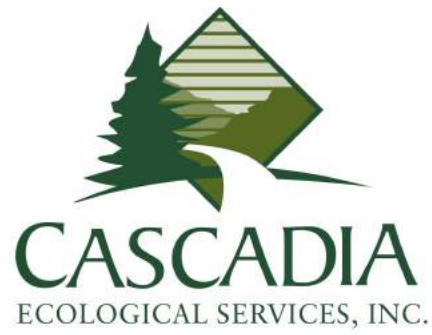




**WETLAND DELINEATION AND ASSESSMENT REPORT
UNION SELF STORAGE PROJECT
TAX PARCEL 176190000**



PREPARED BY:

CASCADIA ECOLOGICAL SERVICES, INC.

PREPARED FOR:

**TOM STRASSENBERG
200 SE 197TH PLACE
CAMAS, WA 98607**

REPORT DATE: 6/14/16

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TABLE 1. SITE SUMMARY

Site Location(s)	6250 NW Friberg-Strunk Street, Camas, WA 98607
Applicant / Owner(s)	Tom Strassenberg
Tax Parcels (area)	176190000 (3.59 acres)
County	Clark County
City	Camas
Section, Township, Range	SE 1/4, S29, T2N, R3E
Zoning	CC
Lat./Long.	45.62430386021988 N. lat. / -122.46499837245655 W long.
Topography	Slopes < 5 percent
Elevation	High point: ~250 feet above mean sea level (at NW Friberg-Strunk Street; west property boundary); Low Point: ~240 feet above mean sea level (across most of the property extending from west to east property line)
Watershed	Lacamas Creek
Sub-Watershed	Dwyer Creek
Land Form	Terrace
Priority Habitat	No mapping indicators
Habitat Area Buffer	No mapping indicators
Soil Map Unit(s) (Sheet 3 of 8)	Dollar loam, 0 to 5 percent slopes (DoB); Cove silty clay loam, thin solum, 0 to 3 percent slopes (CvA)
Archaeological Probability	High
Slope Stability	No mapped areas of potential instability
Mapped Wetlands (Sheet 4 of 8)	No mapping indicators
Flood Hazard Area	Outside flood area
Shoreline	No mapping indicators
Current Land Use	Undeveloped pasture
Adjacent Land Use	Camas School District, Clark Public Utilities Substation, Residential
Proposed Land Use	Self-storage facility

Statement of Accuracy and Completeness

The information contained in this report documents the investigation, best professional judgment and conclusions of Cascadia Ecological Services, Inc. All assumptions made and relied upon are complete and accurate.

A handwritten signature in dark ink, appearing to read "J. Barnes", is written over a horizontal line.

James S. Barnes

President

Cascadia Ecological Services, Inc.

BACKGROUND

Tom Strassenberg (applicant) contracted with Cascadia Ecological Services, Inc. (CES) to complete a critical areas report for Tax Parcel 217372000. The purpose of the report is to identify and discuss the presence of wetlands or other critical areas within the confines of the proposed project area that may be subject to regulation by the U.S. Army Corps of Engineers (USACE) and the Washington Department of Ecology (Ecology) under sections 404 and 401 of the Clean Water Act, and locally by the City of Camas Critical Areas Ordinance (City of Camas, 2016).

The Resource Company, Inc. completed a wetland delineation report for the study area in August 2007 followed by a USACE jurisdictional wetland boundary verification (NWS-2007-547-CRS). The USACE issued a Nationwide Permit 39 (NWS-2008-1072) for a 0.42 acre wetland fill in 2008. The project – Union Self Storage - was never constructed by the previous applicant and no wetland fill occurred as authorized by the permit.

The current applicant is proposing to proceed with the construction of the self-storage project in 2016.

For the purposes of this report, CES identified on-site wetlands based on the Methodology of the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (USACE, 2010). This report documents the Investigation, best professional judgment and conclusions of CES.

LANDSCAPE SETTING AND LAND USE

The study area is located in the Lewis, Salmon-Washougal Watershed Resource Inventory Area (WRIA) 27. The local watershed is Lacamas Creek. The subwatershed in which the property is located is Dwyer Creek (Ecology, 2015).

Lacamas Creek is in Clark County, Washington, United States, and flows about 12.5 miles (20.1 km) from headwaters near Camp Bonneville to Lacamas Lake and Round Lake in Camas, and eventually into the Washougal River (Clark County, 2013). Lacamas Creek is fed by numerous streams, but the five largest tributaries are Matney Creek, Shanghai Creek, Fifth Plain Creek, China Ditch, and Dwyer Creek.

Site topography is generally flat to undulating (less than 5%). The east portion of the parcel is slightly lower than the rest of the site. The property was likely used in the past for light agriculture but is now in a fallow condition as grassland pasture. The south boundary of the property is bordered by a Clark Public Utilities Electric Substation. NW Friberg-Strunk Street comprises the west boundary. Other surrounding properties to the north and east are undeveloped. An unnamed DNR Type F stream is located within a

forested corridor approximately 500 feet east of the east property line of the study area.

WETLAND DELINEATION METHODOLOGY

CES conducted a site investigation on June 13, 2016 using the routine on-site methodology of the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region to determine the extent of wetlands on the property.

According to the regional supplement, jurisdictional wetlands are defined as:

Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

The on-site methodology uses three parameters to determine if wetlands exist in a given area: hydrophytic vegetation, hydric soils and wetland hydrology.

Except in certain situations defined in the manual, evidence of a minimum of one positive wetland indicator from each of the three parameters (hydrology, soil, and vegetation) must be found in order to make a positive wetland determination.

Prior to conducting the site investigation, CES reviewed existing information to assist with the determination of wetland boundaries on the study area. This review included the Clark County Soil Survey, National and Clark County wetland Inventory maps, USGS Topographic Quadrangle maps and aerial photographs.

In order to conduct the wetland delineation, CES established several data observation points within the confines of the study area that corresponded with the terrain features, vegetation patterns, mapped hydric soil areas, and hydrologic indicators.

CES characterized the vegetation, soils, and hydrology at each of the observation points and used the information gathered as a basis for making the wetland determinations. Numerous data observation points were established in order to make the wetland determinations. For the purposes of this report, ten data observation points representative of the wetland areas are given (Sheet 6 of 8/Appendix A).

Vegetation on the site was compared to *The National Wetland Plant List* (Lichvar, 2016) to determine plant wetland indicator status. This list places plants into four categories as given in Table 2.

Table 2. Wetland indicator status ratings based on ecological descriptions (Lichvar R. e., 2014).

Indicator Status	Designation	Qualitative Description
Obligate (OBL)	Hydrophyte	Almost always occur in wetlands
Facultative Wetland	Hydrophyte	Usually occur in wetlands, but may occur in non-
Facultative (FAC)	Hydrophyte	Occur in wetlands and non-wetlands
Facultative Upland	Nonhydrophyte	Usually occur in uplands, but may occur in non-
Upland (UPL)	Nonhydrophyte	Almost never occur in wetlands

Hydrophytic vegetation are macrophytic plants that occur in areas where the frequency and duration of inundation or soil saturation produce permanently or periodically saturated soils of sufficient duration to exert a controlling influence on the plant species present. The vegetation occurring in a wetland may consist of more than one plant community. Hydrophytic vegetation is present when more than 50 percent of the dominant species have an indicator status of OBL, FACW, and/or FAC.

The definition of a hydric soil is a soil that formed under conditions of saturation, flooding or ponding long enough during the growing season to develop anaerobic conditions in the upper part.

Hydric soils include soils developed under sufficiently wet conditions to support the growth and regeneration of hydrophytic vegetation. Soils that are sufficiently wet because of artificial measures are included in the concept of hydric soils. Also, soils in which the hydrology has been artificially modified are hydric if the soil, in an unaltered state, was hydric. Some series, designated as hydric, have phases that are not hydric depending on water table, flooding, and ponding characteristics (NRCS, 2016).

The project site was examined for areas of evident wetland hydrology characteristics. These include areas where the presence of water has an overriding influence on characteristics of vegetation and soils due to anaerobic and reducing conditions, respectively. Such characteristics are usually present in areas that are inundated or have soils that are saturated to the surface for sufficient duration to develop hydric soils and support vegetation typically adapted for life in periodically anaerobic soil conditions.

Wetland indicators that were noted on the project site included drainage patterns, and evidence of ponding in the lowest areas of the wetlands.

RESULTS AND DISCUSSION

The Clark County GIS wetland inventory (Sheet 4 of 8) does not indicate the presence of wetland on the study area.

The Clark County Soil Survey (USDA, 1972) (Sheet 3 of 8) identifies the following soil mapping units on this site:

- Dollar loam, 0 to 5 percent slopes (DoB)
- Cove silty clay loam, thin solum, 0 to 3 percent slopes (CvA)

The Dollar series consists of moderately deep to a fragipan, moderately well drained soils formed in old alluvium on terraces. Slopes are 0 to 5 percent. The average annual precipitation is about 50 inches. The mean annual temperature is about 50 degrees F.

The Cove series consists of very deep, poorly and very poorly drained soils that formed in mixed alluvium from sedimentary and basic igneous rocks. Cove soils are on flood plains and have slopes of 0 to 3 percent. The mean annual precipitation is about 40 inches and the mean annual temperature is about 53 degrees F.

WETLAND FUNCTIONAL ASSESSMENT

The wetlands identified within the confines of the study area were assessed using the Washington State Wetland Rating System for Western Washington (Hruby, T., 2014). The rating system was designed to differentiate among wetlands based on their sensitivity to disturbance, their significance, their rarity, the ability to replace them, and the functions they provide.

Each wetland is assessed based on a numerical rating (category 1, 2, 3, or 4) that results from questions related to water quality, hydrologic, and habitat functions. The following table summarizes the results of the wetland ratings completed for this project.

Table 3. Wetland Function Rating

Wetland	Wetland Type	Water Quality Functions	Hydrologic Functions	Habitat Functions	Total Score	Wetland Category
A	Slope	6	3	4	13	IV

Critical Areas Discussion (Wetlands)

The east portion of the study area contains Category 4 PEM1C (Palustrine emergent persistent seasonally flooded) slope wetlands. In general, the wetlands drain in an easterly direction towards an unnamed stream off-site.

The wetlands on the study area would be classified as slope. Slope wetlands occur on hill or valley slopes where groundwater surfaces and begins running along the surface, or immediately below the surface. Water in these wetlands flows only in one direction (down the slope) and the gradient is steep enough that the water is not impounded. The downhill side of the wetland is always the point of lowest elevation in the wetland (Hruby, T., 2014).

The dominant plant species noted within the wetlands includes meadow foxtail (*Alopecurus pratensis* – FAC), redtop grass (*Agrostis gigantea* – FAC), reed canarygrass (*Phalaris arundinacea* – FACW), common velvetgrass (*Holcus lanatus* – FAC), and quackgrass (*Elymus repens* – FAC). Scattered areas of Douglas spirea (*Spiraea douglasii* – FAC) and Oregon ash (*Fraxinus latifolia* – FACW) seedlings were also observed in the east portion of the wetlands on-site.

Soils within the non-wetland areas generally match the description of the hydric Cove soil series with a low soil chroma and redox features.

Wetland hydrology was visually present in the form of saturated soils within twelve inches of the surface, oxidized rhizospheres on living plant roots, and the presence of reduced iron in the soil. No free water was observed in any of the soil data plots taken in the wetlands at the time of the site visit.

Critical Areas Discussion (Non-wetland Areas)

The west portion of the study area consists of an area of fill adjacent to the east side of NW Friberg-Strunk Street. This area is several feet higher than the remainder of the study area and is dominated mostly by weedy plants and grasses.

The dominant upland plant community on the site is dominated by tall fescue (*Festuca arundinacea* – FAC), sweet vernalgrass (*Anthoxanthum odoratum* – FACU), red clover (*Trifolium pratense* – FACU), white clover (*Trifolium repens* – FAC), Canada thistle (*Cirsium arvense* – FAC), prickly lettuce (*Lactuca serriola* – FACU), meadow foxtail, cat's ear (*Hypochaeris radicata* – FACU), California brome (*Bromus carinatus* – UPL), sheep sorrel, and lanceleaf plantain (*Plantago lanceolata* – FACU).

Soils within the non-wetland areas generally match the description of the non-hydric Dollar soil series. No primary or secondary wetland indicators were observed in the non-wetland portions of the site.

REGULATORY ISSUES

Based on the information presented above, the critical areas shown on Sheet 5 of 8 were identified. The depressional wetlands on this site are regulated based on the definitions given in the City of Camas Municipal Code – Chapter 16.53 – Wetlands (City of Camas, 2016). Associated required protective buffers are as follows:

- Category 4 Wetland – 50-feet (High Intensity Use)

It is recommended that the City of Camas verify the wetland categories and associated critical areas buffer requirements before any substantial commitments are made towards project planning and design.

This report documents the investigation, best professional judgment and conclusions of CES. It should be considered a Preliminary Jurisdictional Determination of wetlands and other waters and used at your own risk unless it has been reviewed and approved in writing by the Corps of Engineers, Washington Department of Ecology, and the City of Camas under their jurisdictional standards.

WORKS CITED

- City of Camas. (2016, June 21). *City of Camas Municipal Code Chapter 16.53 Wetlands*. Retrieved June 21, 2016, from https://www2.municode.com/library/wa/camas/codes/code_of_ordinances?no_deld=TIT16EN_CRAR_CH16.53WE
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Sheet 1 of 7. Location Map
Wetland Delineation and Assessment Report
Union Self Storage



Legend

- Building Footprints
- Taxlots
- Cities Boundaries
- Urban Growth Boundaries

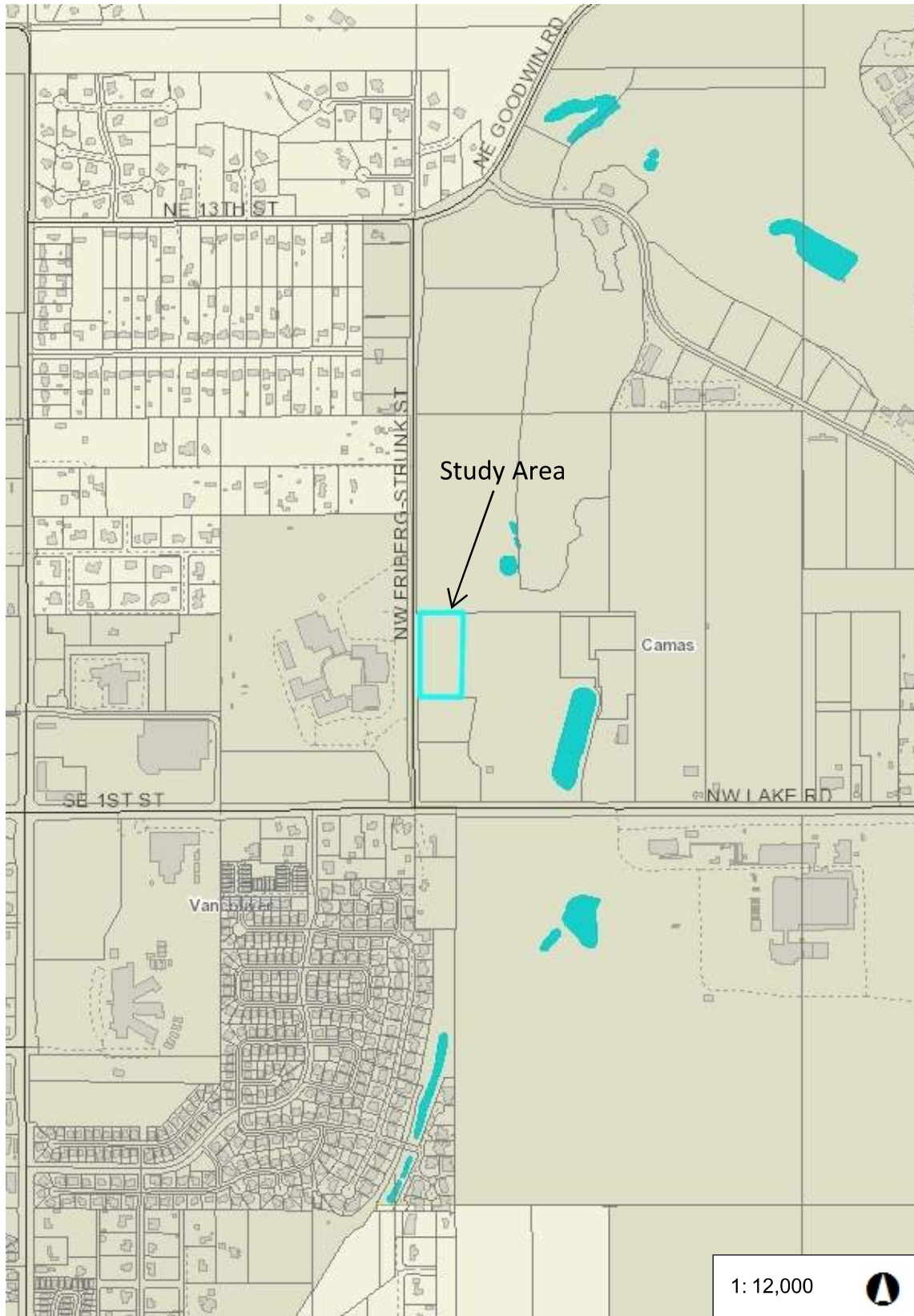
Tax Parcel: 176190000
6250 NW Friberg-Strunk
Street, Camas, WA 98607

SE 1/4, S29, T2N, R3E of
the Willamette Meridian

Lat: 45.62430386021988 N.
Long: -122.4649983724 W

Applicant:
Tom Strassenberg
200 SE 197th Place
Camas, WA 98607

Date: 6/21/16



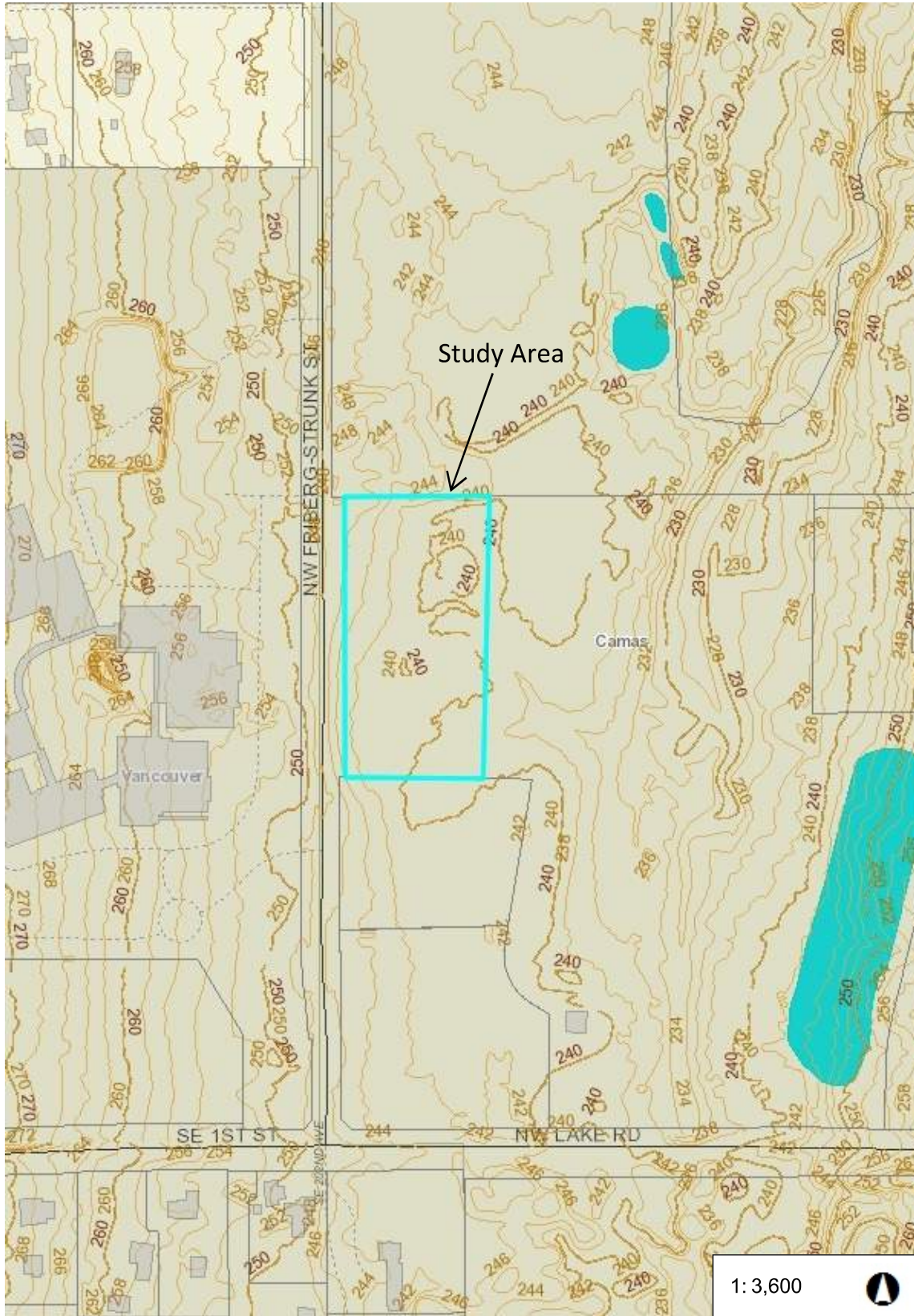
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Clark County, WA. GIS - <http://gis.clark.wa.gov>

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.



Sheet 2 of 7. Site Topographical Contours
Wetland Delineation and Assessment Report
Union Self Storage



Legend

- Building Footprints
- Taxlots
- Contour Lines - 2 ft
- Contour Lines - 10 ft
- Contour Lines - 200 ft
- Cities Boundaries
- Urban Growth Boundaries

Tax Parcel: 176190000
6250 NW Friberg-Strunk
Street, Camas, WA 98607

SE 1/4, S29, T2N, R3E of
the Willamette Meridian

Lat: 45.62430386021988 N.
Long: -122.4649983724 W

Applicant:
Tom Strassenberg
200 SE 197th Place
Camas, WA 98607

Date: 6/21/16



1:3,600



600.0 0 300.00 600.0Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA. GIS - <http://gis.clark.wa.gov>

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.



