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November 28, 2011

Kevin Stender
City of Edgewood
2221 Meridian Avenue East
Edgewood, Washington 98371

RE: Jovita Re-alignment – Edgewood Project #3470
SWC Job#A8-180

Dear Kevin,

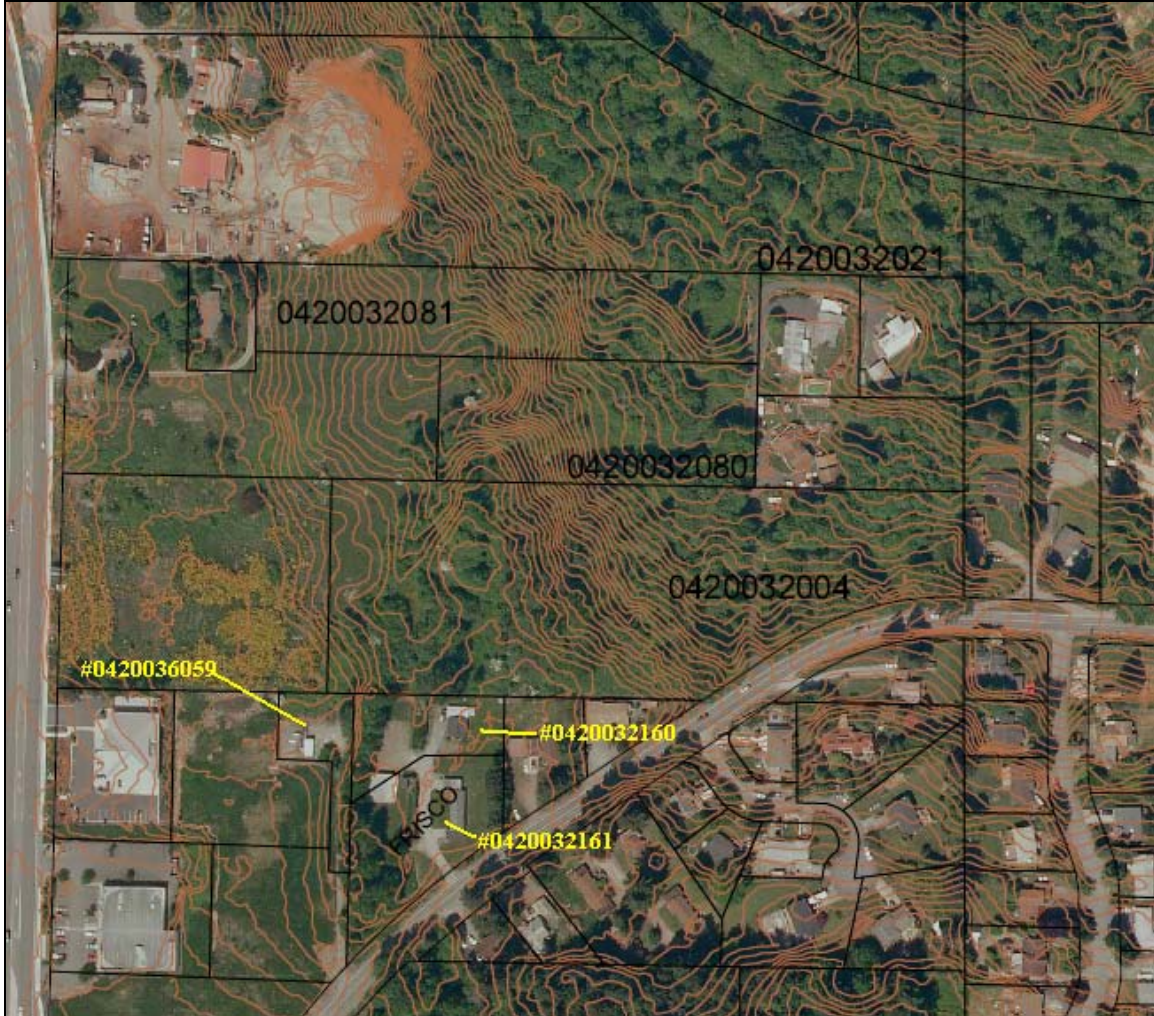
At your request, this letter describes our re-assessment of Wetlands #2 and #3 as described by Jones and Stokes in their report “*Wetland Delineation Report Existing Conditions – City of Edgewood Jovita Boulevard Re-alignment, Gray and Osbourne*” dated October 2008. Due to the critical issues raised from potential impacts to these described features, a more in-depth site review and background review was conducted to determine the origin, character and jurisdiction of these features.

