1 Overview

Three wetlands were identified nearby. They are mostly off-site or outside the project boundaries and labeled as WL1, WL2, and WL3 in this report and corresponding exhibits. Table 1 below summarizes the wetlands in the vicinity and the remainder of this subsection includes a description of vegetation, soils, and hydrology and functions and values. Wetland rating forms are provided in Appendix B.

Table 1. Wetlands within the Project Vicinity.

	Wetland Classification				Wetland	Buffer
Wetland ^a	Cowardin ^b HGM I	Ecology ^c	Local Jurisdiction ^d	Size (acre)	Width (feet) ^e	
WL1	PEM1Ch	Depressional	Category III	Category III	18+/-	75
WL2	PEMIC	Depressional	Category III	Category III	2.5+/-	75
WL3	E2EMIN	Freshwater Tidal Fringe	Category II	Category II	0.75+/-	25



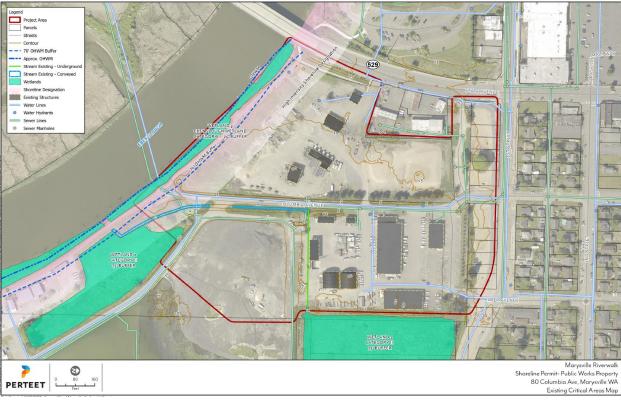


Figure 2. Existing Conditions Map.

4.2.2 Vegetation

Table 2. Dominant Vegetation Observed at Each Wetland.

Wetland	Dominant Vegetation
	Reed canary grass, black cottonwood, pacific willow, Sitka willow, Douglas
WL1	hardhack, Himalayan blackberry, pacific cattail
WL2	Reed canary grass
WL3	Seacoast bulrush, triangle arache

4.2.3 Soils

The NRCS maps the site as containing Puget Silty Clay Loam. This soil is comprised of 85% Puget soils with small includes of Sultan, Snohomish, and Sumas soils. The Puget series is described as very deep, poorly drained soil that formed in flood deposits and largely found on low river terraces and in floodplains. These soils occur in nearly level topography. Common characteristics include a dark grayish brown (2.5Y 3/2) silt loam at the surface and grayish brown (2.5Y 5/2) silty clay loam with dark brown and brown redox concentrations to about 17 inches below the surface. Puget, Snohomish, and Sumas are listed as hydric soils in Washington State.



4.2.4 Hydrology

Surface water and saturation was not observed during the September 26, 2023, site assessment within WL1 and WL2 but inundation is visible in aerial imagery and their geomorphic positions and dominance of Facultative and wetter species are indicators that these areas are influenced by seasonal high groundwater. Hydrology within WL3 within the Ebey Slough channel, is influenced by surface flows and tidal fluctuations.

Table 3. Presumed Hydrologic Inputs Observed at Each Wetland.

Wetland	Primary Hydrologic Input
WL1	Seasonal high groundwater
WL2	Seasonal high groundwater
WL3	Tidal and surface flows

4.2.5 Wetland Functions

WL1 is a large emergent and scrub-shrub wetland located offsite to the east. It has been modified and manipulated over the years through diking and impoundments from high-intensity development on all sides. The wetland supports perennially flowing drainage outlet, persistent vegetation and potential for seasonal ponding. It is surrounded by surface areas that generate excessive runoff and pollutants, and pollution and flooding problems are known to occur in the same basin. Based on these existing conditions, WL1 provides important water quality and hydrologic functions on-site and in the landscape.

Wildlife habitat is limited within the wetland, due to low habitat interspersion, few special habitats features and isolation from habitats. Its association with instream and riparian habitats elevates its value somewhat, but overall, it scores low for habitat functions.

WL2, though smaller than WL1, holds similar conditions and levels of function also due to historical modifications. It receives stormwater discharges and hydrology from the piped stream that originates in WL1 (discussed in greater detail in Section 4.4). WL2 is dominated by persistent vegetation adjacent upland surface areas that generate excessive runoff and pollutants, and pollution and flooding problems are known to occur in the same basin. Based on these existing conditions, WL2 provides important water quality and hydrologic functions on-site and in the landscape.

Wildlife habitat is also limited within WL2 due to low habitat interspersion, few special habitat features, and is isolated from other habitats by heavily developed areas. And although it supports valuable instream and perennial habitat and is near Ebey Slough habitat, its overall value for habitat is low.

WL3 is the tidal fringe wetland influenced by Ebey Slough seasonal fluctuations and regular tidal fluctuations. The wetland is covered by persistent emergent vegetation with potential to trap sediments and pollutants, which benefits the slough and downstream environments. It is somewhat narrow compared to the width of the slough, which hinders its capacity to control floodwaters at the site. It nevertheless has the capacity to reduce flow velocities and protect downstream communities and ecosystems during significant flooding events.

The wetland itself supports relatively low plant diversity with limited special features and hydroperiods, but it can provide important refuge and nutrients for birds, fish, and macroinvertebrates. Its connectedness with Ebey Slough, a lightly used waterway by boaters, and proximity to valuable riparian and instream habitat are indicative of moderate to high habitat function and value in the landscape.



4.2.6 Wetland Buffers

The buffers are mostly degraded and devoid of viable vegetation on this site. The vegetated buffers on WL1 terminate at the edge of the existing developed areas, resulting in roughly 25 feet vegetated areas between the wetland and the existing pavement and building. The buffer on WL2 is partly vegetated with invasive blackberry, reed canary grass, and sporadic black cottonwood. The buffer on WL3 contains the paved pedestrian riverfront walkway as part of the allowed use under the Shoreline Master program and contains some landscape plantings, rose, and blackberries.

Where existing roadways intersect the buffers, the buffer extent is at the base of the road prism. Buffers do not extend across roadways or other legally established uses that functionally limit wetland protection.

4.3 Streams

Two streams occur in the project's vicinity, including Ebey Slough along the southern site boundary and a Type F stream flowing south through the site within the southeastern quarter.

A summary of each aquatic resource is presented in Table 4 below.

Stream Name

DNR Water Type

City of Marysville
Buffer Width (feet)

Type S

70' under Marysville SMP

150

Table 4. Streams within the Project Corridor.

Type F

4.3.1 Ebey Slough

Stream 1

Ebey Slough is part of an extensive estuary system in the Snohomish River delta, classified as a Type S Shoreline of Statewide Significance and borders the south side of the subject site. The shoreline is regulated under the Marysville Shoreline Master Program (SMP). Its setback for mixed uses within the High-Intensity Shoreline Jurisdiction is 70 feet (Marysville Shoreline Management Program, March 2020). Ebey Slough provides valuable habitat for several important fish species, as described in Section 5.0 below.

4.3.2 Stream 1

The Type F stream historically flowed in a meandering channel from WL1 to Ebey Slough where the filled lagoon now exists. The stream is more than 2 feet wide on a low gradient less than 5% between Ebey Slough up to the upper reach in WL1. Marysville Critical Areas Maps (Marysville, 2023) show the stream as unregulated but it is likely a Type F stream.

Stream I was placed in a pipe several decades ago to make way for the Marysville Sewage Lagoon facility. The piped conveyance flows west and discharges to a south-flowing drainage and eventually discharges to Ebey Slough. The ditch conveyance is vegetated with grasses and blackberries along the side slopes but above-bank riparian vegetation is non-existent as it flows through the active industrial site. No fish habitat has been documented within this stream.



5.0 SPECIES AND HABITATS OF INTEREST

As part of the greater Snohomish River delta leading to the Puget Sound, Ebey Slough provides habitat for a variety of species. Important fish include Steelhead Trout, Sockeye Salmon, Pink Salmon, Bull Trout, Coho Salmon, Chinook Salmon, Chum Salmon, and Cutthroat Trout.

