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November 9, 2021

Linda Ritter City of Mukilteo Planning and Community Development Department 11930 Cyrus Way Mukilteo, WA 98275

RE: Review of Wetland Findings for Rodriguez Property

Dear Linda Ritter:

Thank you for asking the Washington Department of Ecology (Ecology) to review wetland presence/absence by arranging a site visit to the Johnny Rodriguez property in Mukilteo. This property (Parcel No. 00611600009300) covers 4.5 acres and is located at 4203 78th Street SW. The southern half of this property has been partially cleared and graded without a permit, while the northern half is forested. This Ecology review focused on the northwest corner of the parcel bordering the First Slavic Church Awakening property.

As the state agency responsible for implementing the state Water Pollution Control Act (RCW 90.48), Ecology routinely provides wetland-related technical assistance to local jurisdictions and we are happy to assist the City of Mukilteo (City) in this wetland review. The results of our literature research and site visit, as well as our recommendations is provided below.

Literature Review Findings

Background information that I reviewed prior to the site visit included:

- Snohomish County critical areas map
- Natural Resources Conservation Service (NRCS) Soil Survey map
- Critical Areas Study for Pellitteri, prepared by Wetland Resources, dated March 15, 2018
- Conceptual Buffer Averaging Plan for Casanelles-Skookum Kennel, prepared by Wetland Resources, dated June 27, 2018
- Feasibility Report for Skookum Kennels, prepared by Rolluda Architects, dated May 31, 2018
- Rodriguez Commercial Site Drawings, prepared by BRL Services LLC, received by City of Mukilteo on September 15, 2021

The Snohomish County critical areas map shows a wetland in the northern portion of the parcel. The topographic contours indicate there is a linear drainage feature paralleling the northwestern

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edge of the parcel. The NRCS Soil Survey map shows the property containing Alderwood gravelly sandy loam on 0-8% slopes and Alderwood-Urban land complex on 8-15% slopes, which are not considered hydric soils.

The critical areas study by Wetland Resources shows a wetland (0.81 acres) in the northwest corner of the Rodriguez property. This depressional wetland is described as being forested and seasonally flooded. They rated this as a Category III wetland with a habitat score of 6, which receives a 165' buffer according to the City of Mukilteo.

A recent wetland reconnaissance by B&A did not identify any wetlands on the Rodriguez property.

Site Visit Findings

I conducted a site visit on October 29, 2021, within the northwest corner of the property to collect data on the presence/absence of wetland indicators based on methods in the federal wetland delineation manual and *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region.*

I observed a drainage feature paralleling the northwest edge of the property and noted signs of flowing water, saturated soils, and hydrophytic vegetation within this swale (see attached photos). There is a small stream that was 2' wide and 3" deep flowing north in a shallow swale. This stream originates from groundwater seeps that appear to flow from a storm water level spreader on the adjacent parcel.

I examined two soil pits within representative areas near this stream and found positive wetland indicators of vegetation, soil, and hydrology (see attachments). Soil pit # 1 was located approximately 30' east of the stream, while soil pit #2 was located 3' west of the stream.

- At soil pit #1 the dominant vegetation was red alder (*Alnus rubra*), Pacific willow (*Salix lucida*), salmonberry (*Rubus spectabilis*), Himalayan blackberry (*Rubus armeniacus*), slough sedge (*Carex obnupta*), and reed canarygrass (*Phalaris arundinacea*). The soil layer from 0-5" was a dark brown (10YR 2/2) silt loam, from 5-10" it was a (10YR 2/1) silt loam with 2% redoximorphic features, and from 10-18" there was a silt loam (10YR 4/2) with 5% redoximorphic features. This soil profile met the Redox Dark Surface (F6) hydric soil indicator. Signs of hydrology consisted of saturated soil at 8" in the soil pit.
- The dominant vegetation in soil pit #2 was red alder, salmonberry, Himalayan blackberry, slough sedge, reed canarygrass, and lady fern (*Athyrium filix-femina*). The soil layer from 0-6" was a very dark brown (7.5YR 2.5/1) mucky silt, and from 6-18" it was a (7.5YR 2.5/1) sandy silt with 5% redoximorphic features. This soil profile met the Redox Dark Surface (F6) hydric soil indicator. Signs of hydrology consisted of flowing water nearby in the stream and saturated soil at 6" in the soil pit.

