

HABITAT TECHNOLOGIES

July 16, 2018

Mr. Robert Hansen, Planning Manager
@ City of Federal Way
33325 – 8th Avenue South
Federal Way, Washington 98003

Ms. Becky Chapin, Associated Planner
@ City of Federal Way
33325 – 8th Avenue South
Federal Way, Washington 98003
e-mail Becky.Chapin@cityoffederalway.com

RE: Review of Wetland Z Adjacent to Parcel 1721049034

I would first like to thank you both for meeting with me to discuss the potential implementation of Wetland Z and its associated buffer (as depicted in the prior delineation for the Celebration Park Area) in relation to the future planning for Parcel 1721049034. As noted for the prior Celebration Park Area, Wetland Z was confined within a narrow ravine and dominated by a forest plant community. As such, Wetland Z was defined in 1997 as a City of Federal Way Category II Wetland with a standard buffer of 100 feet in width. Wetland Z was also defined as not exhibiting any high value ratings for any functions.

As we discussed, and as depicted within the mapping prepared for the Celebration Park Area, the prior standard 100-foot buffer for Wetland Z extended approximately 30 to 40 feet onto the very western boundary of Parcel 1721049034. In addition, the compensatory mitigation completed along Wetland Z also pushed the standard buffer even further onto the western boundary of Parcel 1721049034.

Following our discussion Habitat Technologies completed an onsite assessment and subsequent categorization of Wetland Z pursuant to the Washington State *Wetland Rating System for Western Washington* (Hruby, 2014). Wetland Z was identified as confined within an existing ravine that appeared to have not changed significantly since the 1997 assessment completed for the Celebration Park Area, was dominated by a deciduous forest plant community, as not exhibiting an intermittent defined channel, and as entering a stormwater system at the southern end of the wetland. In addition, the prior mitigation work completed along Wetland Z as a part of the development of the Celebration Park has added a variety of young coniferous trees and a mixture of native shrubs to the buffer area.

As defined, Wetland Z was identified as meeting the present criteria for designation as a City of Federal Way Category III Wetland. This wetland received a total of 17 points for total functions which included a total of 4 points for habitat functions (Appendix A). As such, the present City of Federal Way buffer for this wetland would be 60 feet in width.

With a Category III Wetland rating and a standard buffer of 60 feet it appears that the standard buffer for this wetland would generally follow the existing chain link fence along the western boundary of Parcel 1721049034. In addition, as discussed it would appear beneficial that any required landscaping associated with the future development of Parcel 1721049034 be composed on native species located along the western boundary of the parcel.

Thank you for your attention to this site planning.

Sincerely,

Thomas D. Deming

Thomas D. Deming, PWS
Habitat Technologies

cc. Mr. Paul Rasmussen, @ Cascadia Senior Living
e-mail paulr@cascadiaseniorliving.com

Appendix A – 2014 Wetland Rating Worksheet

Wetland name or number Z

RATING SUMMARY – Western Washington

Name of wetland (or ID #): Wetland Z Date of site visit: 13 JUL 2018

Rated by Habitat Technologies Trained by Ecology? Yes No Date of training 2014

HGM Class used for rating Depressional Wetland has multiple HGM classes? Y N

NOTE: Form is not complete without the figures requested (figures can be combined).

Source of base aerial photo/map Google

OVERALL WETLAND CATEGORY 3 (based on functions or special characteristics)

1. Category of wetland based on FUNCTIONS

Category I – Total score = 23 - 27

Category II – Total score = 20 - 22

Category III – Total score = 16 - 19

Category IV – Total score = 9 - 15

FUNCTION	Improving Water Quality	Hydrologic	Habitat	
<i>Circle the appropriate ratings</i>				
Site Potential	H <input type="checkbox"/> M <input checked="" type="checkbox"/> L	H <input type="checkbox"/> M <input checked="" type="checkbox"/> L	H <input type="checkbox"/> M <input checked="" type="checkbox"/> L	
Landscape Potential	H <input type="checkbox"/> M <input checked="" type="checkbox"/> L	H <input type="checkbox"/> M <input checked="" type="checkbox"/> L	H M <input type="checkbox"/> L	
Value	<input checked="" type="checkbox"/> H M L	H <input type="checkbox"/> M <input checked="" type="checkbox"/> L	H M <input type="checkbox"/> L	TOTAL
Score Based on Ratings	7	6	4	17