Listed species under the Endangered Species Act (ESA) documented within Ebey Slough and nearshore waters of Puget Sound include Puget Sound Chinook salmon, Puget Sound steelhead, and Bull Trout. Other ESA-listed species potentially present in Puget Sound are Stellar sea lion, humpback whale, leatherback sea turtle, marbled murrelet, and Southern Resident killer whale. Of these latter species, only Southern Resident killer whale is likely to be present in the nearshore or estuarine waters of Ebey Slough.

Ebey Slough is critical habitat for Puget Sound Chinook salmon and steelhead, and the outer part of the Snohomish River delta, 0.3 miles west of the site is critical habitat for Southern Resident killer whale.

For Marbled Murrelet there is a final critical habitat for this species identified on IPaC; however, the project location does not overlap the critical habitat.

6.0 IMPACT ASSESSMENT

6.1 Project Purpose and Description

The City of Marysville is embarking on re-purposing city lands currently used for light industrial purposes into a water-dependent mixed-use development on the Ebey Slough waterfront. The project is intended to meet the City's vision for its downtown as presented in the 2019 Downtown Master Plan.

The proposed project is a mixed-use development including multi-family luxury apartments, a hotel, restaurants, a sports facility, and public plaza, and open space connections to the Ebey Waterfront trail and connecting commercial uses.

To achieve this development plan, it is necessary to add significant amount of fill to the site (187,500 CY) to bring it above base flood elevation. As a result, a portion of a Category III wetland ("WL2") will be filled, and a Type F steam ("Stream 1") will be placed in an appropriately sized pipe. The work is anticipated to begin in June 2024, upon receipt of applicable permits. The impacts are summarized as follows.

- Wetland impact—Fill approximately 2,000 square feet of Category III wetland (WL2) and 16,400 square feet of its associated buffer located in the southeastern corner of the site, where the project overlaps these areas.
- Stream impact—Place approximately 500 linear feet/6,800 square feet of the ditched stream channel into a pipe where it flows through the southeastern quadrant of the site. After enclosure of the watercourse, the aforementioned fill will be added to the site.

To mitigate the permanent impacts, the City will purchase mitigation bank credits from a State-certified mitigation bank through either the Qwuloolt Estuary or the Blue Heron Slough Conservation Bank or a combination of the two, depending on availability. All other provisions for wetland mitigation banking under MMC Chapter 22E.010.130 will apply.

9





Figure 3. Site Plan and Conceptual Mitigation Plan.

6.2 Impact Analysis

6.2.1 Water Quality Improvements

Existing Conditions

The subject site is currently in degraded condition, developed with industrial uses. Runoff entering drainage ditches connects with natural hydrology of the channelized watercourse ("Stream 1") between WL1 and WL2. It is assumed that pollutants and mobilized sediments from these ditches are potentially mobile through the water column and ultimately discharge to Ebey Slough. The local drainage basin contains 303d listed water and is part of a TMDL, indicating that water quality improvement functions are of value to the area. However, the site's condition and existing uses provides essentially no water quality function.

Potential Impact

The project footprint will occur over existing degraded surfaces and paved and built areas. Vegetation removal will be limited to herbaceous and weed vegetated surrounding the site, and a few scattered deciduous trees and scrub-shrub vegetation within the designated wetland fill area. Native landscaping will be established within the new buffers, as well as areas within Wetland 2 and along the Ebey Slough setback (regulated under the SMP) to ensure a no net loss of vegetation on the site.

Stormwater measures will comply with the 2019 Washington Department of Ecology Stormwater Manual and implement LID where possible. Construction impacts will be minimized to the greatest extent possible, best management practices (BMPs) will be implemented to prevent the mobilization of sediments and ensure that site disturbances remain on-site.



We presume placing Stream 1 in a closed system where stormwater runoff no longer enters it would result in moderate improvements to water quality compared to current conditions. This is largely because any mobilized sediments and pollutants from the industrial uses that wash into the storm system will be eliminated through the site's planned stormwater management. Therefore, the risk of those sediments and pollutants entering the waters of Ebey Slough will be eliminated.

Impact Determination

No water quality impacts are anticipated since the project the projects plans ensure that no pollutants from the site will enter downstream systems. Implementing construction BMPs, the latest stormwater management methods, and a significant net increase in native landscaping will ensure that the project will not detrimentally impact water quality.

6.2.2 Fish and Wildlife Functions Impacts

Existing Conditions

Stream 1 drains out of WL1 through approximately 410 linear feet of a west-flowing pipe, then enters an open drainage ditch, flowing south along a roadside ditch before flowing into WL2 and out to Ebey Slough. The water course contains no known documented presence of salmonids or other aquatic species. It lacks canopy cover and contains invasive species. The culvert under the waterfront trail is a presumed barrier to salmonids. As such, it is presumed that fish usage is likely low due to existing impacted conditions within the watercourse.

Potential Impact

The city proposes to place approximately 500 linear feet of the stream currently within an open channel into a closed pipe to outlet into WL2 just before flowing into Ebey Slough. The impact will result in a total of 6,800 square feet of open channel to be piped. The project is expected to have no direct impact on fish and wildlife functions since virtually none exist within the project area. The project will not remove important vegetation since virtually none exists. The City plans to mitigate the impact by paying for mitigation bank credits in a local, statecertified mitigation bank.

Impact Determination

The purchase of mitigation bank credits will sufficiently mitigate the impacts associated with placing 575 linear feet of a degraded, ditched stream into a pipe.

6.2.3 Hydrologic Functions

Existing Conditions

The site is degraded with hardened surfaces, limited vegetation cover and limited capacity to retain significant volumes of floodwaters. It is almost entirely within the floodplain.

Potential Impact

Although the site and approximately 2,000 square feet of wetland is to be filled to just above base flood elevations, the floodway will not be filled. Placing Stream 1 in a pipe will not alter hydrologic functions as a result of the project. Vegetation enhancement along the Ebey shoreline will be enhanced as part of the SMP requirements, which can help to control hydrologic processes. Furthermore, displaced floodwaters can be taken up by WL1 and WL2.



Impact Determination

The project does not result in significant loss of hydrologic function since nearby wetlands and the new stream corridor have the capacity to store large volumes of hydrology and planting significant amounts of native vegetation along the shoreline will help to control hydrologic processes.

6.2.4 Cumulative Impacts

The subject site is currently heavily degraded and developed with industrial uses within the downtown core growth area of Marysville. The proposed redevelopment project will convert the site to other high intensity mixed uses. We would anticipate that population growth and development will continue to increase as part of the redevelopment plan on-site and in surrounding areas. Along with that, traffic and noise levels are expected to increase. But industrial noises will decrease. Although the project requires significant fill placement, it is unlikely to detrimentally impact water quality or hydrologic functions as BMPs and the most current stormwater methods will be implemented. Furthermore, cumulative impacts on fish and wildlife habitat are expected to be low since these functions are virtually nonexistent on-site, compensatory mitigation will ensure no-net-loss of functions, and development impacts will be contained on-site.

7.0 MITIGATION

The on-site wetlands and stream are assumed to be under the jurisdiction of the City of Marysville, Ecology, Corps, and WDFW. Compensatory mitigation measures are proposed to replace impacted functions and are designed to meet Marysville, WDFW, and interagency guidance documentation to the greatest extent possible.

7.1 Mitigation Sequencing

Project proponents are required to demonstrate mitigation sequencing, according to MMC 22E.010.110.1(a-f) if impacts are proposed. This means the applicant must demonstrate that all reasonable efforts have been taken to mitigate impacts in the following sequence: Avoiding the impact, minimizing the impact, rectifying the impact, reducing the impact over time, and compensating the impact. The discussion follows.

7.1.1 Avoid

The proposed project avoids all direct impact on Ebey Slough waters and its buffers but impacts on 2,000 square feet of WL2 and 6,800 square feet of Stream 1 are unavoidable to bring the elevation of the site above flood elevation. Not taking action to increase the site elevation could render the new development at risk of damage from flooding and could also put the health and safety of residents at risk during a significant flood event. Avoiding the steam by not taking action to place it in a pipe would impact approximately 25% of the project area, precluding the entire sports complex that is already part of the City's downtown master redevelopment plans.