Sheet 3 of 7. Clark County GIS Mapped Soils and Wetlands
Wetland Delineation and Assessment Report
Union Self Storage



Legend

- Building Footprints
- Taxlots
- Soil Type
- Wetlands Presence
- Cities Boundaries
- Urban Growth Boundaries

Tax Parcel: 217372000
6250 NW Friberg-Strunk
Street, Camas, WA 98607

SE 1/4, S29, T2N, R3E of
the Willamette Meridian

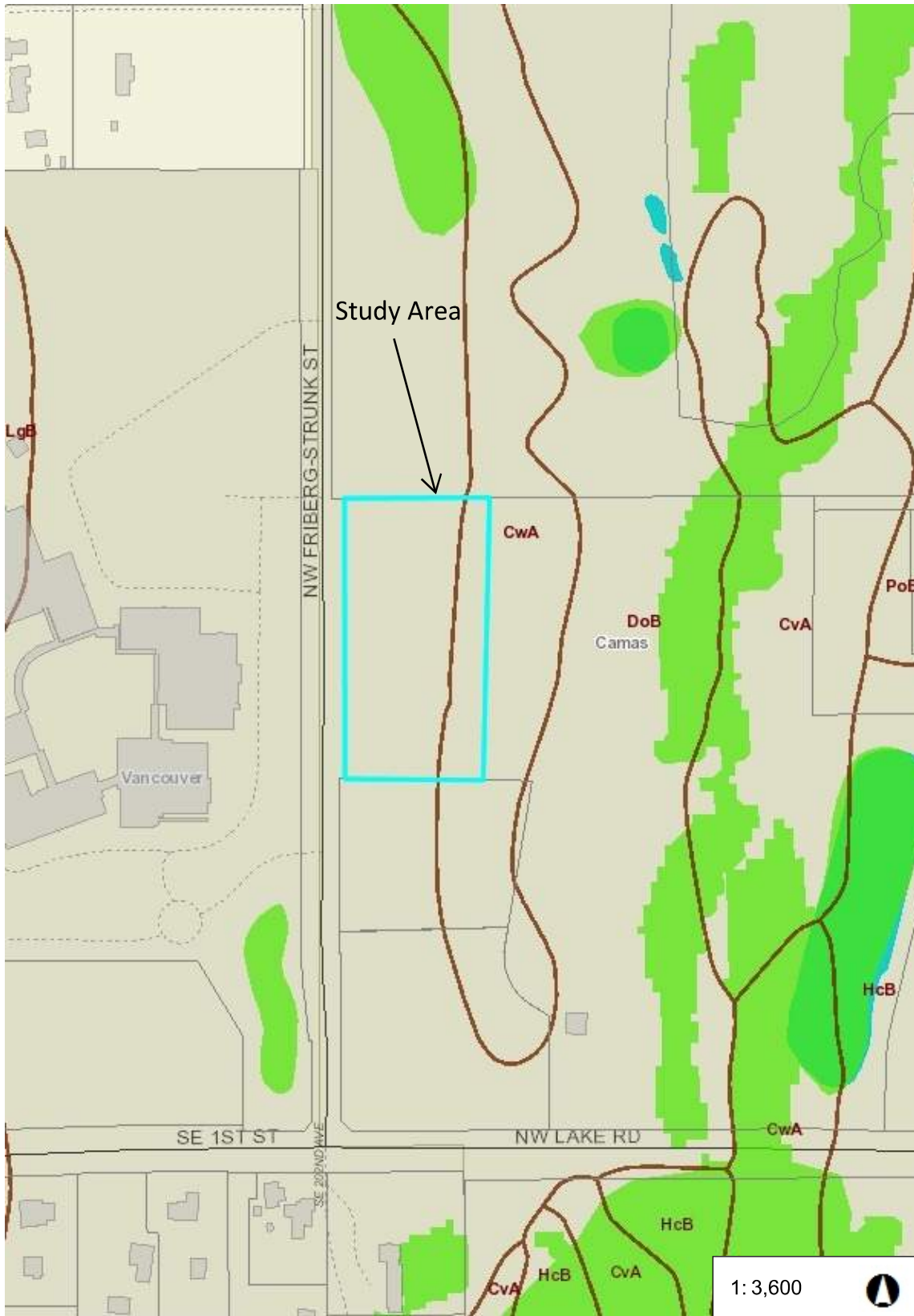
Lat: 45.62430386021988 N.
Long: -122.4649983724 W

Soils:
Dollar loam, 0 to 5 percent
slopes (DoB)

Cove silty clay loam, thin
solum, 0 to 3 percent
slopes (CvA)

Applicant:
Tom Strassenberg
200 SE 197th Place
Camas, WA 98607

Date: 6/21/16



600.0 0 300.00 600.0Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA. GIS - <http://gis.clark.wa.gov>

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Sheet 4 of 7. Priority Habitat and Species Mapping
Wetland Delineation and Assessment Report
Union Self Storage



Legend

Priority Habitat and Species Ar

Non-riparian Habitat Conservation /

Species Area

Riparian Habitat Conservation Area

Priority Habitat Buffer

Priority Species Buffer

Stream - DNR

Lake - DNR

Watershed

Sub-Watershed

Building Footprints

Taxlots

Cities Boundaries

Urban Growth Boundaries

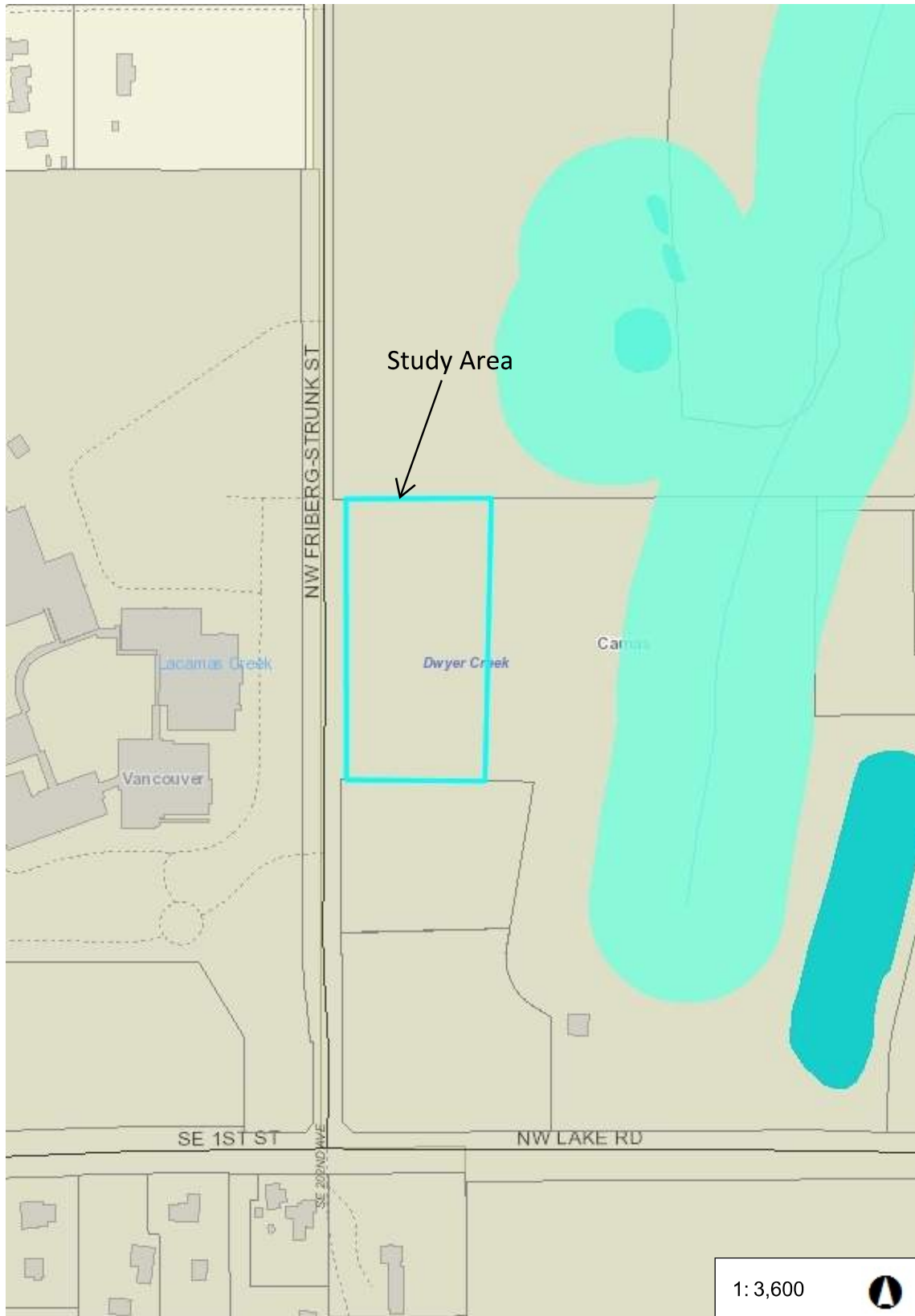
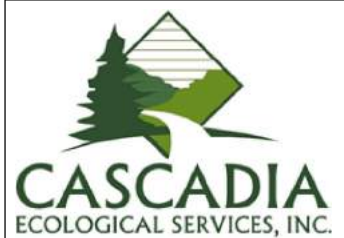
Tax Parcel: 176190000
6250 NW Friberg-Strunk
Street, Camas, WA 98607

SE 1/4, S29, T2N, R3E of
the Willamette Meridian

Lat: 45.62430386021988 N.
Long: -122.4649983724 W

Applicant:
Tom Strassenberg
200 SE 197th Place
Camas, WA 98607

Date: 6/21/16



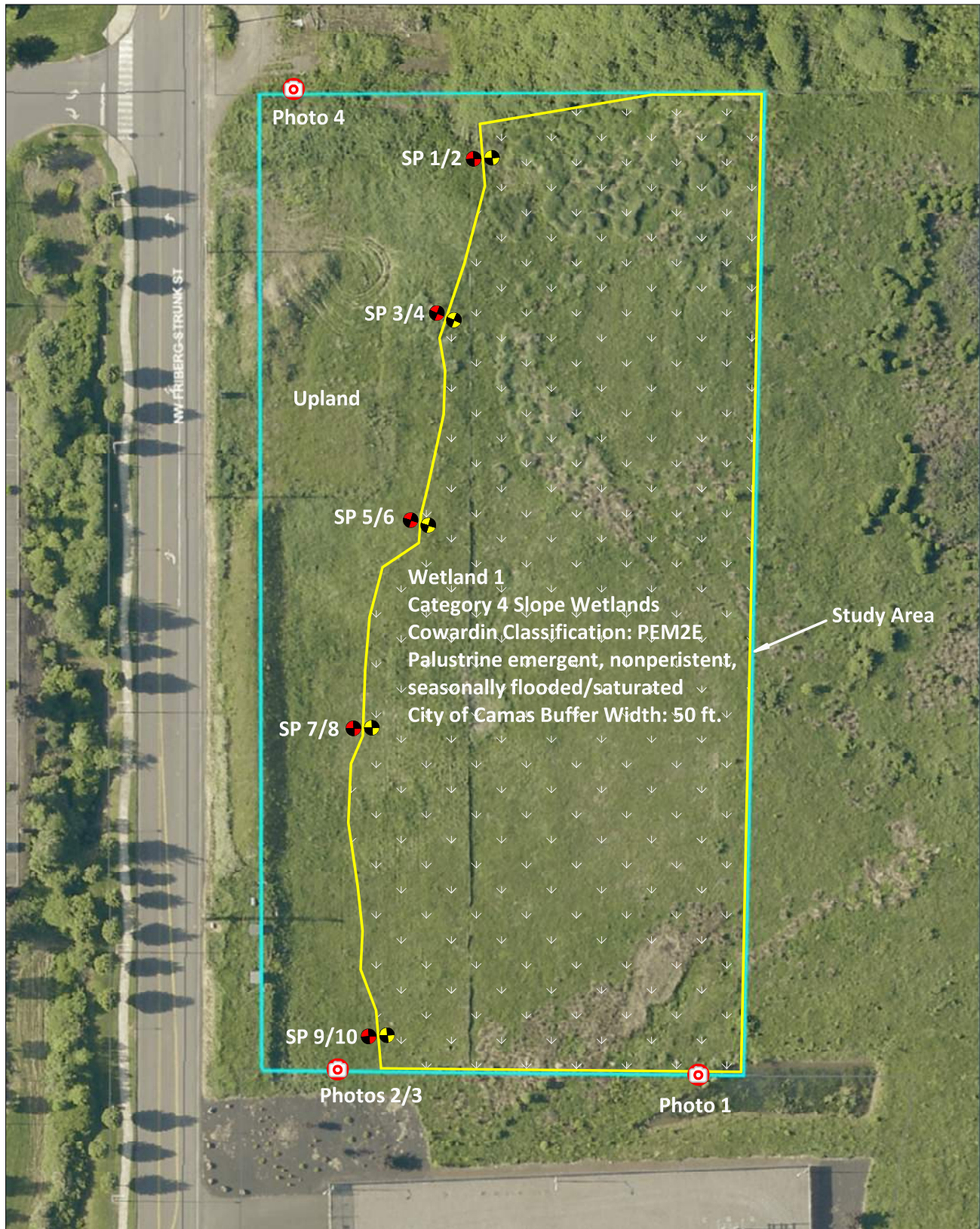
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WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA. GIS - <http://gis.clark.wa.gov>

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Sheet 5 of 7
Drawn by:
J. Barnes



Delineated Wetlands & Critical Areas Project: Union Self Storage

Location: 6250 NW Friberg-Strunk Street, Camas, WA 98607

Tax Parcel: 176190000

Legal: SE 1/4, S29, T2N, R3E of the Willamette Meridian
45.62430386021988 N. lat. / -122.46499837245655 W long.

County: Clark

Cascadia Ecological Services, Inc.

3015 NW 95th Place, Vancouver, WA 98665

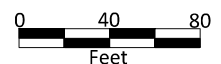
(360) 601-8631

www.cascadia-inc.com

CLIENT:

Tom Strassenberg
200 SE 197th Place
Camas, WA 98607

- - Upland Soil Plot
- - Wetland Soil Plot
- - Photo Location



Date: 6/21/16



Photo 1. Photo taken at southeast property boundary facing east.



Photo 2. Photo taken at southwest corner of study area facing southeast.



Drawn by:
J. Barnes
Sheet 6 of 7

Photo Plate 1
Project: Union Self Storage

Location: 6250 NW Friberg-Strunk Street, Camas, WA 98607
Tax Parcel: 176190000
Legal: SE 1/4, S29, T2N, R3E of the Willamette Meridian
45.62430386021988 N. lat. / -122.46499837245655 W long.
County: Clark

Cascadia Ecological Services, Inc.
3015 NW 95th Place, Vancouver, WA 98665
(360) 601-8631
www.cascadia-inc.com

CLIENT:
Tom Strassenberg
200 SE 197th Place
Camas, WA 98607

Date: 6/21/16



Photo 3. Photo taken at southwest property boundary facing east.



Photo 4. Photo taken at northwest corner of study area facing south.



Drawn by:
J. Barnes

Sheet 7 of 7

Photo Plate 2
Project: Union Self Storage

Location: 6250 NW Friberg-Strunk Street, Camas, WA 98607
Tax Parcel: 176190000
Legal: SE 1/4, S29, T2N, R3E of the Willamette Meridian
45.62430386021988 N. lat. / -122.46499837245655 W long.
County: Clark

Cascadia Ecological Services, Inc.
3015 NW 95th Place, Vancouver, WA 98665
(360) 601-8631
www.cascadia-inc.com

CLIENT:
Tom Strassenberg
200 SE 197th Place
Camas, WA 98607

Date: 6/21/16

APPENDIX A

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 01
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☒ No ☐	Is the Sampled Area within a Wetland? Yes ☐ No ☒
Hydric Soil Present? Yes ☐ No ☒	
Wetland Hydrology Present? Yes ☐ No ☒	
Remarks:	

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species? Rel.Strat. Cover	Indicator Status	Dominance Test worksheet: Number of Dominant Species That are OBL, FACW, or FAC: <u>2</u> (A) Total Number of Dominant Species Across All Strata: <u>3</u> (B) Percent of dominant Species That Are OBL, FACW, or FAC: <u>66.7%</u> (A/B)
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
		0 = Total Cover		
Sapling/Shrub Stratum (Plot size: _____)				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species <u>0</u> x 1 = <u>0</u> FACW species <u>0</u> x 2 = <u>0</u> FAC species <u>70</u> x 3 = <u>210</u> FACU species <u>30</u> x 4 = <u>120</u> UPL species <u>0</u> x 5 = <u>0</u> Column Totals: <u>100</u> (A) <u>330</u> (B) Prevalence Index = B/A = <u>3.300</u>
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
5. _____	_____	☐ 0.0%	_____	
		0 = Total Cover		
Herb Stratum (Plot size: <u>1m x 1m</u>)				Hydrophytic Vegetation Indicators: ☐ 1 - Rapid Test for Hydrologic Vegetation ☒ 2 - Dominance Test is > 50% ☐ 3 - Prevalence Index is ≤ 3.0 ¹ ☐ 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) ☐ 5 - Wetland Non-Vascular Plants ¹ ☐ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. <u>Alopecurus pratensis</u>	<u>10</u>	☐ 10.0% FAC	_____	
2. <u>Agrostis gigantea</u>	<u>20</u>	☒ 20.0% FAC	_____	
3. <u>Elymus repens</u>	<u>10</u>	☐ 10.0% FAC	_____	
4. <u>Festuca arundinacea</u>	<u>20</u>	☒ 20.0% FAC	_____	
5. <u>Cirsium arvense</u>	<u>10</u>	☐ 10.0% FAC	_____	
6. <u>Hypochaeris radicata</u>	<u>10</u>	☐ 10.0% FACU	_____	
7. <u>Plantago lanceolata</u>	<u>20</u>	☒ 20.0% FACU	_____	
8. _____	_____	☐ 0.0%	_____	
9. _____	_____	☐ 0.0%	_____	
10. _____	_____	☐ 0.0%	_____	
11. _____	_____	☐ 0.0%	_____	
		100 = Total Cover		
Woody Vine Stratum (Plot size: _____)				Hydrophytic Vegetation Present? Yes ☒ No ☐
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
		0 = Total Cover		
% Bare Ground in Herb Stratum: _____				
Remarks:				

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 01

[illegible]

Hydrology

Wetland Hydrology Indicators:			Wetland Hydrology Present?	
Primary Indicators (minimum of one required; check all that apply)			Secondary Indicators (minimum of two required)	
☐ Surface Water (A1) ☐ High Water Table (A2) ☐ Saturation (A3) ☐ Water Marks (B1) ☐ Sediment Deposits (B2) ☐ Drift deposits (B3) ☐ Algal Mat or Crust (B4) ☐ Iron Deposits (B5) ☐ Surface Soil Cracks (B6) ☐ Inundation Visible on Aerial Imagery (B7) ☐ Sparsely Vegetated Concave Surface (B8)	☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) ☐ Salt Crust (B11) ☐ Aquatic Invertebrates (B13) ☐ Hydrogen Sulfide Odor (C1) ☐ Oxidized Rhizospheres on Living Roots (C3) ☐ Presence of Reduced Iron (C4) ☐ Recent Iron Reduction in Tilled Soils (C6) ☐ Stunted or Stressed Plants (D1) (LRR A) ☐ Other (Explain in Remarks)	☐ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) ☐ Drainage Patterns (B10) ☐ Dry Season Water Table (C2) ☐ Saturation Visible on Aerial Imagery (C9) ☐ Geomorphic Position (D2) ☐ Shallow Aquitard (D3) ☐ FAC-neutral Test (D5) ☐ Raised Ant Mounds (D6) (LRR A) ☐ Frost Heave Hummocks (D7)		
Field Observations: Surface Water Present? Yes ☐ No ☒ Water Table Present? Yes ☐ No ☒ Saturation Present? Yes ☐ No ☒ (includes capillary fringe)			Depth (inches): 0 Depth (inches): 0 Depth (inches): 0	Wetland Hydrology Present? Yes ☐ No ☒
Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:				
Remarks:				

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 02
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☒ No ☐	Is the Sampled Area within a Wetland? Yes ☒ No ☐
Hydric Soil Present? Yes ☒ No ☐	
Wetland Hydrology Present? Yes ☒ No ☐	
Remarks:	

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species? Rel.Strat. Cover	Indicator Status	Dominance Test worksheet:
1. _____	_____	☐ 0.0%	_____	Number of Dominant Species That are OBL, FACW, or FAC: <u>3</u> (A)
2. _____	_____	☐ 0.0%	_____	Total Number of Dominant Species Across All Strata: <u>3</u> (B)
3. _____	_____	☐ 0.0%	_____	Percent of dominant Species That Are OBL, FACW, or FAC: <u>100.0%</u> (A/B)
4. _____	_____	☐ 0.0%	_____	
0 = Total Cover				
Sapling/Shrub Stratum (Plot size: _____)				Prevalence Index worksheet:
1. _____	_____	☐ 0.0%	_____	Total % Cover of: _____ Multiply by: _____
2. _____	_____	☐ 0.0%	_____	OBL species <u>0</u> x 1 = <u>0</u>
3. _____	_____	☐ 0.0%	_____	FACW species <u>0</u> x 2 = <u>0</u>
4. _____	_____	☐ 0.0%	_____	FAC species <u>100</u> x 3 = <u>300</u>
5. _____	_____	☐ 0.0%	_____	FACU species <u>0</u> x 4 = <u>0</u>
0 = Total Cover				UPL species <u>0</u> x 5 = <u>0</u>
Herb Stratum (Plot size: <u>1m x 1m</u>)				Column Totals: <u>100</u> (A) <u>300</u> (B)
1. <u>Alopecurus pratensis</u>	<u>60</u>	☒ 60.0%	<u>FAC</u>	Prevalence Index = B/A = <u>3.000</u>
2. <u>Agrostis gigantea</u>	<u>20</u>	☒ 20.0%	<u>FAC</u>	
3. <u>Elymus repens</u>	<u>20</u>	☒ 20.0%	<u>FAC</u>	
4. _____	_____	☐ 0.0%	_____	
5. _____	_____	☐ 0.0%	_____	
6. _____	_____	☐ 0.0%	_____	
7. _____	_____	☐ 0.0%	_____	
8. _____	_____	☐ 0.0%	_____	
9. _____	_____	☐ 0.0%	_____	
10. _____	_____	☐ 0.0%	_____	
11. _____	_____	☐ 0.0%	_____	
100 = Total Cover				
Woody Vine Stratum (Plot size: _____)				
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
0 = Total Cover				
% Bare Ground in Herb Stratum: _____				
Remarks:				Hydrophytic Vegetation Present? Yes ☒ No ☐

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 02

[illegible]

Hydrology

Wetland Hydrology Indicators:		
Primary Indicators (minimum of one required; check all that apply) ☐ Surface Water (A1) ☐ High Water Table (A2) ☐ Saturation (A3) ☐ Water Marks (B1) ☐ Sediment Deposits (B2) ☐ Drift deposits (B3) ☐ Algal Mat or Crust (B4) ☐ Iron Deposits (B5) ☐ Surface Soil Cracks (B6) ☐ Inundation Visible on Aerial Imagery (B7) ☐ Sparsely Vegetated Concave Surface (B8) Secondary Indicators (minimum of two required) ☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) ☐ Salt Crust (B11) ☐ Aquatic Invertebrates (B13) ☐ Hydrogen Sulfide Odor (C1) ☒ Oxidized Rhizospheres on Living Roots (C3) ☒ Presence of Reduced Iron (C4) ☐ Recent Iron Reduction in Tilled Soils (C6) ☐ Stunted or Stressed Plants (D1) (LRR A) ☐ Other (Explain in Remarks)		
Field Observations: Surface Water Present? Yes ☐ No ☒ Water Table Present? Yes ☐ No ☒ Saturation Present? (includes capillary fringe) Yes ☐ No ☒ Depth (inches): 0 Depth (inches): 0 Depth (inches): 0 Wetland Hydrology Present? Yes ☒ No ☐		
Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:		
Remarks:		

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 03
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☒ No ☐ Hydric Soil Present? Yes ☐ No ☒ Wetland Hydrology Present? Yes ☐ No ☒	Is the Sampled Area within a Wetland? Yes ☐ No ☒
Remarks:	

VEGETATION - Use scientific names of plants.