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Recommendations

Based on the literature review and site visit, Ecology believes there is a wetland in the northwest corner of the Rodriguez property. The wetland boundary shown on the attached drawing is an approximate depiction of wetlands on the Rodriguez property. Therefore, I disagree with the B&A conclusion there are no wetlands on the property.

If you have any questions or would like to discuss my recommendations, please give me a call at (425) 429-1846 or send an email to Doug.Gresham@ecy.wa.gov.

Sincerely,

Doug Gresham, Senior PWS

Wetland Specialist

Shorelands and Environmental Assistance Program

Sent by email to: lritter@mukilteowa.gov

Doug Gesham



Photo 1—Vegetation at soil pit #1 on Rodriguez property.



Photo 2—Vegetation and stream at soil pit #2 on Rodriguez property.

WETLAND DETERMINATION DATA FORM - Western Mountains, Valleys, and Coast Region

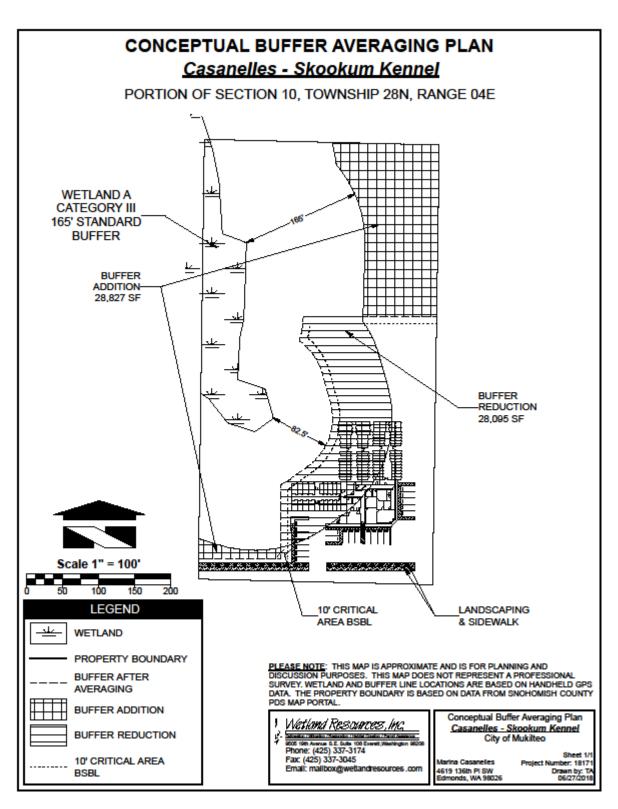
Project/Site: Rodriguez commercial	property		City/Co	unty: Mukilteo/	Snohomish	Sampling Date: 10/2	29/21
Applicant/Owner: Johnny Rodriguez					State: WA	Sampling Point: SF	P-1
Investigator(s): Doug Gresham				Section, To	ownship, Range:		
Landform (hillslope, terrace, etc.):			Local	relief (concave	, convex, none): concave	Slope	(%):
Subregion (LRR):		Lat:			Long:	Datum:	
Soil Map Unit Name:							
Are climatic / hydrologic conditions o							
Are Vegetation, Soil, o		•		,	ormal Circumstances" pres	ent? Yes⊠ No	П
Are Vegetation, Soil, o					ed, explain any answers in		_
SUMMARY OF FINDINGS -							ures, etc.
Hydrophytic Vegetation Present?	Yes ⊠ No □						
Hydric Soil Present?	Yes ⊠ No □			s the Sampled			
Wetland Hydrology Present?	Yes ⊠ No 🗆		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	within a Wetlaı	nd? Yes⊠ No	3 🗆	
Remarks: Meets all three criteria							
VEGETATION - Use scienti	fic names of plan	ts.					
Tree Stratum (Plot size:)		Absolute		nant Indicator	Dominance Test works	heet:	
1. Alnus rubra				es? Status FAC	Number of Dominant Sp That Are OBL, FACW, o		(A)
Salix lucida				FACW			(//)
3.					Total Number of Domina Species Across All Strats		(B)
4.					,		_ (/
Sapling/Shrub Stratum (Plot size:		90			Percent of Dominant Sports That Are OBL, FACW, o		(A/B)
1. Rubus spectabilis		40	X	<u>FAC</u>	Prevalence Index work	sheet:	
2. Rubus armenicacus		30	X	FAC	Total % Cover of:	Multiply by	<u>y:</u>
3					OBL species		
4					FACW species		
5					FAC species	<u></u>	
Herb Stratum (Plot size:)		70	= I ota	al Cover	FACU species		
1. Carex obnupta		70	Χ	OBL	UPL species Column Totals:		
2. Phalaris arundanicea					Column Totalo.	(//)	(D)
3. Polystichum munitum		5		<u>FACU</u>		= B/A =	_
4					Hydrophytic Vegetation		
5					Rapid Test for Hydro		
6					□ Dominance Test is > □ Drawslanes Index is a larger to the providence of the providence		
7					☐ Prevalence Index is☐ Morphological Adapt		porting
8						or on a separate sh	
9					☐ Wetland Non-Vascul	ar Plants ¹	
10. 11.					☐ Problematic Hydroph	nytic Vegetation1 (Ex	rplain)
· · · · · · · · · · · · · · · · · · ·		100			¹ Indicators of hydric soil be present, unless distur		ogy must
Woody Vine Stratum (Plot size:					be present, unless distai	bed of problematio.	
1					Hydrophytic		
2					Vegetation Present? Yes	s⊠ No □	
% Bare Ground in Herb Stratum	<u></u>		- 100	ai OUVEI	100	<u> </u>	
Remarks:							

