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## MITIGATION / BANK USE PLAN

PARCELS P27513 & P126391  
EAST DIVISION STREET  
MOUNT VERNON, WA

FEBRUARY 2019

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**NW ECOLOGICAL SERVICES**  
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## EXECUTIVE SUMMARY

Northwest Ecological Services, LLC (NES) was retained to complete a bank use plan for the proposed preliminary plat on E Division St. in Mount Vernon, Washington. This report summarizes existing conditions, analyzes impacts, and presents mitigating actions based on the current design that will maintain, protect, and/or enhance existing wetland and buffer functions in accordance with applicable environmental regulations.

This report is intended for inclusion with future development permit submissions to the City of Mount Vernon, Washington State Department of Ecology (WDOE), Washington State Department of Fish and Wildlife (WDFW), and the U.S. Army Corps of Engineers (Corps), as may be required.

The 15.35-acre project area includes two adjacent parcels (P27513 and P126391), located on the north side of East Division Street and west of Mt Vernon Big Lake Road in the City of Mount Vernon, Washington.

The proposed project consists of developing a 49-lot subdivision across the subject parcels for single-family residential use, along with access roads, utilities, two stormwater tracts, and one open space unit.

The project area contains seven palustrine forested (PFO), depression wetlands (Wetlands A, B, C, D, E, F, and G) as described in Northwest Ecological Service's *Critical Areas Assessment* (March 2018). The wetlands were rated using the 2014 WDOE Wetland Rating System for Western Washington. Wetlands A, B, C, D, F, and G are Category III wetlands expected to require a 75-foot buffer, while Wetland E is a Category IV wetland expected to require a 50-foot buffer.

Impacts associated with the project include: 20,198 square feet (sq. ft.) (0.46 acres) of wetland fill. Proposed wetland impacts are under the regulatory authority of the City of Mount Vernon, WDOE, and the Corps. The compensatory mitigation detailed in this plan is intended to fulfill permitting obligations for these agencies and compensate for the loss of any wetland functions resulting from the proposed project.

Off-site mitigation is proposed in the form of 0.43 credits purchased from the Skagit Environmental Bank.



## NES QUALIFICATIONS

NES is a specialized service-oriented environmental consulting firm based in Bellingham, Washington. We provide a range of biological services to both the public and private sectors. Our services include: wetland assessments, biological assessments, wetland restoration and mitigation plans, natural resource analysis, environmental regulatory compliance, landscape and ecological design, and environmental impact assessment of plants, animals, fish and sensitive habitats. NES professionals have performed wetland and biological assessment over 32,000 acres [1991-2018] in Whatcom, Skagit, Island, Snohomish and King Counties.

NES staff qualifications summary:

- Michele Bodtke is an ecologist with NES and has been providing environmental services within the north Puget Sound area since 2002. Ms. Bodtke also has an extensive understanding of land use laws. Ms. Bodtke has Bachelor of Science in Geology from Michigan State University, and a certificate in wetland science and management from the University of Washington. She is certified through SWS as a PWS, #2790
- Molly Porter is an ecologist with NES and has provided environmental services within the north Puget Sound area since 2004. Ms. Porter obtained a Bachelor of Science in Environmental Science from Huxley College of the Environment at Western Washington University. She is certified through SWS as a PWS, #2064.
- Katrina Poppe is an ecologist with NES, providing technical support for projects throughout north Puget Sound. Ms. Poppe obtained a Bachelor of Science in Biology from the University of Victoria and a Master of Science in Environmental Science from Western Washington University. Ms. Poppe's graduate research focused on coastal wetlands and climate change. Her experience also includes botanical surveys and coastal sediment studies. She is certified through SWS as a PWS, #2915.
- Collin Van Slyke is an ecologist with NES, providing technical support for projects throughout north Puget Sound. Mr. Van Slyke obtained a Bachelor of Science in Environmental Science from Huxley College of the Environment at Western Washington University. His experience includes surface water quality analysis, fish surveys, and outdoor recreation management.
- Erin Donahou is an ecologist with NES, providing technical support for projects throughout north Puget Sound. Ms. Donahou obtained a Bachelor of Science in Environmental Science from Huxley College of the Environment at Western Washington University. Her experience also includes amphibian surveys, water quality sampling and analysis and wildlife monitoring.

## DISCLAIMER

Wetland, stream, and lake delineations and determinations are based upon protocols defined in manuals and publications produced by federal, state and local agencies. The wetland methodology used in this report is consistent with methods described in the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region* (Corps, 2010) and the *Corps of Engineers Wetland Delineation Manual* (Environmental Laboratory, 1987), as required by WAC 173-22-035. The findings were based on observations of conditions at the time of the site visit(s). This report is provided for the use of the named recipient only and is not intended for use by others parties for any other purpose.

Mitigation plans are developed to meet local regulations. This plan requires local agency concurrence prior to implementation. The recommendations are based on conditions at the time of the site visit(s) and development plans provided by the Client and Client representatives. Although the plan is carefully designed to facilitate success, no guarantees are given that the project will meet all performance standards. Project success depends on many unforeseen and uncontrollable events, achieving success can be greatly improved through:

- Ensuring a qualified ecologist is on site during mitigation project construction
- Installing the mitigation project as specified in this report
- Maintaining the mitigation project as specified in this report (ideally by a landscape professional that specializes in restoration and/or wetland mitigation)
- Implementing any recommended contingency measures in a timely manner

This report is provided for the use and named recipient only and is not intended for use by other parties for any purpose. This report does not guarantee agency concurrence or permit approval.