Score for each function based on three ratings (order of ratings is not important)

9 = H,H,H

8 = H,H,M

7 = H,H,L

7 = H,M,M

6 = H,M,L

6 = M,M,M

5 = H,L,L

5 = M,M,L

4 = M,L,L

3 = L,L,L

2. Category based on SPECIAL CHARACTERISTICS of wetland

CHARACTERISTIC	CATEGORY
Estuarine	I II
Wetland of High Conservation Value	I
Bog	I
Mature Forest	I
Old Growth Forest	I
Coastal Lagoon	I II
Interdunal	I II III IV
None of the above	X

Wetland name or number Z

Maps and figures required to answer questions correctly for Western Washington

Depressional Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	D 1.3, H 1.1, H 1.4	W1
Hydroperiods	D 1.4, H 1.2	W2
Location of outlet (<i>can be added to map of hydroperiods</i>)	D 1.1, D 4.1	W2
Boundary of area within 150 ft of the wetland (<i>can be added to another figure</i>)	D 2.2, D 5.2	W2
Map of the contributing basin	D 4.3, D 5.3	W3
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	W4
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	D 3.1, D 3.2	W5
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	D 3.3	W6

Riverine Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	↑
Hydroperiods	H 1.2	↑
Ponded depressions	R 1.1	↑
Boundary of area within 150 ft of the wetland (<i>can be added to another figure</i>)	R 2.4	↑
Plant cover of trees, shrubs, and herbaceous plants	R 1.2, R 4.2	↑
Width of unit vs. width of stream (<i>can be added to another figure</i>)	R 4.1	N/A
Map of the contributing basin	R 2.2, R 2.3, R 5.2	↑
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	↑
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	R 3.1	↑
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	R 3.2, R 3.3	↓

Lake Fringe Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	L 1.1, L 4.1, H 1.1, H 1.4	↑
Plant cover of trees, shrubs, and herbaceous plants	L 1.2	↑
Boundary of area within 150 ft of the wetland (<i>can be added to another figure</i>)	L 2.2	↑
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	N/A
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	L 3.1, L 3.2	↓
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	L 3.3	↓

Slope Wetlands

Map of:	To answer questions:	Figure #
Cowardin plant classes	H 1.1, H 1.4	↑
Hydroperiods	H 1.2	↑
Plant cover of dense trees, shrubs, and herbaceous plants	S 1.3	↑
Plant cover of dense, rigid trees, shrubs, and herbaceous plants (<i>can be added to figure above</i>)	S 4.1	N/A
Boundary of 150 ft buffer (<i>can be added to another figure</i>)	S 2.1, S 5.1	↑
1 km Polygon: Area that extends 1 km from entire wetland edge - including polygons for accessible habitat and undisturbed habitat	H 2.1, H 2.2, H 2.3	↑
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	S 3.1, S 3.2	↓
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	S 3.3	↓

HGM Classification of Wetlands in Western Washington

For questions 1-7, the criteria described must apply to the entire unit being rated.

If the hydrologic criteria listed in each question do not apply to the entire unit being rated, you probably have a unit with multiple HGM classes. In this case, identify which hydrologic criteria in questions 1-7 apply, and go to Question 8.

1. Are the water levels in the entire unit usually controlled by tides except during floods?

NO - go to 2

YES - the wetland class is **Tidal Fringe** - go to 1.1

- 1.1 Is the salinity of the water during periods of annual low flow below 0.5 ppt (parts per thousand)?

NO - **Saltwater Tidal Fringe (Estuarine)**

YES - **Freshwater Tidal Fringe**

*If your wetland can be classified as a Freshwater Tidal Fringe use the forms for **Riverine** wetlands. If it is Saltwater Tidal Fringe it is an **Estuarine** wetland and is not scored. This method **cannot** be used to score functions for estuarine wetlands.*

2. The entire wetland unit is flat and precipitation is the only source (>90%) of water to it. Groundwater and surface water runoff are NOT sources of water to the unit.

NO - go to 3

YES - The wetland class is **Flats**

*If your wetland can be classified as a Flats wetland, use the form for **Depressional** wetlands.*

3. Does the entire wetland unit **meet all** of the following criteria?

The vegetated part of the wetland is on the shores of a body of permanent open water (without any plants on the surface at any time of the year) at least 20 ac (8 ha) in size;

At least 30% of the open water area is deeper than 6.6 ft (2 m).

