Soundview Consultants LLC
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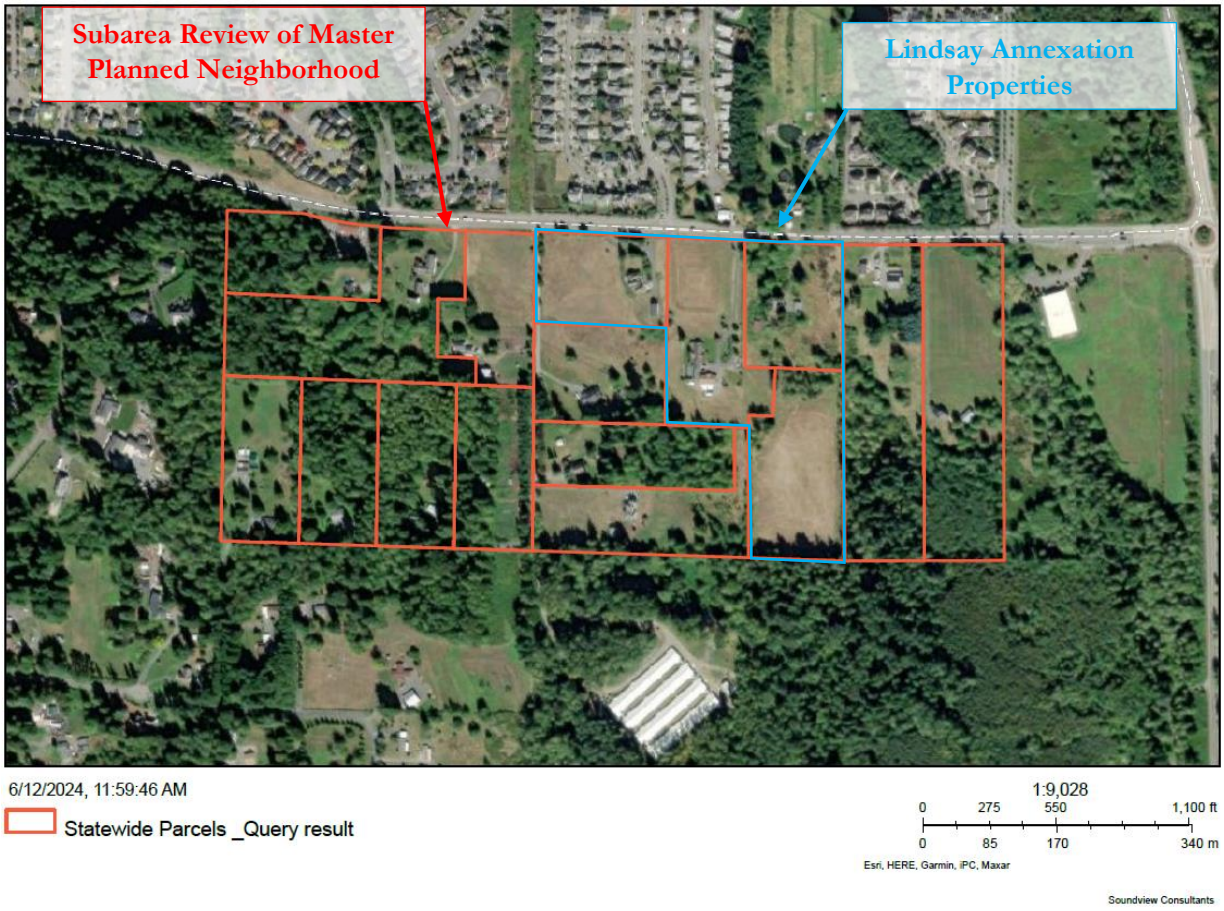
Master Planned Neighborhood District
Critical Areas and Proposed Preliminary Mitigation

MJS Investors- Rob Risinger
11201 Southeast 8th Street, Suite 116
Bellevue, WA 98004