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## 1.0 INTRODUCTION

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### 1.1 Scope of Work

Northwest Ecological Services, LLC (NES) was retained to complete a Bank Use Plan for two adjacent parcels (P27513 and P126391) on E Division St. in the City of Mount Vernon, Washington. This Bank Use Plan describes existing conditions, analyzes impacts, and presents mitigating actions based on the current design that will maintain, protect, and/or enhance existing wetland and buffer functions in accordance with applicable environmental regulations.

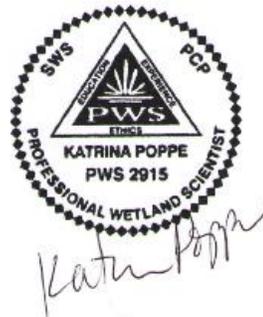
This report is intended for inclusion with future wetland, stream, and wildlife habitat permit applications to the City of Mount Vernon, Washington State Department of Ecology (WDOE), Washington State Department of Fish and Wildlife (WDFW), and the U.S. Army Corps of Engineers (Corps), as may be required.

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### 1.2 Project Location

The project area encompasses two parcels (P27513 and P126391) totaling 15.35 acres, located on the northern side of E Division Street near the Mount Vernon city limits (Section 22, Township 34N, Range 04E) (Figure 1, Appendix B). The northern end of the project area abuts the south end of Crested Butte Blvd, while the southern end abuts E Division St. An aerial photograph of the site and surrounding landscape is included as Figure 2 (Appendix B).

### 1.3 Background

A critical areas assessment of the site was completed by Northwest Ecological Services, LLC in March of 2018 (NES, 2018). Seven wetlands were delineated on site (Figure 3, Appendix B).

## 1.4 Project Overview

The proposed project consists of a 48-lot subdivision across the project area for single-family residential use, with access roads, utilities, two stormwater tracts, and one open space unit. The proposed site plan is shown in Figure 4 (Appendix B). The project includes the following elements:

- Lots. A total of 49 single-family residential lots are proposed in addition to stormwater and open space tracts. Lot sizes range from 7,500 to 11,834 square feet (sq. ft.) in size.
- Access. The project includes the extension of Crested Butte Boulevard to access the site from the north, as well as new roads within the site (Roads A, B, and C), one of which connects to North 53<sup>rd</sup> Street to the west.
- Stormwater. Stormwater from the site shall meet all requirements of the Washington State Department of Ecology's 2012 Stormwater Management Manual for Western Washington (2012 DOE Manual). The project includes two stormwater tracts for stormwater ponds, at the northeast and southwest corners. Stormwater from all pollutant-generating surfaces will be directed toward the stormwater ponds.

Some portion of water from non-pollutant generating surfaces (likely roof runoff) shall be directed into the retained wetlands in order to match pre-development flow rates/hydrology.

- Wetland fill. A total of 20,198 sq. ft. (0.46 acres) of wetland fill is proposed to allow for the plat. The project also includes 2,005 sq. ft. (0.05 acres) of indirect wetland impact.
- Mitigation. Compensatory mitigation for identified wetland impacts includes the purchase of 0.43 Bank credits (see Section 4.0).

## 2.0 BASELINE INFORMATION

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### 2.1 Existing Conditions

The project area is currently undeveloped and forested. Adjacent parcels to the north are developed for high-density residences. Adjacent parcels to the west are under construction for an elementary school. Adjacent parcels to the east and south are developed with lower density single-family residences. The project area is separated from a larger undeveloped, forested area by the school access road.

A ditch was observed along a portion of the eastern property boundary, with a second ditch along the southern boundary that appears to drain westward. Site topography is generally level but terrain is hummocky. The E Division Street road surface is currently raised above the surface of the site. The adjacent residential property to the east is also raised several feet above the elevation of the project site.

## 2.2 Wetland, Stream, and Wildlife Summary

Below is a summary of environmental features within the project site. For additional information refer to the March 2018 *Critical Areas Assessment* (NES, 2018).

### 2.2.1 Wetlands

NES identified seven wetlands (Wetland A, B, C, D, E, F, and G) within the project area. Figure 4 (Appendix B) shows the location and extent of the surveyed wetlands. A summary of the wetland areas, hydrogeomorphic classifications, Cowardin classifications, and wetland categories from NES (2018) is included in Table 1 below.

**Table 1. Wetland Classification Summary**

Wetland	Hydrogeomorphic Class	Cowardin Classification	Size (sq. ft.)	WDOE Category
A	Depressional	PFO	575*	III
B	Depressional	PFO	5,296	III
C	Depressional	PFO	7,842	III
D	Depressional	PFO	1,488	III
E	Depressional	PFO	7,940**	IV
F	Depressional	PFO	592	III
G	Depressional	PFO	1,456	III

(PFO: Palustrine Forested)

\* Wetland extends off site. Only on-site area is reported.

\*\* Wetland mosaic. The size indicates the size based on the outer edge of the entire mosaic.

### 2.2.2 Streams

No streams were identified within or in the vicinity of the project area. The nearest stream is mapped approximately 1,000 feet northwest of the project area as a perennial tributary to Trumpeter Creek.

### 2.2.3 Fish and Wildlife

No Fish and Wildlife Habitat Conservation Areas or Priority species were observed or mapped within or in the vicinity of the project area.

## 2.3 Regulatory Summary

Agencies with regulatory authority over site critical areas are summarized below in Table 2.