Stratum	Absolute % Cover	Dominant Species? Rel.Strat. Cover	Indicator Status	Dominance Test worksheet:
Tree Stratum (Plot size: _____)				Number of Dominant Species That are OBL, FACW, or FAC: <u>2</u> (A) Total Number of Dominant Species Across All Strata: <u>2</u> (B) Percent of dominant Species That Are OBL, FACW, or FAC: <u>100.0%</u> (A/B)
1. _____		☐ 0.0%		
2. _____		☐ 0.0%		
3. _____		☐ 0.0%		
4. _____		☐ 0.0%		
0 = Total Cover				
Sapling/Shrub Stratum (Plot size: _____)				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species <u>0</u> x 1 = <u>0</u> FACW species <u>0</u> x 2 = <u>0</u> FAC species <u>85</u> x 3 = <u>255</u> FACU species <u>15</u> x 4 = <u>60</u> UPL species <u>0</u> x 5 = <u>0</u> Column Totals: <u>100</u> (A) <u>315</u> (B) Prevalence Index = B/A = <u>3.150</u>
1. _____		☐ 0.0%		
2. _____		☐ 0.0%		
3. _____		☐ 0.0%		
4. _____		☐ 0.0%		
5. _____		☐ 0.0%		
0 = Total Cover				
Herb Stratum (Plot size: <u>1m x 1m</u>)				Hydrophytic Vegetation Indicators: ☐ 1 - Rapid Test for Hydrologic Vegetation ☒ 2 - Dominance Test is > 50% ☐ 3 - Prevalence Index is ≤ 3.0 ¹ ☐ 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) ☐ 5 - Wetland Non-Vascular Plants ¹ ☐ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. <u>Alopecurus pratensis</u>	<u>5</u>	☐ 5.0% FAC		
2. <u>Agrostis gigantea</u>	<u>25</u>	☒ 25.0% FAC		
3. <u>Elymus repens</u>	<u>10</u>	☐ 10.0% FAC		
4. <u>Festuca arundinacea</u>	<u>30</u>	☒ 30.0% FAC		
5. <u>Cirsium arvense</u>	<u>15</u>	☐ 15.0% FAC		
6. <u>Hypochaeris radicata</u>	<u>5</u>	☐ 5.0% FACU		
7. <u>Plantago lanceolata</u>	<u>10</u>	☐ 10.0% FACU		
8. _____		☐ 0.0%		
9. _____		☐ 0.0%		
10. _____		☐ 0.0%		
11. _____		☐ 0.0%		
100 = Total Cover				
Woody Vine Stratum (Plot size: _____)				Hydrophytic Vegetation Present? Yes ☒ No ☐
1. _____		☐ 0.0%		
2. _____		☐ 0.0%		
0 = Total Cover				
% Bare Ground in Herb Stratum: _____				
Remarks:				

¹Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 03

[illegible]

Hydrology

Wetland Hydrology Indicators:		
Primary Indicators (minimum of one required; check all that apply) ☐ Surface Water (A1) ☐ High Water Table (A2) ☐ Saturation (A3) ☐ Water Marks (B1) ☐ Sediment Deposits (B2) ☐ Drift deposits (B3) ☐ Algal Mat or Crust (B4) ☐ Iron Deposits (B5) ☐ Surface Soil Cracks (B6) ☐ Inundation Visible on Aerial Imagery (B7) ☐ Sparsely Vegetated Concave Surface (B8) Secondary Indicators (minimum of two required) ☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) ☐ Salt Crust (B11) ☐ Aquatic Invertebrates (B13) ☐ Hydrogen Sulfide Odor (C1) ☐ Oxidized Rhizospheres on Living Roots (C3) ☐ Presence of Reduced Iron (C4) ☐ Recent Iron Reduction in Tilled Soils (C6) ☐ Stunted or Stressed Plants (D1) (LRR A) ☐ Other (Explain in Remarks)		
Field Observations: Surface Water Present? Yes ☐ No ☒ Water Table Present? Yes ☐ No ☒ Saturation Present? (includes capillary fringe) Yes ☐ No ☒ Depth (inches): 0 Depth (inches): 0 Depth (inches): 0 Wetland Hydrology Present? Yes ☐ No ☒		
Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:		
Remarks:		

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 04
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☒ No ☐ Hydric Soil Present? Yes ☒ No ☐ Wetland Hydrology Present? Yes ☒ No ☐	Is the Sampled Area within a Wetland? Yes ☒ No ☐
Remarks:	

VEGETATION - Use scientific names of plants.

Stratum	Absolute % Cover	Rel. Strat. Cover	Indicator Status	Dominance Test worksheet:	
Tree Stratum (Plot size: _____)				Number of Dominant Species That are OBL, FACW, or FAC: <u>3</u> (A) Total Number of Dominant Species Across All Strata: <u>3</u> (B) Percent of dominant Species That Are OBL, FACW, or FAC: <u>100.0%</u> (A/B)	
1. _____		☐ 0.0%			
2. _____		☐ 0.0%			
3. _____		☐ 0.0%			
4. _____		☐ 0.0%			
	0	= Total Cover			
Sapling/Shrub Stratum (Plot size: _____)				Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species <u>0</u> x 1 = <u>0</u> FACW species <u>40</u> x 2 = <u>80</u> FAC species <u>60</u> x 3 = <u>180</u> FACU species <u>0</u> x 4 = <u>0</u> UPL species <u>0</u> x 5 = <u>0</u> Column Totals: <u>100</u> (A) <u>260</u> (B) Prevalence Index = B/A = <u>2.600</u>	
1. _____		☐ 0.0%			
2. _____		☐ 0.0%			
3. _____		☐ 0.0%			
4. _____		☐ 0.0%			
5. _____		☐ 0.0%			
	0	= Total Cover			
Herb Stratum (Plot size: <u>1m x 1m</u>)				Hydrophytic Vegetation Indicators: ☐ 1 - Rapid Test for Hydrologic Vegetation ☒ 2 - Dominance Test is > 50% ☒ 3 - Prevalence Index is ≤ 3.0 ¹ ☐ 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) ☐ 5 - Wetland Non-Vascular Plants ¹ ☐ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.	
1. <u>Alopecurus pratensis</u>	40	☒ 40.0%	FAC		
2. <u>Agrostis gigantea</u>	20	☒ 20.0%	FAC		
3. <u>Phalaris arundinacea</u>	40	☒ 40.0%	FACW		
4. _____		☐ 0.0%			
5. _____		☐ 0.0%			
6. _____		☐ 0.0%			
7. _____		☐ 0.0%			
8. _____		☐ 0.0%			
9. _____		☐ 0.0%			
10. _____		☐ 0.0%			
11. _____		☐ 0.0%			
	100	= Total Cover			
Woody Vine Stratum (Plot size: _____)					Hydrophytic Vegetation Present? Yes ☒ No ☐
1. _____		☐ 0.0%			
2. _____		☐ 0.0%			
	0	= Total Cover			
% Bare Ground in Herb Stratum: _____					
Remarks:					

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 04

[illegible]

Hydrology

Wetland Hydrology Indicators:		
Primary Indicators (minimum of one required; check all that apply) ☐ Surface Water (A1) ☐ High Water Table (A2) ☐ Saturation (A3) ☐ Water Marks (B1) ☐ Sediment Deposits (B2) ☐ Drift deposits (B3) ☐ Algal Mat or Crust (B4) ☐ Iron Deposits (B5) ☐ Surface Soil Cracks (B6) ☐ Inundation Visible on Aerial Imagery (B7) ☐ Sparsely Vegetated Concave Surface (B8) Secondary Indicators (minimum of two required) ☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) ☐ Salt Crust (B11) ☐ Aquatic Invertebrates (B13) ☐ Hydrogen Sulfide Odor (C1) ☒ Oxidized Rhizospheres on Living Roots (C3) ☒ Presence of Reduced Iron (C4) ☐ Recent Iron Reduction in Tilled Soils (C6) ☐ Stunted or Stressed Plants (D1) (LRR A) ☐ Other (Explain in Remarks)		
Field Observations: Surface Water Present? Yes ☐ No ☒ Water Table Present? Yes ☐ No ☒ Saturation Present? (includes capillary fringe) Yes ☐ No ☒ Depth (inches): 0 Depth (inches): 0 Depth (inches): 0 Wetland Hydrology Present? Yes ☒ No ☐		
Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:		
Remarks:		

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 05
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☐ No ☒	Is the Sampled Area within a Wetland? Yes ☐ No ☒
Hydric Soil Present? Yes ☐ No ☒	
Wetland Hydrology Present? Yes ☐ No ☒	
Remarks:	

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species? Rel.Strat. Cover	Indicator Status	Dominance Test worksheet: Number of Dominant Species That are OBL, FACW, or FAC: <u>2</u> (A) Total Number of Dominant Species Across All Strata: <u>4</u> (B) Percent of dominant Species That Are OBL, FACW, or FAC: <u>50.0%</u> (A/B)
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
Sapling/Shrub Stratum (Plot size: _____)		0 = Total Cover		Prevalence Index worksheet: Total % Cover of: _____ Multiply by: OBL species <u>0</u> x 1 = <u>0</u> FACW species <u>0</u> x 2 = <u>0</u> FAC species <u>60</u> x 3 = <u>180</u> FACU species <u>40</u> x 4 = <u>160</u> UPL species <u>0</u> x 5 = <u>0</u> Column Totals: <u>100</u> (A) <u>340</u> (B) Prevalence Index = B/A = <u>3.400</u>
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
Herb Stratum (Plot size: <u>1m x 1m</u>)		0 = Total Cover		Hydrophytic Vegetation Indicators: ☐ 1 - Rapid Test for Hydrologic Vegetation ☐ 2 - Dominance Test is > 50% ☐ 3 - Prevalence Index is ≤3.0 ¹ ☐ 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) ☐ 5 - Wetland Non-Vascular Plants ¹ ☐ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. <u>Festuca arundinacea</u>	<u>40</u>	☒ 40.0%	<u>FAC</u>	
2. <u>Cirsium arvense</u>	<u>20</u>	☒ 20.0%	<u>FAC</u>	
3. <u>Hypochaeris radicata</u>	<u>20</u>	☒ 20.0%	<u>FACU</u>	
4. <u>Plantago lanceolata</u>	<u>20</u>	☒ 20.0%	<u>FACU</u>	
5. _____	_____	☐ 0.0%	_____	
6. _____	_____	☐ 0.0%	_____	
7. _____	_____	☐ 0.0%	_____	
8. _____	_____	☐ 0.0%	_____	
9. _____	_____	☐ 0.0%	_____	
10. _____	_____	☐ 0.0%	_____	
11. _____	_____	☐ 0.0%	_____	
Woody Vine Stratum (Plot size: _____)		0 = Total Cover		Hydrophytic Vegetation Present? Yes ☐ No ☒
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
% Bare Ground in Herb Stratum: _____				
Remarks:				

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 05

[illegible]

Hydrology

Wetland Hydrology Indicators:		
Primary Indicators (minimum of one required; check all that apply) ☐ Surface Water (A1) ☐ High Water Table (A2) ☐ Saturation (A3) ☐ Water Marks (B1) ☐ Sediment Deposits (B2) ☐ Drift deposits (B3) ☐ Algal Mat or Crust (B4) ☐ Iron Deposits (B5) ☐ Surface Soil Cracks (B6) ☐ Inundation Visible on Aerial Imagery (B7) ☐ Sparsely Vegetated Concave Surface (B8) ☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) ☐ Salt Crust (B11) ☐ Aquatic Invertebrates (B13) ☐ Hydrogen Sulfide Odor (C1) ☐ Oxidized Rhizospheres on Living Roots (C3) ☐ Presence of Reduced Iron (C4) ☐ Recent Iron Reduction in Tilled Soils (C6) ☐ Stunted or Stressed Plants (D1) (LRR A) ☐ Other (Explain in Remarks)		
Secondary Indicators (minimum of two required) ☐ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) ☐ Drainage Patterns (B10) ☐ Dry Season Water Table (C2) ☐ Saturation Visible on Aerial Imagery (C9) ☐ Geomorphic Position (D2) ☐ Shallow Aquitard (D3) ☐ FAC-neutral Test (D5) ☐ Raised Ant Mounds (D6) (LRR A) ☐ Frost Heave Hummocks (D7)		
Field Observations: Surface Water Present? Yes ☐ No ☒ Depth (inches): 0 Water Table Present? Yes ☐ No ☒ Depth (inches): 0 Saturation Present? (includes capillary fringe) Yes ☐ No ☒ Depth (inches): 0 Wetland Hydrology Present? Yes ☐ No ☒		
Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:		
Remarks:		

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 06
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☒ No ☐	Is the Sampled Area within a Wetland? Yes ☒ No ☐
Hydric Soil Present? Yes ☒ No ☐	
Wetland Hydrology Present? Yes ☒ No ☐	
Remarks:	

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species? Rel.Strat. Cover	Indicator Status	Dominance Test worksheet: Number of Dominant Species That are OBL, FACW, or FAC: <u>3</u> (A) Total Number of Dominant Species Across All Strata: <u>3</u> (B) Percent of dominant Species That Are OBL, FACW, or FAC: <u>100.0%</u> (A/B)
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
Sapling/Shrub Stratum (Plot size: _____)		0 = Total Cover		Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species <u>0</u> x 1 = <u>0</u> FACW species <u>30</u> x 2 = <u>60</u> FAC species <u>65</u> x 3 = <u>195</u> FACU species <u>5</u> x 4 = <u>20</u> UPL species <u>0</u> x 5 = <u>0</u> Column Totals: <u>100</u> (A) <u>275</u> (B) Prevalence Index = B/A = <u>2.750</u>
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
5. _____	_____	☐ 0.0%	_____	
Herb Stratum (Plot size: <u>1m x 1m</u>)		0 = Total Cover		Hydrophytic Vegetation Indicators: ☐ 1 - Rapid Test for Hydrologic Vegetation ☒ 2 - Dominance Test is > 50% ☒ 3 - Prevalence Index is ≤ 3.0 ¹ ☐ 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) ☐ 5 - Wetland Non-Vascular Plants ¹ ☐ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. <u>Alopecurus pratensis</u>	<u>40</u>	☒ 40.0%	<u>FAC</u>	
2. <u>Agrostis gigantea</u>	<u>20</u>	☒ 20.0%	<u>FAC</u>	
3. <u>Phalaris arundinacea</u>	<u>30</u>	☒ 30.0%	<u>FACW</u>	
4. <u>Cirsium arvense</u>	<u>5</u>	☐ 5.0%	<u>FAC</u>	
5. <u>Plantago lanceolata</u>	<u>5</u>	☐ 5.0%	<u>FACU</u>	
6. _____	_____	☐ 0.0%	_____	
7. _____	_____	☐ 0.0%	_____	
8. _____	_____	☐ 0.0%	_____	
9. _____	_____	☐ 0.0%	_____	
10. _____	_____	☐ 0.0%	_____	
11. _____	_____	☐ 0.0%	_____	
Woody Vine Stratum (Plot size: _____)		100 = Total Cover		Hydrophytic Vegetation Present? Yes ☒ No ☐
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
% Bare Ground in Herb Stratum: _____		0 = Total Cover		
Remarks:				

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 06

[illegible]

Hydrology

Wetland Hydrology Indicators:		
Primary Indicators (minimum of one required; check all that apply) Secondary Indicators (minimum of two required)		
☐ Surface Water (A1) ☐ High Water Table (A2) ☐ Saturation (A3) ☐ Water Marks (B1) ☐ Sediment Deposits (B2) ☐ Drift deposits (B3) ☐ Algal Mat or Crust (B4) ☐ Iron Deposits (B5) ☐ Surface Soil Cracks (B6) ☐ Inundation Visible on Aerial Imagery (B7) ☐ Sparsely Vegetated Concave Surface (B8)	☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) ☐ Salt Crust (B11) ☐ Aquatic Invertebrates (B13) ☐ Hydrogen Sulfide Odor (C1) ☒ Oxidized Rhizospheres on Living Roots (C3) ☒ Presence of Reduced Iron (C4) ☐ Recent Iron Reduction in Tilled Soils (C6) ☐ Stunted or Stressed Plants (D1) (LRR A) ☐ Other (Explain in Remarks)	☐ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) ☐ Drainage Patterns (B10) ☐ Dry Season Water Table (C2) ☐ Saturation Visible on Aerial Imagery (C9) ☐ Geomorphic Position (D2) ☐ Shallow Aquitard (D3) ☒ FAC-neutral Test (D5) ☐ Raised Ant Mounds (D6) (LRR A) ☐ Frost Heave Hummocks (D7)
Field Observations: Surface Water Present? Yes ☐ No ☒ Water Table Present? Yes ☐ No ☒ Saturation Present? (includes capillary fringe) Yes ☐ No ☒ Depth (inches): 0 Depth (inches): 0 Depth (inches): 0 Wetland Hydrology Present? Yes ☒ No ☐		
Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:		
Remarks:		

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 07
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☐ No ☒	Is the Sampled Area within a Wetland? Yes ☐ No ☒
Hydric Soil Present? Yes ☐ No ☒	
Wetland Hydrology Present? Yes ☐ No ☒	
Remarks:	

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species? Rel.Strat. Cover	Indicator Status	Dominance Test worksheet: Number of Dominant Species That are OBL, FACW, or FAC: <u>1</u> (A) Total Number of Dominant Species Across All Strata: <u>3</u> (B) Percent of dominant Species That Are OBL, FACW, or FAC: <u>33.3%</u> (A/B)
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
= Total Cover		0		
Sapling/Shrub Stratum (Plot size: _____)				
1. _____	_____	☐ 0.0%	_____	Prevalence Index worksheet: Total % Cover of: _____ Multiply by: OBL species <u>0</u> x 1 = <u>0</u> FACW species <u>0</u> x 2 = <u>0</u> FAC species <u>50</u> x 3 = <u>150</u> FACU species <u>50</u> x 4 = <u>200</u> UPL species <u>0</u> x 5 = <u>0</u> Column Totals: <u>100</u> (A) <u>350</u> (B) Prevalence Index = B/A = <u>3.500</u>
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
5. _____	_____	☐ 0.0%	_____	
= Total Cover		0		
Herb Stratum (Plot size: <u>1m x 1m</u>)				
1. <u>Festuca arundinacea</u>	<u>40</u>	☒ 40.0%	<u>FAC</u>	Hydrophytic Vegetation Indicators: ☐ 1 - Rapid Test for Hydrologic Vegetation ☐ 2 - Dominance Test is > 50% ☐ 3 - Prevalence Index is ≤3.0 ¹ ☐ 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) ☐ 5 - Wetland Non-Vascular Plants ¹ ☐ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
2. <u>Cirsium arvense</u>	<u>10</u>	☐ 10.0%	<u>FAC</u>	
3. <u>Hypochaeris radicata</u>	<u>20</u>	☒ 20.0%	<u>FACU</u>	
4. <u>Plantago lanceolata</u>	<u>20</u>	☒ 20.0%	<u>FACU</u>	
5. <u>Lactuca serriola</u>	<u>10</u>	☐ 10.0%	<u>FACU</u>	
6. _____	_____	☐ 0.0%	_____	
7. _____	_____	☐ 0.0%	_____	
8. _____	_____	☐ 0.0%	_____	
9. _____	_____	☐ 0.0%	_____	
10. _____	_____	☐ 0.0%	_____	
11. _____	_____	☐ 0.0%	_____	
= Total Cover		100		
Woody Vine Stratum (Plot size: _____)				
1. _____	_____	☐ 0.0%	_____	Hydrophytic Vegetation Present? Yes ☐ No ☒
2. _____	_____	☐ 0.0%	_____	
= Total Cover		0		
% Bare Ground in Herb Stratum: _____				
Remarks:				

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 07

[illegible]

Hydrology

Wetland Hydrology Indicators:		
Primary Indicators (minimum of one required; check all that apply) ☐ Surface Water (A1) ☐ High Water Table (A2) ☐ Saturation (A3) ☐ Water Marks (B1) ☐ Sediment Deposits (B2) ☐ Drift deposits (B3) ☐ Algal Mat or Crust (B4) ☐ Iron Deposits (B5) ☐ Surface Soil Cracks (B6) ☐ Inundation Visible on Aerial Imagery (B7) ☐ Sparsely Vegetated Concave Surface (B8) ☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) ☐ Salt Crust (B11) ☐ Aquatic Invertebrates (B13) ☐ Hydrogen Sulfide Odor (C1) ☐ Oxidized Rhizospheres on Living Roots (C3) ☐ Presence of Reduced Iron (C4) ☐ Recent Iron Reduction in Tilled Soils (C6) ☐ Stunted or Stressed Plants (D1) (LRR A) ☐ Other (Explain in Remarks)		
Secondary Indicators (minimum of two required) ☐ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) ☐ Drainage Patterns (B10) ☐ Dry Season Water Table (C2) ☐ Saturation Visible on Aerial Imagery (C9) ☐ Geomorphic Position (D2) ☐ Shallow Aquitard (D3) ☐ FAC-neutral Test (D5) ☐ Raised Ant Mounds (D6) (LRR A) ☐ Frost Heave Hummocks (D7)		
Field Observations: Surface Water Present? Yes ☐ No ☒ Depth (inches): 0 Water Table Present? Yes ☐ No ☒ Depth (inches): 0 Saturation Present? (includes capillary fringe) Yes ☐ No ☒ Depth (inches): 0 Wetland Hydrology Present? Yes ☐ No ☒		
Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:		
Remarks:		

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 08
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☒ No ☐	Is the Sampled Area within a Wetland? Yes ☒ No ☐
Hydric Soil Present? Yes ☒ No ☐	
Wetland Hydrology Present? Yes ☒ No ☐	
Remarks:	