7.1.2 Minimize

To minimize impacts to the greatest extent possible, best management practices (BMPs) will be implemented to prevent the mobilization of sediments and ensure that site disturbances remain on-site. Additionally, the project stormwater plans will comply with the 2019 Washington Department of Ecology Stormwater Manual and implement LID where possible.



7.1.3 Rectify

Since impacts are permanent, no restoration measures are anticipated. If any unplanned disturbances occur, a qualified wetland specialist shall evaluate the area and prepare a restoration plan for City review and approval.

7.1.4 Reduce

Stormwater management facilities will be maintained to ensure that water quality functions are not impacted. The protected critical areas and buffer will be demarcated with special signage to ensure their protection.

7.1.5 Compensate

To mitigate the permanent impacts on 2,000 square feet of Category III wetland, 16,400 square feet of its associated buffer, and 6,800 square feet of Type F stream, the City will purchase mitigation bank credits from a State-certified mitigation bank and all other provisions for wetland mitigation banking under MMC Chapter 22E.010.130 will apply.

8.0 CONCEPTUAL MITIGATION STRATEGY

8.1 Overview

The impact consists of filling 2,000 square feet of Category III wetland and 16,400 square feet its associated buffer, and placing 6,800 square feet (500 linear feet) of Type F stream into an appropriately sized pipe. There are two mitigation banks in the area in which the City will inquire about availability of credits and recommended purchase ratios for each impact area.

Impact Area	Category	Total Impact Area (acres)
Wetland "WL2"	Category III Wetland	0.05
WL2 Buffer	Category III Wetland Buffer	0.38
Stream 1	Type F Stream	0.16

Table 5. Impact Summary

8.2 Site Selection Using a Watershed Approach

To mitigate the permanent wetland impacts, the City proposes to purchase credits through either the Qwuloolt Estuary or the Blue Heron Slough Conservation Bank or a combination of the two as appropriate and available. On-site and in-kind replacement measures through wetland enhancement and stream restoration were considered for this project but it was determined that permittee-responsible mitigation poses too great of a risk of failure. The risk of failure is largely due to several identified several human-induced constraints, as explained below.

Regarding the ditched stream, the City had considered several alternative measures to managing Stream 1, including utilizing the filled lagoon in the abutting lands to the east to place the stream into a pipe or open channel, restored channel. Through careful analysis, the City determined routing the stream through the lagoon fill, whether piped or in a restored open channel, would be too technically challenging and costly to successfully



complete. Challenges are largely due to the potential risk of residual contaminant entering the waterway, replicating hydrologic conditions and ensuring the overall project success. The area is severely confined within a roughly 200-foot corridor bounded by the proposed project to the west, open water sewage lagoon to the east and existing public works roadways to the north and south. Although the fill is lined to prevent leaching of contaminants, disturbing the fill poses a risk of releasing toxins that could harm aquatic life. Furthermore, the City determined that attempting to fully replicate the hydrological conditions and the necessary ecological processes to a reach of stream with relatively limited upstream available habitat would be extremely difficult if not impossible to successfully achieve.

Locating available lands for compensatory mitigation for wetland impacts also proved to be unfruitful. Essentially, there is no suitable location for compensatory mitigation within the UGA that would ensure successful replacement of lost functions. Enhancement measures at a higher ratio is an option but does not adequately replace the impacted wetland function. Even with careful engineering and execution, there is nevertheless a level of uncertainty that a mitigation site can be supplied an adequate, sustained hydrology to achieve wetland conditions. Furthermore, improvements of habitat functions cannot be achieved when a site is surrounded by high-intensity land use and isolated from other habitats. Based on these conditions, creating a wetland on-site or within the contributing basin is not a viable approach to mitigation.

According to Ecology publications, "Wetland Mitigation in Washington State," 2006 (Publication # 06-06-011a and 06-06-011b) and Chart 2 of "Selecting Wetland Mitigation Sites Using a Watershed Approach" (Publication #09-06-032), we determined that off-site mitigation will achieve the greatest chance of successful replacement of functions.

To ensure full replacement of impacted functions, the applicant proposes mitigation lesser developed, adjacent hydrologic units. This will be achieved by purchasing credits through either the Qwuloolt Estuary or the Blue Heron Slough Conservation Bank or a combination of the two if appropriate. Both mitigation banks are located within lower Snohomish River Estuary (WRIA 7) near the Snohomish River delta. The Blue Heron Slough Conservation Bank is located within one mile south of the site and the Qwuloolt Estuary is located within one-half mile to the east. Both mitigation banks offer recovered habitat for Puget Sound Chinook, bull trout, and other salmonids, through rehabilitated estuary habitat comprised of channels, marsh, mud flats, and riparian areas. Purchasing bank credits within either of these local mitigation bank would guarantee a no-net-loss of ecological functions within WRIA 7. The purchase of mitigation bank credits is consistent with the mitigation hierarchy established in the 2008 Final Rule on Compensatory Mitigation for Losses of Aquatic resources (The Rule).

9.0 LIMITATIONS

This report documents existing conditions, best professional judgment, and conclusions based on the site conditions encountered at the time of this study. The information contained in this report is correct and complete to the best of our knowledge. It should be considered a preliminary jurisdictional determination of wetlands and other waters until it has been reviewed and approved in writing by the appropriate jurisdictional authorities. The final determination of the wetland boundary, classification, and required setback and buffer will be made by local, state, and federal jurisdictions.



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APPENDIX A Wetland Rating Forms

Wetland name or number: WL1

RATING SUMMARY - Western Washington

Name of wetland (or ID#): WL1 **Date of site visit:** 09/26/2023

Trained by Ecology? Yes [X] No [] **Date of Training:** 05/16/2015 Rated By: Andrea Bachman

> **HGM Class used for rating:** Depressional Wetland has multiple HGM classes? Yes [] No [X]

NOTE: Form is not complete without the figures requested (figures can be combined). Source of base aerial photo/map:

OVERALL WETLAND CATEGORY: [Category III] (based on functions [X] or special characteristics [])

- 1. Category of wetland based on FUNCTIONS
 - [] Category I Total score = 23 27
 - [] Category II Total score = 20 22
 - [X] Category III Total score = 16 19
 - [] Category IV Total score = 9 15

FUNCTION	Improving Water Quality	Hydrologic	Habitat	
Site Potential	M	M	L	
Landscape Potential	M	Н	L	
Value	Н	Н	M	Total
Score Based on Ratings	7	8	4	19

Score for each function based on three ratings (order of ratings is not important) $9 = H,H,H \qquad 6 = M,M,M$ 8 = H,H,M 5 = H,L,L7 = H,H,L 5 = M,M,L $7 = H,M,M \quad 4 = M,L,L$ 6 = H,M,L 3 = L,L,L

2. Category based on SPECIAL CHARACTERISTICS of wetland

CHARACTERISTIC	CATEGORY
Estuarine	
Wetland of High Conservation Value	
Bog	
Forested	
Coastal Lagoon	
Interdunal	
None of the above	Not Applicable

Maps and figures required to answer questions correctly for Western Washington

Depressional Wetlands		
Map of:	To answer questions:	Figure #
Cowardin plant classes	D 1.3, H 1.1, H 1.4	1-2
Hydroperiods	D 1.4, H 1.2	1-3
Location of outlet (can be added to map of hydroperiods)	D 1.1, D 4.1	1-1
Boundary of area within 150 ft of the wetland (can be added to another figure)	D 2.2, D 5.2	1-6
Map of the contributing basin	D 4.3, D 5.3	1-4
1km Polygon: Area that extends 1km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	1-5
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	D 3.1, D 3.2	1-7
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	D 3.3	1-8

Water	<u>DEPRESSIONAL AND FLATS WETLANDS</u> Quality Functions - Indicators that the site functions to improve water of	nuality	
D 1.0 Does the site have the potential to improve v			
D 1.1 What are the characteristics of surface water ou Wetland has an unconstricted, or slightly constricted,		points = 1	Score: 1
D 1.2 Can the soil 2in below the surface be identified None of the above	as true clay or organic soil?	points = 0	Score: 0
D 1.3 What are the characteristics and distribution of Wetland has persistent, ungrazed, plants > 95% of are		points = 5	Score: 5
D 1.4 What are the characteristics of seasonal pondin Area seasonally ponded is > 25% total area of wetland		points = 2	Score: 2
		Total for D 1:	8
Rating of Site Potential	[] 12-16 = H [X] 6-11 = M [] 0-5 = L	Record the ratin	g on the first pa
D 2.0 Does the landscape have the potential to sup	oport the water quality function of the site?		
D 2.1 Does the wetland unit receive stormwater disch	narges?	points = 1	Score: 1
D 2.2 <u>Is > 10% of the area within 150ft of the wetland</u> Yes	in land uses that generate pollutants in surface runoff?	points = 1	Score: 1
D 2.3 Are there septic systems within 250ft of the wet No	tland?	points = 0	Score: 0