October 10, 2024,

Soundview Consultants LLC (SVC) is assisting MJS Investors (Applicant) with a wetland and fish and wildlife habitat desktop analysis of the entire Master Planned Neighborhood (MPN) district located at 7530, 7720, 7808 & 8410 172nd Street Northeast; 7521, 7603, 7731 & 7807 168th Street Northeast; and 17011, 16905 & 16825 79th Avenue Northeast within the City of Arlington, Washington (Figure 1). Additionally, SVC is assisting the Applicant with a Wetland and Fish and Wildlife Habitat Assessment, Conceptual Mitigation Plan, State and Federal permitting and applications to support the proposed residential development of a 32.28-acre site located at 8014, 8228, 8210, and 8326 172nd Street Northeast within the City of Arlington, Washington, which is located within the MPN district, and had a full wetland and stream delineation completed in April of 2024 which is documented under a separate cover titled *Wetland Delineation and Fish and Wildlife Habitat Assessment Report- Lindsay Annexation* (SVC 2024). The subarea review of the MPN district consists of 10 parcels situated in the Northeast ¼, of Section 26, Township 31 North, Range 5 East, (Snohomish County Tax Parcel Numbers 31052600100800, 31052600100300, 31052600101800, 31052600100400, 31052600101500, 31052600101400, 31052600101900, 31052600101700, 31052600102000, and 31052600102100). SVC completed a desktop review to evaluate if any potentially regulated wetlands, waterbodies, fish and wildlife habitat, and/or priority species are located on or adjacent to the parcels listed above within the subarea review of the MPN district in support of a future Environmental Impact Statement (EIS) required to proceed with future development within the MPN district. This letter summary has been prepared to review the proposed wetland and stream buffers and support in the development of proposed mitigation and restoration measures throughout the entire MPN district.

Figure 1. Subarea Review of Master Planned Neighborhood Location.



Streams

Three streams were identified within the MPN district boundary (Streams Z, 1 [Edgecomb Creek], and 2). A small portion of Stream Z is located on the northwest corner of the MJS Lindsay Annexation site, while the majority of Stream Z is located within the MPN district boundary. Stream 1 is located in a large ravine on the western portion of the MPN district and continues offsite to the northwest. Stream 1 is considered the headwater of Edgecomb Creek. Through desktop and offsite review, Stream 1 (Edgecomb Creek) was observed to have a well defined greater than 6-foot channel, promote stream flow with mixed stream bed cobble and gravel material. Stream 2 is located on the northeast corner of the MPN district and continues offsite to the north.

Streams Z and 2 are considered Type Ns (non-fish bearing seasonal streams) and are subject to standard 50-foot buffers per AMC 20.93.730 Table 20.93-3. Stream 1 is considered a Type F ESA (fish bearing stream) and will likely be subject to a standard 150-foot buffer per AMC 20.93.730 Table 20.93-3. However, per AMC 20.93.440.a.1, for streams with endangered or threatened salmonid species a 150-foot buffer shall be required; this buffer shall consist of a 100-foot native growth protection area and the remaining 50-foot zone shall be designated as a management zone, in which vegetation may be managed solely for public health and safety reasons that may threaten structures or public infrastructure.

Wetlands

Four potentially-regulated wetlands (Wetlands A - D) were identified and delineated on the MJS Lindsay Annexation property. Additionally, one potentially regulated wetland was identified offsite to the west (Wetland 1).

Per AMC 20.93.830, wetland buffers are based on wetland category and the level of habitat functions. Wetlands A and D are classified as Category IV wetlands per Arlington Municipal Code (AMC) 20.93.800 and are subject to a standard 40-foot buffer regardless of habitat score per AMC 20.93.830 Table 20.93-4 with the required use of minimization measures outlined in AMC Table 20.93-5. Wetlands B, C, and 1 are classified as Category III wetlands per AMC 20.93.800 with moderate habitat scores of (6 or 7) and are subject to a standard 110-foot buffer per AMC 20.93.830 Table 20.93-4 with the required use of minimization measures outlined in AMC Table 20.93-5. Table 8 presents the standard wetland buffer widths for the identified wetlands.