Depth	Matrix				<u>dox Featι</u>	1162				
(inches)	Color (moist)	%_	Colo	or (moist)	%	Type ¹	Loc ²	Textur	<u>e</u> _	<u>Remarks</u>
<u>0-5</u>	10YR 2/2	100						silt loan	<u>n</u>	roots and duff
<u>5-10</u>	10YR 2/1	98	10Y	R 4/4	2	С	M	silt loan	<u>n</u>	
10-18	10YR 4/2	95	10Y	R 4/4	5	С	M	silt loan	n	
				-	-				,	
	-									
-										
¹Type: C=Co	oncentration, D=D	epletion, F	RM=Red	uced Matrix,	CS=Cove	red or Coat	ed Sand G	rains.	² Loc	eation: PL=Pore Lining, M=Matrix.
	ndicators: (App									rs for Problematic Hydric Soils ³ :
☐ Histosol ((A1)			Sandy Redox	(S5)] 2 cm	Muck (A10)
	ipedon (A2)			Stripped Matr	. ,					Parent Material (TF2)
☐ Black His				Loamy Mucky			t MLRA 1)		-	Shallow Dark Surface (TF12)
	Sulfide (A4)	(8.4.4)		Loamy Gleye		F2)			Othe	r (Explain in Remarks)
	Below Dark Surfa rk Surface (A12)	ace (A11)		Depleted Mat Redox Dark S	` '	·6)		310	odicata	rs of hydrophytic vegetation and
	ucky Mineral (S1)			Depleted Dark				"		nd hydrology must be present,
•	leyed Matrix (S4)		_	Redox Depre		` '				s disturbed or problematic.
	ayer (if present)	:		· · ·	•	<u>, </u>				·
Type:				_						
Depth (inc	ches):							Hydri	c Soil	Present? Yes ⊠ No □
Remarks:										
HADBOLO	cv.									
Wetland Hyd	Irology Indicator		uiro de obo	ook all that ar	anh d				Cooon	adore Indicators (2 or more required)
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Wetland Hyden Primary Indice Surface Version High Water Mark Sediment Drift Depote Algal Mater Iron Depote Inundatio Sparsely Field Observer Surface Water Table Saturation President Saturation President Sediment Saturation President Sediment Sedime	Arology Indicator Lators (minimum of Lators (M2) Lator (M3) Lator (M3) Lator (M4)	I Imagery ve Surfac Yes Yes Yes Yes Yes Yes	(B7) e (B8) No	Water-S 1, 2, Salt Crus Aquatic Hydroge Oxidized Presenc Recent I Stunted Other (E	tained Lea 4A, and 4 st (B11) Invertebra n Sulfide I Rhizospl e of Redu ron Redu or Stresse xplain in I	ates (B13) Odor (C1) heres along iced Iron (C ction in Tille ed Plants (E Remarks)	Living Roo 4) ed Soils (C6 01) (LRR A	ots (C3) i) land Hyd	☐ W. ☐ Dr ☐ Dr ☐ Sa ☐ Ge ☐ Sh ☐ FA ☐ Ra ☐ Fr	ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) ainage Patterns (B10) y-Season Water Table (C2) aturation Visible on Aerial Imagery (C9) eomorphic Position (D2) nallow Aquitard (D3) AC-Neutral Test (D5) aised Ant Mounds (D6) (LRR A) ost-Heave Hummocks (D7)