Wotland name or number: W/I 1

Wetland name or number: WL1			
D 2.4 Are there other sources of pollutants coming into	to the wetland that are not listed in questions D 2.1-D 2.3?		
No		points = 0	Score: 0
D 2.5 What are the other sources of pollutants coming	g into the wetland?		
		Total for D 2:	2
Rating of Landscape Potential	[] 3-4 = H [X] 1-2 = M [] 0 = L	Record the rating	g on the first pag
D 3.0 Is the water quality improvement provided by	y the site valuable to society?		
D 3.1 Does the wetland discharge directly (i.e., within 1	1 mi) to a stream, river, lake, or marine water that is on the 303(d) list?		
No		points = 0	Score: 0
D 3.2 Is the wetland in a basin or sub-basin where an a	aquatic resource is on the 303(d) list?		
Yes		points = 1	Score: 1
D 3.3 Has the site been identified in a watershed or loo	cal plan as important for maintaining water quality?		
Yes		points = 2	Score: 2
		Total for D 3:	3

Rating of Value	[X] 2-4 = H [] 1 = M [] 0 = L	Record the ratin	ng on the first page
Hydrolog	gic Functions - Indicators that the site functions to reduce flooding	and stream degradtion	
D 4.0 Does the site have the potential to redu	ce flooding and erosion?		
D 4.1 What are the characteristics of surface was	ter outflows from the wetland?		
Wetland has an unconstricted, or slightly constri	cted, surface outlet that is permanently flowing	points = 0	Score: 0
D 4.2 What is the depth of storage during the w	et periods?		
Marks of ponding are at least 0.5ft to <2ft from	the surface or the bottom of the outlet.	points = 3	Score: 3
D 4.3 What is the contribution of the wetland to	storage in the watershed?		
The area of the basin is less than 10 times the ar	ea of the unit	points = 5	Score: 5
		Total for D 4:	8

Wetland name or number: WL1

Rating of Site Potential	[] 12-16 = H [X] 6-11 = M [] 0-5 = L	Record the rating	on the first page
D 5.0 Does the landscape have the potential to support hydrolog	ic functions of the site?		
D 5.1 Does the wetland unit receive stormwater discharges?			
Yes		points = 1	Score: 1
D 5.2 Is >10% of the area within 150 ft of the wetland in land uses the	at generate excess runoff?		
Yes		points = 1	Score: 1
D 5.3 Is more than 25% of the contributing basin of the wetland cover	ered with intensive human land uses?		
Yes		points = 1	Score: 1
		Total for D 5:	3
Rating of Landscape Potential	[X] 3 = H [] 1-2 = M [] 0 = L	Record the rating	on the first page
D 6.0 Are the hydrologic functions provided by the site valuable	to society?		
D 6.1 Is the wetland in a landscape that has flooding problems?			
Flooding occurs in a sub-basin that is immediately down-gradient of		points = 2	Score: 2
D 6.2 Has the site been identified as important for flood storage or fl	lood conveyance in a regional flood control plan?		
No		points = 0	Score: 0
		Total for D 6:	2
Rating of Value	[X] 2-4 = H [] 1 = M [] 0 = L	Record the rating	on the first page
	HABITAT FUNCTIONS		
These questions apply to wetlands o	f all HGM classes - Indicators that the site functions t	o provide important habitat	
H 1.0 Does the wetland have the potential to provide habitat for	many species?		
H 1.1 What is the structure of the plant community?			
Aquatic Bed			
✓ Emergent			
✓ Scrub-shrub			
Forested			
Multiple strata within the Forested class (canopy, sub-canopy, shrubs, herbaced	ous, moss/ground cover)		
2 structures		points = 1	Score: 1

Wetland i	name or number: WL1				
H 1.2 W	at are the hydroperiods that meet the size thresholds in the wetland?				
Perman	ently flooded or inundated				
✓ Seasona	lly flooded or inundated				
Occasio	nally flooded or inundated				
✓ Saturate	ed only				
	ently flowing stream or river in, or adjacent to, the wetland				
	lly flowing stream in, or adjacent to, the wetland				
	nge wetland				
Freshwa	ter Tidal wetland				
3 types p	resent or Lake Fringe / Freshwater Tidal Fringe		points = 2	Score:	2
H 1.3 W	at is the richness of the plant species in the wetland?				
5-19 spec	ies		points = 1	Score:	1
H 1.4 W	at is the interspersion of habitats?				
Low			points = 1	Score:	1
	at are the execial helitat features in the wetland?		points – i	Score.	•
	at are the special habitat features in the wetland? owned, woody debris within the wetland (>4in diameter and 6ft long).				
	g snags (dbh >4in) within the wetland				
	it banks are present for at least 6.6ft (2m) and/or overhanging plants extend at least 3.3ft (1m) o	over open water or a stream (or ditch) in or contiguous with t	the wetland for at least 33ft (10n	n)	
	teep banks of fine material that might be used by beaver or muskrat for denning (>30 degree s				wood
is exposed)	teep banks of the material that might be used by beaver of maskful for defining (>50 degree s	iope, on signs of recent beaver detivity are present (eat sinut	is of trees that have not yet weat	nerea where	wood
At least	0.25ac of thin-stemmed persistent plants or woody branches are present in areas that are perm plants cover less than 25% of the wetland area in every stratum of plants (see H 1.1 for list of stratum).		amphibians)		
			Total for H 1:	5	
Rating of	Site Potential [] 15-18 = H []	7-14 = M [X] 0-6 = L	Record the rating	g on the firs	st page
H 2.0 Do	es the landscape have the potential to support habitat functions of the site	?			
H 2.1 W	at is the percentage of accessible habitat within 1km of the wetland?				
<10% of	1km Polygon		points = 0	Score:	0
H 2.2 Wh	at is the percentage of total habitat in a 1km polygon around the wetland?				
Total hab	itat is 10-50% of the Polygon and in >3 patches		points = 1	Score:	1

Wetland name or number: WL1			
H 2.3 What is the land use intensity in the 1km polygon?			
50% of the Polygon is high intensity land use		points = -2	Score: -2
		Total for H 2:	-1
Rating of Landscape Potential	[] 4-6 = H [] 1-3 = M [X] 0 = L	Record the ratin	g on the first page
H 3.0 Is the habitat provided by the site valuable to so	ociety?		
H 3.1 Does the site provide habitat for species valued in	laws, regulations, or policies?		
Aspen Stands			
Biodiversity Areas and Corridors			
Herbaceous Balds			
Old-growth/Mature Forests			
Oregon White Oak			
✓ Riparian			
Westside Prarie			
Fresh Deepwater			
✓ Instream			
Nearshore (Coastal, Open Coast, Puget Sound)			
Caves			
Cliffs			
Snags and Logs			
Talus			
The following criteria automatically score 2 points:			
The wetland provides habitat for Threatened or Endangered spec	ies		
The wetland is mapped as a location for an individual WDFW pric	rity species		
The wetland is a Wetland of High Conservation Value			
The wetland has been categorized as an important habitat site in	a local plan		
The site has 1 or 2 WDFW priority habitats within 100m		points = 1	Score: 1
		Total for H 3:	1
Rating of Value	[] 2 = H [X] 1 = M [] 0 = L	Record the ratin	g on the first page

https://secureaccess.wa.gov/ecy/wetlandsratingtool/WATOR/WetlandCondensedSummary?WetlandId=395&WetlandName=WL1&WetlandType=Depressional&ProjectName=Marysville Riverwalk&Proje... 6/8