NO - go to 4

YES - The wetland class is **Lake Fringe (Lacustrine Fringe)**

4. Does the entire wetland unit **meet all** of the following criteria?

The wetland is on a slope (*slope can be very gradual*),

The water flows through the wetland in one direction (unidirectional) and usually comes from seeps. It may flow subsurface, as sheetflow, or in a swale without distinct banks,

The water leaves the wetland **without being impounded**.

NO - go to 5

YES - The wetland class is **Slope**

NOTE: Surface water does not pond in these type of wetlands except occasionally in very small and shallow depressions or behind hummocks (depressions are usually <3 ft diameter and less than 1 ft deep).

5. Does the entire wetland unit **meet all** of the following criteria?

The unit is in a valley, or stream channel, where it gets inundated by overbank flooding from that stream or river,

The overbank flooding occurs at least once every 2 years.

Wetland name or number Z

NO - go to 6

YES - The wetland class is Riverine

NOTE: The Riverine unit can contain depressions that are filled with water when the river is not flooding

6. Is the entire wetland unit in a topographic depression in which water ponds, or is saturated to the surface, at some time during the year? *This means that any outlet, if present, is higher than the interior of the wetland.*

NO - go to 7

YES - The wetland class is Depressional

7. Is the entire wetland unit located in a very flat area with no obvious depression and no overbank flooding? The unit does not pond surface water more than a few inches. The unit seems to be maintained by high groundwater in the area. The wetland may be ditched, but has no obvious natural outlet.

NO - go to 8

YES - The wetland class is Depressional

8. Your wetland unit seems to be difficult to classify and probably contains several different HGM classes. For example, seeps at the base of a slope may grade into a riverine floodplain, or a small stream within a Depressional wetland has a zone of flooding along its sides. **GO BACK AND IDENTIFY WHICH OF THE HYDROLOGIC REGIMES DESCRIBED IN QUESTIONS 1-7 APPLY TO DIFFERENT AREAS IN THE UNIT** (make a rough sketch to help you decide). Use the following table to identify the appropriate class to use for the rating system if you have several HGM classes present within the wetland unit being scored.

NOTE: Use this table only if the class that is recommended in the second column represents 10% or more of the total area of the wetland unit being rated. If the area of the HGM class listed in column 2 is less than 10% of the unit; classify the wetland using the class that represents more than 90% of the total area.

HGM classes within the wetland unit being rated	HGM class to use in rating
Slope + Riverine	Riverine
Slope + Depressional	Depressional
Slope + Lake Fringe	Lake Fringe
Depressional + Riverine along stream within boundary of depression	Depressional
Depressional + Lake Fringe	Depressional
Riverine + Lake Fringe	Riverine
Salt Water Tidal Fringe and any other class of freshwater wetland	Treat as ESTUARINE

*If you are still unable to determine which of the above criteria apply to your wetland, or if you have **more than 2 HGM classes** within a wetland boundary, classify the wetland as Depressional for the rating.*

Wetland name or number Z

DEPRESSIONAL AND FLATS WETLANDS

Water Quality Functions - Indicators that the site functions to improve water quality

D 1.0. Does the site have the potential to improve water quality?	
D 1.1. Characteristics of surface water outflows from the wetland: Wetland is a depression or flat depression (QUESTION 7 on key) with no surface water leaving it (no outlet). points = 3 Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet. points = 2 Wetland has an unconstricted, or slightly constricted, surface outlet that is permanently flowing points = 1 Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch. points = 1	2
D 1.2. The soil 2 in below the surface (or duff layer) is true clay or true organic (use NRCS definitions). Yes = 4 No = 0	0
D 1.3. Characteristics and distribution of persistent plants (Emergent, Scrub-shrub, and/or Forested Cowardin classes): Wetland has persistent, ungrazed, plants > 95% of area points = 5 Wetland has persistent, ungrazed, plants > ½ of area points = 3 Wetland has persistent, ungrazed plants > 1/10 of area points = 1 Wetland has persistent, ungrazed plants < 1/10 of area points = 0	5
D 1.4. Characteristics of seasonal ponding or inundation: <i>This is the area that is ponded for at least 2 months. See description in manual.</i> Area seasonally ponded is > ½ total area of wetland points = 4 Area seasonally ponded is > ¼ total area of wetland points = 2 Area seasonally ponded is < ¼ total area of wetland points = 0	2
Total for D 1	9