**Table 2. Critical Areas Summary**

Feature	2014 WDOE Category	Regulatory Authority				Corps Hydrology Classification*	Regulated Buffer (ft)*
		Mount Vernon	Corps	WDOE	WDFW		
Wetland A	III	X		X		Isolated	75
Wetland B	III	X		X		Isolated	75
Wetland C	III	X		X		Isolated	75
Wetland D	III	X		X		Isolated	75
Wetland E	IV	X		X		Isolated	50
Wetland F	III	X		X		Isolated	75
Wetland G	III	X	X	X	X	Adjacent to an RPW	75

RPW= Relatively Permanent Water

\* Only the Corps has the authority to make this determination

### 2.3.1 Local – City of Mount Vernon CAO

The review area and surrounding landscape contain the following wetlands, streams, and HCAs under the jurisdiction of the Mount Vernon CAO:

- Wetlands A, B, C, D, E, F, and G

The City of Mount Vernon requires a buffer around regulated critical areas to protect functions. The buffer must remain naturally vegetated except where it can be enhanced to improve the functions. Buffers are measured from the wetland edge. Standard wetland buffer widths are determined according to the overall wetland category (MVMC 15.40.090[A]). Wetlands A, B, C, D, F, and G are WDOE Category III wetlands. Therefore, **Wetlands A, B, C, D, F, and G are expected to require 75-foot standard buffers.** Wetland E is a Category IV wetland. Therefore, **Wetland E is expected to require a 50-foot standard buffer.**

### 2.3.2 State and Federal

Activities altering wetlands, streams, and drainage ditches may require permit authorization from the Corps under Section 404 of the federal Clean Water Act (CWA) (33 U.S.C. § 1251 et seq.) and Section 10 of the Rivers and Harbors Act of 1899 (33 U.S.C. § 401). Only the Corps has the ability to make a jurisdictional determination. A significant nexus determination may be necessary for certain wetlands, and a number of the on-site wetlands are potentially isolated (Wetlands A, B, C, D, E, and F) and may not be under Corps jurisdiction.

WDOE has authority over discharge into all wetlands (including isolated wetlands) and streams and can impose buffers and compensatory mitigation for impacts. WDOE reviews all permits received by the Corps for 401 Water Quality Certification. WDOE requires an “individual” review of all wetland disturbances greater than one-half acre. Water Quality Certification is required for all Individual Permit applications. WDOE appears to have jurisdiction over all wetlands listed in Table 1, above.

The WDFW requires issuance of a Hydraulic Project Approval (HPA) prior to any activities that may directly or indirectly affect streams or associated wetlands.

Only the aforementioned agencies have the authority to make jurisdictional determinations.

### 3.0 IMPACT ASSESSMENT

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#### 3.1 Summary of Impacts

The project proposes a total of 0.46 acres (20,198 sq. ft.) of permanent wetland fill (direct impact) and 0.05 acres (2,005 sq. ft.) of permanent indirect impact. Table 3 details proposed impacts for individual wetlands. Wetland impacts are also shown in Figure 4 (Appendix B).

**Table 3. Proposed site wetland impacts**

Wetland	WDOE Category	Wetland Size (sq. ft.)	Wetland fill (sq. ft.)	Indirect impact (sq. ft.)
A	III	640*	640	0
B	III	5,296	1,169	1,112
C	III	7,842	7,842	0
D	III	1,488	595	893
E	IV	7,904	7,904	0
F	III	592	592	0
G	III	1,456	1,456	0
<b>Total</b>		<b>25,218</b>	<b>20,198</b>	<b>2,005</b>

\* Wetland extends off site. On-site wetland area is 575 sq. ft.

##### 3.1.1 Water Quality Improvement/ Run-off Filtration

Site wetlands currently have a high ability to provide water quality improvement and run-off filtration functions. Overall, a decrease in water quality improvement and run-off filtration is anticipated due to the loss of wetland acreage, increased land-use intensity, and loss of wetlands to treat run-off from the site. However, stormwater ponds will provide these functions to some degree.

### **3.1.2 Hydrology**

Site wetlands currently have a moderate to high ability to provide hydrology functions. Overall, a decrease in hydrologic flood/stormwater and baseflow/groundwater support is anticipated with the proposed fill due to overall loss of wetland and subsequent water storage capacity. However, a portion of some wetlands (Wetlands B and D) will remain undisturbed, retaining their ability to provide these functions. The proposed stormwater ponds will provide this function to some degree.

### **3.1.3 Thermal Protection**

In general, site wetlands are forested and therefore have a high ability to provide thermal protection. The project is expected to decrease thermal protection due to the loss of wetland acreage, although the stormwater ponds may provide this function to some degree.

### **3.1.4 Wildlife Habitat**

Site wetlands have a moderate ability to provide wildlife habitat. Although the site is currently relatively undisturbed, the diversity of habitat types and the number of habitat features available on site are low. A moderate reduction in wildlife function is anticipated under the proposed project due to wetland fill and increased human presence on site.

## **4.0 MITIGATION**

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The wetlands associated with the proposed project are under the regulatory authority of one or more permitting agency (City of Mount Vernon, WDOE, WDFW, and/or Corps). The following section describes mitigating actions that have been proposed to compensate for loss of wetland functions. The mitigation plan has been designed to meet the Corps and WDOE's Wetland Mitigation in Washington State guidance document (WDOE, 2006) to the greatest extent possible.

### **4.1 Mitigation Sequencing**

All permitting agencies require that projects demonstrate adherence to a specific sequence of actions termed "mitigation sequencing" before impacting wetlands, streams, or their buffers. Mitigation sequencing is a process whereby applicants show they have avoided all impacts to regulated areas and their buffers to the furthest extent possible. In some cases, if alteration to the regulated area is deemed unavoidable, impacts may be allowed if all adverse impacts resulting from a development proposal are mitigated using best available science so as to result in no net loss of critical area functions and values. When alteration or impact to a regulated area is proposed, the applicant must demonstrate that all reasonable efforts have been taken to mitigate impacts in the following prioritized order: 1) Avoid, 2) Minimize, 3) Rectify, 4) Reduce, 5) Compensate. Table 4 discusses how the proposed project meets mitigation sequencing.