Wetland name or number: WL1

CATEGORIZATION BASED ON SPECIAL CHARACTERISTICS	
SC 1.0 Estuarine Wetlands	
SC 1.1 Does the wetland meet all of the following criteria for Estuarine wetlands?	
The dominant water regime is tidal The wetland is vegetated	
The water salinity is greater than 0.5 ppt	
No - Not an Estuarine Wetland	Result: Not an Estuarine Wetland
SC 2.0 Wetlands of High Conservation Value	
SC 2.1 Does the wetland overlap with any known or historical rare plant or rare & high-quality ecosystem polygons on the WNHP Data Explorer?	
No - Go to SC 2.2	Result: Go to SC 2.2
SC 3.0 Bogs	
SC 3.1 Does an area within the wetland unit have organic soil horizons, either peats or mucks, that compose 16in or more of the first 32in of the s	oil profile?
No - Go to SC 3.2	Result: Go to SC 3.2
SC 3.2 Does an area within the wetland unit have organic soils, either peats or mucks, that are less than 16 in deep over bedrock, or an impermeating the second of the se	ble hardpan such as clay or volcanic
ash, or that are floating on top of a lake or pond?	
No - Not a Bog Wetland	Result: Not a Bog Wetland
SC 4.0 Forested Wetlands	
SC 4.1 Does the wetland have at least 1 contiguous acre of forest that meets one of the following criteria?	
Old-growth forests Mature forests	
Matter forests	
No - Not a Forested Wetland	Result: Not a Forested Wetland

Wetland name or number: WL1 SC 5.0 Wetlands in Coastal Lagoons SC 5.1 Coastal Lagoons: Does the wetland meet all of the following criteria of a wetland in a coastal lagoon? The wetland lies in a depression adjacent to marine waters that is wholly or partially separated from marine waters by sandbanks, gravel banks, shingle, or rocks The depression in which the wetland is located contains ponded water that is saline or brackish (>0.5 ppt) during most of the year in at least a portion of the open water area (measured near the bottom) **Result: Not a Coastal Lagoon** No - Not a Coastal Lagoon Wetland Wetland SC 6.0 Interdunal Wetlands SC 6.1 Is the wetland west of the 1889 line (also called the Western Boundary of Upland Ownership WBUO)? No - Not an Interdunal Wetland **Result: Not an Interdunal Wetland Category of wetland based on Special Characteristics** If you answered No for all types, enter "Not Applicable" on Summary Form **Final Category: Not Applicable**

WL1—Depressional, Category III

Rating Figures

Figure 1-1. Outlets



Figure 1-2. Cowardin Classes

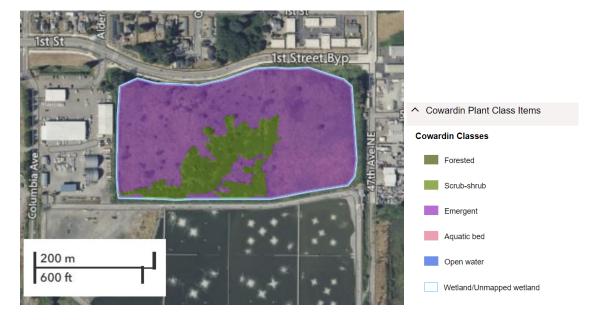


Figure 1-3. Hydroperiod

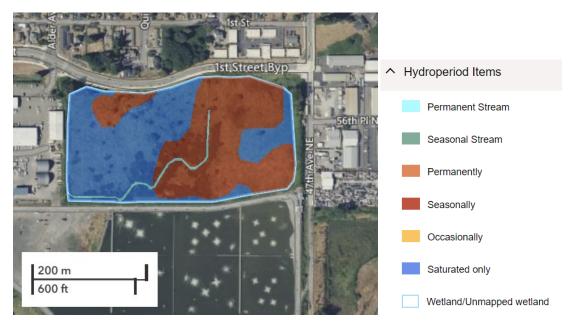


Figure 1-4. Contributing Basin

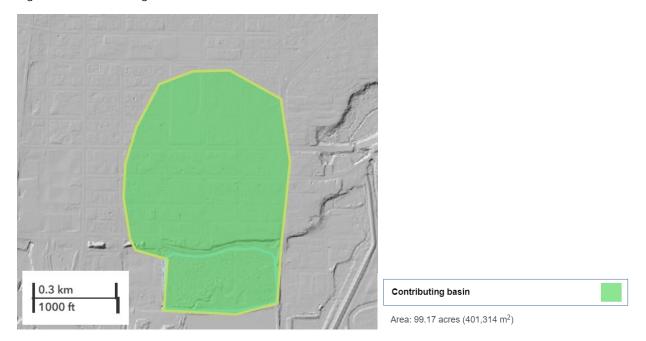


Figure 1-5. Available Habitat within 1KM



Figure 1-6. 303d Waters

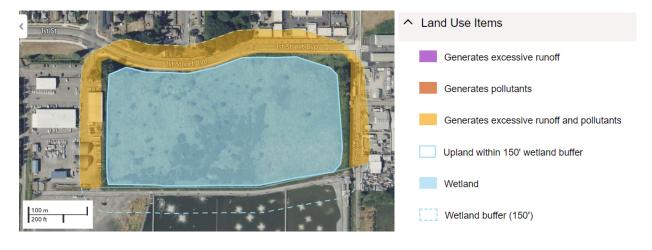


Figure 1-7. 303d Waters

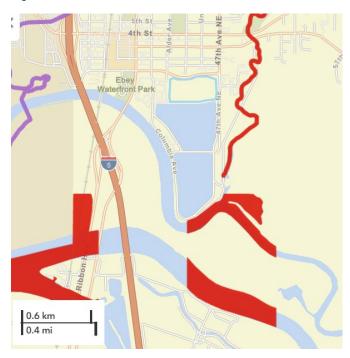


Figure 1-8. TMDLs



Wetland name or number: WL2

RATING SUMMARY - Western Washington

Name of wetland (or ID#): WL2 **Date of site visit:** 09/26/2023

Trained by Ecology? Yes [X] No [] **Date of Training:** 05/16/2015 Rated By: Andrea Bachman

> **HGM Class used for rating:** Depressional Wetland has multiple HGM classes? Yes [] No [X]

NOTE: Form is not complete without the figures requested (figures can be combined). Source of base aerial photo/map:

OVERALL WETLAND CATEGORY: [Category III] (based on functions [X] or special characteristics [])

- 1. Category of wetland based on FUNCTIONS
 - [] Category I Total score = 23 27
 - [] Category II Total score = 20 22
 - [X] Category III Total score = 16 19
 - [] Category IV Total score = 9 15

FUNCTION	Improving Water Quality	Hydrologic	Habitat	
Site Potential	M	M	L	
Landscape Potential	M	Н	L	
Value	Н	Н	M	Total
Score Based on Ratings	7	8	4	19

Score for each function based on three ratings (order of ratings is not important) $9 = H,H,H \qquad 6 = M,M,M$ 8 = H,H,M 5 = H,L,L7 = H,H,L 5 = M,M,L $7 = H,M,M \quad 4 = M,L,L$ 6 = H,M,L 3 = L,L,L

2. Category based on SPECIAL CHARACTERISTICS of wetland

CHARACTERISTIC	CATEGORY
Estuarine	
Wetland of High Conservation Value	
Bog	
Forested	
Coastal Lagoon	
Interdunal	
None of the above	Not Applicable

Maps and figures required to answer questions correctly for Western Washington

<u>Depressional Wetlands</u>		
Map of:	To answer questions:	Figure #
Cowardin plant classes	D 1.3, H 1.1, H 1.4	2-2
Hydroperiods	D 1.4, H 1.2	2-3
Location of outlet (can be added to map of hydroperiods)	D 1.1, D 4.1	2-1
Boundary of area within 150 ft of the wetland (can be added to another figure)	D 2.2, D 5.2	2-6
Map of the contributing basin	D 4.3, D 5.3	2-4
1km Polygon: Area that extends 1km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	2-5
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	D 3.1, D 3.2	2-7
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	D 3.3	2-8