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species? Rel.Strat. Cover	Indicator Status	Dominance Test worksheet:
1. _____	_____	☐ 0.0%	_____	Number of Dominant Species That are OBL, FACW, or FAC: <u>2</u> (A)
2. _____	_____	☐ 0.0%	_____	Total Number of Dominant Species Across All Strata: <u>2</u> (B)
3. _____	_____	☐ 0.0%	_____	Percent of dominant Species That Are OBL, FACW, or FAC: <u>100.0%</u> (A/B)
4. _____	_____	☐ 0.0%	_____	
	0	= Total Cover		
Sapling/Shrub Stratum (Plot size: _____)				Prevalence Index worksheet:
1. _____	_____	☐ 0.0%	_____	Total % Cover of: _____ Multiply by: _____
2. _____	_____	☐ 0.0%	_____	OBL species <u>0</u> x 1 = <u>0</u>
3. _____	_____	☐ 0.0%	_____	FACW species <u>30</u> x 2 = <u>60</u>
4. _____	_____	☐ 0.0%	_____	FAC species <u>65</u> x 3 = <u>195</u>
5. _____	_____	☐ 0.0%	_____	FACU species <u>5</u> x 4 = <u>20</u>
	0	= Total Cover		UPL species <u>0</u> x 5 = <u>0</u>
Herb Stratum (Plot size: <u>1m x 1m</u>)				Column Totals: <u>100</u> (A) <u>275</u> (B)
1. <u>Alopecurus pratensis</u>	<u>50</u>	☒ 50.0%	FAC	Prevalence Index = B/A = <u>2.750</u>
2. <u>Agrostis gigantea</u>	<u>10</u>	☐ 10.0%	FAC	
3. <u>Phalaris arundinacea</u>	<u>30</u>	☒ 30.0%	FACW	
4. <u>Cirsium arvense</u>	<u>5</u>	☐ 5.0%	FAC	
5. <u>Plantago lanceolata</u>	<u>5</u>	☐ 5.0%	FACU	
6. _____	_____	☐ 0.0%	_____	
7. _____	_____	☐ 0.0%	_____	
8. _____	_____	☐ 0.0%	_____	
9. _____	_____	☐ 0.0%	_____	
10. _____	_____	☐ 0.0%	_____	
11. _____	_____	☐ 0.0%	_____	
	100	= Total Cover		
Woody Vine Stratum (Plot size: _____)				
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
	0	= Total Cover		
% Bare Ground in Herb Stratum: _____				
Remarks:				Hydrophytic Vegetation Present? Yes ☒ No ☐

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 08

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix		Redox Features						Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²				
0-17	10YR	3/2	80	10YR	3/4	20	RM	M	Silty Clay Loam	

¹Type: C=Concentration. D=Depletion. RM=Reduced Matrix, CS=Covered or Coated Sand Grains ²Location: PL=Pore Lining, M=Matrix

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)

- | | |
|--|--|
| ☐ Histosol (A1) | ☐ Sandy Redox (S5) |
| ☐ Histic Epipedon (A2) | ☐ Stripped Matrix (S6) |
| ☐ Black Histic (A3) | ☐ Loamy Mucky Mineral (F1) (except in MLRA 1) |
| ☐ Hydrogen Sulfide (A4) | ☐ Loamy Gleyed Matrix (F2) |
| ☐ Depleted Below Dark Surface (A11) | ☐ Depleted Matrix (F3) |
| ☐ Thick Dark Surface (A12) | ☐ Redox Dark Surface (F6) |
| ☐ Sandy Muck Mineral (S1) | ☐ Depleted Dark Surface (F7) |
| ☐ Sandy Gleyed Matrix (S4) | ☒ Redox depressions (F8) |

Indicators for Problematic Hydric Soils³:

- | |
|---|
| ☐ 2 cm Muck (A10) |
| ☐ Red Parent Material (TF2) |
| ☐ Other (Explain in Remarks) |

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ☒ No ☐

Remarks:

Hydrology

Wetland Hydrology Indicators:

Primary Indicators (minimum of one required; check all that apply)

- | | |
|--|---|
| ☐ Surface Water (A1) | ☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) |
| ☐ High Water Table (A2) | ☐ Salt Crust (B11) |
| ☐ Saturation (A3) | ☐ Aquatic Invertebrates (B13) |
| ☐ Water Marks (B1) | ☐ Hydrogen Sulfide Odor (C1) |
| ☐ Sediment Deposits (B2) | ☒ Oxidized Rhizospheres on Living Roots (C3) |
| ☐ Drift deposits (B3) | ☒ Presence of Reduced Iron (C4) |
| ☐ Algal Mat or Crust (B4) | ☐ Recent Iron Reduction in Tilled Soils (C6) |
| ☐ Iron Deposits (B5) | ☐ Stunted or Stressed Plants (D1) (LRR A) |
| ☐ Surface Soil Cracks (B6) | ☐ Other (Explain in Remarks) |
| ☐ Inundation Visible on Aerial Imagery (B7) | |
| ☐ Sparsely Vegetated Concave Surface (B8) | |

Secondary Indicators (minimum of two required)

- | |
|--|
| ☐ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B) |
| ☐ Drainage Patterns (B10) |
| ☐ Dry Season Water Table (C2) |
| ☐ Saturation Visible on Aerial Imagery (C9) |
| ☐ Geomorphic Position (D2) |
| ☐ Shallow Aquitard (D3) |
| ☒ FAC-neutral Test (D5) |
| ☐ Raised Ant Mounds (D6) (LRR A) |
| ☐ Frost Heave Hummocks (D7) |

Field Observations:

Surface Water Present? Yes ☐ No ☒

Depth (inches): 0

Water Table Present? Yes ☐ No ☒

Depth (inches): 0

Saturation Present?
(includes capillary fringe) Yes ☐ No ☒

Depth (inches): 0

Wetland Hydrology Present? Yes ☒ No ☐

Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:

Remarks:

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 09
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☐ No ☒ Hydric Soil Present? Yes ☐ No ☒ Wetland Hydrology Present? Yes ☐ No ☒	Is the Sampled Area within a Wetland? Yes ☐ No ☒
Remarks:	

VEGETATION - Use scientific names of plants.

Stratum	Absolute % Cover	Dominant Species? Rel.Strat. Cover	Indicator Status	Notes
Tree Stratum (Plot size: _____)				
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
	0	= Total Cover		
Sapling/Shrub Stratum (Plot size: _____)				
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
5. _____	_____	☐ 0.0%	_____	
	0	= Total Cover		
Herb Stratum (Plot size: <u>1m x 1m</u>)				
1. <u>Festuca arundinacea</u>	30	☒ 30.0%	FAC	
2. <u>Cirsium arvense</u>	10	☐ 10.0%	FAC	
3. <u>Hypochaeris radicata</u>	20	☒ 20.0%	FACU	
4. <u>Plantago lanceolata</u>	10	☐ 10.0%	FACU	
5. <u>Vicia sativa</u>	10	☐ 10.0%	UPL	
6. <u>Bromus carinatus</u>	20	☒ 20.0%	UPL	
7. _____	_____	☐ 0.0%	_____	
8. _____	_____	☐ 0.0%	_____	
9. _____	_____	☐ 0.0%	_____	
10. _____	_____	☐ 0.0%	_____	
11. _____	_____	☐ 0.0%	_____	
	100	= Total Cover		
Woody Vine Stratum (Plot size: _____)				
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
	0	= Total Cover		
% Bare Ground in Herb Stratum: _____				

Dominance Test worksheet:

Number of Dominant Species That are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of dominant Species That Are OBL, FACW, or FAC: 33.3% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species <u>0</u>	x 1 = <u>0</u>
FACW species <u>0</u>	x 2 = <u>0</u>
FAC species <u>40</u>	x 3 = <u>120</u>
FACU species <u>30</u>	x 4 = <u>120</u>
UPL species <u>30</u>	x 5 = <u>150</u>
Column Totals: <u>100</u> (A)	<u>390</u> (B)

Prevalence Index = B/A = 3.900

Hydrophytic Vegetation Indicators:

☐ 1 - Rapid Test for Hydrologic Vegetation

☐ 2 - Dominance Test is > 50%

☐ 3 - Prevalence Index is ≤ 3.0¹

☐ 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)

☐ 5 - Wetland Non-Vascular Plants¹

☐ Problematic Hydrophytic Vegetation¹ (Explain)

¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ☐ No ☒

Remarks:

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 09

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)								
Depth (inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-18	10YR	3/3	100					

¹Type: C=Concentration. D=Depletion. RM=Reduced Matrix, CS=Covered or Coated Sand Grains ²Location: PL=Pore Lining, M=Matrix

Hydric Soil Indicators: (Applicable to all LRRs, unless otherwise noted.)		Indicators for Problematic Hydric Soils ³ :
☐ Histosol (A1)	☐ Sandy Redox (S5)	☐ 2 cm Muck (A10)
☐ Histic Epipedon (A2)	☐ Stripped Matrix (S6)	☐ Red Parent Material (TF2)
☐ Black Histic (A3)	☐ Loamy Mucky Mineral (F1) (except in MLRA 1)	☐ Other (Explain in Remarks)
☐ Hydrogen Sulfide (A4)	☐ Loamy Gleyed Matrix (F2)	
☐ Depleted Below Dark Surface (A11)	☐ Depleted Matrix (F3)	
☐ Thick Dark Surface (A12)	☐ Redox Dark Surface (F6)	
☐ Sandy Muck Mineral (S1)	☐ Depleted Dark Surface (F7)	
☐ Sandy Gleyed Matrix (S4)	☐ Redox depressions (F8)	

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if present):
Type: _____
Depth (inches): _____

Hydric Soil Present? Yes ☐ No ☒

Remarks:

Hydrology

Wetland Hydrology Indicators:		
Primary Indicators (minimum of one required; check all that apply)		Secondary Indicators (minimum of two required)
☐ Surface Water (A1)	☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B)	☐ Water-Stained Leaves (B9) (MLRA 1, 2, 4A, and 4B)
☐ High Water Table (A2)	☐ Salt Crust (B11)	☐ Drainage Patterns (B10)
☐ Saturation (A3)	☐ Aquatic Invertebrates (B13)	☐ Dry Season Water Table (C2)
☐ Water Marks (B1)	☐ Hydrogen Sulfide Odor (C1)	☐ Saturation Visible on Aerial Imagery (C9)
☐ Sediment Deposits (B2)	☐ Oxidized Rhizospheres on Living Roots (C3)	☐ Geomorphic Position (D2)
☐ Drift deposits (B3)	☐ Presence of Reduced Iron (C4)	☐ Shallow Aquitard (D3)
☐ Algal Mat or Crust (B4)	☐ Recent Iron Reduction in Tilled Soils (C6)	☐ FAC-neutral Test (D5)
☐ Iron Deposits (B5)	☐ Stunted or Stressed Plants (D1) (LRR A)	☐ Raised Ant Mounds (D6) (LRR A)
☐ Surface Soil Cracks (B6)	☐ Other (Explain in Remarks)	☐ Frost Heave Hummocks (D7)
☐ Inundation Visible on Aerial Imagery (B7)		
☐ Sparsely Vegetated Concave Surface (B8)		

Field Observations:		
Surface Water Present?	Yes ☐ No ☒	Depth (inches): 0
Water Table Present?	Yes ☐ No ☒	Depth (inches): 0
Saturation Present? (includes capillary fringe)	Yes ☐ No ☒	Depth (inches): 0

Wetland Hydrology Present? Yes ☐ No ☒

Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:

Remarks:

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

Project/Site: Union Self Storage (Tax Parcel 176190000) City/County: Clark Sampling Date: 16-Jun-16
 Applicant/Owner: Tom Strassenberg State: WA Sampling Point: 10
 Investigator(s): Jim Barnes Section, Township, Range: S 29 T 2N R 3E
 Landform (hillslope, terrace, etc.): Terrace Local relief (concave, convex, none): flat Slope: 2.0 % / 1.1 °
 Subregion (LRR): LRR A Lat.: 45.62430386021988 Long.: -122.46499837245655 Datum: NAD83
 Soil Map Unit Name: Dollar loam, 0 to 5 percent slopes (DoB) NWI classification: None

Are climatic/hydrologic conditions on the site typical for this time of year? Yes ☒ No ☐ (If no, explain in Remarks.)
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ significantly disturbed? Are "Normal Circumstances" present? Yes ☒ No ☐
 Are Vegetation ☐ , Soil ☐ , or Hydrology ☐ naturally problematic? (If needed, explain any answers in Remarks.)

Summary of Findings - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes ☒ No ☐	Is the Sampled Area within a Wetland? Yes ☒ No ☐
Hydric Soil Present? Yes ☒ No ☐	
Wetland Hydrology Present? Yes ☒ No ☐	
Remarks:	

VEGETATION - Use scientific names of plants.

Tree Stratum (Plot size: _____)	Absolute % Cover	Dominant Species? Rel.Strat. Cover	Indicator Status	Dominance Test worksheet: Number of Dominant Species That are OBL, FACW, or FAC: <u>2</u> (A) Total Number of Dominant Species Across All Strata: <u>2</u> (B) Percent of dominant Species That Are OBL, FACW, or FAC: <u>100.0%</u> (A/B)
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
Sapling/Shrub Stratum (Plot size: _____)		0 = Total Cover		Prevalence Index worksheet: Total % Cover of: _____ Multiply by: _____ OBL species <u>0</u> x 1 = <u>0</u> FACW species <u>35</u> x 2 = <u>70</u> FAC species <u>65</u> x 3 = <u>195</u> FACU species <u>0</u> x 4 = <u>0</u> UPL species <u>0</u> x 5 = <u>0</u> Column Totals: <u>100</u> (A) <u>265</u> (B) Prevalence Index = B/A = <u>2.650</u>
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
3. _____	_____	☐ 0.0%	_____	
4. _____	_____	☐ 0.0%	_____	
5. _____	_____	☐ 0.0%	_____	
Herb Stratum (Plot size: <u>1m x 1m</u>)		0 = Total Cover		Hydrophytic Vegetation Indicators: ☐ 1 - Rapid Test for Hydrologic Vegetation ☒ 2 - Dominance Test is > 50% ☒ 3 - Prevalence Index is ≤ 3.0 ¹ ☐ 4 - Morphological Adaptations ¹ (Provide supporting data in Remarks or on a separate sheet) ☐ 5 - Wetland Non-Vascular Plants ¹ ☐ Problematic Hydrophytic Vegetation ¹ (Explain) ¹ Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.
1. <u>Alopecurus pratensis</u>	<u>50</u>	☒ 50.0%	<u>FAC</u>	
2. <u>Agrostis gigantea</u>	<u>5</u>	☐ 5.0%	<u>FAC</u>	
3. <u>Phalaris arundinacea</u>	<u>35</u>	☒ 35.0%	<u>FACW</u>	
4. <u>Cirsium arvense</u>	<u>10</u>	☐ 10.0%	<u>FAC</u>	
5. _____	_____	☐ 0.0%	_____	
6. _____	_____	☐ 0.0%	_____	
7. _____	_____	☐ 0.0%	_____	
8. _____	_____	☐ 0.0%	_____	
9. _____	_____	☐ 0.0%	_____	
10. _____	_____	☐ 0.0%	_____	
11. _____	_____	☐ 0.0%	_____	
Woody Vine Stratum (Plot size: _____)		0 = Total Cover		Hydrophytic Vegetation Present? Yes ☒ No ☐
1. _____	_____	☐ 0.0%	_____	
2. _____	_____	☐ 0.0%	_____	
% Bare Ground in Herb Stratum: _____				
Remarks:				

*Indicator suffix = National status or professional decision assigned because Regional status not defined by FWS.

Soil

Sampling Point: 10

[illegible]

Hydrology

Wetland Hydrology Indicators:		
Primary Indicators (minimum of one required; check all that apply) ☐ Surface Water (A1) ☐ High Water Table (A2) ☐ Saturation (A3) ☐ Water Marks (B1) ☐ Sediment Deposits (B2) ☐ Drift deposits (B3) ☐ Algal Mat or Crust (B4) ☐ Iron Deposits (B5) ☐ Surface Soil Cracks (B6) ☐ Inundation Visible on Aerial Imagery (B7) ☐ Sparsely Vegetated Concave Surface (B8) Secondary Indicators (minimum of two required) ☐ Water-Stained Leaves (B9) (except MLRA 1, 2, 4A, and 4B) ☐ Salt Crust (B11) ☐ Aquatic Invertebrates (B13) ☐ Hydrogen Sulfide Odor (C1) ☒ Oxidized Rhizospheres on Living Roots (C3) ☒ Presence of Reduced Iron (C4) ☐ Recent Iron Reduction in Tilled Soils (C6) ☐ Stunted or Stressed Plants (D1) (LRR A) ☐ Other (Explain in Remarks)		
Field Observations: Surface Water Present? Yes No Water Table Present? Yes No Saturation Present? (includes capillary fringe) Yes No Depth (inches): 0 Depth (inches): 0 Depth (inches): 0 Wetland Hydrology Present? Yes No		
Describe Recorded Data (stream gauge, monitor well, aerial photos, previous inspections), if available:		
Remarks:		

APPENDIX B

Wetland name or number 1 (Union Self Storage)

RATING SUMMARY – Western Washington

Name of wetland (or ID #): Wetland 1 Date of site visit: 6/14/16
 Rated by Jim Barnes Trained by Ecology? ☒ Yes ☐ No Date of training 11/12/13
 HGM Class used for rating Slope 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 Clark County GIS

OVERALL WETLAND CATEGORY IV (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	
Circle the appropriate ratings				
Site Potential	H <u>M</u> L	H M <u>L</u>	H <u>M</u> L	
Landscape Potential	H M <u>L</u>	H M <u>L</u>	H M <u>L</u>	
Value	<u>H</u> M L	H M <u>L</u>	H <u>M</u> L	TOTAL
Score Based on Ratings	<u>6</u>	<u>3</u>	<u>5</u>	<u>14</u>

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	

Wetland name or number 2

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	
Hydroperiods	D 1.4, H 1.2	
Location of outlet <i>(can be added to map of hydroperiods)</i>	D 1.1, D 4.1	
Boundary of area within 150 ft of the wetland <i>(can be added to another figure)</i>	D 2.2, D 5.2	
Map of the contributing basin	D 4.3, D 5.3	
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)	D 3.1, D 3.2	
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	D 3.3	

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	
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	
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	WR1
Hydroperiods	H 1.2	WR1
Plant cover of dense trees, shrubs, and herbaceous plants	S 1.3	WR1
Plant cover of dense, rigid trees, shrubs, and herbaceous plants <i>(can be added to figure above)</i>	S 4.1	WR1
Boundary of 150 ft buffer <i>(can be added to another figure)</i>	S 2.1, S 5.1	WR1
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	WR2
Screen capture of map of 303(d) listed waters in basin (from Ecology website)	S 3.1, S 3.2	WR3
Screen capture of list of TMDLs for WRIA in which unit is found (from web)	S 3.3	WR3

Wetland name or number 1

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 2

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 1

SLOPE WETLANDS	
Water Quality Functions - Indicators that the site functions to improve water quality	
S 1.0. Does the site have the potential to improve water quality?	
S 1.1. Characteristics of the average slope of the wetland: (<i>a 1% slope has a 1 ft vertical drop in elevation for every 100 ft of horizontal distance</i>) Slope is 1% or less points = 3 Slope is > 1%-2% points = 2 Slope is > 2%-5% points = 1 Slope is greater than 5% points = 0	2
S 1.2. The soil 2 in below the surface (or duff layer) is true clay or true organic (use NRCS definitions): Yes = 3 No = 0	0
S 1.3. Characteristics of the plants in the wetland that trap sediments and pollutants: Choose the points appropriate for the description that best fits the plants in the wetland. <i>Dense means you have trouble seeing the soil surface (>75% cover), and uncut means not grazed or mowed and plants are higher than 6 in.</i> Dense, uncut, herbaceous plants > 90% of the wetland area points = 6 Dense, uncut, herbaceous plants > ½ of area points = 3 Dense, woody, plants > ½ of area points = 2 Dense, uncut, herbaceous plants > ¼ of area points = 1 Does not meet any of the criteria above for plants points = 0	6
Total for S 1	8

Rating of Site Potential If score is: 12 = H 6-11 = M 0-5 = L

Record the rating on the first page

S 2.0. Does the landscape have the potential to support the water quality function of the site?	
S 2.1. Is > 10% of the area within 150 ft on the uphill side of the wetland in land uses that generate pollutants? Yes = 1 No = 0	0
S 2.2. Are there other sources of pollutants coming into the wetland that are not listed in question S 2.1? Other sources _____ Yes = 1 No = 0	0
Total for S 2	0

Rating of Landscape Potential If score is: 1-2 = M 0 = L

Record the rating on the first page

S 3.0. Is the water quality improvement provided by the site valuable to society?	
S 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
S 3.2. Is the wetland in a basin or sub-basin where water quality is an issue? <i>At least one aquatic resource in the basin is on the 303(d) list. Dwyer creek trib.</i> Yes = 1 No = 0	1
S 3.3. Has the site been identified in a watershed or local plan as important for maintaining water quality? <i>Answer YES if there is a TMDL for the basin in which unit is found.</i> Yes = 2 No = 0	2
Total for S 3	3

Rating of Value If score is: 2-4 = H 1 = M 0 = L

Record the rating on the first page

Wetland name or number 1

SLOPE WETLANDS

Hydrologic Functions - Indicators that the site functions to reduce flooding and stream erosion

S 4.0. Does the site have the potential to reduce flooding and stream erosion?

S 4.1. Characteristics of plants that reduce the velocity of surface flows during storms: Choose the points appropriate for the description that best fits conditions in the wetland. *Stems of plants should be thick enough (usually $> \frac{1}{8}$ in), or dense enough, to remain erect during surface flows.*

Dense, uncut, rigid plants cover $> 90\%$ of the area of the wetland

points = 1

All other conditions

points = 0

1

Rating of Site Potential If score is: ☒ 1 = M ☐ 0 = L

Record the rating on the first page

S 5.0. Does the landscape have the potential to support the hydrologic functions of the site?

S 5.1. Is more than 25% of the area within 150 ft upslope of wetland in land uses or cover that generate excess surface runoff?

Yes = 1 No = 0

0

Rating of Landscape Potential If score is: ☐ 1 = M ☒ 0 = L

Record the rating on the first page

S 6.0. Are the hydrologic functions provided by the site valuable to society?

S 6.1. Distance to the nearest areas downstream that have flooding problems:

The sub-basin immediately down-gradient of site has flooding problems that result in damage to human or natural resources (e.g., houses or salmon redds)

points = 2

Surface flooding problems are in a sub-basin farther down-gradient

points = 1

No flooding problems anywhere downstream

points = 0

0

S 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 S 6

Add the points in the boxes above

0

Rating of Value If score is: ☐ 2-4 = H ☐ 1 = M ☒ 0 = L

Record the rating on the first page

NOTES and FIELD OBSERVATIONS:

Wetland name or number 1

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.*

- | | |
|---|----------------------------------|
| ☐ Aquatic bed | 4 structures or more: points = 4 |
| ☒ Emergent | 3 structures: points = 2 |
| ☒ Scrub-shrub (areas where shrubs have > 30% cover) | 2 structures: points = 1 |
| ☒ Forested (areas where trees have > 30% cover) | 1 structure: points = 0 |
- If the unit has a Forested class, check if:*
- ☐ 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

2

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*).