Rating of Site Potential If score is: 12-16 = H X 6-11 = M 0-5 = L *Record the rating on the first page*

D 2.0. Does the landscape have the potential to support the water quality function of the site?	
D 2.1. Does the wetland unit receive stormwater discharges? Yes = 1 No = 0	1
D 2.2. Is > 10% of the area within 150 ft of the wetland in land uses that generate pollutants? Yes = 1 No = 0	1
D 2.3. Are there septic systems within 250 ft of the wetland? Yes = 1 No = 0	0
D 2.4. Are there other sources of pollutants coming into the wetland that are not listed in questions D 2.1-D 2.3? Source _____ Yes = 1 No = 0	0
Total for D 2	2

Rating of Landscape Potential If score is: 3 or 4 = H X 1 or 2 = M 0 = L *Record the rating on the first page*

D 3.0. Is the water quality improvement provided by the site valuable to society?	
D 3.1. Does the wetland discharge directly (i.e., within 1 mi) to a stream, river, lake, or marine water that is on the 303(d) list? Yes = 1 No = 0	0
D 3.2. Is the wetland in a basin or sub-basin where an aquatic resource is on the 303(d) list? Yes = 1 No = 0	1
D 3.3. Has the site been identified in a watershed or local plan as important for maintaining water quality (answer YES if there is a TMDL for the basin in which the unit is found)? Yes = 2 No = 0	1
Total for D 3	2

Rating of Value If score is: X 2-4 = H 1 = M 0 = L *Record the rating on the first page*

Wetland name or number Z

DEPRESSIONAL AND FLATS WETLANDS		
Hydrologic Functions - Indicators that the site functions to reduce flooding and stream degradation		
D 4.0. Does the site have the potential to reduce flooding and erosion?		
D 4.1. Characteristics of surface water outflows from the wetland:		
Wetland is a depression or flat depression with no surface water leaving it (no outlet)	points = 4	2
Wetland has an intermittently flowing stream or ditch, OR highly constricted permanently flowing outlet	points = 2	
Wetland is a flat depression (QUESTION 7 on key), whose outlet is a permanently flowing ditch	points = 1	
Wetland has an unconfined, or slightly constricted, surface outlet that is permanently flowing	points = 0	
D 4.2. Depth of storage during wet periods: Estimate the height of ponding above the bottom of the outlet. For wetlands with no outlet, measure from the surface of permanent water or if dry, the deepest part.		
Marks of ponding are 3 ft or more above the surface or bottom of outlet	points = 7	3
Marks of ponding between 2 ft to < 3 ft from surface or bottom of outlet	points = 5	
Marks are at least 0.5 ft to < 2 ft from surface or bottom of outlet	points = 3	
The wetland is a "headwater" wetland	points = 3	
Wetland is flat but has small depressions on the surface that trap water	points = 1	
Marks of ponding less than 0.5 ft (6 in)	points = 0	
D 4.3. Contribution of the wetland to storage in the watershed: Estimate the ratio of the area of upstream basin contributing surface water to the wetland to the area of the wetland unit itself.		
The area of the basin is less than 10 times the area of the unit	points = 5	5
The area of the basin is 10 to 100 times the area of the unit	points = 3	
The area of the basin is more than 100 times the area of the unit	points = 0	
Entire wetland is in the Flats class	points = 5	
Total for D 4	Add the points in the boxes above	10

Rating of Site Potential If score is: 12-16 = H X 6-11 = M 0-5 = L *Record the rating on the first page*

D 5.0. Does the landscape have the potential to support hydrologic functions of the site?		
D 5.1. Does the wetland receive stormwater discharges?	Yes = 1 No = 0	1
D 5.2. Is >10% of the area within 150 ft of the wetland in land uses that generate excess runoff?	Yes = 1 No = 0	0
D 5.3. Is more than 25% of the contributing basin of the wetland covered with intensive human land uses (residential at >1 residence/ac, urban, commercial, agriculture, etc.)?	Yes = 1 No = 0	1
Total for D 5	Add the points in the boxes above	2

Rating of Landscape Potential If score is: 3 = H X 1 or 2 = M 0 = L *Record the rating on the first page*