Water Q	<u>DEPRESSIONAL AND FLATS WETLANDS</u> uality Functions - Indicators that the site functions to improve water	er quality	
D 1.0 Does the site have the potential to improve wa	ater quality?	. ,	
D 1.1 What are the characteristics of surface water outf	lows from the wetland?		
Wetland has an unconstricted, or slightly constricted, su	ırface outlet that is permanently flowing	points = 1	Score: 1
D 1.2 Can the soil 2in below the surface be identified a	s true clay or organic soil?		
None of the above		points = 0	Score: 0
D 1.3 What are the characteristics and distribution of p	ersistent plants?		
Wetland has persistent, ungrazed, plants > 95% of area		points = 5	Score: 5
D 1.4 What are the characteristics of seasonal ponding	or inundation in the wetland area?		
Area seasonally ponded is > 50% total area of wetland		points = 4	Score: 4
		Total for D 1:	10
Rating of Site Potential	[] 12-16 = H [X] 6-11 = M [] 0-5 = L	Record the ratin	g on the first page
D 2.0 Does the landscape have the potential to supp	ort the water quality function of the site?		
D 2.1 Does the wetland unit receive stormwater discha	rges?		
Yes	5	points = 1	Score: 1
D 2.2 Is > 10% of the area within 150ft of the wetland in	land uses that generate pollutants in surface runoff?	·	
Yes	<u> </u>	points = 1	Score: 1
D 2.3 Are there septic systems within 250ft of the wetla	nd?	•	
No		points = 0	Score: 0

Motland n

Wetland name or number: WL2		
D 2.4 Are there other sources of pollutants coming in	to the wetland that are not listed in questions D 2.1-D 2.3?	
No	points = 0	Score: 0
D 2.5 What are the other sources of pollutants coming	g into the wetland?	
	Total for D 2:	2
Rating of Landscape Potential	[] 3-4 = H [X] 1-2 = M [] 0 = L Record the ration	g on the first pag
D 3.0 Is the water quality improvement provided b	by the site valuable to society?	
D 3.1 Does the wetland discharge directly (i.e., within	1 mi) to a stream, river, lake, or marine water that is on the 303(d) list?	
No	points = 0	Score: 0
D 3.2 Is the wetland in a basin or sub-basin where an	aquatic resource is on the 303(d) list?	
Yes	points = 1	Score: 1
D 3.3 Has the site been identified in a watershed or lo	ocal plan as important for maintaining water quality?	
Yes	points = 2	Score: 2
	Total for D 3:	3

Rating of Value	ing of Value [X] 2-4 = H [] 1 = M [] 0 = L Record		
Hydrologic	Functions - Indicators that the site functions to reduce flooding a	nd stream degradtion	
D 4.0 Does the site have the potential to reduce	flooding and erosion?		
D 4.1 What are the characteristics of surface water of Wetland has an unconstricted, or slightly constricted		points = 0	Score: 0
D 4.2 What is the depth of storage during the wet p Marks of ponding are at least 0.5ft to <2ft from the	periods?	points = 3	Score: 3
D 4.3 What is the contribution of the wetland to sto	rage in the watershed?	points = 5	Score: 5
		Total for D 4:	8

Rating of Site Potential	[] 12-16 = H [X] 6-11 = M [] 0-5 = L	Record the rating	on the first page
D 5.0 Does the landscape have the potential to support	rt hydrologic functions of the site?		
D 5.1 Does the wetland unit receive stormwater discharge	es?		
Yes		points = 1	Score: 1
D 5.2 Is > 10% of the area within 150 ft of the wetland in I	land uses that generate excess runoff?		
Yes		points = 1	Score: 1
D 5.3 Is more than 25% of the contributing basin of the w	vetland covered with intensive human land uses?		
Yes		points = 1	Score: 1
		Total for D 5:	3
Rating of Landscape Potential	[X] 3 = H [] 1-2 = M [] 0 = L	Record the rating	on the first page
D 6.0 Are the hydrologic functions provided by the sit	te valuable to society?		
D 6.1 Is the wetland in a landscape that has flooding prob			
Flooding occurs in a sub-basin that is immediately down-	9	points = 2	Score: 2
D 6.2 Has the site been identified as important for flood s	storage or flood conveyance in a regional flood control plan?		
No		points = 0	Score: 0
		Total for D 6:	2
Rating of Value	[X] 2-4 = H [] 1 = M [] 0 = L	Record the rating	on the first page
	HABITAT FUNCTIONS		
These questions apply to v	wetlands of all HGM classes - Indicators that the site functions to p	provide important habitat	
H 1.0 Does the wetland have the potential to provide	habitat for many species?		
H 1.1 What is the structure of the plant community?			
Aquatic Bed			
Emergent			
Scrub-shrub			
Forested			
Multiple strata within the Forested class (canopy, sub-canopy, shr	rubs, herbaceous, moss/ground cover)		
2 structures		points = 1	Score: 1

Wetland name or number: WL2 H 1.2 What are the hydroperiods that meet the size thresholds in the wetland? Permanently flooded or inundated ✓ Seasonally flooded or inundated Occasionally flooded or inundated ✓ Saturated only Permanently flowing stream or river in, or adjacent to, the wetland Seasonally flowing stream in, or adjacent to, the wetland Lake Fringe wetland Freshwater Tidal wetland 2 types present points = 1Score: 1 H 1.3 What is the richness of the plant species in the wetland? 5-19 species Score: 1 points = 1**H 1.4** What is the interspersion of habitats? Low points = 1Score: 1 **H 1.5** What are the special habitat features in the wetland? Large, downed, woody debris within the wetland (>4in diameter and 6ft long). Standing snags (dbh >4in) within the wetland Undercut banks are present for at least 6.6ft (2m) and/or overhanging plants extend at least 3.3ft (1m) over open water or a stream (or ditch) in, or contiguous with the wetland, for at least 33ft (10m) Stable steep banks of fine material that might be used by beaver or muskrat for denning (>30 degree slope) OR signs of recent beaver activity are present (cut shrubs or trees that have not yet weathered where wood is exposed) At least 0.25ac of thin-stemmed persistent plants or woody branches are present in areas that are permanently or seasonally inundated (structures for egg-laying by amphibians) Invasive plants cover less than 25% of the wetland area in every stratum of plants (see H 1.1 for list of strata) No habitats selected points = 0Score: 0 Total for H 1: Record the rating on the first page **Rating of Site Potential** [] 15-18 = H [] 7-14 = M [X] 0-6 = L H 2.0 Does the landscape have the potential to support habitat functions of the site? H 2.1 What is the percentage of accessible habitat within 1km of the wetland?

<10% of 1km Polygon points = 0Score: 0 H 2.2 What is the percentage of total habitat in a 1km polygon around the wetland? Total habitat is 10-50% of the Polygon and in >3 patches Score: 1 points = 1

Wetland name or number: WL2			
H 2.3 What is the land use intensity in the 1km polygon?			
50% of the Polygon is high intensity land use		points = -2	Score: -2
		Total for H 2:	-1
Rating of Landscape Potential	[] 4-6 = H [] 1-3 = M [X] 0 = L	Record the ratin	g on the first page
H 3.0 Is the habitat provided by the site valuable to so	ciety?		
H 3.1 Does the site provide habitat for species valued in la	aws, regulations, or policies?		
Aspen Stands			
Biodiversity Areas and Corridors			
Herbaceous Balds			
Old-growth/Mature Forests			
Oregon White Oak			
✓ Riparian			
Westside Prarie			
Fresh Deepwater			
✓ Instream			
Nearshore (Coastal, Open Coast, Puget Sound)			
Caves			
Cliffs			
Snags and Logs			
Talus			
The following criteria automatically score 2 points:			
The wetland provides habitat for Threatened or Endangered speci			
The wetland is mapped as a location for an individual WDFW prior	rity species		
The wetland is a Wetland of High Conservation Value			
The wetland has been categorized as an important habitat site in a	a local plan		
The site has 1 or 2 WDFW priority habitats within 100m		points = 1	Score: 1
		Total for H 3:	1