Table 8. Wetland Buffer Summary

Wetland	Category[1]	Habitat Score	Standard Buffer Width[2]
A	IV	6	40 Feet
B	III	7	110 Feet
C	III	6	110 Feet
D	IV	5	40 Feet
1	III	6	110 Feet

1. Washington State Department of Ecology (WSDOE) wetland rating system (Hruby and Yahnke 2023) per AMC 20.93.800 and AMC 20.93.730
2. Standard buffer width per AMC 20.93.830

Wetlands located within 300 feet of the MPN district and adjacent that are located outside of the MJS Linday Annexation subject property (Wetlands 1, 2, 3, 4, 5, 6, and 7) were only assessed from a desktop perspective utilizing online mapping resources. Wetlands 4, 5, 6, and 7 are located entirely outside of the MPN boundary and will not be accessible for restoration. Wetland 1 is the same wetland as stated above as Wetland 1 and will have buffers that project onto the MJS Lindsay Annexation project. Wetlands 2 – 7 were not formally delineated or rated by SVC staff due to lack of access to the parcels that these critical areas are potentially located on.

Proposed Mitigation and Restoration

Stream Z (Onsite portions of stream only)

Stream Z is considered a Type Ns stream with an associated 50-foot buffer. Proposed mitigation for Stream Z consists of:

- Planting the riparian buffer with larger caliper conifer trees (5 gallon pots) instead of smaller 1- or 2-gallon pots. Larger conifer trees have better survival rates and will mature faster and will provide increased habitat and shading within the riparian zone, which will help to keep water temperatures within Stream Z cooler and will provide increased habitat and woody debris input compared to smaller 1- or 2-gallon potted plants.

- The channel of Stream Z will be fully restored through naturalizing the channel and through placing gravel and cobble substrate within the stream channel to improve habitat conditions. Additionally, woody material may be added to the stream channel to improve habitat and increase stream channel diversity.

- Non-native invasive species will be controlled within the stream channel and riparian buffer.

Stream Z (Offsite portions of stream only)

Stream Z is considered a Type Ns stream with an associated 50-foot buffer. Proposed mitigation for Stream Z consists of:

- Planting the riparian buffer with larger caliper conifer trees (5 gallon pots) instead of smaller 1- or 2-gallon pots. Larger conifer trees have better survival rates and will mature faster and will provide increased habitat and shading within the riparian zone, which will help to keep water temperatures within Stream Z cooler and will provide increased habitat and woody debris input compared to smaller 1- or 2-gallon potted plants.

- The channel of Stream Z will be fully restored through naturalizing the channel and through placing gravel and cobble substrate within the stream channel to improve habitat conditions. Additionally, woody material may be added to the stream channel to improve habitat and increase stream channel diversity.

- The culvert beneath 79th Avenue Northeast will eventually be replaced with a channel spanning bottomless bridge culvert to improve habitat conditions within the stream. Additional downstream culverts will also be replaced with bottomless crossings.

- Potential re-meandering of the channel at select locations and through the placement of large wood debris and log toe-veins and cribbing to assist in natural stream channel processes.

- Non-native invasive species will be controlled within the stream channel and riparian buffer.

Stream 1 (Future Recommended Restoration and Mitigation Actions)

Stream 1 will likely be considered a Type F stream with an associated 100-foot buffer. Proposed mitigation for Stream 1 consists of:

- Removal of the manmade dam barrier that is located on parcel 31052600100300.

- Planting the riparian buffer with larger caliper conifer trees (5-gallon pots) instead of smaller 1- or 2-gallon pots. Larger conifer trees have better survival rates and will mature faster and will provide increased habitat and shading within the riparian zone, which will help to keep water temperatures within Stream 1 cooler and will provide increased habitat and woody debris input compared to smaller 1- or 2-gallon potted plants.

- Non-native invasive species will be removed and controlled within the stream channel and riparian buffer.

- If the Stream 1 channel extends south of parcel 31052600101400 and if a road is constructed along the southern boundary of the MPN district, then a bottomless bridge culvert will be installed to maintain natural processes with the stream.

- Placement of large wood debris and log toe-veins and cribbing to assist in natural stream channel processes, sediment recruitment, pools and rifles

- If non-conforming land uses exist within the Stream 1 buffer, those structures will be removed and the riparian buffer will be fully restored.

Stream 2

Stream 2 is likely considered a Type Ns stream with an associated 50-foot buffer. The portion of Stream 2 within the MPN district boundary is located entirely on Stillaguamish Tribal land on parcel 31052500200500. Proposed mitigation for Stream 2 consists of:

- Planting the riparian buffer with larger caliper conifer trees (5-gallon pots) instead of smaller 1- or 2-gallon pots. Larger conifer trees have better survival rates and will mature faster and will provide increased habitat and shading within the riparian zone, which will help to keep water temperatures within Stream 2 cooler and will provide increased habitat and woody debris input compared to smaller 1- or 2-gallon potted plants.