D 6.0. Are the hydrologic functions provided by the site valuable to society?		
D 6.1. The unit is in a landscape that has flooding problems. Choose the description that best matches conditions around the wetland unit being rated. Do not add points. Choose the highest score if more than one condition is met.		
The wetland captures surface water that would otherwise flow down-gradient into areas where flooding has damaged human or natural resources (e.g., houses or salmon redds):		
• Flooding occurs in a sub-basin that is immediately down-gradient of unit.	points = 2	1
• Surface flooding problems are in a sub-basin farther down-gradient.	points = 1	
Flooding from groundwater is an issue in the sub-basin.	points = 1	
The existing or potential outflow from the wetland is so constrained by human or natural conditions that the water stored by the wetland cannot reach areas that flood. Explain why _____	points = 0	
There are no problems with flooding downstream of the wetland.	points = 0	
D 6.2. Has the site been identified as important for flood storage or flood conveyance in a regional flood control plan?		
	Yes = 2 No = 0	0
Total for D 6	Add the points in the boxes above	1

Rating of Value If score is: 2-4 = H X 1 = M 0 = L *Record the rating on the first page*

These questions apply to wetlands of all HGM classes.

HABITAT FUNCTIONS - Indicators that site functions to provide important habitat

H 1.0. Does the site have the potential to provide habitat?

H 1.1. Structure of plant community: *Indicators are Cowardin classes and strata within the Forested class.* Check the Cowardin plant classes in the wetland. *Up to 10 patches may be combined for each class to meet the threshold of ¼ ac or more than 10% of the unit if it is smaller than 2.5 ac. Add the number of structures checked.*

- | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|---|
| <input type="checkbox"/> Aquatic bed | 4 structures or more: points = 4 | 1 |
| <input type="checkbox"/> Emergent | 3 structures: points = 2 | |
| <input type="checkbox"/> Scrub-shrub (areas where shrubs have > 30% cover) | 2 structures: points = 1 | |
| <input checked="" type="checkbox"/> Forested (areas where trees have > 30% cover) | 1 structure: points = 0 | |
| <i>If the unit has a Forested class, check if:</i> | | |
| <input checked="" type="checkbox"/> The Forested class has 3 out of 5 strata (canopy, sub-canopy, shrubs, herbaceous, moss/ground-cover) that each cover 20% within the Forested polygon | | |

H 1.2. Hydroperiods

Check the types of water regimes (hydroperiods) present within the wetland. The water regime has to cover more than 10% of the wetland or ¼ ac to count (*see text for descriptions of hydroperiods*).

- | | | |
|----------------------------------------------------------------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> Permanently flooded or inundated | 4 or more types present: points = 3 | 1 |
| <input checked="" type="checkbox"/> Seasonally flooded or inundated | 3 types present: points = 2 | |
| <input type="checkbox"/> Occasionally flooded or inundated | 2 types present: points = 1 | |
| <input checked="" type="checkbox"/> Saturated only | 1 type present: points = 0 | |
| <input type="checkbox"/> Permanently flowing stream or river in, or adjacent to, the wetland | | |
| <input type="checkbox"/> Seasonally flowing stream in, or adjacent to, the wetland | | |
| <input type="checkbox"/> Lake Fringe wetland | 2 points | |
| <input type="checkbox"/> Freshwater tidal wetland | 2 points | |

H 1.3. Richness of plant species

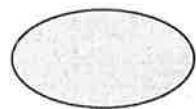
Count the number of plant species in the wetland that cover at least 10 ft².

Different patches of the same species can be combined to meet the size threshold and you do not have to name the species. Do not include Eurasian milfoil, reed canarygrass, purple loosestrife, Canadian thistle

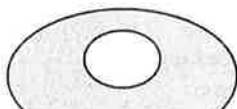
- | | | |
|------------------------------|------------|---|
| If you counted: > 19 species | points = 2 | 2 |
| 5 - 19 species | points = 1 | |
| < 5 species | points = 0 | |

H 1.4. Interspersion of habitats

Decide from the diagrams below whether interspersions among Cowardin plants classes (described in H 1.1), or the classes and unvegetated areas (can include open water or mudflats) is high, moderate, low, or none. *If you have four or more plant classes or three classes and open water, the rating is always high.*



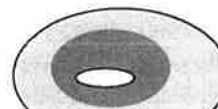
None = 0 points



Low = 1 point

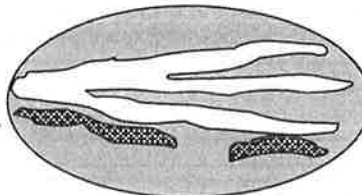
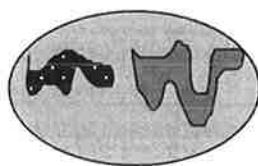