- | | |
|---|-------------------------------------|
| ☐ Permanently flooded or inundated | 4 or more types present: points = 3 |
| ☐ Seasonally flooded or inundated | 3 types present: points = 2 |
| ☒ Occasionally flooded or inundated | 2 types present: points = 1 |
| ☒ Saturated only | 1 type present: points = 0 |
- ☐ Permanently flowing stream or river in, or adjacent to, the wetland
- ☒ Seasonally flowing stream in, or adjacent to, the wetland
- ☐ Lake Fringe wetland 2 points
- ☐ Freshwater tidal wetland 2 points

2

H 1.3. Richness of plant species

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

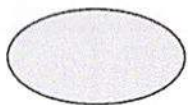
Different patches of the same species can be combined to meet the size threshold and you do not have to name the species. Do not include Eurasian milfoil, reed canarygrass, purple loosestrife, Canadian thistle

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

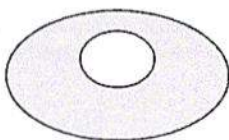
1

H 1.4. Interspersion of habitats

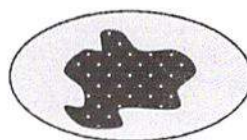
Decide from the diagrams below whether interspersion among Cowardin plants classes (described in H 1.1), or the classes and unvegetated areas (can include open water or mudflats) is high, moderate, low, or none. *If you have four or more plant classes or three classes and open water, the rating is always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



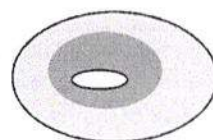
None = 0 points



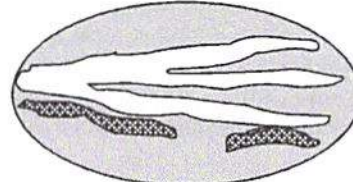
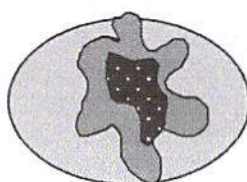
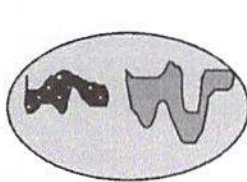
Low = 1 point



Moderate = 2 points



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



2

Wetland name or number 1

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> ☐ Large, downed, woody debris within the wetland (> 4 in diameter and 6 ft long). ☐ Standing snags (dbh > 4 in) within the wetland ☐ 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) ☐ 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>) ☐ 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>) ☐ 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>)		
Total for H 1	Add the points in the boxes above	<u>7</u>
Rating of Site Potential If score is: <u>15-18</u> = H ☒ <u>7-14</u> = M ☐ <u>0-6</u> = L <i>Record the rating on the first page</i>		

H 2.0. Does the landscape have the potential to support the habitat functions of the site?		
H 2.1. Accessible habitat (include <i>only habitat that directly abuts wetland unit</i>). Calculate: % undisturbed habitat <u>0</u> + [(% moderate and low intensity land uses)/2] <u>7</u> = <u>7</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		<u>0</u>
H 2.2. Undisturbed habitat in 1 km Polygon around the wetland. Calculate: % undisturbed habitat <u>25</u> + [(% moderate and low intensity land uses)/2] <u>15</u> = <u>40</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		<u>1</u>
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		<u>-2</u>
Total for H 2	Add the points in the boxes above	<u>-1</u>
Rating of Landscape Potential If score is: <u>4-6</u> = H ☐ <u>1-3</u> = M ☒ <u>< 1</u> = L <i>Record the rating on the first page</i>		

H 3.0. Is the habitat provided by the site valuable to society?		
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		<u>1</u>
Rating of Value If score is: <u>2</u> = H ☒ <u>1</u> = M ☐ <u>0</u> = L <i>Record the rating on the first page</i>		

Wetland name or number _____

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.

Wetland name or number _____

CATEGORIZATION BASED ON SPECIAL CHARACTERISTICS

Wetland Type	Category
<i>Check off any criteria that apply to the wetland. Circle the category when the appropriate criteria are met.</i>	
SC 1.0. Estuarine wetlands Does the wetland meet the following criteria for Estuarine wetlands? — The dominant water regime is tidal, — Vegetated, and — With a salinity greater than 0.5 ppt	Yes – Go to SC 1.1 No = Not an estuarine wetland
SC 1.1. Is the wetland within a National Wildlife Refuge, National Park, National Estuary Reserve, Natural Area Preserve, State Park or Educational, Environmental, or Scientific Reserve designated under WAC 332-30-151?	Yes = Category I No - Go to SC 1.2 Cat. I
SC 1.2. Is the wetland unit at least 1 ac in size and meets at least two of the following three conditions? — The wetland is relatively undisturbed (has no diking, ditching, filling, cultivation, grazing, and has less than 10% cover of non-native plant species. (If non-native species are <i>Spartina</i> , see page 25) — At least ¾ of the landward edge of the wetland has a 100 ft buffer of shrub, forest, or un-grazed or unmowed grassland. — The wetland has at least two of the following features: tidal channels, depressions with open water, or contiguous freshwater wetlands.	Yes = Category I No = Category II Cat. I Cat. II
SC 2.0. Wetlands of High Conservation Value (WHCV) SC 2.1. Has the WA Department of Natural Resources updated their website to include the list of Wetlands of High Conservation Value? SC 2.2. Is the wetland listed on the WDNR database as a Wetland of High Conservation Value? SC 2.3. Is the wetland in a Section/Township/Range that contains a Natural Heritage wetland? http://www1.dnr.wa.gov/nhp/refdesk/datasetsearch/wnhpwetlands.pdf SC 2.4. Has WDNR identified the wetland within the S/T/R as a Wetland of High Conservation Value and listed it on their website?	Yes – Go to SC 2.2 No – Go to SC 2.3 Yes = Category I No = Not a WHCV Yes – Contact WNHP/WDNR and go to SC 2.4 No = Not a WHCV Yes = Category I No = Not a WHCV Cat. I
SC 3.0. Bogs Does the wetland (or any part of the unit) meet both the criteria for soils and vegetation in bogs? <i>Use the key below. If you answer YES you will still need to rate the wetland based on its functions.</i> SC 3.1. Does an area within the wetland unit have organic soil horizons, either peats or mucks, that compose 16 in or more of the first 32 in of the soil profile? SC 3.2. Does an area within the wetland unit have organic soils, either peats or mucks, that are less than 16 in deep over bedrock, or an impermeable hardpan such as clay or volcanic ash, or that are floating on top of a lake or pond? SC 3.3. Does an area with peats or mucks have more than 70% cover of mosses at ground level, AND at least a 30% cover of plant species listed in Table 4? NOTE: If you are uncertain about the extent of mosses in the understory, you may substitute that criterion by measuring the pH of the water that seeps into a hole dug at least 16 in deep. If the pH is less than 5.0 and the plant species in Table 4 are present, the wetland is a bog. SC 3.4. Is an area with peats or mucks forested (> 30% cover) with Sitka spruce, subalpine fir, western red cedar, western hemlock, lodgepole pine, quaking aspen, Engelmann spruce, or western white pine, AND any of the species (or combination of species) listed in Table 4 provide more than 30% of the cover under the canopy?	Yes – Go to SC 3.3 No – Go to SC 3.2 Yes – Go to SC 3.3 No = Is not a bog Yes = Is a Category I bog No – Go to SC 3.4 Cat. I Yes = Is a Category I bog No = Is not a bog

Wetland name or number _____

SC 4.0. Forested Wetlands Does the wetland have at least <u>1 contiguous acre</u> of forest that meets one of these criteria for the WA Department of Fish and Wildlife's forests as priority habitats? <i>If you answer YES you will still need to rate the wetland based on its functions.</i> — Old-growth forests (west of Cascade crest): Stands of at least two tree species, forming a multi-layered canopy with occasional small openings; with at least 8 trees/ac (20 trees/ha) that are at least 200 years of age OR have a diameter at breast height (dbh) of 32 in (81 cm) or more. — Mature forests (west of the Cascade Crest): Stands where the largest trees are 80- 200 years old OR the species that make up the canopy have an average diameter (dbh) exceeding 21 in (53 cm). Yes = Category I No = Not a forested wetland for this section	Cat. I
SC 5.0. Wetlands in Coastal Lagoons Does the wetland meet all of the following criteria of a wetland in a coastal lagoon? — The wetland lies in a depression adjacent to marine waters that is wholly or partially separated from marine waters by sandbanks, gravel banks, shingle, or, less frequently, rocks — The lagoon in which the wetland is located contains ponded water that is saline or brackish (> 0.5 ppt) during most of the year in at least a portion of the lagoon (<i>needs to be measured near the bottom</i>) Yes – Go to SC 5.1 No = Not a wetland in a coastal lagoon SC 5.1. Does the wetland meet all of the following three conditions? — The wetland is relatively undisturbed (has no diking, ditching, filling, cultivation, grazing), and has less than 20% cover of aggressive, opportunistic plant species (see list of species on p. 100). — At least ¾ of the landward edge of the wetland has a 100 ft buffer of shrub, forest, or un-grazed or un-mowed grassland. — The wetland is larger than 1/10 ac (4350 ft²) Yes = Category I No = Category II	Cat. I Cat. II
SC 6.0. Interdunal Wetlands Is the wetland west of the 1889 line (also called the Western Boundary of Upland Ownership or WBUO)? <i>If you answer yes you will still need to rate the wetland based on its habitat functions.</i> In practical terms that means the following geographic areas: — Long Beach Peninsula: Lands west of SR 103 — Grayland-Westport: Lands west of SR 105 — Ocean Shores-Copalis: Lands west of SR 115 and SR 109 Yes – Go to SC 6.1 No = not an interdunal wetland for rating SC 6.1. Is the wetland 1 ac or larger and scores an 8 or 9 for the habitat functions on the form (rates H,H,H or H,H,M for the three aspects of function)? Yes = Category I No – Go to SC 6.2 SC 6.2. Is the wetland 1 ac or larger, or is it in a mosaic of wetlands that is 1 ac or larger? Yes = Category II No – Go to SC 6.3 SC 6.3. Is the unit between 0.1 and 1 ac, or is it in a mosaic of wetlands that is between 0.1 and 1 ac? Yes = Category III No = Category IV	Cat I Cat. II Cat. III Cat. IV
Category of wetland based on Special Characteristics If you answered No for all types, enter "Not Applicable" on Summary Form	

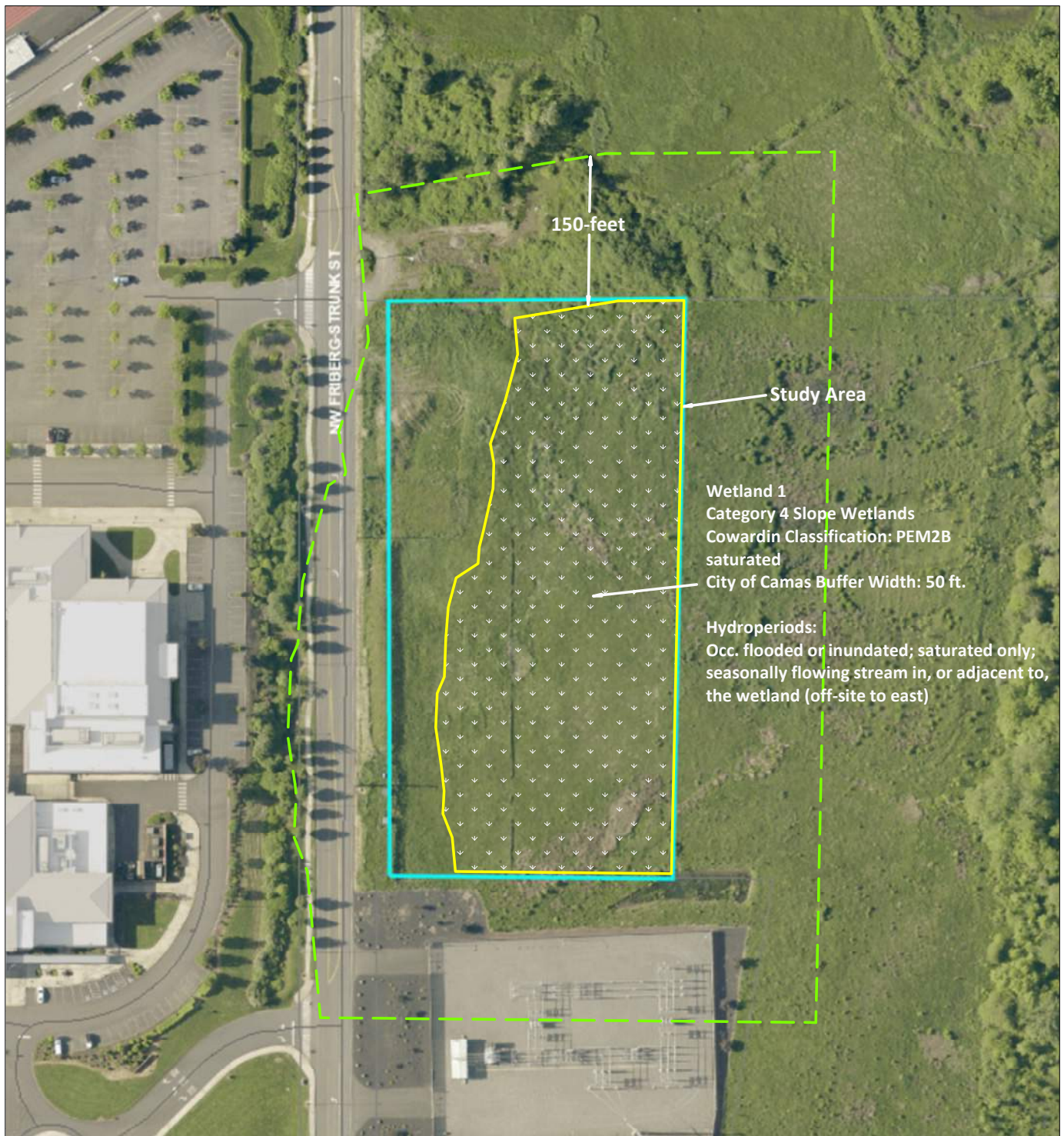


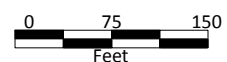
Figure WR-1 - Wetland Rating Form
Project: Union Self Storage
 Cowardin plant classes; Plant cover of dense trees, shrubs, and herbaceous plants; Boundary of area within 150 ft of the wetland

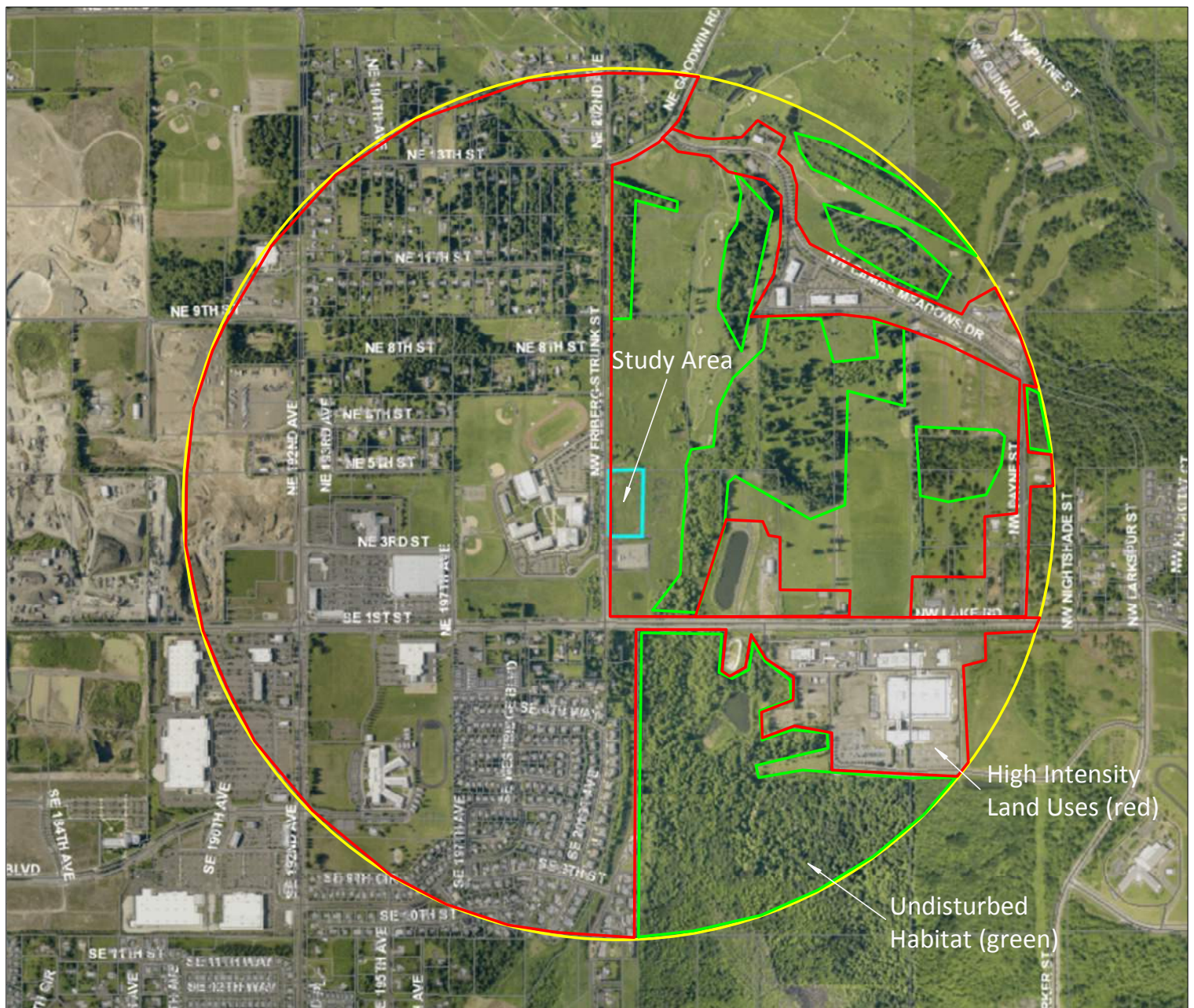
Location: 6250 NW Friberg-Strunk Street, Camas, WA 98607
 Tax Parcel: 176190000
 Legal: SE 1/4, S29, T2N, R3E of the Willamette Meridian
 45.62430386021988 N. lat. / -122.46499837245655 W long.
 County: Clark

Cascadia Ecological Services, Inc.
 3015 NW 95th Place, Vancouver, WA 98665
 (360) 601-8631
www.cascadia-inc.com

Date: 6/21/16

CLIENT:
 Tom Strassenberg
 200 SE 197th Place
 Camas, WA 98607





Note: All other areas within 1km circle are moderate and low intensity land uses.

Drawn by: J. Barnes



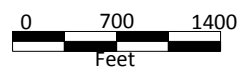
Figure WR-2; Wetland Rating Form
1 km Polygon extending from wetland edge

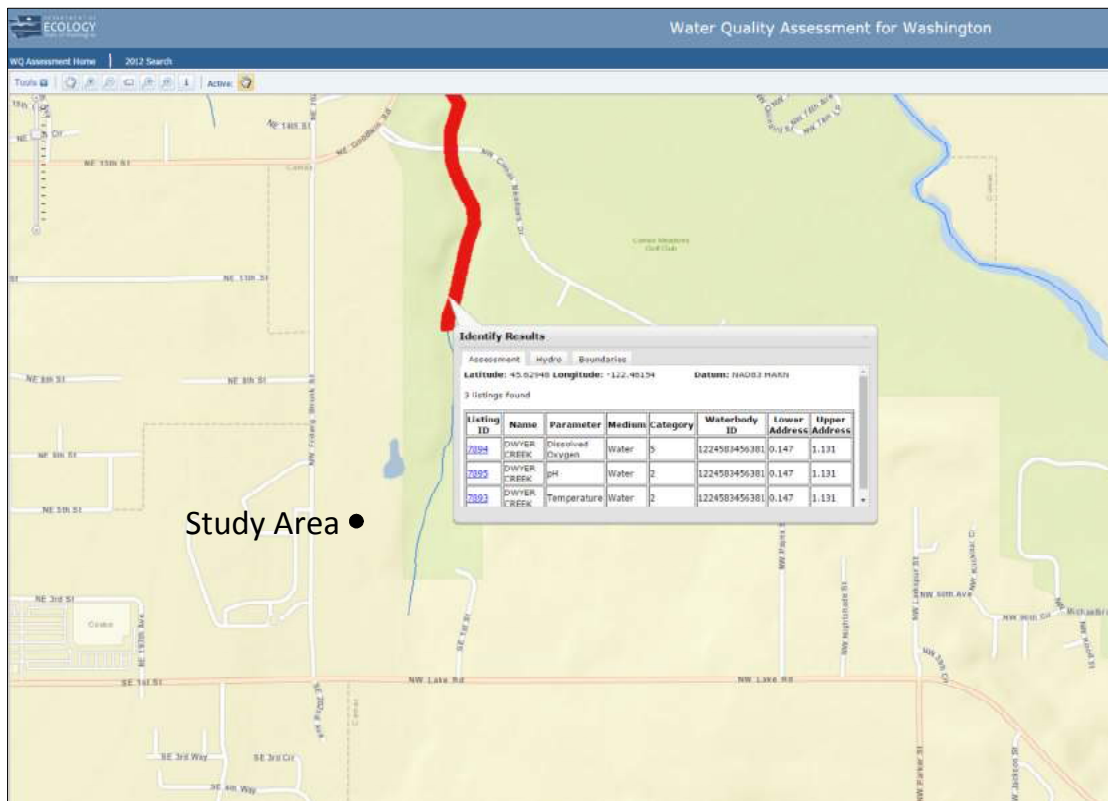
Location: 6250 NW Friberg-Strunk Street, Camas, WA 98607
Tax Parcel: 176190000
Legal: SE 1/4, S29, T2N, R3E of the Willamette Meridian
45.62430386021988 N. lat. / -122.46499837245655 W long.
County: Clark

CLIENT:
Tom Strassenberg
200 SE 197th Place
Camas, WA 98607

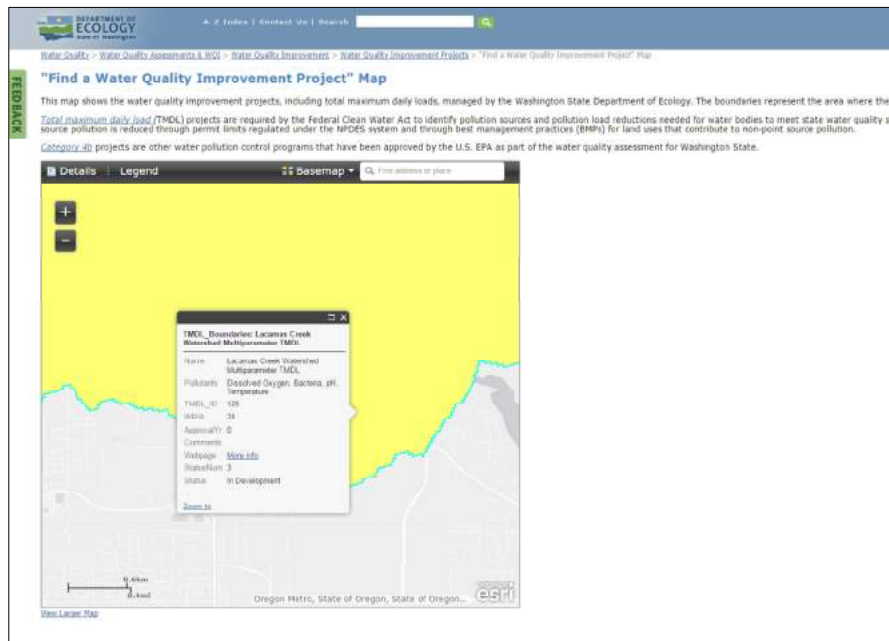
Cascadia Ecological Services, Inc.
3015 NW 95th Place, Vancouver, WA 98665
(360) 601-8631
www.cascadia-inc.com