**Table 4. Mitigation Sequencing**

Sequencing	Project Elements
Avoid	Due to the location of wetlands distributed across the project site, avoidance of impact would be difficult while still meeting housing needs. The majority of two wetlands avoid direct impacts, either being indirectly impacted or preserved.
Minimize	The open space tract was placed in a location that maximizes wetland preservation, minimizing impacts.
Rectify	N/A; no temporary disturbance is proposed.
Reduce or eliminate through preservation or maintenance	Proposal includes on-site stormwater treatment facilities. All retained wetlands and buffers shall be permanently protected within the stormwater and preservation tract.
Compensate	Purchase of wetland Bank credits as compensation for wetland fill (detailed below).

## 4.2 Mitigation Strategy

Because on-site mitigation is unfeasible, compensatory mitigation for the 0.46 acres of wetland impact is proposed to be primarily provided off site in the form of credit purchase from the Skagit Environmental Bank (Bank or SEB). Additional on-site measures are proposed as supplemental compensatory mitigation.

## 4.3 Off-Site Mitigation

The Skagit Environmental Bank was chosen as the primary mitigation option for the following reasons:

- There are no additional adequate on-site mitigation options.
- The impacted functions can be mitigated off site because the Bank and project area are both located in the Lower Skagit WRIA 03 watershed, and the Nookachamps sub-watershed.
- The project site is within the service area of the Bank (Figure 5, Appendix B). The service area for the Bank includes freshwater wetlands within the Lower Skagit-Samish Watershed Area WRIA 03 east of the easternmost boundaries of Swinomish Slough, Skagit Bay, Padilla Bay, and Samish Bay, excluding all islands and all brackish marshes, halotrophic wetlands, or wetlands influenced by saline conditions of >0.5 parts per thousand salt at any time during the year (SEB Instrument, 2011).

### 4.3.1 Skagit Environmental Bank Summary

The overall mission and purpose of the Skagit Environmental Bank is to restore and preserve 396 acres of critical floodplain habitat in the lower Skagit watershed in a way that achieves net functional gain, while successfully supporting economic and social development.

Bank restoration activities include rehabilitating 59 existing wetland acres and re-establishing 296 former wetland acres. These activities are anticipated to result in a variety of wetland classes, vegetation communities, and canopy structures in the floodplain and along three creek reaches, with the following goals as stated in the Bank's implementing documents:

- Restore in-channel and off-channel rearing, refuge, and migration habitat for salmonids, resident fish, amphibians, reptiles, and other aquatic dependent species.
- Restore stream channel morphology with the addition of large woody debris, or engineered log jams, at certain intervals in order to effect change in geomorphic process (e.g., riffle and pool formation, channel bank undercutting, point bar formation, and duration of wetland inundation).
- Shade the stream channels by restoring a scrub-shrub and forest canopy.
- Restore palustrine forested (PFO), scrub-shrub (PSS), and emergent (PEM) habitat that will extend well beyond the edges of the creek channel and effect change in numerous hydrologic and hydraulic floodplain and wetland functions.
- Restore a wildlife corridor connection between four existing wetlands within 0.5 miles of the Bank. Restore an unbroken vegetation corridor that is at least 150 feet wide and at least 30% forested and scrub-shrub, which connects to existing wetlands that are at least 25 acres in size.

## **4.4 Compensating for Wetland Functions**

We believe that the proposed purchase of bank credits and additional on-site mitigation measures are a reasonable means of providing compensation for the functional losses associated with the proposed wetland impact for the reasons discussed below.

### **4.4.1 Water Quality**

Compensation for water quality impacts is proposed through the purchase of Bank credits in order to provide water quality improvement in the larger watershed (WRIA 3). The Bank includes design elements that include improvement of water quality function in the WRIA 3 watershed, including traditional mitigation such as wetland re-establishment and re-habilitation.

Specific activities that are intended to take place at the Bank site that will provide improved water quality functions include:

- Re-establishment and rehabilitation of wetlands throughout the Bank site.
- Increased water quality function is anticipated at the Bank sites due to enhancement planting of native tree and shrub species. Plantings will increase species richness and will provide additional water quality function to areas that were previously limited due to the lack of woody material. The addition of woody plant material increases water quality function within a system by creating more porosity within the soil with their deep roots, stabilizing waterborne pollutants within the runoff, and decreasing erosion via interception and year round structure.

- Removal, management, and monitoring of invasive species will increase biodiversity and species richness, ultimately resulting in wide ranging habitat benefits and functional improvements.

In order to maintain water quality functions in downstream waters and retained wetlands within the project site, the project design includes stormwater treatment and detention for all new impervious surface per the WDOE 2012 stormwater manual and City of Mount Vernon municipal code.

#### **4.4.2 Hydrology**

Compensation for hydrology impacts is proposed through the purchase of Bank credits. Because the project is not expected to result in significant downstream (indirect) hydrologic impacts, and the project's immediate drainage basin does not currently experience flooding problems, compensatory mitigation for hydrologic impacts appear to be more beneficial at the Bank site where there are known flooding problems. There are documented flooding problems in both the Skagit and Samish River systems, where the Bank is located.

Specific activities that are intended to take place at the Bank site that will provide improved hydrologic functions include:

- Re-establishment and rehabilitation of wetlands throughout the Bank site.
- Enhancement plantings. Adding a tree and shrub component to the Bank site will add structural complexity and a multi-layered canopy, which will increase the degree of rainwater interception and year round water uptake within the biomass of woody plants. Woody plants will also add increased friction to decrease the runoff velocity of surface waters.