Moderate = 2 points



0

All three diagrams in this row are **HIGH** = 3 points



Wetland name or number Z

<p>H 1.5. Special habitat features: Check the habitat features that are present in the wetland. <i>The number of checks is the number of points.</i> <input checked="" type="checkbox"/> Large, downed, woody debris within the wetland (> 4 in diameter and 6 ft long). <input type="checkbox"/> Standing snags (dbh > 4 in) within the wetland <input type="checkbox"/> Undercut banks are present for at least 6.6 ft (2 m) and/or overhanging plants extends at least 3.3 ft (1 m) over a stream (or ditch) in, or contiguous with the wetland, for at least 33 ft (10 m) <input type="checkbox"/> Stable steep banks of fine material that might be used by beaver or muskrat for denning (> 30 degree slope) OR signs of recent beaver activity are present (<i>cut shrubs or trees that have not yet weathered where wood is exposed</i>) <input checked="" type="checkbox"/> At least ¼ ac of thin-stemmed persistent plants or woody branches are present in areas that are permanently or seasonally inundated (<i>structures for egg-laying by amphibians</i>) <input checked="" type="checkbox"/> Invasive plants cover less than 25% of the wetland area in every stratum of plants (<i>see H 1.1 for list of strata</i>)</p>	3
Total for H 1	7

Rating of Site Potential If score is: 15-18 = H X 7-14 = M 0-6 = L *Record the rating on the first page*

<p>H 2.0. Does the landscape have the potential to support the habitat functions of the site?</p>	
<p>H 2.1. Accessible habitat (include <i>only habitat that directly abuts wetland unit</i>). <i>Calculate:</i> % undisturbed habitat <u>0</u> + [(% moderate and low intensity land uses)/2] <u>5</u> = <u>5</u> % If total accessible habitat is: > 1/3 (33.3%) of 1 km Polygon points = 3 20-33% of 1 km Polygon points = 2 10-19% of 1 km Polygon points = 1 < 10% of 1 km Polygon points = 0</p>	0
<p>H 2.2. Undisturbed habitat in 1 km Polygon around the wetland. <i>Calculate:</i> % undisturbed habitat <u>10</u> + [(% moderate and low intensity land uses)/2] <u>0</u> = <u>0</u> % Undisturbed habitat > 50% of Polygon points = 3 Undisturbed habitat 10-50% and in 1-3 patches points = 2 Undisturbed habitat 10-50% and > 3 patches points = 1 Undisturbed habitat < 10% of 1 km Polygon points = 0</p>	1
<p>H 2.3. Land use intensity in 1 km Polygon: If > 50% of 1 km Polygon is high intensity land use points = (- 2) ≤ 50% of 1 km Polygon is high intensity points = 0</p>	(-2)
Total for H 2	0

Rating of Landscape Potential If score is: 4-6 = H 1-3 = M X < 1 = L *Record the rating on the first page*

<p>H 3.0. Is the habitat provided by the site valuable to society?</p>	
<p>H 3.1. Does the site provide habitat for species valued in laws, regulations, or policies? <i>Choose only the highest score that applies to the wetland being rated.</i> Site meets ANY of the following criteria: points = 2 — It has 3 or more priority habitats within 100 m (see next page) — It provides habitat for Threatened or Endangered species (any plant or animal on the state or federal lists) — It is mapped as a location for an individual WDFW priority species — It is a Wetland of High Conservation Value as determined by the Department of Natural Resources — It has been categorized as an important habitat site in a local or regional comprehensive plan, in a Shoreline Master Plan, or in a watershed plan Site has 1 or 2 priority habitats (listed on next page) within 100 m points = 1 Site does not meet any of the criteria above points = 0</p>	0

Rating of Value If score is: 2 = H 1 = M X 0 = L *Record the rating on the first page*

WDFW Priority Habitats

Priority habitats listed by WDFW (see complete descriptions of WDFW priority habitats, and the counties in which they can be found, in: Washington Department of Fish and Wildlife. 2008. Priority Habitat and Species List. Olympia, Washington. 177 pp. <http://wdfw.wa.gov/publications/00165/wdfw00165.pdf> or access the list from here: <http://wdfw.wa.gov/conservation/phs/list/>)

Count how many of the following priority habitats are within 330 ft (100 m) of the wetland unit: **NOTE:** *This question is independent of the land use between the wetland unit and the priority habitat.*