WETLAND DETERMINATION DATA FORM - Western Mountains, Valleys, and Coast Region

Project/Site: Rodriguez commercial pr	operty		City/Cou	unty: <u>Mukilteo/</u>	Snohomish	Sampling Date: 10/2	29/21
Applicant/Owner: Johnny Rodriguez					State: WA	Sampling Point: SP	-2
Investigator(s): Doug Gresham				Section, To	ownship, Range:		
Landform (hillslope, terrace, etc.):			_Local r	relief (concave,	convex, none): concave	Slope ((%):
Subregion (LRR):		_ Lat:			Long:	Datum: _	
Soil Map Unit Name:							
Are climatic / hydrologic conditions on							
Are Vegetation, Soil, or	• •	•		,	ormal Circumstances" pres		¬
Are Vegetation, Soil, or					ed, explain any answers in		_
SUMMARY OF FINDINGS –							ıres, etc.
Hydrophytic Vegetation Present?	Yes ⊠ No □						
Hydric Soil Present?	Yes ⊠ No □			s the Sampled			
Wetland Hydrology Present?	Yes ⊠ No □		W	vithin a Wetlar	nd? Yes⊠ N	∘ ⊔	
Remarks: Meets all three criteria			·				
VEGETATION – Use scientifi	ic names of plan	ts.					
	•	Absolute		ant Indicator	Dominance Test works	sheet:	
Tree Stratum (Plot size:)				es? Status	Number of Dominant Sp	ecies	(4)
1. Alnus rubra					That Are OBL, FACW, o	or FAC: <u>5</u>	(A)
2					Total Number of Domina		(D)
3					Species Across All Strat	ta: <u>5</u>	(B)
4		60			Percent of Dominant Sp		(A /D)
Sapling/Shrub Stratum (Plot size:)	00	- 100	ai Oovei	That Are OBL, FACW, o	or FAC: 100	(A/B)
1. Rubus spectabilis		30	X	<u>FAC</u>	Prevalence Index work	sheet:	
2. Rubus armenicacus		20	X	FAC	Total % Cover of:	Multiply by	<u>r:</u>
3					OBL species	x 1 =	
4		-			FACW species		
5					FAC species		
Herb Stratum (Plot size:)		<u>50</u>	= Tota	al Cover	FACU species		
1. Carex obnupta		60	X	OBL	UPL species		
Phalaris arundanicea					Column Totals:	(A)	(B)
Athyrium filix femina				FAC	Prevalence Index	= B/A =	_
4					Hydrophytic Vegetatio	n Indicators:	
5.					☐ Rapid Test for Hydro	ophytic Vegetation	
6					□ Dominance Test is >	> 50%	
7					☐ Prevalence Index is	≤3.0 ¹	
8					☐ Morphological Adapt	tations ¹ (Provide supper or on a separate she	
9					☐ Wetland Non-Vascu	•	701)
10						hytic Vegetation ¹ (Ex	plain)
11					¹Indicators of hydric soil	, , , ,	• ′
Woody Vine Stratum (Plot size:)	95	= Iota	al Cover	be present, unless distu	rbed or problematic.	
1					Hydrophytic		
2					Vegetation		
% Bare Ground in Herb Stratum			= Tota	al Cover	Present? Yes	s⊠ No □	
% Bare Ground in Herb Stratum Remarks:	<u>—</u>				l		