- Non-native invasive species will be removed and controlled within the stream channel and riparian buffer.

- The culvert associated with Stream 2 that conveys flows beneath 172nd Street Northeast will likely not be replaced due to the significant roadway that currently exists and lack of documented fish presence within Stream 2.

Wetlands A, B, C, and D

Wetlands A, B, C, and D are located on the MJS Lindsay Annexation subject property. Wetland D is proposed to be filled. The northern portions of Wetlands A and C are proposed to be filled. Impacts to Wetlands A, C, and D are proposed to be mitigated for onsite through wetland creation and buffer enhancement on the southern portion of parcel 31052600102200. No impacts are proposed to Wetland B or its associated buffer. As Wetlands A, C, and D are currently degraded by lack of diverse woody vegetation and non-native invasive species, onsite wetland creation and enhancement will create a net ecological lift compared to the existing conditions onsite. Proposed mitigation to offset direct impacts to Wetlands A, C, and D will consist of:

- Compensatory and non-compensatory wetland creation on the southern portion of parcel 31052600102200. The proposed wetland creation area will be excavated to a depth that will allow for natural wetland hydrology to develop throughout the wetland creation area.

- Enhance the degraded buffers of Wetlands A, B, and C.

- The wetland creation and buffer enhancement areas will be planted with a suite of native trees, shrubs and herbaceous species, and larger caliper conifer trees (5-gallon pots) will be installed instead of smaller 1- or 2-gallon pots. Larger conifer trees have better survival rates and will mature faster and will provide increased habitat and shading within the wetlands and associated buffers, which will help to keep water temperatures within Stream Z cooler and will provide increased habitat complexity faster than compared to smaller 1- or 2-gallon potted plants. As the wetland creation area will input hydrology into Stream Z, the focus of the wetland creation and buffer enhancement areas will be to improve water quality through reducing water temperatures and treating stormwater runoff from the associated adjacent developments.

- Non-native invasive species will be removed and controlled within the wetlands and associated buffers.

- Habitat features such as snags, large woody debris, upland hummocks, etc. will be added to provide added habitat complexity to the mitigation area and wetlands to be preserved.

Wetlands 1 – 7

As Wetlands 2 – 7 have not been formally assessed and their presence is only presumed from a desktop review perspective, the below proposed mitigation is preliminary and the guidance below provides general recommendations for restoring all wetland areas within the MPN district. Wetlands 4, 5, 6, and 7 are located entirely outside of the MPN boundary and will not be accessible for restoration. Wetland 1 was assessed from an offsite perspective while Soundview completed the formal wetland delineation on the MJS Lindsay Annexation property.

- All degraded wetland buffers will be fully enhanced or restored. The wetland buffer enhancement areas will be planted with a suite of native trees, shrubs and herbaceous species, and larger caliper conifer trees (5-gallon pots) will be installed instead of smaller 1- or 2-gallon pots. Larger conifer trees have better survival rates and will mature faster and will provide increased habitat and shading within the wetlands and associated buffers, which will help to keep water temperatures cooler and will provide increased habitat complexity faster than compared to smaller 1- or 2-gallon potted plants.

- If degraded wetlands are identified within the greater MPN district, these wetlands will either be fully enhanced and restored, or they will be filled and mitigated for onsite through wetland creation contiguous with a larger higher functioning preexisting wetland within the MPN district.

- Similar habitat features should be added to provide a watershed benefit.

Once you've had a chance to review this information, please feel free to call me at 253-514-8952 to discuss our findings.