The engineered stormwater facilities on site will assist in limiting impacts to hydrologic functions in this basin.

#### **4.4.3 Fish and Wildlife**

Compensation for fish and wildlife habitat impacts will be achieved through the purchase of Bank credits. The Bank provides increased wildlife habitat in the WRIA 3 watershed through creation, expansion, or protection of habitat for anadromous fish, waterfowl, and other species that occupy river, riparian, wetland, and associated habitats in the Skagit lowlands.

Specific activities that are intended to take place at the Bank site that will provide improved fish and wildlife habitat functions include:

- Re-establishment and rehabilitation of wetlands throughout the Bank site.
- Removal, management, and monitoring of invasive species will increase biodiversity and species richness, ultimately resulting in wide ranging habitat benefits and functional improvements.
- Adding an expanded woody component to the Bank Site will increase species richness, which is important to supporting diverse fish and wildlife populations. Tree and shrub

species will add structural complexity to a multi-layered canopy, which will provide thermal and disturbance cover for all species.

#### 4.4.4 Wetland Functions Not Mitigated at the Wetland Mitigation Bank

All identified impacts to wetland function shall be compensated for through purchase of credits at the Skagit Environmental Bank.

### 4.5 Proposed Mitigation Credits

Table 5 details the number of Bank credits that appear to be required to compensate for impacts to particular Category wetlands according to the Skagit Environmental Bank Instrument (SEB Instrument, 2011).

**Table 5. Skagit Environmental Bank Mitigation Ratios**

Category of Impacted Wetland	Total Impact Area (acres)	Bank Credits Recommended per Acre of Impact	Credits Proposed for Purchase
I	0	Case-by-case	0
II	0	1.2:1	0
III	0.28	1:1	0.28
IV	0.18	0.85:1	0.15
<b>TOTAL</b>	<b>0.46</b>	<b>n/a</b>	<b>0.43</b>

### 4.6 Credit Purchase

A total of 0.43 Bank credits shall be purchased prior to project construction. The applicant shall provide proof of purchase to transfer of credits to all permitting agencies prior to any land disturbance.

## **APPENDIX A: REFERENCES**

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## References

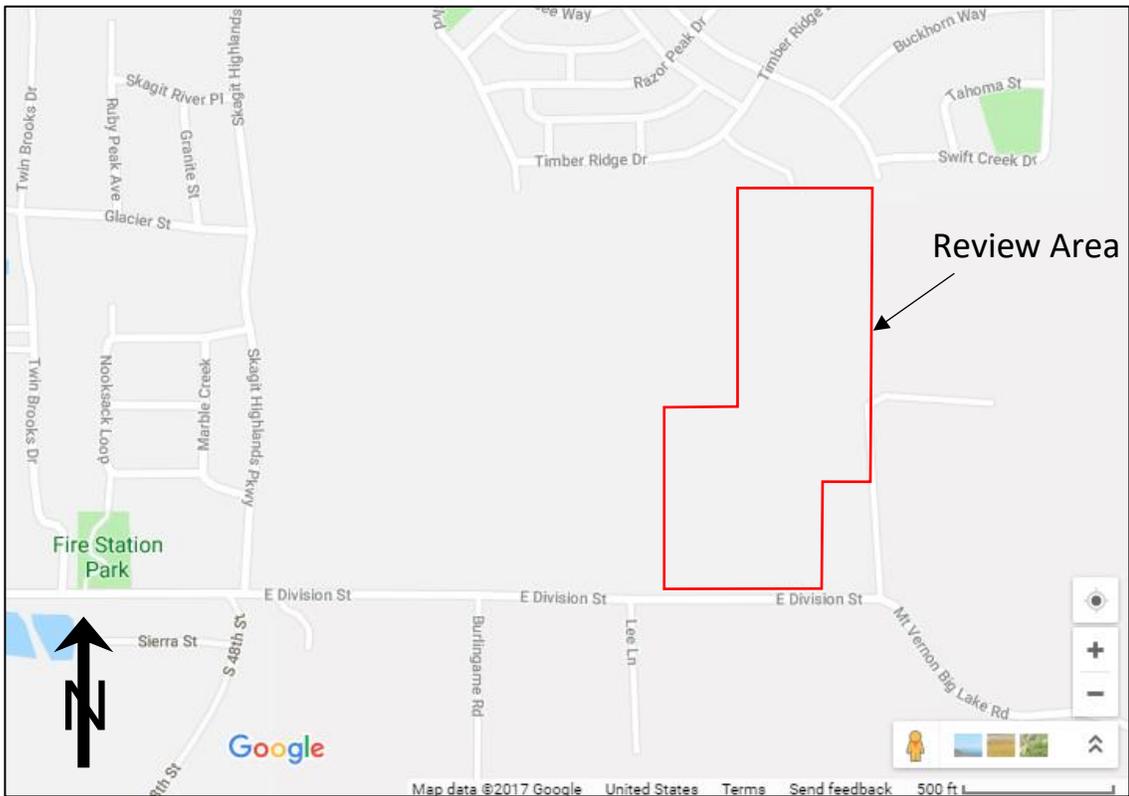
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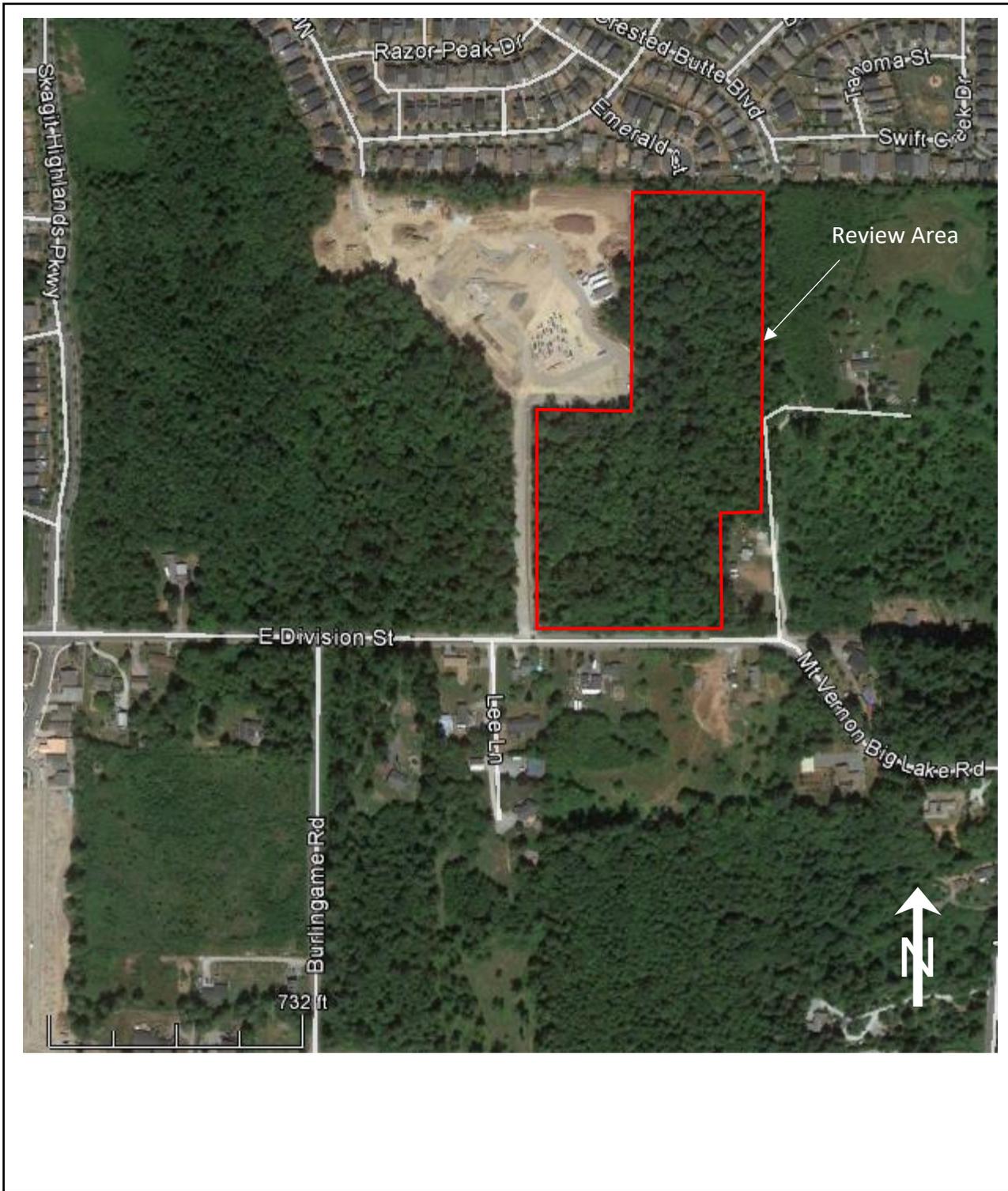
## APPENDIX B: FIGURES