Date: 6/21/16





Screen capture of map of 303(d) listed waters in basin (from Ecology's website)
 Accessed 6/14/16



Screen capture of map of list of TMDL's for WRIA in which unit is found
 (from Ecology's website); Accessed 6/14/16

Drawn by: J. Barnes



Figure WR-3; Wetland Rating Form
 Screen captures (303-d & TMDL's) from Ecology Website

Location: 6250 NW Friberg-Strunk Street, Camas, WA 98607
 Tax Parcel: 176190000
 Legal: SE 1/4,S29,T2N,R3E of the Willamette Meridian
 45.62430386021988 N. lat. / -122.46499837245655 W long.
 County: Clark

CLIENT:
 Tom Strassenberg
 200 SE 197th Place
 Camas, WA 98607

Cascadia Ecological Services, Inc.
 3015 NW 95th Place, Vancouver, WA 98665
 (360) 601-8631
www.cascadia-inc.com

Date: 6/14/16

APPENDIX C



DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3755
SEATTLE, WASHINGTON 98124-3755

REPLY TO
ATTENTION OF

Regulatory Branch

Mr. Dean Kirkland
Kirkland Development, LLC
19215 SE 34th Street
Suite 106, Box #341
Camas, Washington 98607

Reference: NWS-2008-1072
Kirkland Development
(Union Self Storage)

Dear Mr. Kirkland:

We have reviewed your application to place fill in 0.42 acre of wetlands adjacent to an unnamed creek northeast of the intersection of NW Friberg-Strunk Street and NW Lake Road in Camas, Clark County, Washington. Based on the information you provided to us, Nationwide Permit 39, Commercial and Institutional Developments (Federal Register, March 12, 2007 Vol. 72, No. 47), authorizes your proposal as depicted on the enclosed drawings dated March 2, 2009. In order for this NWP authorization to be valid, you must ensure that the work is performed in accordance with the enclosed *Nationwide Permit 39, Terms and Conditions* and the following special conditions:

a. The wetland areas established, rehabilitated and enhanced as compensatory mitigation for work authorized by this permit, shall not be made the subject of a future individual or general Department of the Army permit application for fill or other development, except for the purposes of enhancing or restoring the mitigation associated with this project. In addition, a description of the mitigation area identified in the final mitigation plan as approved and any subsequent permit mitigation area revisions will be recorded with the Registrar of Deeds or other appropriate official charged with maintaining records on real property. Proof of recording must be provided to the Corps, Seattle District, Regulatory Branch and Southwest Field Office no later than 60 days from the date of permit issuance.

b. A status report on the mitigation construction, including as-built drawings, must be submitted to the Corps, Seattle District, Regulatory Branch and Southwest Field Office no later than 13 months from the date of permit issuance. Annual status reports on mitigation construction are required until mitigation construction is complete.

c. The permittee shall implement and abide by the mitigation plan "Preliminary Mitigation Plan: Union Self Storage Project; Camas, Washington" dated March 2, 2009. Mitigation monitoring reports will be due years 1, 2, 3, 5, 7, and 10 from the due date of the as-built

drawings of the mitigation site. All reports must be submitted to the Corps, Seattle District, Regulatory Branch and Southwest Field Office and must prominently display the reference number NWS-2008-1072. The mitigation monitoring reports must be submitted in the format shown on the enclosed "Mitigation Monitoring Report Format" dated August 3, 2006. Reports should be submitted in hard copy or electronically.

d. Your responsibility to complete the required compensatory mitigation as set forth in Special Condition "c" will not be considered fulfilled until you have demonstrated mitigation success and have received written verification from the U.S. Army Corps of Engineers.

Please note that you must comply with Seattle District's Regional General Condition number 5 on the enclosed NWP Terms and Conditions regarding the inadvertent discovery of cultural resources or human burials.

The authorized work complies with the Washington State Department of Ecology's (Ecology) Water Quality Certification and the Coastal Zone Management Act requirements for this NWP. No further coordination with Ecology is required. We have reviewed your project pursuant to the requirements of the Endangered Species Act (ESA) and the Magnuson-Stevens Fishery Conservation and Management Act in regards to Essential Fish Habitat (EFH). We have determined that this project complies with the requirements of NWP National General Condition regarding ESA and will not adversely affect EFH.

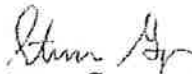
We have completed an approved jurisdictional determination for your project area which can be found on our website at <http://www.nws.usace.army.mil/> click on Regulatory, Regulatory/Permits, Recent Jurisdictional Determinations. If you object to this determination, you may request an administrative appeal under our regulations 33 CFR 331 as described in the enclosed *Appeal Process Fact Sheet* and the *Notification of Administrative Appeal Options and Process and Request for Appeal* form.

Our verification of this NWP authorization is valid for 2 years from the date of this letter unless the NWP is modified, reissued, or revoked prior to that date. If the authorized work has not been completed by that date, please contact us to discuss the status of your authorization. Failure to comply with all terms and conditions of this NWP verification invalidates this authorization and could result in a violation of Section 404 of the Clean Water Act and/or Section 10 of the 1899 Rivers and Harbors Act. Also, you must obtain all State and local permits that apply to this project.

Upon completing the authorized work, you must fill out and return the enclosed *Certificate of Compliance with Department of the Army Permit* form. Thank you for your cooperation during the permit process. We are interested in your experience with our Regulatory Program and encourage you to complete a customer service survey form. This form and information about our program is available on our website.

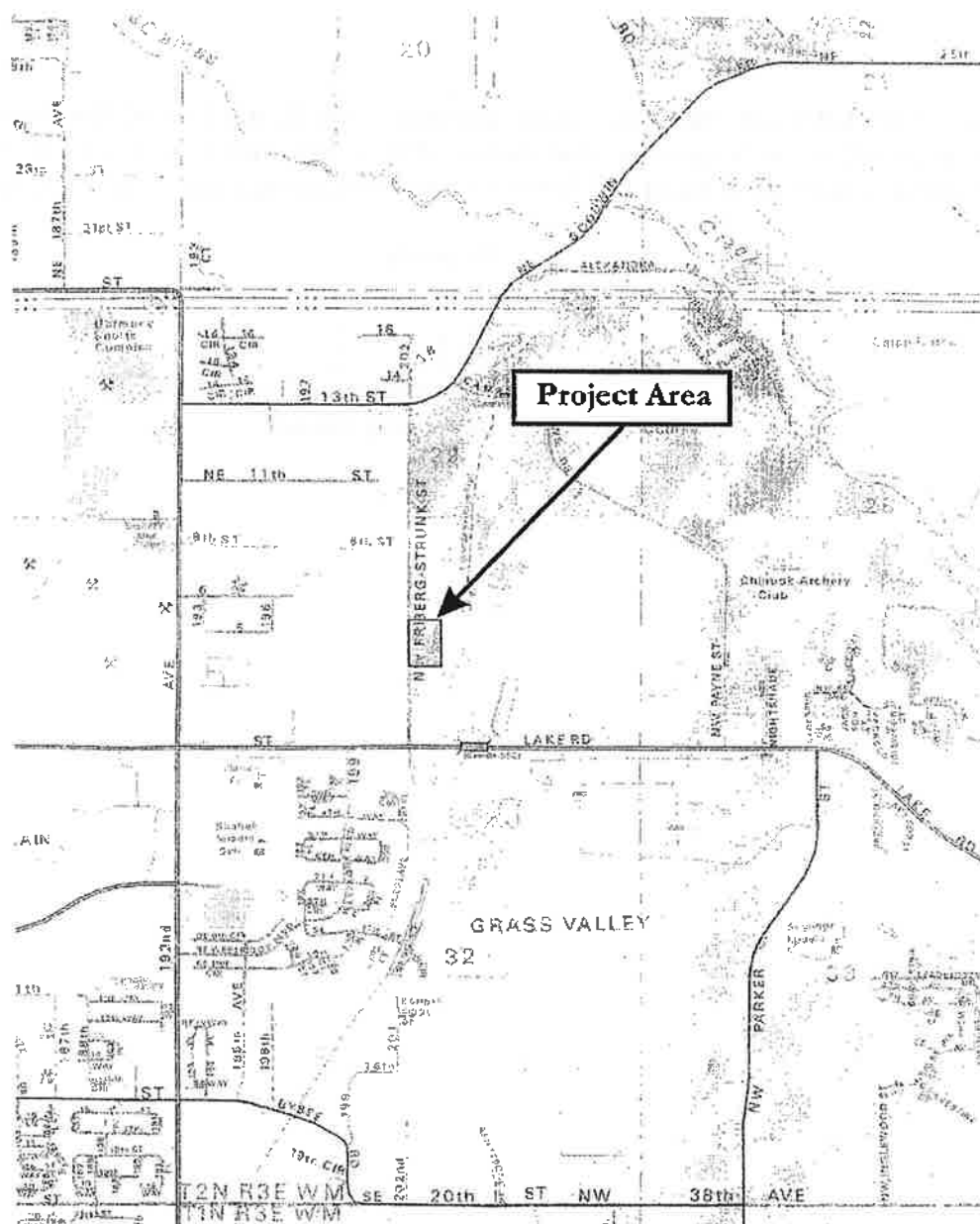
A copy of this letter with enclosure will be furnished to Mr. Dustin Day, of The Resource Company, at 2008 C Street, Vancouver, Washington 98663. If you have any questions about this letter, please contact me at (360) 750-9046 or via email at steven.k.gagnon@usace.army.mil.

Sincerely,



Steven Gagnon, Project Manager
Regulatory Branch

Enclosures



1000 2000

Scale 1" = 2000'

Location: Lat 45.6242N

Long 122.4651W

Union Self-Storage Project

APPLICANT:
Kirkland Development, LLC
19215 SE 34th Street
Suite 106-Box 341
Camas, WA 98607

PURPOSE: Preliminary Wetland Mitigation Plan

Location Map Union Self-Storage Project Camas, WA

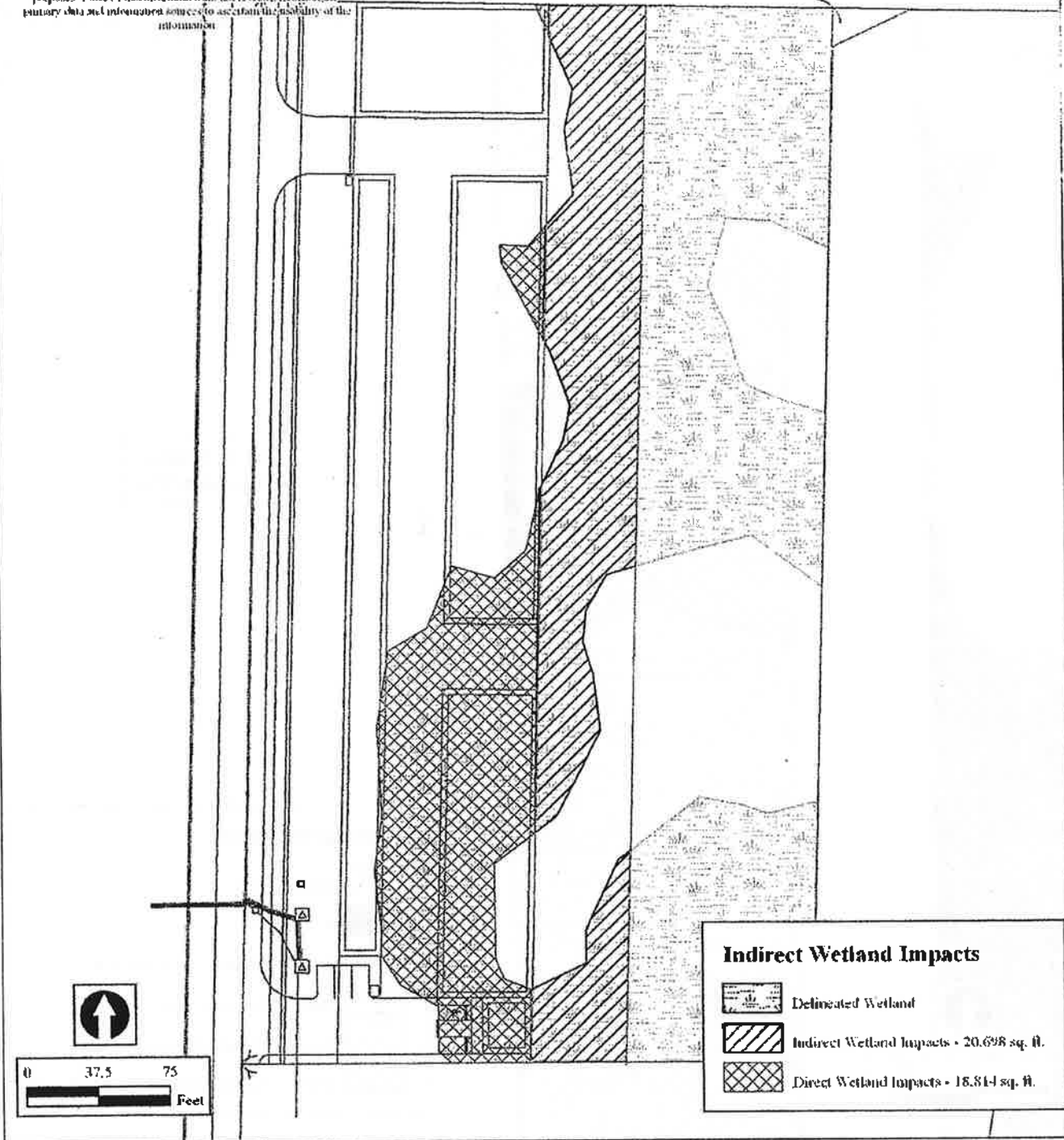
The Resource Company, Inc.
Environmental Services

2008 C Street Vancouver, WA 98663 ph: 360-693-4555 fax: 360-699-6242

PROPOSED ACTIVITIES IN:
Lacamas Creek Watershed
LEGAL: SE 1/4 of Section 29, T02N,
R03E, W. M.
NEAR: Camas, WA
COUNTY: Clark County, WA
DATE: Revised March 2, 2009

Figure 1

This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. Users of this information should review and consult the primary data and independent sources to ascertain the reliability of the information.



Union Self-Storage Project

APPLICANT:
Kirkland Development, LLC
19215 SE 34th Street
Suite 106-Box 341
Camas, WA 98607

PURPOSE: Preliminary Wetland Mitigation Plan

Proposed Indirect Impacts Union Self-Storage Project Camas, WA

The Resource Company, Inc.
Environmental Services

2008 C Street Vancouver, WA 98663 ph: 360-693-4555 fax: 360-699-6242

PROPOSED ACTIVITIES IN:
Lacamas Creek Watershed
LEGAL: SE 1/4 of Section 29, T02N,
R03E, W. M.
NEAR: Camas, WA
COUNTY: Clark County, WA
DATE: Revised March 2, 2009

Figure 6

This product is for informational purposes and may not have been prepared for, or be suitable for, legal, engineering, or surveying purposes. Users of this information should review or consult the primary data and information sources to ascertain the reliability of the information.

City of Camas
Mitigation Site

Wetland Mitigation

-  Delineated Wetland
-  Proposed Berm
-  Direct Wetland Impacts - 18,814 sq. ft.
-  Proposed Wetland Creation - 18,814 sq. ft.
-  Proposed Wetland Enhancement - 20,602 sq. ft.
-  Proposed Wetland Rehabilitation - 11,456 sq. ft.

Union Self-Storage Project

APPLICANT:
Kirkland Development, LLC
19215 SE 34th Street
Suite 106-Box 341
Camas, WA 98607

PURPOSE: Preliminary Wetland Mitigation Plan

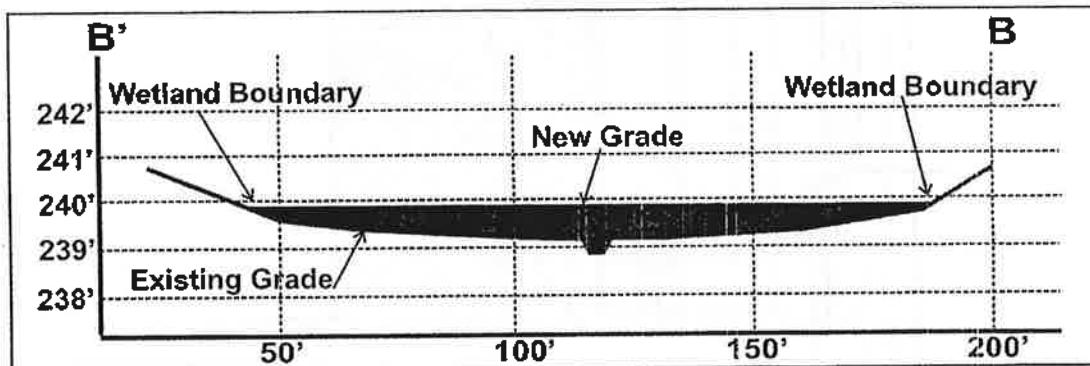
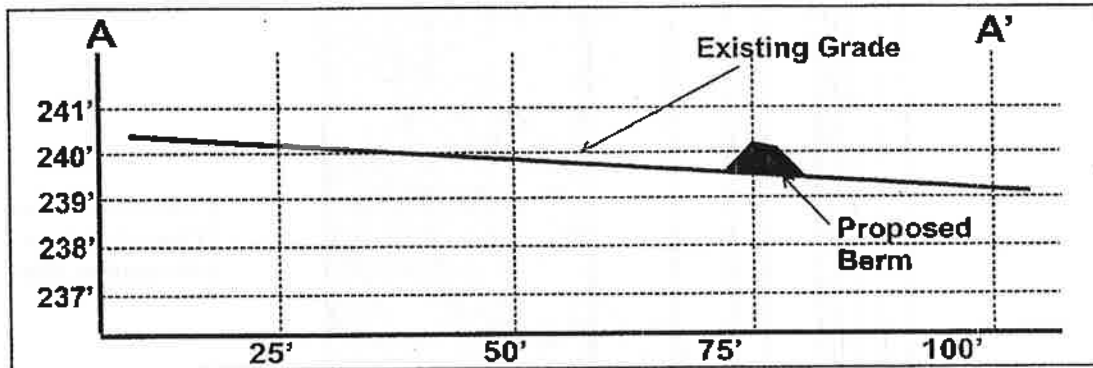
Proposed Creation Details Union Self-Storage Project Camas, WA

The Resource Company, Inc.
Environmental Services

2008 C Street Vancouver, WA 98663 ph: 360-693-4555 fax: 360-699-6242

PROPOSED ACTIVITIES IN:
Lacamas Creek Watershed
LEGAL: SE 1/4 of Section 29, T02N,
R03E, W. M.
NEAR: Camas, WA
COUNTY: Clark County, WA
DATE: Revised March 2, 2009

Figure 8



Union Self-Storage Project

APPLICANT:
Kirkland Development, LLC
19215 SE 34th Street
Suite 105-Box 341
Camas, WA 98607

PURPOSE: Preliminary Wetland Mitigation Plan

**Berm Cross-Sections
Union Self-Storage Project
Camas, WA**

The Resource Company, Inc.
Environmental Services

2008 C Street Vancouver, WA 98663 ph: 360-693-4555 fax: 360-699-6242

PROPOSED ACTIVITIES IN:
Lacamas Creek Watershed
LEGAL: SE 1/4 of Section 29, T02N,
R03E, W. M.
NEAR: Camas, WA
COUNTY: Clark County, WA
DATE: Revised March 2, 2009

Figure 9

This product is for informational purposes and may not have been prepared for, or be suitable for legal, engineering or surveying purposes. Users of this information should review or consult the primary data and information sources to ascertain the reliability of the information.

Buffer Enhancement for Indirect Wetland Impacts
28,287 Square Feet (1:1.4 ratio)
Planted with Trees and Shrubs
See Text for Details.

City of Camas
Mitigation Site

Wetland Mitigation

	Proposed Berni		Proposed Wetland Creation - 18,814 sq. ft.
	Direct Wetland Impacts - 18,814 sq. ft.		Proposed Wetland Enhancement - 20,602 sq. ft.
	Proposed Upland Buffer Enhancement - 7,814 sq. ft.		Proposed Wetland Rehabilitation - 11,456 sq. ft.
	Proposed Wetland Buffer Enhancement - 20,473 sq. ft.		



0 50 100
 Feet

Union Self-Storage Project

APPLICANT:
 Kirkland Development, LLC
 19215 SE 34th Street
 Suite 106-Box 341
 Camas, WA 98607

PURPOSE: Preliminary Wetland Mitigation Plan

Mitigation for Indirect Impacts Union Self-Storage Project Camas, WA

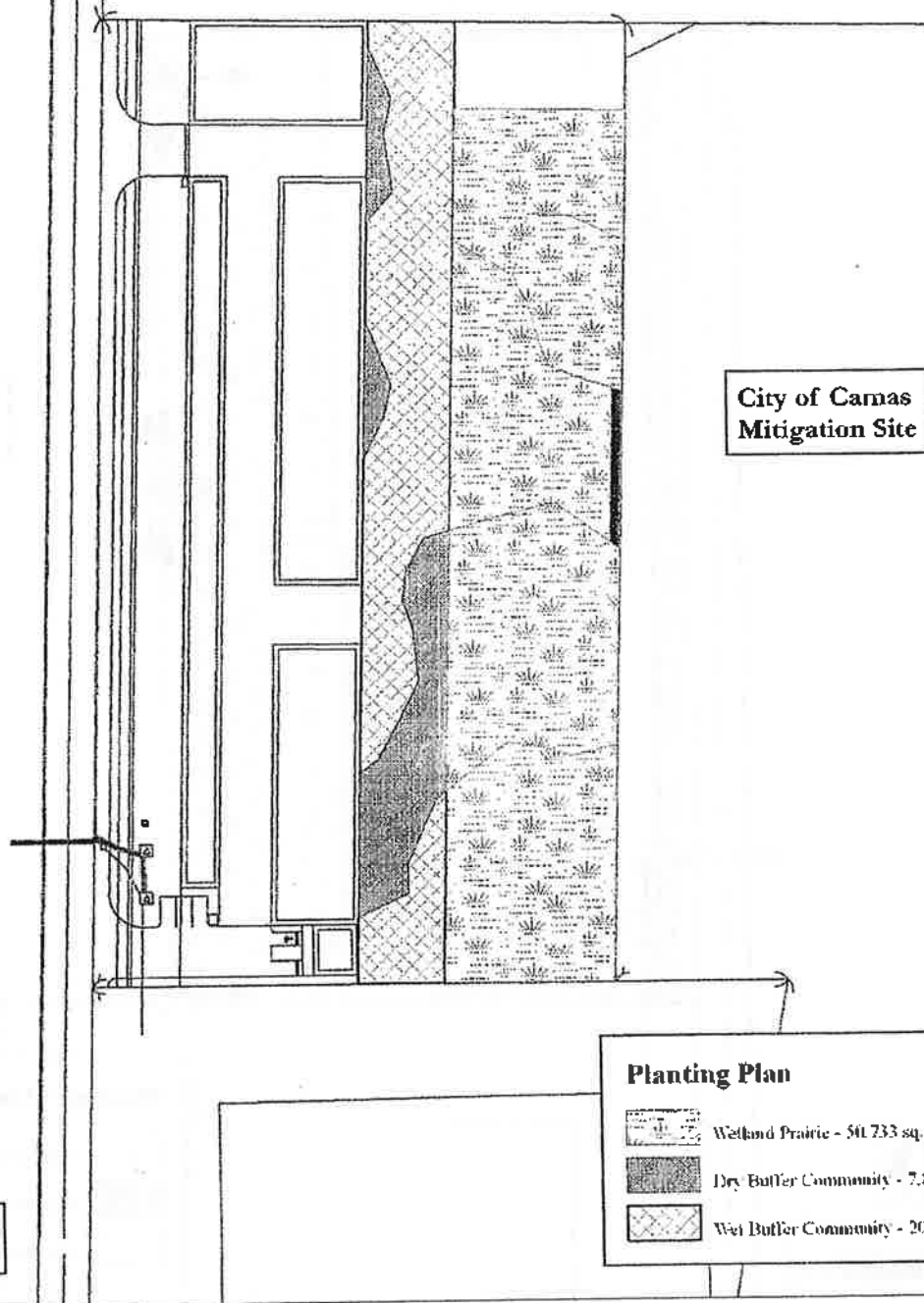
The Resource Company, Inc.
Environmental Services

2008 C Street Vancouver, WA 98663 ph: 360-693-4555 fax: 360-699-6242

PROPOSED ACTIVITIES IN:
 Lacamas Creek Watershed
LEGAL: SE 1/4 of Section 29, T02N,
 R03E, W. M.
NEAR: Camas, WA
COUNTY: Clark County, WA
DATE: Revised March 2, 2009

Figure 10

This product is for informational purposes and may not have been prepared for, or be suitable for legal, engineering or surveying purposes. Users of this information should verify or consult the primary data and information sources to ascertain the reliability of the information.