In addition, we reviewed in the field and through personal communication with others on Parcels #0420032160, #0420032161, #420032080 and #0420032081 for evidence of any critical areas. Specifically, personal communication with Tom Deming of Habitat Technologies in regards to a study he conducted in July of 2007 of Parcels #420032080 and #0420032081 was used in assessing areas which we had no legal access to the north and northeast of the study area. Below are our findings and opinions based upon our additional review;

Wetland #2

Wetland #2 is described as a 1,590sf Category 3 wetland. The wetland is a small, linear feature that is present along a cut-slope of the access road to the cell tower. Recent review of a 1996 aerial photograph of the site reveals this area was recently graded and cut at that time. This indicates this area is truly a result of grading activities and was not a historic wetland feature. As we previously stated and detailed in EMC 14.20.030.J, Category 3 wetlands below 2,500sf in size which are not part of a mosaic are exempt from the provisions of the Code. It is our interpretation this feature (Wetland #2 a total of 1,590sf in size) is not part of a mosaic as the man made feature would be considered a break in a mosaic. In addition, this appears to be a small area created as a result of

construction activities and was not historically present. As a result, it appears to meet the criteria as exempt from regulation by City Code.



Above: Parcel Map of area of study.

Wetland #3

A detailed review of Wetland #3 was conducted in January of 2009. Our original review did not include an extensive review of areas to the north and south. During this review the entire drainage was inspected. In addition we had discussions with other consultants who had conducted work on properties to the north of the site where the natural drainage would lead one to assume a connection to wetlands to the north near Jovita Creek. The following are our findings in regards to this wetland/drainage;

a) Although this area receives water from the south from an apparent wetland on the south side of Jovita Boulevard, we do not believe it is part of the same wetland or should

be rated as part of the same wetland. The wetland area to the south of Jovita Boulevard drains to the north in a concrete culvert under Jovita Boulevard. This drainage flows in a northerly direction only, has an apparent drop of >6" from one side of the road to the other, and is separated by non-wetland area (Jovita Boulevard). Based upon interpretation of wetland connectivity typically applied in this situation by the Corps and WADOE, we would not consider the area south of Jovita Boulevard part of this feature.

b) The large lobe area (This is in the area identified as Data Points #12 and #13) of delineated Wetland #3 along Jovita Boulevard was inspected several days following the mid January record precipitation event. The majority of this "lobe" was found to be dry to a depth of +/-18" during this period. The only area with any saturation within 12" of the surface was approximately 20' of a ditch draining to the east towards the culvert. My observations of this area indicate much of the soils is highly disturbed and contains lenses and layers of old fill material. The data sheets in the report for these points do not indicate that these were dug in disturbed or fill soils. This is important as many of the hydric soil features observed appear to be relic features from the site where the fill material originated. Additionally, the dominant species in this area are generally only facultative (alder, cottonwood, salmonberry) as well as invasive species such as blackberry, which leads to less certainty about its being a wetland plant community without definitive soil and hydrology indicators. Hydrology criteria are shown to be just met with saturation at 10-12 inches. However, we have no background on recent rainfall at that time or if it was only observed during this one site visit.