Sincerely,

_____ October 10, 2024

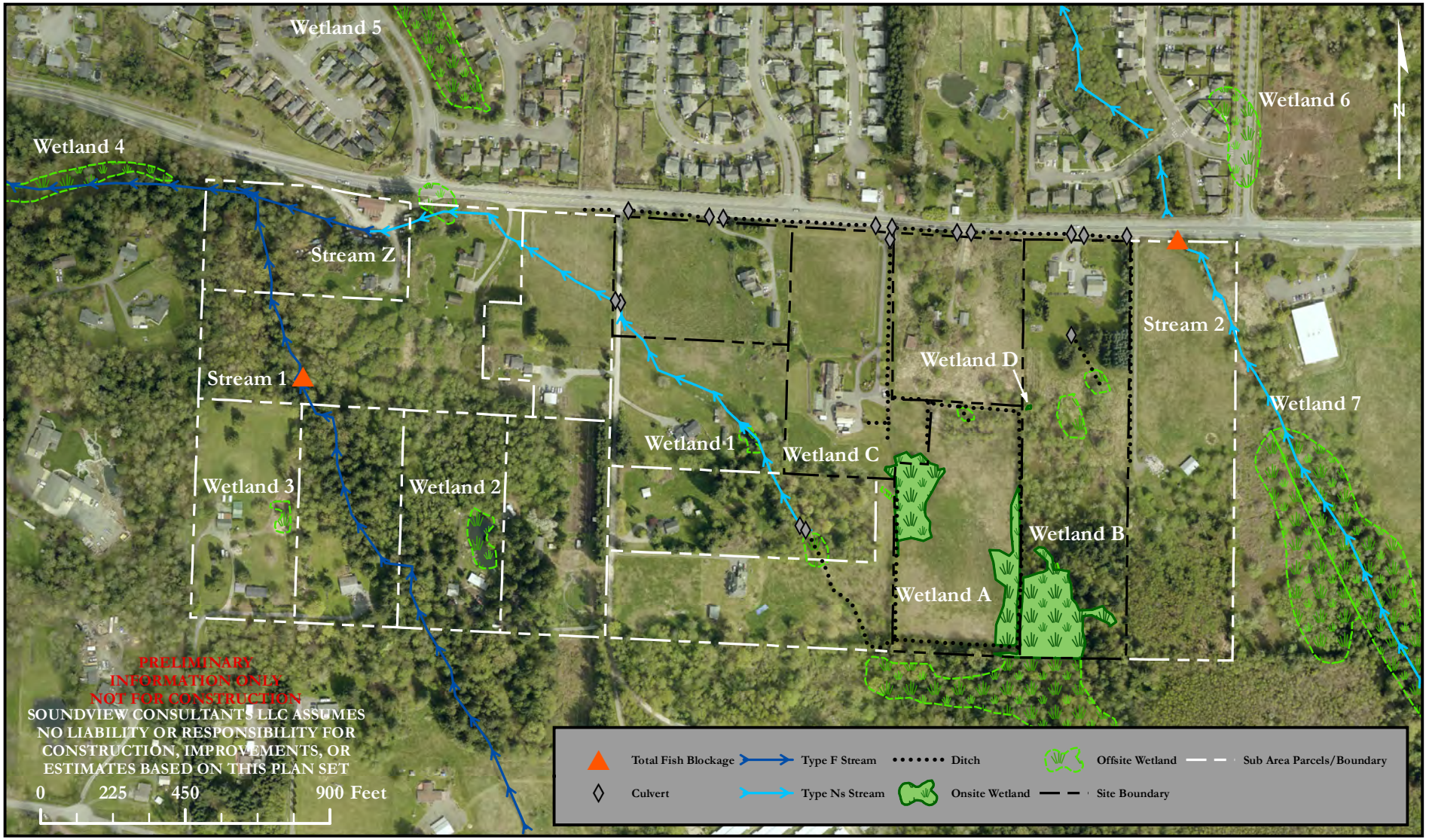
Kramer Canup Date
Project Manager and Environmental Scientist