Union Self-Storage Project

APPLICANT:
Kirkland Development, LLC
19215 SE 34th Street
Suite 106-Box 341
Camas, WA 98607

PURPOSE: Preliminary Wetland Mitigation Plan

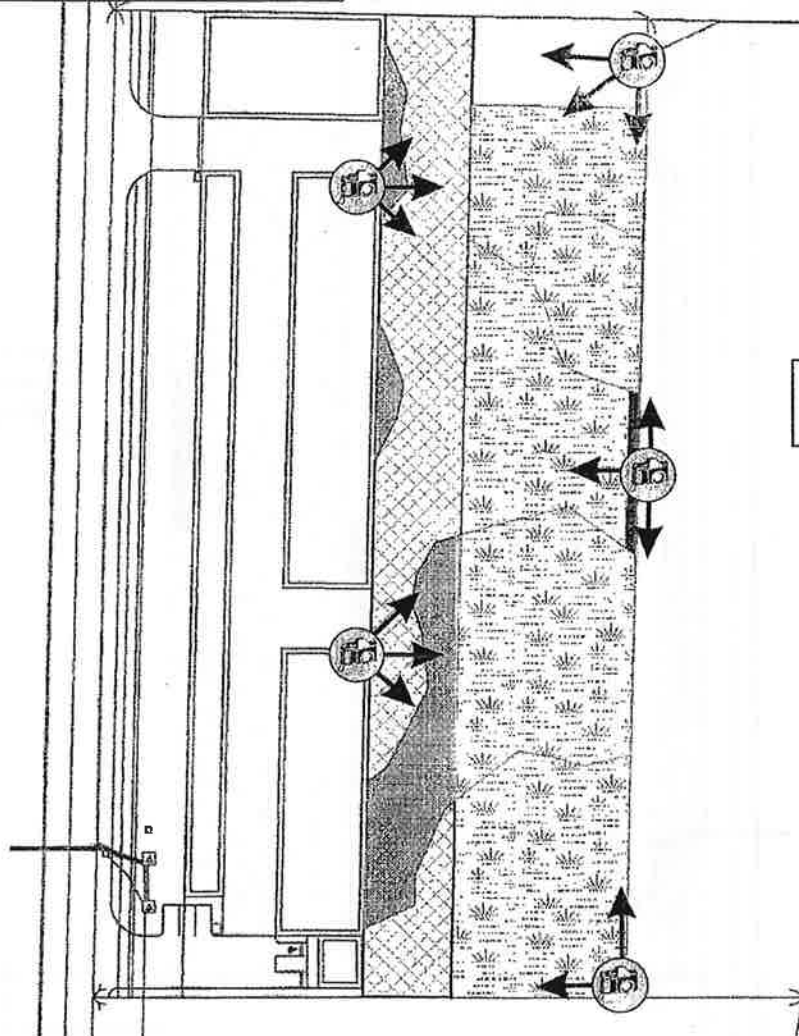
Proposed Planting Plan Union Self-Storage Project Camas, WA

The Resource Company, Inc.
Environmental Services

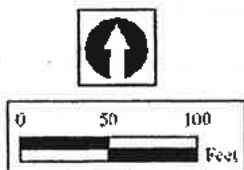
2008 C Street Vancouver, WA 98663 ph: 360-693-4555 fax: 360-699-6242

PROPOSED ACTIVITIES IN:
Lacamas Creek Watershed
LEGAL: SE 1/4 of Section 29, T02N,
R03E, W. M.
NEAR: Camas, WA
COUNTY: Clark County, WA
DATE: Revised March 2, 2009

Figure 11



**City of Camas
Mitigation Site**



Planting Plan

	Wetland Prairie - 50,733 sq. ft.
	Dry Buffer Community - 7,841 sq. ft.
	Wet Buffer Community - 20,473 sq. ft.

Union Self-Storage Project

APPLICANT:
Kirkland Development, LLC
19215 SE 34th Street
Suite 106-Box 341
Camas, WA 98607

PURPOSE: Preliminary Wetland Mitigation Plan

**Photo - Station Locations
Union Self-Storage Project
Camas, WA**

The Resource Company, Inc.
Environmental Services

2009 C Street Vancouver, WA 98663 ph: 360-693-4555 fax: 360-699-6242

PROPOSED ACTIVITIES IN:
Lacamas Creek Watershed
LEGAL: SE 1/4 of Section 29, T02N,
R03E, W. M.
NEAR: Camas, WA
COUNTY: Clark County, WA
DATE: Revised March 2, 2009

Figure 12



US Army Corps
of Engineers
Seattle District

NATIONWIDE PERMIT 39

Terms and Conditions

Effective Date: September 10, 2007



- A. Description of Authorized Activities
- B. Corps National General Conditions for all NWP
- C. Corps Seattle District Regional General Conditions
- D. Corps Regional Specific Conditions for this NWP
- E. State 401 Certification General Conditions
- F. State 401 Certification Specific Conditions for this NWP
- G. EPA 401 Certification General Conditions
- H. EPA 401 Certification Specific Conditions for this NWP
- I. Spokane Tribe of Indians 401 Certification General Conditions
- J. Tribal 401 Certification Specific Conditions for this NWP
- K. CZM Consistency Response Specific Conditions for this NWP
- L. Additional Limitations on the Use of NWPs

In addition to any special condition that may be required on a case-by-case basis by the District Engineer, the following terms and conditions must be met, as applicable, for a Nationwide Permit 39 authorization to be valid in Washington State.

A. DESCRIPTION OF AUTHORIZED ACTIVITIES

39. Commercial and Institutional Developments. Discharges of dredged or fill material into non-tidal waters of the United States for the construction or expansion of commercial and institutional building foundations and building pads and attendant features that are necessary for the use and maintenance of the structures. Attendant features may include, but are not limited to, roads, parking lots, garages, yards, utility lines, storm water management facilities, and recreation facilities such as playgrounds and playing fields. Examples of commercial developments include retail stores, industrial facilities, restaurants, business parks, and shopping centers. Examples of institutional developments include schools, fire stations, government office buildings, judicial buildings, public works buildings, libraries, hospitals, and places of worship. The construction of new golf courses, new ski areas, or oil and gas wells is not authorized by this NWP.

The discharge must not cause the loss of greater than 1/2-acre of non-tidal waters of the United States, including the loss of no more than 300 linear feet of stream bed, unless for intermittent and ephemeral stream beds this 300

linear foot limit is waived in writing by the district engineer. This NWP does not authorize discharges into non-tidal wetlands adjacent to tidal waters.

Notification: The permittee must submit a pre-construction notification to the district engineer prior to commencing the activity. (See general condition 27.) (Sections 10 and 404)

B. CORPS NATIONAL GENERAL CONDITIONS FOR ALL NWPs

1. Navigation. (a) No activity may cause more than a minimal adverse effect on navigation. (b) Any safety lights and signals prescribed by the U.S. Coast Guard, through regulations or otherwise, must be installed and maintained at the permittee's expense on authorized facilities in navigable waters of the United States. (c) The permittee understands and agrees that, if future operations by the United States require the removal, relocation, or other alteration, of the structure or work herein authorized, or if, in the opinion of the Secretary of the Army or his authorized representative, said structure or work shall cause unreasonable obstruction to the free navigation of the navigable waters, the permittee will be required, upon due notice from the Corps of Engineers, to remove, relocate, or alter the structural work or obstructions caused thereby, without expense to the United States. No claim shall be made against the United States on account of any such removal or alteration.

2. Aquatic Life Movements. No activity may substantially disrupt the necessary life cycle movements of those species of aquatic life indigenous to the waterbody, including those species that normally migrate through the area, unless the activity's primary purpose is to impound water. Culverts placed in streams must be installed to maintain low flow conditions.

3. Spawning Areas. Activities in spawning areas during spawning seasons must be avoided to the maximum extent practicable. Activities that result in the physical destruction (e.g., through excavation, fill, or downstream smothering by substantial turbidity) of an important spawning area are not authorized.

4. Migratory Bird Breeding Areas. Activities in waters of the United States that serve as breeding areas for migratory birds must be avoided to the maximum extent practicable.

5. Shellfish Beds. No activity may occur in areas of concentrated shellfish populations, unless the activity is directly related to a shellfish harvesting activity authorized by NWPs 4 and 48.

6. Suitable Material. No activity may use unsuitable material (e.g., trash, debris, car bodies, asphalt, etc.). Material used for construction or discharged must be free from toxic pollutants in toxic amounts (see Section 307 of the Clean Water Act).

7. Water Supply Intakes. No activity may occur in the proximity of a public water supply intake, except where the activity is for the repair or improvement of public water supply intake structures or adjacent bank stabilization.

8. Adverse Effects From Impoundments. If the activity creates an impoundment of water, adverse effects to the aquatic system due to accelerating the passage of water, and/or restricting its flow must be minimized to the maximum extent practicable.

9. Management of Water Flows. To the maximum extent practicable, the pre-construction course, condition, capacity, and location of open waters must be maintained for each activity, including stream channelization and storm water management activities, except as provided below. The activity must be constructed to withstand expected high flows. The activity must not restrict or impede the passage of normal or high flows, unless the primary purpose of the activity is to impound water or manage high flows. The activity may alter the pre-construction course, condition, capacity, and location of open waters if it benefits the aquatic environment (e.g., stream restoration or relocation activities).

10. Fills Within 100-Year Floodplains. The activity must comply with applicable FEMA-approved state or local floodplain management requirements.

11. Equipment. Heavy equipment working in wetlands or mudflats must be placed on mats, or other measures must be taken to minimize soil disturbance.

12. Soil Erosion and Sediment Controls. Appropriate soil erosion and sediment controls must be used and maintained in effective operating condition during construction, and all exposed soil and other fills, as well as any work below the ordinary high water mark or high tide line, must be permanently stabilized at the earliest practicable date. Permittees are encouraged to perform work within waters of the United States during periods of low-flow or no-flow.

13. Removal of Temporary Fills. Temporary fills must be removed in their entirety and the affected areas returned to pre-construction elevations. The affected areas must be revegetated, as appropriate.

14. Proper Maintenance. Any authorized structure or fill shall be properly maintained, including maintenance to ensure public safety.

15. Wild and Scenic Rivers. No activity may occur in a component of the National Wild and Scenic River System, or in a river officially designated by Congress as a "study river" for possible inclusion in the system while the river is in an official study status, unless the appropriate Federal agency with direct management responsibility for such river, has determined in writing that the proposed activity will not adversely affect the Wild and Scenic River designation or study status. Information on Wild and Scenic Rivers may be obtained from the appropriate Federal land management agency in the area (e.g., National Park Service, U.S. Forest Service, Bureau of Land Management, U.S. Fish and Wildlife Service).

16. Tribal Rights. No activity or its operation may impair reserved tribal rights, including, but not limited to, reserved water rights and treaty fishing and hunting rights.

17. Endangered Species. (a) No activity is authorized under any NWP which is likely to jeopardize the continued existence of a threatened or endangered species or a species proposed for such designation, as identified under the Federal Endangered Species Act (ESA), or which will destroy or adversely modify the critical habitat of such species. No activity is authorized under any NWP which "may affect" a listed species or critical habitat, unless Section 7 consultation addressing the effects of the proposed activity has been completed. (b) Federal agencies should follow their own procedures for complying with the requirements of the ESA. Federal permittees must provide the district engineer with the appropriate documentation to demonstrate compliance with those requirements. (c) Non-federal permittees shall notify the district engineer if any listed species or designated critical habitat might be affected or is in the vicinity of the project, or if the project is located in designated critical habitat, and shall not begin work on the activity until notified by the district engineer that the requirements of the ESA have been satisfied and that the activity is authorized. For activities that might affect Federally-listed endangered or threatened species or designated critical habitat, the pre-construction notification must include the name(s) of the endangered or threatened species that may be affected by the proposed work or that utilize the designated critical habitat that may be affected by the proposed work. The district engineer will determine whether the proposed activity "may affect" or will have "no effect" to listed species and designated critical habitat and will notify the non-Federal applicant of the Corps' determination within 45 days of receipt of a complete pre-construction notification. In cases where the non-Federal applicant has identified listed species or critical habitat that might be affected or is in the vicinity of the project, and has so notified the Corps, the applicant shall not begin work until the Corps has provided notification the proposed activities will have "no effect" on listed species or critical habitat, or until Section 7 consultation has been completed. (d) As a result of formal or informal consultation with the FWS or NMFS the district engineer may add species-specific regional endangered species conditions to the NWPs. (e) Authorization of an activity by a NWP does not authorize the "take" of a threatened or endangered species as defined under the ESA. In the absence of separate authorization (e.g., an ESA Section 10 Permit, a Biological Opinion with "incidental take" provisions, etc.) from the U.S. FWS or the NMFS, both lethal and non-lethal "takes" of protected species are in violation of the ESA. Information on the location of threatened and endangered species and their critical habitat can be obtained directly from the offices of the U.S. FWS and NMFS or their World Wide Web pages at <http://www.fws.gov/> and <http://www.noaa.gov/fisheries.html> respectively.

18. Historic Properties. (a) In cases where the district engineer determines that the activity may affect properties listed, or eligible for listing, in the National Register of Historic Places, the activity is not authorized, until the

requirements of Section 106 of the National Historic Preservation Act (NHPA) have been satisfied. (b) Federal permittees should follow their own procedures for complying with the requirements of Section 106 of the National Historic Preservation Act. Federal permittees must provide the district engineer with the appropriate documentation to demonstrate compliance with those requirements. (c) Non-federal permittees must submit a pre-construction notification to the district engineer if the authorized activity may have the potential to cause effects to any historic properties listed, determined to be eligible for listing on, or potentially eligible for listing on the National Register of Historic Places, including previously unidentified properties. For such activities, the pre-construction notification must state which historic properties may be affected by the proposed work or include a vicinity map indicating the location of the historic properties or the potential for the presence of historic properties. Assistance regarding information on the location of or potential for the presence of historic resources can be sought from the State Historic Preservation Officer or Tribal Historic Preservation Officer, as appropriate, and the National Register of Historic Places (see 33 CFR 330.4(g)). The district engineer shall make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey. Based on the information submitted and these efforts, the district engineer shall determine whether the proposed activity has the potential to cause an effect on the historic properties. Where the non-Federal applicant has identified historic properties which the activity may have the potential to cause effects and so notified the Corps, the non-Federal applicant shall not begin the activity until notified by the district engineer either that the activity has no potential to cause effects or that consultation under Section 106 of the NHPA has been completed. (d) The district engineer will notify the prospective permittee within 45 days of receipt of a complete pre-construction notification whether NHPA Section 106 consultation is required. Section 106 consultation is not required when the Corps determines that the activity does not have the potential to cause effects on historic properties (see 36 CFR §800.3(a)). If NHPA section 106 consultation is required and will occur, the district engineer will notify the non-Federal applicant that he or she cannot begin work until Section 106 consultation is completed. (e) Prospective permittees should be aware that section 110k of the NHPA (16 U.S.C. 470h-2(k)) prevents the Corps from granting a permit or other assistance to an applicant who, with intent to avoid the requirements of Section 106 of the NHPA, has intentionally significantly adversely affected a historic property to which the permit would relate, or having legal power to prevent it, allowed such significant adverse effect to occur, unless the Corps, after consultation with the Advisory Council on Historic Preservation (ACHP), determines that circumstances justify granting such assistance despite the adverse effect created or permitted by the applicant. If circumstances justify granting the assistance, the Corps is required to notify the ACHP and provide documentation specifying the circumstances, explaining the degree of damage to the integrity of any historic properties affected, and proposed mitigation. This documentation must include any views obtained from the applicant, SHPO/THPO, appropriate Indian tribes if the undertaking occurs on or affects historic properties on tribal lands or affects properties of interest to those tribes, and other parties known to have a legitimate interest in the impacts to the permitted activity on historic properties.

19. Designated Critical Resource Waters. Critical resource waters include, NOAA-designated marine sanctuaries, National Estuarine Research Reserves, state natural heritage sites, and outstanding national resource waters or other waters officially designated by a state as having particular environmental or ecological significance and identified by the district engineer after notice and opportunity for public comment. The district engineer may also designate additional critical resource waters after notice and opportunity for comment. (a) Discharges of dredged or fill material into waters of the United States are not authorized by NWP 7, 12, 14, 16, 17, 21, 29, 31, 35, 39, 40, 42, 43, 44, 49, and 50 for any activity within, or directly affecting, critical resource waters, including wetlands adjacent to such waters. (b) For NWPs 3, 8, 10, 13, 15, 18, 19, 22, 23, 25, 27, 28, 30, 33, 34, 36, 37, and 38, notification is required in accordance with general condition 27, for any activity proposed in the designated critical resource waters including wetlands adjacent to those waters. The district engineer may authorize activities under these NWPs only after it is determined that the impacts to the critical resource waters will be no more than minimal.

20. Mitigation. The district engineer will consider the following factors when determining appropriate and practicable mitigation necessary to ensure that adverse effects on the aquatic environment are minimal: (a) The activity must be designed and constructed to avoid and minimize adverse effects, both temporary and permanent, to waters of the United States to the maximum extent practicable at the project site (i.e., on site). (b) Mitigation in all its forms (avoiding, minimizing, rectifying, reducing, or compensating) will be required to the extent necessary to ensure that the adverse effects to the aquatic environment are minimal. (c) Compensatory mitigation at a minimum one-for-one ratio will be required for all wetland losses that exceed 1/10 acre and require pre-construction

notification, unless the district engineer determines in writing that some other form of mitigation would be more environmentally appropriate and provides a project-specific waiver of this requirement. For wetland losses of 1/10 acre or less that require pre-construction notification, the district engineer may determine on a case-by-case basis that compensatory mitigation is required to ensure that the activity results in minimal adverse effects on the aquatic environment. Since the likelihood of success is greater and the impacts to potentially valuable uplands are reduced, wetland restoration should be the first compensatory mitigation option considered. (d) For losses of streams or other open waters that require pre-construction notification, the district engineer may require compensatory mitigation, such as stream restoration, to ensure that the activity results in minimal adverse effects on the aquatic environment. (e) Compensatory mitigation will not be used to increase the acreage losses allowed by the acreage limits of the NWP. For example, if an NWP has an acreage limit of 1/2 acre, it cannot be used to authorize any project resulting in the loss of greater than 1/2 acre of waters of the United States, even if compensatory mitigation is provided that replaces or restores some of the lost waters. However, compensatory mitigation can and should be used, as necessary, to ensure that a project already meeting the established acreage limits also satisfies the minimal impact requirement associated with the NWP. (f) Compensatory mitigation plans for projects in or near streams or other open waters will normally include a requirement for the establishment, maintenance, and legal protection (e.g., conservation easements) of riparian areas next to open waters. In some cases, riparian areas may be the only compensatory mitigation required. Riparian areas should consist of native species. The width of the required riparian area will address documented water quality or aquatic habitat loss concerns. Normally, the riparian area will be 25 to 50 feet wide on each side of the stream, but the district engineer may require slightly wider riparian areas to address documented water quality or habitat loss concerns. Where both wetlands and open waters exist on the project site, the district engineer will determine the appropriate compensatory mitigation (e.g., riparian areas and/or wetlands compensation) based on what is best for the aquatic environment on a watershed basis. In cases where riparian areas are determined to be the most appropriate form of compensatory mitigation, the district engineer may waive or reduce the requirement to provide wetland compensatory mitigation for wetland losses. (g) Permittees may propose the use of mitigation banks, in-lieu fee arrangements or separate activity-specific compensatory mitigation. In all cases, the mitigation provisions will specify the party responsible for accomplishing and/or complying with the mitigation plan. (h) Where certain functions and services of waters of the United States are permanently adversely affected, such as the conversion of a forested or scrub-shrub wetland to a herbaceous wetland in a permanently maintained utility line right-of-way, mitigation may be required to reduce the adverse effects of the project to the minimal level.

21. Water Quality. Where States and authorized Tribes, or EPA where applicable, have not previously certified compliance of an NWP with CWA Section 401, individual 401 Water Quality Certification must be obtained or waived (see 33 CFR 330.4(c)). The district engineer or State or Tribe may require additional water quality management measures to ensure that the authorized activity does not result in more than minimal degradation of water quality.

22. Coastal Zone Management. In coastal states where an NWP has not previously received a state coastal zone management consistency concurrence, an individual state coastal zone management consistency concurrence must be obtained, or a presumption of concurrence must occur (see 33 CFR 330.4(d)). The district engineer or a State may require additional measures to ensure that the authorized activity is consistent with state coastal zone management requirements.

23. Regional and Case-By-Case Conditions. The activity must comply with any regional conditions that may have been added by the Division Engineer (see 33 CFR 330.4(e)) and with any case specific conditions added by the Corps or by the state, Indian Tribe, or U.S. EPA in its section 401 Water Quality Certification, or by the state in its Coastal Zone Management Act consistency determination.

24. Use of Multiple Nationwide Permits. The use of more than one NWP for a single and complete project is prohibited, except when the acreage loss of waters of the United States authorized by the NWP does not exceed the acreage limit of the NWP with the highest specified acreage limit. For example, if a road crossing over tidal waters is constructed under NWP 14, with associated bank stabilization authorized by NWP 13, the maximum acreage loss of waters of the United States for the total project cannot exceed 1/3-acre.

