



## Sewall Wetland Consulting, Inc.

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RESUBMITTED

Apr 09 2020

CITY OF FEDERAL WAY  
COMMUNITY DEVELOPMENT

April 1, 2020

Dmitriy Mayzlin  
RMJ Holdings LLC  
9675 SE 36th Street, Suite 105  
Mercer Island, Washington 98040

RE: Critical Areas Mitigation Plan – “Woodlands at Redondo”  
SWC Job #19-141

Dear Dmitriy,

This report describes the proposed mitigation on the Woodlands at Redondo project located in the city of Federal Way, Washington. The proposed buffer averaging and mitigation work as depicted on the attached “*Critical Area Mitigation Plan – The Woodlands at Redondo Creek*” dated 3-27-20. Specifically, this letter responds to the February 7, 2020 Memorandum from ESA regarding the project. There were two comments pertinent to the proposed mitigation as shown below with responses to each comment;

- ESA agrees that the proposed Project has met all the requirements for buffer averaging per FWRC 19.145.440.5 – *Buffer Averaging*. However, according to the Report, the area proposed for buffer addition “is mature forest with some transient impacts but generally less than the reduction area.” ESA recommends that the applicant propose buffer enhancement in the buffer addition area to ensure that buffer averaging does not result in a loss of ecological function. Appropriate buffer enhancement strategies include the removal of refuse, invasive plants, and the subsequent planting of native vegetation, where appropriate.

**Response:** As requested, in the attached “*Critical Area Mitigation Plan – The Woodlands at Redondo Creek*”, we have included enhancement of the buffer addition areas where needed as a result of transient camps in this area. This includes removal of trash and debris as well as replanting with native vegetation of similar species composition to the existing buffer.

- ESA does not agree that buffer reduction is an appropriate alternative for the portion of the wetland buffer to be impacted by the widening of South 304<sup>th</sup> Street. According to FWRC 19.145.440.4(4) – *Permanently Altered Buffer*, buffer reduction may be considered by the Director “when existing conditions are such that portions of the required buffer exist in a permanently altered state (e.g., roadways, paved parking lots, and permanent structures) and do not provide any buffer function.” ESA agrees that the portion of the buffer adjacent to the road has been permanently impacted by the road and stormwater infrastructure (i.e. culvert). However, during the August 28, 2019 site visit, this portion of the buffer included a vegetated road shoulder and road prism (see photograph below); and therefore, still provided some level of ecological function to the wetland, primarily the filtering of pollutants and sediment from road runoff before entering the wetland.

Based on a discussion with you, we understand that the impacts to the wetland buffer are viewed as a result of the City-required road widening and therefore should be reviewed under FWRC 19.145.120 – *Public Exemptions*. This code provision states that “the director may permit the placement of an essential public facility or utility or other public improvements in a critical area if no practical alternative with less impact on the critical area(s) exists.” Under this exemption, the City still requires mitigation for any impacts to critical areas. ESA recommends that the applicant revise the Report and Plan Sheets to include a mitigation plan for the buffer impacts as required by FWRC 19.145.140 – *Mitigation Plan Requirements*. We also recommend that mitigation be focused on protecting the wetland and stream from possible impacts caused by the road widening and may include installing native plants in the wetland or wetland buffer. Additional vegetation in these areas would increase the water quality and hydrologic functions of the already reduced buffer, as well as hamper the possible disposal of refuse by passersby.

**Response:** As requested, we have added additional wetland enhancement and restoration plantings along the area of the widening of South 304<sup>th</sup> Street. The area of the reduction is 2,534sf. We have shown enhancement of 2,589sf along the roadway, as well as 5,924sf of buffer area that currently is a road like pathway used by transients on the site. We have also added language to the report to remove the substantial amount of debris located within the stream channel on the north side of the site. This consists of shopping carts, makeshift bridges and large amounts of trash.

These above described mitigation measures will more than off-set the buffer intrusion into the buffer of the wetland and stream from the South 304<sup>th</sup> Street improvements.

If you have any questions in regards to this report or need additional information, please feel free to contact me at (253) 859-0515 or at [esewall@sewallwc.com](mailto:esewall@sewallwc.com) .

Sincerely,  
*Sewall Wetland Consulting, Inc.*

A handwritten signature in black ink on a light yellow background. The signature is cursive and appears to read "Ed Sewall".

Ed Sewall  
Senior Wetlands Ecologist PWS #212