[] 2 = H [X] 1 = M [] 0 = L **Rating of Value**

Record the rating on the first page

CATEGORIZATION BASED ON SPECIAL CHARACTERISTICS

SC 1.0 Estuarine Wetlands

SC 2.0 Wetlands of High Conservation Value

SC 3.0 Bogs

SC 4.0 Forested Wetlands

SC 5.0 Wetlands in Coastal Lagoons

SC 6.0 Interdunal Wetlands

Category of wetland based on Special Characteristics

If you answered No for all types, enter "Not Applicable" on Summary Form

Final Category: Not Applicable

WL2—Depressional, Category III

Rating Figures

Figure 2-1. Outlets



Figure 2-2. Cowardin Classes



Figure 2-3. Hydroperiod

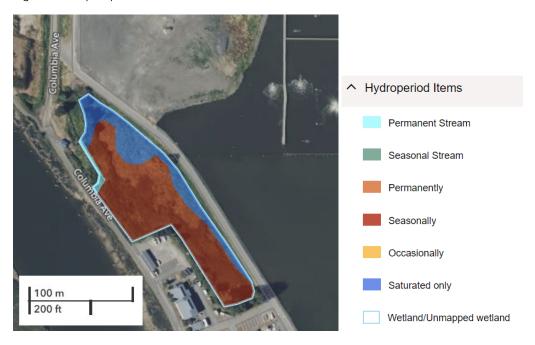


Figure 2-4. Contributing Basin



Figure 2-5. Available Habitat within 1KM



Figure 2-6. Land Use



Figure 1-9. 303d Waters

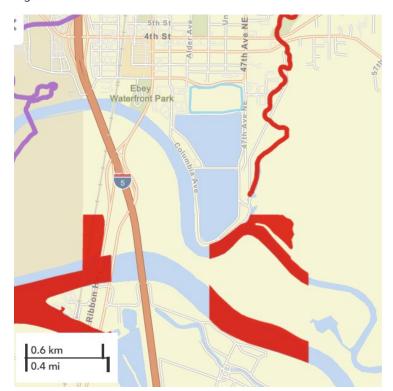


Figure 1-10. TMDLs



RATING SUMMARY - Western Washington

Name of wetland (or ID#): WL3 Date of site visit: 09/26/2023

Rated By: Andrea Bachman Trained by Ecology? Yes [X] No [] Date of Training: 05/16/2015

HGM Class used for rating: Freshwater Tidal Fringe Wetland has multiple HGM classes? Yes [] No [X]

NOTE: Form is not complete without the figures requested (figures can be combined).

Source of base aerial photo/map:

OVERALL WETLAND CATEGORY: [Category II] (based on functions [X] or special characteristics [])

- 1. Category of wetland based on FUNCTIONS
 - [] **Category I** Total score = 23 27
 - [X] Category II Total score = 20 22
 - [] Category III Total score = 16 19
 - [] Category IV Total score = 9 15

FUNCTION	Improving Water Quality	Hydrologic	Habitat	
Site Potential	M	M	L	
Landscape Potential	Н	Н	M	
Value	M	Н	Н	Total
Score Based on Ratings	7	8	6	21

Score for each function based on three ratings (order of ratings is not important) 9 = H,H,H 6 = M,M,M 8 = H,H,M 5 = H,L,L 7 = H,H,L 5 = M,M,L 7 = H,M,M 4 = M,L,L 6 = H,M,L 3 = L,L,L

2. Category based on SPECIAL CHARACTERISTICS of wetland

CHARACTERISTIC	CATEGORY
Estuarine	
Wetland of High Conservation Value	
Bog	
Forested	
Coastal Lagoon	
Interdunal	
None of the above	Not Applicable

Maps and figures required to answer questions correctly for Western Washington

Riverine Wetlands		
Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	3-1
Hydroperiods	H 1.2	3-2
Ponded depressions	R 1.1	none
Boundary of area within 150 ft of the wetland (can be added to another figure)	R 2.4	3-6
Plant cover of trees, shrubs, and herbaceous plants	R 1.2, R 4.2	
Width of unit vs. width of stream (can be added to another figure)	R 4.1	3-3
Map of the contributing basin	R 2.2, R 2.3, R 5.2	3-4
1km Polygon: Area that extends 1km form entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	3-5
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	R 3.1	3-7
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	R 3.2, R 3.3	3-8

	D FRESHWATER TIDAL FRINGE WETLANDS s - Indicators that the site functions to improve water quality		
R 1.0 Does the site have the potential to improve water quality?			
R 1.1 What is the total area of surface depressions within the Riverine we No depressions present	etland that can trap sediments during a flooding event?	points = 0	Score: 0
R 1.2 What is the structure of plants in the wetland? Ungrazed, herbaceous plants cover (>6in high) >66% area of the wetland	1	points = 6	Score: 6
		Total for R 1:	6
Rating of Site Potential	[] 12-16 = H [X] 6-11 = M [] 0-5 = L	Record the rating	g on the first page
R 2.0 Does the landscape have the potential to support the water que	ality function of the site?		
R 2.1 Is the wetland within an incorporated city or within its UGA?			
Yes		points = 2	Score: 2
R 2.2 Does the contributing basin to the wetland include a UGA or incorp	oorated area?		
Yes		points = 1	Score: 1
R 2.3 Does at least 10% of the contributing basin contain tilled fields, pas	stures, or forests that have been clearcut within the last 5 years?		
Yes	·	points = 1	Score: 1

Wetland name or number: WL3 R 2.4 Is > 10% of the area within 150ft of the wetland in land uses that generate pollutants? Yes points = 1Score: 1 R 2.5 Are there other sources of pollutants coming into the wetland that are not listed in guestion R 2.1-R 2.4? points = 0Score: 0 **R 2.6** What are the other sources of pollutants coming into the wetland? Total for R 2: 5 **Rating of Landscape Potential** [X] 3-4 = H[] 1-2 = M[] 0 = LRecord the rating on the first page R 3.0 Is the water quality improvement provided by the site valuable to society? R 3.1 Is the wetland along a stream or river that is on the 303(d) list or on a tributary that drains to one within 1 mi? points = 0Score: 0 R 3.2 Is the wetland along a stream or river that has TMDL limits for nutrients, toxics, or pathogens? points = 1Score: 1 R 3.3 Has the site been identified in a watershed or local plan as important for maintaining water quality? points = 0Score: 0 Total for R 3: Rating of Value [] 2-4 = H [X] 1 = M [] 0 = LRecord the rating on the first page RIVERINE AND FRESHWATER TIDAL FRINGE WETLANDS Hydrologic Functions - Indicators that the site functions to reduce flooding and stream degradtion R 4.0 Does the site have the potential to reduce flooding and erosion? R 4.1 What are the characteristics of the overbank storage the wetland provides? If the ratio is < 1points = 1Score: 1 R 4.2 What are the characteristics of plants that slow down water velocities during floods? Forest or shrubs cover >33% of the wetland area OR emergent plants cover >66% of the wetland area points = 7Score: 7 Total for R 4: **Rating of Site Potential** [] 12-16 = H [X] 6-11 = M [] 0-5 = L Record the rating on the first page R 5.0 Does the landscape have the potential to support the hydrologic functions of the site? **R 5.1** Is the stream or river adjacent to the wetland downcut? points = 1Score: 1 **R 5.2** Does the up-gradient watershed include a UGA or incorporated area? Yes points = 1Score: 1 **R 5.3** <u>Is the up-gradient stream or river controlled by dams?</u> No points = 1Score: 1 Total for R 5: **Rating of Landscape Potential** Record the rating on the first page [X] 3 = H[] 1-2 = M[] 0 = LWetland name or number: WL3 R 6.0 Are the hydrologic functions provided by the site valuable to society? **R 6.1** What is the distance to the nearest areas downstream that have flooding problems? The sub-basin immediately down-gradient of the wetland has flooding problems Score: 2 points = 2

1/20/20, 0.10 1 W	Wedaria Rating Curimary Condensed		
·	torage or flood conveyance in a regional flood control plan?		
No		points = 0	Score: 0
		Total for R 6:	2
Rating of Value	[X] 2-4 = H [] 1 = M [] 0 = L	Record the ration	ng on the first page
	HABITAT FUNCTIONS		
These questions apply to v	vetlands of all HGM classes - Indicators that the site functions	s to provide important habitat	
H 1.0 Does the wetland have the potential to provide	habitat for many species?		
H 1.1 What is the structure of the plant community?			
Aquatic Bed			
✓ Emergent			
Scrub-shrub			
Forested			
Multiple strata within the Forested class (canopy, sub-canopy, shr	ubs, herbaceous, moss/ground cover)		
1 structure		points = 0	Score: 0
H 1.2 What are the hydroperiods that meet the size thres	holds in the wetland?		
Permanently flooded or inundated			
Seasonally flooded or inundated			
Occasionally flooded or inundated			
Saturated only			
Permanently flowing stream or river in, or adjacent to, the wetland	d		
Seasonally flowing stream in, or adjacent to, the wetland			
Lake Fringe wetland			
Freshwater Tidal wetland			
3 types present or Lake Fringe / Freshwater Tidal Fringe		points = 2	Score: 2
1 type present		points = 0	Score:
H 1.3 What is the richness of the plant species in the wet	and?	·	
5-19 species		points = 1	Score: 1
H 1.4 What is the interspersion of habitats?			
Low		noints = 1	Score: 1