_____ October 10, 2024

Jonathan Pickett Date
Principal

Appendix A — Existing Conditions Maps

MASTER PLANNED NEIGHBORHOOD REVIEW AREA



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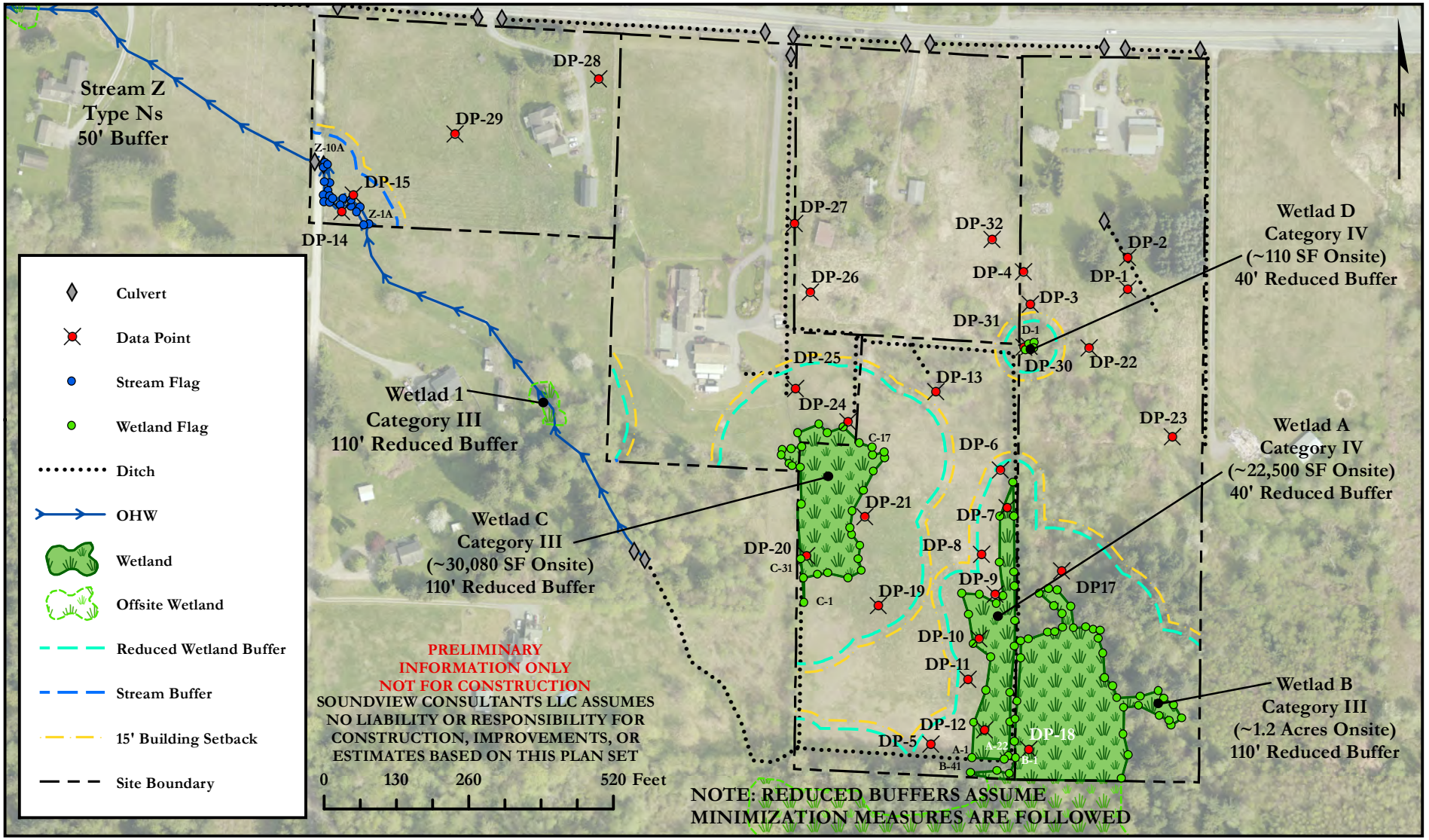
LINDSAY ANNEXATION

8014/8228/8210/8326 172ND STREET NE
ARLINGTON, WA 98223

SNOHOMISH COUNTY PARCEL NUMBERS:
31052500200600, 31052600100100,
31052600100200, 31052600102200, & 31052600102300

DATE:	10/11/2024
JOB:	2419.0002
BY:	CM
SCALE:	1 " = 450 '
FIGURE NO.	1

EXISTING CONDITIONS



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LINDSAY ANNEXATION

8014/8228/8210/8326 172ND STREET NE
ARLINGTON, WA 98223

SNOHOMISH COUNTY PARCEL NUMBERS:
31052500200600, 31052600100100,
31052600100200, 31052600102200, & 31052600102300

DATE:	7/3/2024
JOB:	2419.0002
BY:	DDS
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FIGURE NO.	1