Profile Description: (Describe to the depth needed to documen	nt the indicator or	confirm	the absence	of indicators.)
Depth Matrix Redox F	<u>eatures</u>			
(inches) Color (moist) % Color (moist)	% Type ¹ L	_oc²	Texture	Remarks Programme Remarks
<u>0-6</u> <u>7.5 YR 2.5/1</u> <u>100</u>			mucky silt	roots and duff
6-18 7.5 YR 2.5/1 95 10YR 4/6 5	<u>C M</u>		sandy silt	
				
Trungs C. Concentration D. Donletion DM. Reduced Matrix CC C	Savarad or Castad S	Cond Cr		action, DL Doro Lining M Matrix
Type: C=Concentration, D=Depletion, RM=Reduced Matrix, CS=C Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise)		sand Gra		cation: PL=Pore Lining, M=Matrix. prs for Problematic Hydric Soils ³ :
☐ Histosol (A1) ☐ Sandy Redox (S5)	se noted.)			n Muck (A10)
☐ Histic Epipedon (A2) ☐ Stripped Matrix (S6)			Parent Material (TF2)
☐ Black Histic (A3) ☐ Loamy Mucky Mine	,	-RA 1)		/ Shallow Dark Surface (TF12)
☐ Hydrogen Sulfide (A4) ☐ Loamy Gleyed Mat		,	-	er (Explain in Remarks)
☐ Depleted Below Dark Surface (A11) ☐ Depleted Matrix (F3				,
☐ Thick Dark Surface (A12) ☐ Redox Dark Surfac	e (F6)		³ Indicate	ors of hydrophytic vegetation and
☐ Sandy Mucky Mineral (S1) ☐ Depleted Dark Surf	` '			and hydrology must be present,
☐ Sandy Gleyed Matrix (S4) ☐ Redox Depressions	s (F8)		unles	ss disturbed or problematic.
Restrictive Layer (if present):				
Type:				
Depth (inches):			Hydric Soil	Present? Yes 🛛 No 🗌
Remarks:				
HYDROLOGY				
HYDROLOGY				
Wetland Hydrology Indicators:			0	
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply)	(00)			ndary Indicators (2 or more required)
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply) ☑ Surface Water (A1) ☐ Water-Stained	Leaves (B9) (exce	ept MLR.		/ater-Stained Leaves (B9) (MLRA 1, 2,
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply) ⊠ Surface Water (A1) □ Water-Stained □ High Water Table (A2) 1, 2, 4A, a	nd 4B)	ept MLR.	A	/ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply) ☑ Surface Water (A1) ☐ Water-Stained ☑ High Water Table (A2) 1, 2, 4A, a ☑ Saturation (A3) ☐ Salt Crust (B1	nd 4B) 1)	pt MLR.	A □ W	/ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) rainage Patterns (B10)
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply)	nd 4B) 1) ebrates (B13)	ept MLR.	A □ W □ D □ D	/ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) rainage Patterns (B10) ry-Season Water Table (C2)
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply) ☑ Surface Water (A1) ☐ Water-Stained ☑ High Water Table (A2) 1, 2, 4A, a ☑ Saturation (A3) ☐ Salt Crust (B1 ☐ Water Marks (B1) ☐ Aquatic Inverted ☑ Sediment Deposits (B2) ☐ Hydrogen Sulf	nd 4B) 1) ebrates (B13) iide Odor (C1)	-	A □ W □ D □ D □ S:	/ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) rainage Patterns (B10) ry-Season Water Table (C2) aturation Visible on Aerial Imagery (C9)