- **Aspen Stands:** Pure or mixed stands of aspen greater than 1 ac (0.4 ha).
- **Biodiversity Areas and Corridors:** Areas of habitat that are relatively important to various species of native fish and wildlife (*full descriptions in WDFW PHS report*).
- **Herbaceous Balds:** Variable size patches of grass and forbs on shallow soils over bedrock.
- **Old-growth/Mature forests:** Old-growth west of Cascade crest – Stands of at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 8 trees/ac (20 trees/ha) > 32 in (81 cm) dbh or > 200 years of age. Mature forests – Stands with average diameters exceeding 21 in (53 cm) dbh; crown cover may be less than 100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than that found in old-growth; 80-200 years old west of the Cascade crest.
- **Oregon White Oak:** Woodland stands of pure oak or oak/conifer associations where canopy coverage of the oak component is important (*full descriptions in WDFW PHS report p. 158 – see web link above*).
- **Riparian:** The area adjacent to aquatic systems with flowing water that contains elements of both aquatic and terrestrial ecosystems which mutually influence each other.
- **Westside Prairies:** Herbaceous, non-forested plant communities that can either take the form of a dry prairie or a wet prairie (*full descriptions in WDFW PHS report p. 161 – see web link above*).
- **Instream:** The combination of physical, biological, and chemical processes and conditions that interact to provide functional life history requirements for instream fish and wildlife resources.
- **Nearshore:** Relatively undisturbed nearshore habitats. These include Coastal Nearshore, Open Coast Nearshore, and Puget Sound Nearshore. (*full descriptions of habitats and the definition of relatively undisturbed are in WDFW report – see web link on previous page*).
- **Caves:** A naturally occurring cavity, recess, void, or system of interconnected passages under the earth in soils, rock, ice, or other geological formations and is large enough to contain a human.
- **Cliffs:** Greater than 25 ft (7.6 m) high and occurring below 5000 ft elevation.
- **Talus:** Homogenous areas of rock rubble ranging in average size 0.5 - 6.5 ft (0.15 - 2.0 m), composed of basalt, andesite, and/or sedimentary rock, including riprap slides and mine tailings. May be associated with cliffs.
- **Snags and Logs:** Trees are considered snags if they are dead or dying and exhibit sufficient decay characteristics to enable cavity excavation/use by wildlife. Priority snags have a diameter at breast height of > 20 in (51 cm) in western Washington and are > 6.5 ft (2 m) in height. Priority logs are > 12 in (30 cm) in diameter at the largest end, and > 20 ft (6 m) long.

Note: All vegetated wetlands are by definition a priority habitat but are not included in this list because they are addressed elsewhere.



CITY HALL
33325 8th Avenue South
Federal Way, WA 98003-6325
(253) 835-7000
www.cityoffederalway.com
Jim Ferrell, Mayor

August 10, 2018

Tom Deming
Habitat Technologies
PO Box 1088
Puyallup, WA 98371
tom@habitattechnologies.net

**RE: File #18-103574-00-AD; RESPONSE LETTER
Varga Property Wetland, 1403 South 330th Street, Parcel # 172104-9034, Federal Way**

Dear Mr. Deming:

The Department of Community Development is in receipt of the review memo for a wetland on the City's Celebration Park property, known as Wetland Z, prepared by Habitat Technologies, dated July 16, 2018. Following submittal of an initial Wetland and Drainage Corridor Delineation Assessment, dated June 6, 2018, you met with city staff on June 26, 2018, to discuss present conditions of the site. The city requested revisions to include rating the wetland and buffer pursuant to *Federal Way Revised Code* (FWRC) 19.145.420.

FINDINGS

After review of the revised report, staff concurs with the findings that the onsite wetland meets characteristics of a Category III wetland with a 60-foot buffer. Based on the review memo the standard buffer the Wetland Z would generally follow the existing chain link fence along the western boundary of Parcel # 172104-9034, but no map/site plan with the exact wetland boundary and buffer was provided with the review memo.

FUTURE ITEMS

When submitting for a future development on parcel 172104-9034, the applicant must include a scaled site plan showing the boundaries of the offsite wetland with the associated 60-foot buffer.

If you have any questions regarding this letter or your upcoming project, please contact me at 253-835-2641 or becky.chapin@cityoffederalway.com.

Sincerely,

Becky Chapin
Senior Planner