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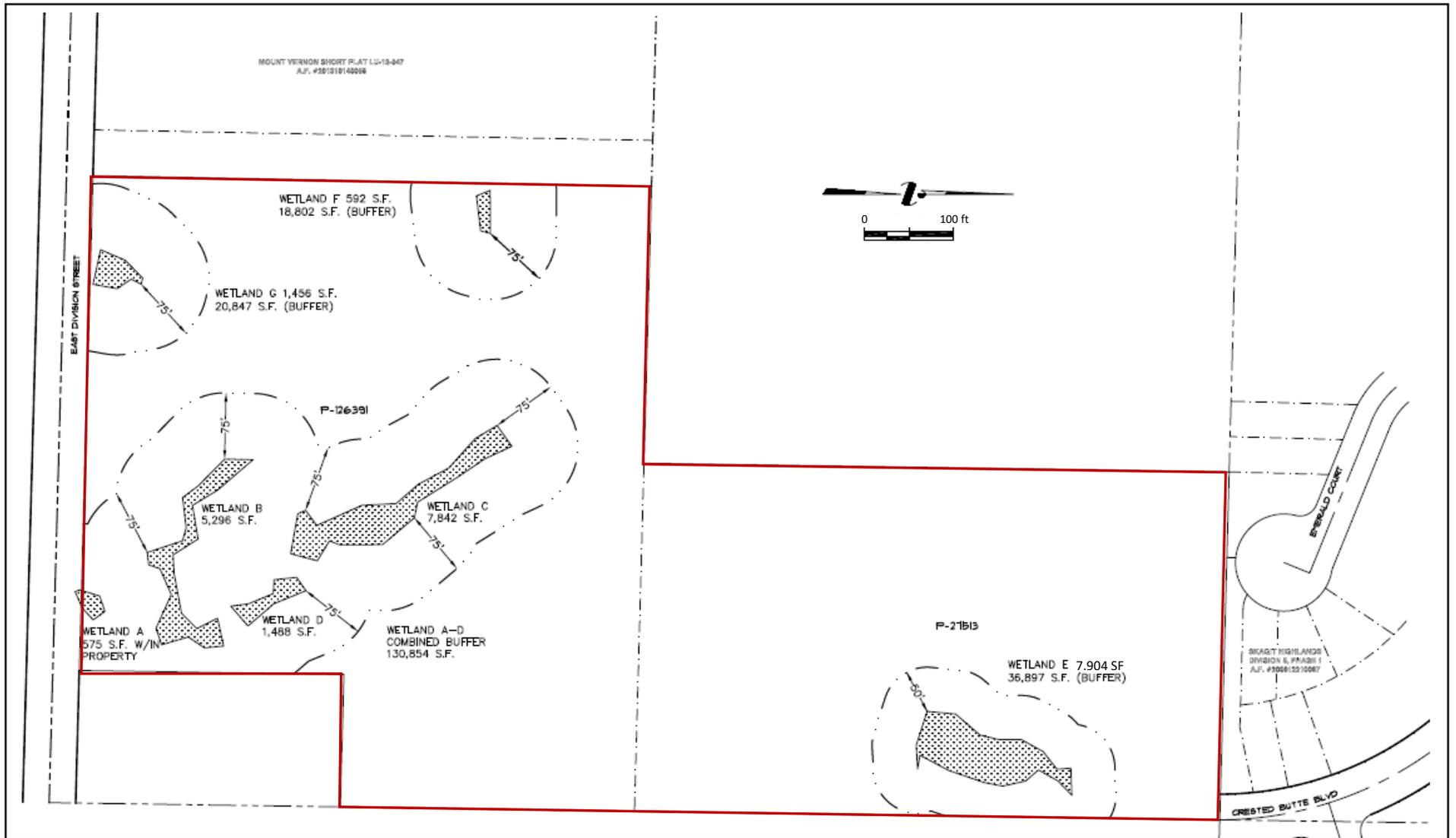