c) The eastern linear feature on the Frisco property (Parcels #0420032160, #0420032161), although containing reed canary grass, has a distinct flow pattern and channel like characteristics through the reed canary grass. A distinct wetted channel was observed in this area with a defined channel. A substantial flow was observed exiting the culvert along Jovita Boulevard and flowing in the entire 2'-3' width of this ditch in a northerly direction. This area appears to be more accurately described as a drainage feature (stream) than a wetland. Water in this feature appears to be a combination of natural runoff, runoff from impervious roads and parking areas to the south, and from drawdown and drain off of the water company tank and well located south of the site within the same drainage. Speaking with residents in this area it is clear that the hydrology of this feature is artificially supported to some degree, as heavy flow has been observed for single day events in the middle of summer, and then being found completely dry the next day.

d) The western linear portion of previously identified Wetland #3 appears to be a remnant of grading activities on the property to the west which has left a ditch-like feature that has not been well maintained. It is clear from historic aerial photographs in the early-mid 1990's that the road bed was filled right up to this area leaving a ditch like feature. Water does flow on the feature from runoff into the ditch, but the feature does appear to be better described as a poorly maintained ditch feature.

e) The area north of the Frisco parcel does contain a small area (@ 10,000sf) of immature forested wetland that does meet wetland criteria. This area receives the water from the ditched stream like feature on the east side of the Frisco property. It spreads out to the north in an area of immature red alder with an understory of creeping buttercup. This area quickly re-converges in a narrow, well-defined channel and flows north, and then east several hundred feet. The channel then drains into a residential property we did not investigate (Parcel #0420032004) due to lack of legal access.

Tom Deming of Habitat Technologies investigated Parcels #420032080 and #0420032081, which are both located to the north of our study area and north of Parcel #0420032004. The topographic low point in which the eastern drainage on the Frisco Property drains is directed to these parcels. I spoke to Tom on January 19th, 2009, as well as a second time on November 22, 2011. According to Tom, they reviewed the property for both wetlands and streams. Streams were specifically reviewed using the methodologies and procedures in the WDNR Forest Practice Rules to identify any feature meeting the definition of a “water of the state”. Tom’s review of these parcels resulted in finding that no areas met either wetland or stream criteria.

The small drainage that passes from under Jovita Boulevard through the Frisco property was found to infiltrate on Parcel #0420032004 prior to entering parcel #0420032080 and there is no stream channel to the north of Parcel #0420032004.

The stream found on the Frisco property has no direct connection to any wetlands or streams, including Jovita Creek, north of Parcel #0420032004.

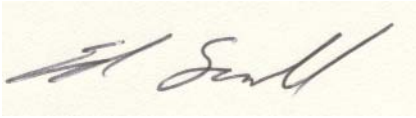
f) I rated the area within the previously delineated Wetland #3, that I determined to meet wetland criteria, based upon my above described findings and found the wetland scored a total of 16 points indicating a Category 3 wetland. The Jones and Stokes rating inaccurately assumed the wetland was much larger than it is to the north and also assumed it should be connected to areas south of Jovita Boulevard.

Conclusion

Based upon the above findings we feel the only natural feature regulated by the City in the vicinity of the Jovita Re-alignment through the Frisco Property is the eastern arm of the previously delineated Wetland #3. On the parcel north of the Frisco Properties parcel, a small area of Category 3 wetland was found. Using the WDNR water typing system, the eastern arm/ditch through the Frisco property and onto Parcel #0420032004 of the delineation best meets the characteristics of a Type Ns water as it is season, has no fish use. However, this drainage does not connect to any other waterbody and ends someplace upon Parcel #0420032004. This stream channel has a flow length that passes from the north side of Jovita Boulevard, through the Frisco properties and onto Parcel #0420032004 where it infiltrates prior to entering Parcel #0420032080.

If you have any questions please feel free to contact me at (253) 859-0515 or at esewall@sewallwc.com .

Sincerely,
Sewall Wetland Consulting, Inc.



Ed Sewall
Senior Wetland Ecologist (PWS #212)