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply)	nd 4B) 1) ebrates (B13) ide Odor (C1) ospheres along Livi	-	A	Vater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) rainage Patterns (B10) ry-Season Water Table (C2) aturation Visible on Aerial Imagery (C9) recomorphic Position (D2)
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply)	nd 4B) 1) ebrates (B13) iide Odor (C1) ospheres along Livi educed Iron (C4)	ng Root	A	/ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) rainage Patterns (B10) ry-Season Water Table (C2) aturation Visible on Aerial Imagery (C9) reomorphic Position (D2) hallow Aquitard (D3)
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply)	nd 4B) 1) ebrates (B13) iide Odor (C1) ospheres along Livi educed Iron (C4) eduction in Tilled So	ng Roots	A	/ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) rainage Patterns (B10) ry-Season Water Table (C2) aturation Visible on Aerial Imagery (C9) eomorphic Position (D2) hallow Aquitard (D3) AC-Neutral Test (D5)
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply) ☑ Surface Water (A1) ☐ Water-Stained ☑ High Water Table (A2) 1, 2, 4A, a ☑ Saturation (A3) ☐ Salt Crust (B1 ☐ Water Marks (B1) ☐ Aquatic Inverted ☑ Sediment Deposits (B2) ☐ Hydrogen Sult ☐ Drift Deposits (B3) ☐ Oxidized Rhiz ☐ Algal Mat or Crust (B4) ☐ Presence of R ☐ Iron Deposits (B5) ☐ Recent Iron R ☐ Surface Soil Cracks (B6) ☐ Stunted or Str	nd 4B) 1) ebrates (B13) ride Odor (C1) ospheres along Livi educed Iron (C4) eduction in Tilled Se essed Plants (D1) (ng Roots	A	/ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) rainage Patterns (B10) ry-Season Water Table (C2) aturation Visible on Aerial Imagery (C9) teomorphic Position (D2) hallow Aquitard (D3) AC-Neutral Test (D5) aised Ant Mounds (D6) (LRR A)
Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply)	nd 4B) 1) ebrates (B13) ride Odor (C1) ospheres along Livi educed Iron (C4) eduction in Tilled Se essed Plants (D1) (ng Roots	A	/ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) rainage Patterns (B10) ry-Season Water Table (C2) aturation Visible on Aerial Imagery (C9) eomorphic Position (D2) hallow Aquitard (D3) AC-Neutral Test (D5)
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Wetland Hydrology Indicators: Primary Indicators (minimum of one required; check all that apply)	nd 4B) 1) ebrates (B13) iide Odor (C1) ospheres along Livi educed Iron (C4) eduction in Tilled Se essed Plants (D1) (in Remarks)	ng Roots	A	/ater-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) rainage Patterns (B10) ry-Season Water Table (C2) aturation Visible on Aerial Imagery (C9) teomorphic Position (D2) hallow Aquitard (D3) AC-Neutral Test (D5) aised Ant Mounds (D6) (LRR A)
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Excerpt from Conceptual Buffer Averaging Plan for Casanelles-Skookum Kennel showing wetland area on Rodriguez property