<p><b>ECOLOGICAL</b></p> <p><b>NORTHWEST</b></p> 	<p align="center"><b>Vicinity Map (Google Maps)</b></p> <p align="center"><b>Parcels P27513 and P126391 Mitigation / Bank Use Plan</b></p>	<p align="center"><b>Figure 1</b></p> <p align="center"><b>FEB 2019</b></p>
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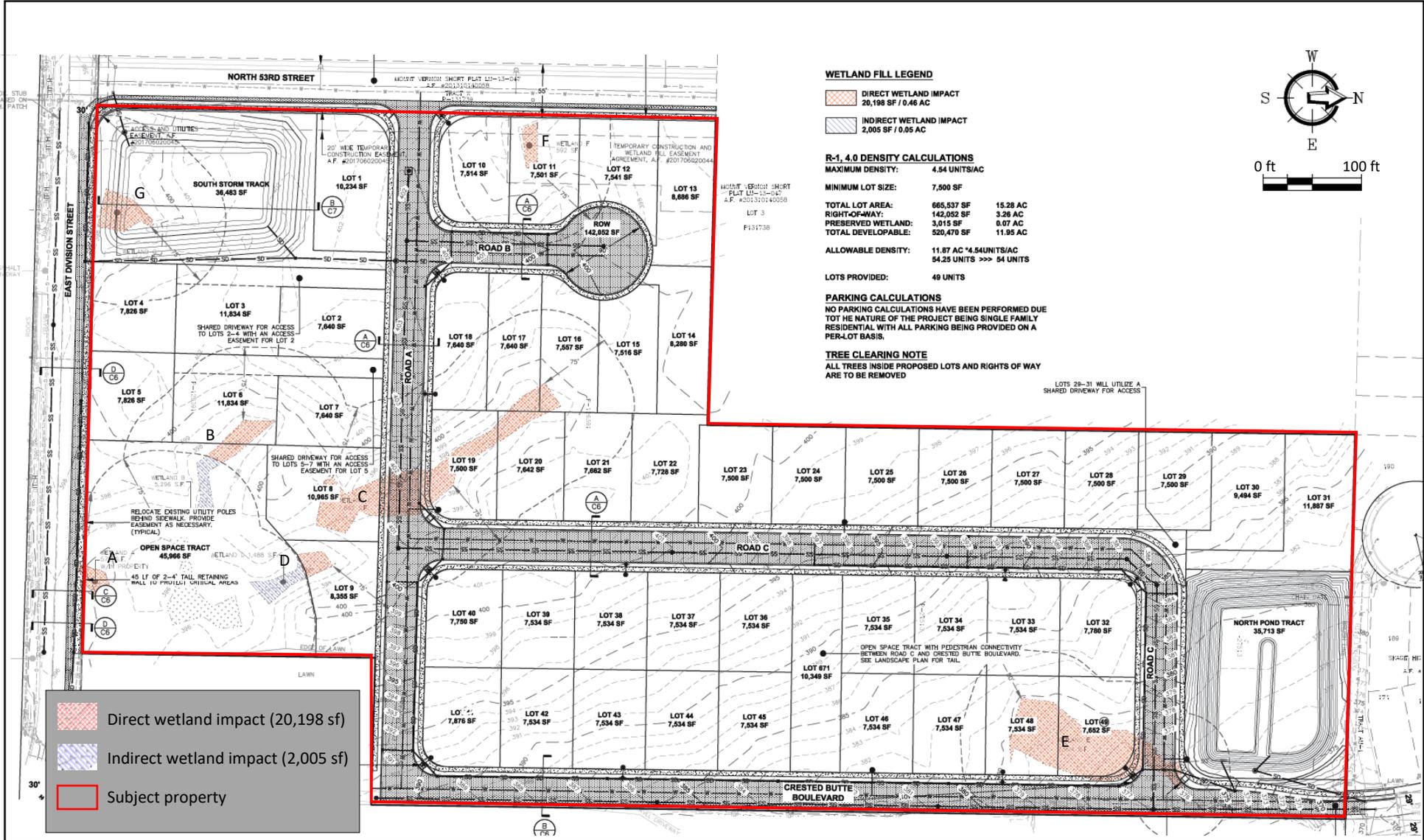