Rating of Landscape Potential

Wetland name or number: WL3 H 1.5 What are the special habitat features in the wetland? Large, downed, woody debris within the wetland (>4in diameter and 6ft long). Standing snags (dbh >4in) within the wetland Undercut banks are present for at least 6.6ft (2m) and/or overhanging plants extend at least 3.3ft (1m) over open water or a stream (or ditch) in, or contiguous with the wetland, for at least 33ft (10m) Stable steep banks of fine material that might be used by beaver or muskrat for denning (>30 degree slope) OR signs of recent beaver activity are present (cut shrubs or trees that have not yet weathered where wood is exposed) At least 0.25ac of thin-stemmed persistent plants or woody branches are present in areas that are permanently or seasonally inundated (structures for egg-laying by amphibians) ✓ Invasive plants cover less than 25% of the wetland area in every stratum of plants (see H 1.1 for list of strata) 1 habitat selected points = 1Score: 1 5 Total for H 1: **Rating of Site Potential** [] 15-18 = H[] 7-14 = M[X] 0-6 = L Record the rating on the first page H 2.0 Does the landscape have the potential to support habitat functions of the site? **H 2.1** What is the percentage of accessible habitat within 1km of the wetland? 20-33% of 1km Polygon points = 2Score: 2 H 2.2 What is the percentage of total habitat in a 1km polygon around the wetland? Total habitat is 10-50% of the Polygon and in >3 patches points = 1Score: 1 H 2.3 What is the land use intensity in the 1km polygon? 50% of the Polygon is high intensity land use points = -2Score: -2 Total for H 2: 1

[] 4-6 = H [X] 1-3 = M [] 0 = L

Record the rating on the first page

Wetland name or number: WL3			
H 3.0 Is the habitat provided by the site valuable to soci	iety?		
H 3.1 Does the site provide habitat for species valued in law	ws, regulations, or policies?		
Aspen Stands	-		
Biodiversity Areas and Corridors			
Herbaceous Balds			
Old-growth/Mature Forests			
Oregon White Oak			
Riparian			
Westside Prarie			
Fresh Deepwater			
Instream			
Nearshore (Coastal, Open Coast, Puget Sound)			
Caves			
Cliffs			
Snags and Logs			
Talus			
The following criteria automatically score 2 points:			
The wetland provides habitat for Threatened or Endangered species	5		
The wetland is mapped as a location for an individual WDFW priority	ty species		
The wetland is a Wetland of High Conservation Value			
The wetland has been categorized as an important habitat site in a	local plan		
The wetland has 3 or more WDFW priority habitats within 1	NOm or meets the criteria for societal value	points = 2	Score: 2
The wedaha has 5 of more with w phonty habitats within 1	oon, or meets the criteria for societal value		
		Total for H 3:	2
Rating of Value	[X] 2 = H [] 1 = M [] 0 = L	Record the rating	on the first page
CATI	CODIZATION DACED ON CDECIAL CHARACTERISTICS		
CAII	EGORIZATION BASED ON SPECIAL CHARACTERISTICS		
SC 1.0 Estuarine Wetlands			
SC 1.1 Does the wetland meet all of the following criteria for	or Estuarine wetlands?		
The dominant water regime is tidal			
The wetland is vegetated			
The water salinity is greater than 0.5 ppt			
No - Not an Estuarine Wetland		Result: Not an Estu	arine Wetland

Wetland name or number: WL3 SC 2.0 Wetlands of High Conservation Value SC 2.1 Does the wetland overlap with any known or historical rare plant or rare & high-quality ecosystem polygons on the WNHP Data Explorer? No - Go to SC 2.2 Result: Go to SC 2.2 SC 3.0 Bogs SC 3.1 Does an area within the wetland unit have organic soil horizons, either peats or mucks, that compose 16in or more of the first 32in of the soil profile? No - Go to SC 3.2 Result: Go to SC 3.2 SC 3.2 Does an area within the wetland unit have organic soils, either peats or mucks, that are less than 16 in deep over bedrock, or an impermeable hardpan such as clay or volcanic ash, or that are floating on top of a lake or pond? No - Not a Bog Wetland **Result: Not a Bog Wetland SC 4.0 Forested Wetlands** SC 4.1 Does the wetland have at least 1 contiguous acre of forest that meets one of the following criteria? Old-growth forests Mature forests No - Not a Forested Wetland **Result: Not a Forested Wetland SC 5.0 Wetlands in Coastal Lagoons** SC 5.1 Coastal Lagoons: Does the wetland meet all of the following criteria of a wetland in a coastal lagoon? The wetland lies in a depression adjacent to marine waters that is wholly or partially separated from marine waters by sandbanks, gravel banks, shingle, or rocks The depression in which the wetland is located contains ponded water that is saline or brackish (>0.5 ppt) during most of the year in at least a portion of the open water area (measured near the bottom) Result: Not a Coastal Lagoon No - Not a Coastal Lagoon Wetland Wetland

SC 6	∩Int	ardun	al W	atlande

SC 6.1 Is the wetland west of the 1889 line (also called the Western Boundary of Upland Ownership WBUO)?

No - Not an Interdunal Wetland

Result: Not an Interdunal Wetland

Category of wetland based on Special Characteristics

If you answered No for all types, enter "Not Applicable" on Summary Form

Final Category: Not Applicable

WL3— Freshwater Tidal Fringe, Category II

Rating Figures

Figure 3-1. Cowardin Classes



Figure 3-2. Hydroperiods

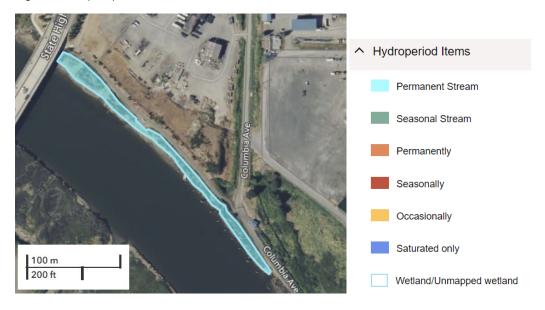


Figure 3-3. Width of Unit vs. Width of Stream



Figure 3-4. Contributing Basin



Contributing basin

Area: 42,816.29 acres (173,271,378 m²)

Figure 3-5. Available Habitat within 1KM

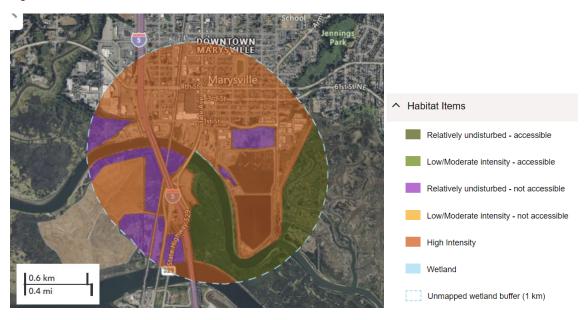


Figure 3-6. Land Use



Figure 3-7. 303d Waters

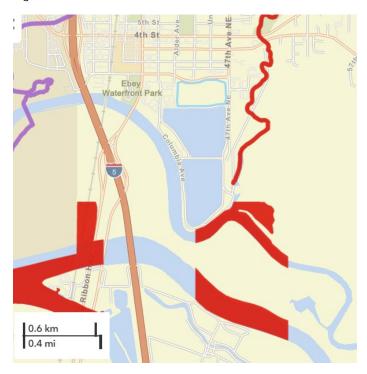


Figure 3-8 TMDLs