<p><b>ECOLOGICAL</b></p> <p><b>NORTHWEST</b></p> 	<p><b>Aerial Photo</b> (Google Earth – July 2017 image)</p> <p><b>Parcels P27513 and P126391</b> Mitigation / Bank Use Plan</p>	<p><b>Figure 2</b></p> <p><b>FEB 2019</b></p>
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<p><b>ECOLOGICAL</b></p> <p><b>NORTHWEST</b></p> 	<p align="center"><b>Wetland Map</b> Survey by Larry Steele &amp; Associates, Inc.</p> <p align="center">Parcels P27513 and P12639 Mitigation / Bank Use Plan</p>	<p align="center"><b>Figure 3</b></p> <p align="center"><b>FEB 2019</b></p>
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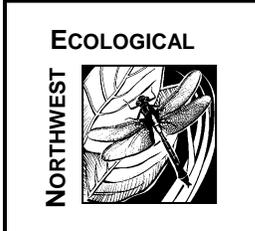
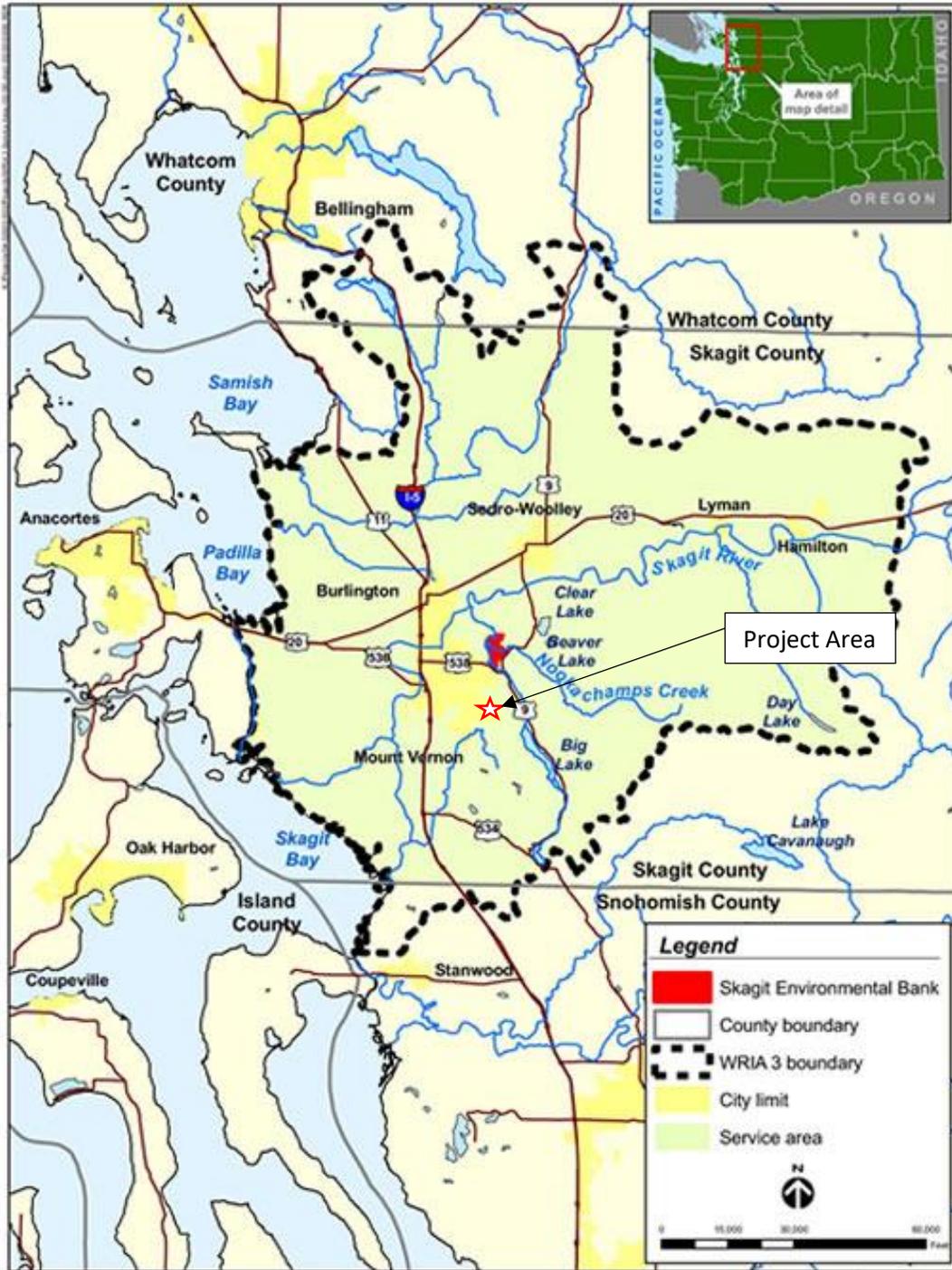
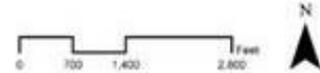
200 ft



<b>NORTHWEST</b> 	<b>Site Plan and Impact Map</b> Design by Freeland and Associates	<b>Figure 4</b>
	Parcels P27513 and P12639 Mitigation / Bank Use Plan	<b>FEB 2019</b>

**SKAGIT ENVIRONMENTAL BANK  
WRIA 3 - Modified**

Source: Skagit County GIS/Mapping Services, Washington State Dept. of Ecology



**Skagit Environmental Bank  
Service Area Map**

Parcels P27513 and P126391  
Mitigation / Bank Use Plan

**Figure 5**

**FEB 2019**