25. Transfer of Nationwide Permit Verifications. If the permittee sells the property associated with a nationwide permit verification, the permittee may transfer the nationwide permit verification to the new owner by submitting a

letter to the appropriate Corps district office to validate the transfer. A copy of the nationwide permit verification must be attached to the letter, and the letter must contain the following statement and signature:

"When the structures or work authorized by this nationwide permit are still in existence at the time the property is transferred, the terms and conditions of this nationwide permit, including any special conditions, will continue to be binding on the new owner(s) of the property. To validate the transfer of this nationwide permit and the associated liabilities associated with compliance with its terms and conditions, have the transferee sign and date below."

(Transferee)

(Date)

26. Compliance Certification. Each permittee who received an NWP verification from the Corps must submit a signed certification regarding the completed work and any required mitigation. The certification form must be forwarded by the Corps with the NWP verification letter and will include: (a) A statement that the authorized work was done in accordance with the NWP authorization, including any general or specific conditions; (b) A statement that any required mitigation was completed in accordance with the permit conditions; and (c) The signature of the permittee certifying the completion of the work and mitigation.

27. Pre-Construction Notification. (a) Timing. Where required by the terms of the NWP, the prospective permittee must notify the district engineer by submitting a pre-construction notification (PCN) as early as possible. The district engineer must determine if the PCN is complete within 30 calendar days of the date of receipt and, as a general rule, will request additional information necessary to make the PCN complete only once. However, if the prospective permittee does not provide all of the requested information, then the district engineer will notify the prospective permittee that the PCN is still incomplete and the PCN review process will not commence until all of the requested information has been received by the district engineer. The prospective permittee shall not begin the activity: (1) Until notified in writing by the district engineer that the activity may proceed under the NWP with any special conditions imposed by the district or division engineer; or (2) If 45 calendar days have passed from the district engineer's receipt of the complete PCN and the prospective permittee has not received written notice from the district or division engineer. However, if the permittee was required to notify the Corps pursuant to general condition 17 that listed species or critical habitat might be affected or in the vicinity of the project, or to notify the Corps pursuant to general condition 18 that the activity may have the potential to cause effects to historic properties, the permittee cannot begin the activity until receiving written notification from the Corps that is "no effect" on listed species or "no potential to cause effects" on historic properties, or that any consultation required under Section 7 of the Endangered Species Act (see 33 CFR 330.4(f)) and/or Section 106 of the National Historic Preservation Act (see 33 CFR 330.4(g)) is completed. Also, work cannot begin under NWPs 21, 49, or 50 until the permittee has received written approval from the Corps. If the proposed activity requires a written waiver to exceed specified limits of an NWP, the permittee cannot begin the activity until the district engineer issues the waiver. If the district or division engineer notifies the permittee in writing that an individual permit is required within 45 calendar days of receipt of a complete PCN, the permittee cannot begin the activity until an individual permit has been obtained. Subsequently, the permittee's right to proceed under the NWP may be modified, suspended, or revoked only in accordance with the procedure set forth in 33 CFR 330.5(d)(2).

(b) Contents of Pre-Construction Notification: The PCN must be in writing and include the following information: (1) Name, address and telephone numbers of the prospective permittee; (2) Location of the proposed project; (3) A description of the proposed project; the project's purpose; direct and indirect adverse environmental effects the project would cause; any other NWP(s), regional general permit(s), or individual permit(s) used or intended to be used to authorize any part of the proposed project or any related activity. The description should be sufficiently detailed to allow the district engineer to determine that the adverse effects of the project will be minimal and to determine the need for compensatory mitigation. Sketches should be provided when necessary to show that the activity complies with the terms of the NWP. (Sketches usually clarify the project and when provided result in a quicker decision.); (4) The PCN must include a delineation of special aquatic sites and other waters of the United States on the project site. Wetland delineations must be prepared in accordance with the current method required by the Corps. The permittee may ask the Corps to delineate the special aquatic sites and other waters of the United States, but there may be a delay if the Corps does the delineation, especially if the project site is large or contains many waters of the United States. Furthermore, the 45 day period will not start until the delineation has been

submitted to or completed by the Corps, where appropriate; (5) If the proposed activity will result in the loss of greater than 1/10 acre of wetlands and a PCN is required, the prospective permittee must submit a statement describing how the mitigation requirement will be satisfied. As an alternative, the prospective permittee may submit a conceptual or detailed mitigation plan. (6) If any listed species or designated critical habitat might be affected or is in the vicinity of the project, or if the project is located in designated critical habitat, for non-Federal applicants the PCN must include the name(s) of those endangered or threatened species that might be affected by the proposed work or utilize the designated critical habitat that may be affected by the proposed work. Federal applicants must provide documentation demonstrating compliance with the Endangered Species Act; and (7) For an activity that may affect a historic property listed on, determined to be eligible for listing on, or potentially eligible for listing on, the National Register of Historic Places, for non-Federal applicants the PCN must state which historic property may be affected by the proposed work or include a vicinity map indicating the location of the historic property. Federal applicants must provide documentation demonstrating compliance with Section 106 of the National Historic Preservation Act.

(c) Form of Pre-Construction Notification: The standard individual permit application form (Form ENG 4345) may be used, but the completed application form must clearly indicate that it is a PCN and must include all of the information required in paragraphs (b)(1) through (7) of this general condition. A letter containing the required information may also be used.

(d) Agency Coordination: (1) The district engineer will consider any comments from Federal and state agencies concerning the proposed activity's compliance with the terms and conditions of the NWP and the need for mitigation to reduce the project's adverse environmental effects to a minimal level. (2) For all NWP 48 activities requiring pre-construction notification and for other NWP activities requiring pre-construction notification to the district engineer that result in the loss of greater than 1/2-acre of waters of the United States, the district engineer will immediately provide (e.g., via facsimile transmission, overnight mail, or other expeditious manner) a copy of the PCN to the appropriate Federal or state offices (U.S. FWS, state natural resource or water quality agency, EPA, State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Office (THPO), and, if appropriate, the NMFS). With the exception of NWP 37, these agencies will then have 10 calendar days from the date the material is transmitted to telephone or fax the district engineer notice that they intend to provide substantive, site-specific comments. If so contacted by an agency, the district engineer will wait an additional 15 calendar days before making a decision on the pre-construction notification. The district engineer will fully consider agency comments received within the specified time frame, but will provide no response to the resource agency, except as provided below. The district engineer will indicate in the administrative record associated with each pre-construction notification that the resource agencies' concerns were considered. For NWP 37, the emergency watershed protection and rehabilitation activity may proceed immediately in cases where there is an unacceptable hazard to life or a significant loss of property or economic hardship will occur. The district engineer will consider any comments received to decide whether the NWP 37 authorization should be modified, suspended, or revoked in accordance with the procedures at 33 CFR 330.5. (3) In cases of where the prospective permittee is not a Federal agency, the district engineer will provide a response to NMFS within 30 calendar days of receipt of any Essential Fish Habitat conservation recommendations, as required by Section 305(b)(4)(B) of the Magnuson-Stevens Fishery Conservation and Management Act. (4) Applicants are encouraged to provide the Corps multiple copies of pre-construction notifications to expedite agency coordination. (5) For NWP 48 activities that require reporting, the district engineer will provide a copy of each report within 10 calendar days of receipt to the appropriate regional office of the NMFS.

(e) District Engineer's Decision: In reviewing the PCN for the proposed activity, the district engineer will determine whether the activity authorized by the NWP will result in more than minimal individual or cumulative adverse environmental effects or may be contrary to the public interest. If the proposed activity requires a PCN and will result in a loss of greater than 1/10 acre of wetlands, the prospective permittee should submit a mitigation proposal with the PCN. Applicants may also propose compensatory mitigation for projects with smaller impacts. The district engineer will consider any proposed compensatory mitigation the applicant has included in the proposal in determining whether the net adverse environmental effects to the aquatic environment of the proposed work are minimal. The compensatory mitigation proposal may be either conceptual or detailed. If the district engineer determines that the activity complies with the terms and conditions of the NWP and that the adverse effects on the aquatic environment are minimal, after considering mitigation, the district engineer will notify the permittee and include any conditions the district engineer deems necessary. The district engineer must approve any compensatory mitigation proposal before the permittee commences work. If the prospective permittee elects to submit a compensatory mitigation plan with the PCN, the district engineer will expeditiously review the proposed compensatory mitigation plan. The district engineer must review the plan within 45 calendar days of receiving a complete PCN and determine whether the proposed mitigation would ensure no more than minimal adverse effects

on the aquatic environment. If the net adverse effects of the project on the aquatic environment (after consideration of the compensatory mitigation proposal) are determined by the district engineer to be minimal, the district engineer will provide a timely written response to the applicant. The response will state that the project can proceed under the terms and conditions of the NWP.

If the district engineer determines that the adverse effects of the proposed work are more than minimal, then the district engineer will notify the applicant either: (1) That the project does not qualify for authorization under the NWP and instruct the applicant on the procedures to seek authorization under an individual permit; (2) that the project is authorized under the NWP subject to the applicant's submission of a mitigation plan that would reduce the adverse effects on the aquatic environment to the minimal level; or (3) that the project is authorized under the NWP with specific modifications or conditions. Where the district engineer determines that mitigation is required to ensure no more than minimal adverse effects occur to the aquatic environment, the activity will be authorized within the 45-day PCN period. The authorization will include the necessary conceptual or specific mitigation or a requirement that the applicant submit a mitigation plan that would reduce the adverse effects on the aquatic environment to the minimal level. When mitigation is required, no work in waters of the United States may occur until the district engineer has approved a specific mitigation plan.

28. Single and Complete Project. The activity must be a single and complete project. The same NWP cannot be used more than once for the same single and complete project.

C. Corps Seattle District Regional General Conditions

1. Aquatic Resources Requiring Special Protection. The following restrictions apply to activities in Washington State requiring Department of the Army authorization:

(a) Activities resulting in a loss of waters of the United States in a mature forested wetland, bog, bog-like wetland, aspen-dominated wetland, or alkali wetland are not authorized by NWP, except the following NWPs:

- NWP 3 – Maintenance
- NWP 20 – Oil Spill Cleanup
- NWP 32 – Completed Enforcement Actions
- NWP 38 – Cleanup of Hazardous and Toxic Waste
- NWP 47 – Pipeline Safety Program Designated Time Sensitive Inspections and Repairs

(b) For activities in or affecting a mature forested wetland, bog, bog-like wetland, wetland in a dunal system along the Washington coast, vernal pool, aspen-dominated wetland, alkali wetland, camas prairie wetland, or marine water with eelgrass beds (except for NWP 48) and not prohibited by the preceding general regional condition 1.a., the permittee must submit a pre-construction notification to the District Engineer in accordance with Nationwide Permit General Condition 27 (Pre-Construction Notification).

2. Access. You must allow representatives of this office to inspect the authorized activity at any time deemed necessary to ensure that the work is being, or has been, accomplished in accordance with the terms and conditions of your permit.

3. Commencement Bay. Activities requiring Department of the Army authorization and located in the Commencement Bay Study Area are not authorized by the following NWPs:

- NWP 12 – Utility Line Activities (substations)
- NWP 13 – Bank Stabilization
- NWP 14 – Linear Transportation Projects
- NWP 23 – Approved Categorical Exclusions
- NWP 29 – Residential Developments
- NWP 39 – Commercial and Institutional Developments
- NWP 40 – Agricultural Activities
- NWP 41 – Reshaping Existing Drainage Ditches
- NWP 42 – Recreational Facilities
- NWP 43 – Stormwater Management Facilities

4. **Bank Stabilization.** All bank stabilization projects require pre-construction notification to the District Engineer in accordance with Nationwide Permit General Condition 27 (Pre-Construction Notification). Each notification must include a planting plan using native riparian plant species unless the applicant demonstrates that a planting plan is not appropriate or not practicable. Each notification must also include the following information, except as waived by the District Engineer:

- (a) Need for the work, including the cause of the erosion and the threat posed to structures, infrastructure, and/or public safety.
- (b) Current and expected post-project sediment movement and deposition patterns in and near the project area.
- (c) Current and expected post-project habitat conditions, including the presence of fish, wildlife and plant species in the project area.
- (d) Demonstration that the proposed project incorporates the least environmentally damaging practicable bank protection methods. These methods include, but are not limited to, the use of bioengineering, biotechnical design, root wads, large woody debris, native plantings, and beach nourishment in certain circumstances. If rock must be used due to site erosion conditions, explain how the bank stabilization structure incorporates elements beneficial to fish.
- (e) Assessment of the likely impact of the proposed work on upstream, downstream and cross-stream properties (at a minimum the area assessed should extend from the nearest upstream bend to the nearest downstream bend of the watercourse). Discuss the methodology used for determining effects.

NOTE: Information on designing bank stabilization projects can be found in the Washington Department of Fish and Wildlife's *Integrated Streambank Protection Guidelines* (<http://www.wdfw.wa.gov/hab/ahg/ispdoc.htm>); King County's *Reconnaissance Assessment of the State of the Nearshore Ecosystem* (<http://dnr.metrokc.gov/wlr/watersheds/puget/nearshore/sonr.htm>); and three technical (white) papers – *Marine and Estuarine Shoreline Modification Issues*, *Ecological Issues in Floodplains and Riparian Corridors*, and *Over-Water Structures: Marine, Freshwater, and Treated Wood Issues* (<http://wdfw.wa.gov/hab/ahg/ahgwhite.htm>).

5. **Cultural Resources and Human Burials.** Permittees must immediately stop work and notify the District Engineer within 24 hours if, during the course of conducting authorized work, human burials, cultural resources, or historic properties, as identified by the National Historic Preservation Act, are discovered and may be affected by the work. Failure to stop work in the area of discovery until the Corps can comply with the provisions of 33 CFR 325 Appendix C, the National Historic Preservation Act, and other pertinent laws and regulations could result in a violation of state and federal laws. Violators are subject to civil and criminal penalties.

6. **Essential Fish Habitat.** An activity which may adversely affect essential fish habitat, as identified under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), may not be authorized by NWP until essential fish habitat requirements have been met by the applicant and the Corps. Non-federal permittees shall notify the District Engineer if essential fish habitat may be affected by, or is in the vicinity of, a proposed activity and shall not begin work until notified by the District Engineer that the requirements of the essential fish habitat provisions of the MSA have been satisfied and the activity is authorized. The notification must identify the type(s) of essential fish habitat (i.e., Pacific salmon, groundfish, and/or coastal-pelagic species) managed by a Fishery Management Plan that may be affected. Information about essential fish habitat is available at <http://www.nwr.noaa.gov/>

7. **Vegetation Protection and Restoration.** Permittees must clearly mark all construction area boundaries before beginning work and minimize the removal of native vegetation in riparian areas and wetlands to the maximum extent practicable. Areas subject to temporary vegetation removal in wetlands or riparian areas during construction shall be replanted with appropriate native species by the end of the first planting season following the disturbance except as waived by the District Engineer.

D. Corps Regional Specific Conditions for this NWP:

1. For activities associated with multi-phase residential, commercial, institutional, or recreational development projects, including real estate subdivisions, the pre-construction notification must include a history of the entire

property involved in the project, including information about subdivisions of the property and past work on the property in or affecting waters of the United States. Required documentation includes copies of the original plat and State Environmental Policy Act (SEPA) determination(s) for the property, including the SEPA checklist. The District Engineer may allow a variance to specific requirements of this condition on a case-by-case basis.

NOTE: *The Seattle District is concerned about the potential cumulative environmental impacts of multi-phase residential, commercial, institutional, and recreational development projects. Seattle District will carefully review all applications involving multi-phase development projects and use its discretionary authority to require Department of the Army authorization by standard individual permit for any phase that would have more than a minimal individual or cumulative adverse impact on the aquatic environment. The Seattle District will consider the cumulative loss of more than 0.5 acre of waters of the United States, including wetlands, to be a strong indicator that the cumulative adverse environmental impact of the proposed work and development project are more than minimal.*

NOTE: *Compensatory mitigation plans for development projects should normally include protected vegetated buffers (riparian areas) to protect wetlands, streams, and other aquatic areas. Buffers should consist of native herbaceous, scrub-shrub, and/or tree species and be at least 100 feet wide, unless otherwise approved by the District Engineer.*

E. State 401 Certification General Conditions

1. **For in-water construction activities.** Individual 401 review is required under this condition for projects or activities authorized under NWPs that will cause, or be likely to cause or contribute to an exceedence of a State water quality standard (WAC 173-201A) or sediment management standard (WAC 173-204).

State water quality standards can be located on Ecology's website: <http://www.ecy.wa.gov/programs/wq/swqs/>. Sediment management standards can be located on Ecology's website:

<http://www.ecy.wa.gov/biblio/wac173204.html>.

Information is also available by contacting Ecology's Federal Permit staff.

2. **Projects or Activities Discharging to Impaired Waters.** Individual 401 review is required by this condition for projects or activities authorized under NWPs if the project or activity may result in further exceedences of a specific parameter the waterbody is listed for on the state's list of impaired waterbodies (the 303(d) list).

The current 303(d) listed waterbodies can be identified using search tools available on Ecology's website:

<http://www.ecy.wa.gov/programs/wq/303d/2002/2002-index.html> or by contacting Ecology's Federal Permit staff.

3. **Notification.** For projects or activities that will require individual 401 review, applicants must provide Ecology with the written documentation provided to the Corps (as described in Corps Nationwide Permit General Condition 27, Pre-Construction Notification), including, when applicable:

(a) A description of the project, including site plans, project purpose, direct and indirect adverse environmental effects the project would cause, any other Department of the Army permits used or intended to be used to authorize any part of the proposed project or any related activity.

(b) Delineation of special aquatic sites and other waters of the United States. Wetland delineations must be prepared in accordance with the current method required by the Corps and shall include Ecology's Wetland Rating form. *Note: Forms are available at Ecology's Wetlands website:*

<http://www.ecy.wa.gov/programs/sea/wetlands/index.html> or by contacting Ecology's Federal Permit staff.

(c) Coastal Zone Management Program "Certification of Consistency" Form if the project is located within a coastal county (Clallam, Grays Harbor, Island, Jefferson, King, Kitsap, Mason, Pacific, Pierce, San Juan, Skagit, Snohomish, Thurston, Wahkiakum, and Whatcom counties).

Note: Forms are available at the Army Corps of Engineers website: <http://www.nws.usace.army.mil> or by contacting Ecology's Federal Permit staff.

(d) Other applicable requirements of Corps Nationwide Permit General Condition 27, Corps Regional Conditions, or notification conditions of the applicable NWP.

Ecology's review time shall not begin until the applicable documents noted above have been provided to Ecology and Ecology has received a copy of the final Nationwide Permit verification letter from the Corps.

4. Aquatic resources requiring special protection. Certain aquatic resources are unique, difficult-to-replace components of the aquatic environment in Washington State. Activities that would affect these resources must be avoided to the greatest extent possible. Compensating for adverse impacts to high value aquatic resources is typically difficult, prohibitively expensive, and may not be possible in some landscape settings. Individual 401 review is required for activities in or affecting the following aquatic resources (and not prohibited by Regional Condition 1), except for:

- NWP 20 – Oil Spill Cleanup
- NWP 32 – Completed Enforcement Actions
- NWP 38 – Cleanup of Hazardous Waste
- NWP 47 – Pipeline Safety Program Repair

(a) Wetlands with special characteristics (as defined in the Washington State Wetland Rating Systems for western and eastern Washington, Ecology Publication #s04-06-025 and #04-06-015):

- estuarine wetlands
- Natural Heritage wetlands
- Bogs
- old-growth and mature forested wetlands
- wetlands in coastal lagoons
- interdunal wetlands
- vernal pools
- alkali wetlands

(b) Bog-like wetlands, aspen-dominated wetlands, camas prairie wetlands, and marine water with eelgrass beds (except for NWP 48).

(c) Category I wetlands

(d) Category II wetlands with a habitat score >29 points.

5. Mitigation. 401 Certification is based on adequate compensatory mitigation being provided for wetland and other water quality-related impacts of projects or activities authorized under the NWP Program.

Mitigation plans submitted for Ecology review and approval shall be based on the guidance provided in Wetland Mitigation in Washington State, Parts 1 and 2 (Ecology Publication #s06-06-011a and #06-06-011b) and shall, at a minimum, include the following:

- (a) A description of the measures taken to avoid and minimize impacts to wetlands and other waters of the U.S.
- (b) The nature of the proposed impacts (i.e., acreage of wetlands and functions lost or degraded)
- (c) The rationale for the mitigation site that was selected
- (d) The goals and objectives of the compensatory mitigation project
- (e) How the mitigation project will be accomplished, including proposed performance standards for measuring success and the proposed buffer widths
- (f) How it will be maintained and monitored to assess progress towards goals and objectives. Monitoring will generally be required for a minimum of five years. For forested and scrub-shrub wetlands, 10 years of monitoring will often be necessary.
- (g) How the compensatory mitigation site will be legally protected for the long-term.

Refer to Wetland Mitigation in Washington State – Part 2: Developing Mitigation Plans (Ecology Publication #06-06-011b) for guidance on developing mitigation plans.

Ecology encourages the use of alternative mitigation approaches, including advance mitigation and other programmatic approaches, such as mitigation banks and programmatic mitigation areas at the local level. If you are interested in proposing use of an alternative mitigation approach, consult with the appropriate Ecology regional staff person. (see <http://www.ecv.wa.gov/programs/sea/wetlands/contacts.htm>)

For information on the state wetland mitigation banking program go to:

<http://www.ecv.wa.gov/programs/sea/wetlands/mitigation/banking/index.html>

6. Temporary Fills. Individual 401 review is required for any project or activity with temporary fill in wetlands or other waters of the State for more than 90 days, unless the applicant has received written approval from Ecology.

7. Mill Creek Special Area Management Plan. This condition applies to all NWP's within the boundaries described in the Mill Creek Special Area Management Plan (SAMP), King County, Washington, dated April 2000 (SAMP). The boundaries of the SAMP encompass all sub-basins and tributaries drained by Algona Creek, Auburn Creek, Bingaman Creek, Midway Creek, Mill Creek, and Mullen Slough. The area is bounded roughly on the south by 8th Avenue N in Algona and 4th Street NE in Auburn, on the east and north by the Ordinary High Water Mark of the Green River, and on the west by the plateau that parallels Interstate 5 above the Green River valley.

Individual 401 review is required for projects or activities authorized under the NWP's unless:

(a) The project or activity will result in fill-related impacts to only wetlands designated as developable under Alternative #8, as shown on Figure 4-8 of the SAMP.

(b) Compensatory mitigation for such impacts is onsite and/or within the areas designated on Figure 3-3, "Maximum Areas for Restoration by Target Habitat Type," in the SAMP Aquatic Resources Restoration Plan (April 2000).

(c) Mitigation plans comply with the requirements of the SAMP and, in general, with the guidance in the interagency Wetland Mitigation in Washington State (March 2006; Ecology publications #06-06-011a and #06-06-011b). Note: You can download the SAMP and Aquatic Resources Restoration Plan at

http://www.nws.usace.army.mil/PublicMenu/Menu.cfm?sitename=REG&pagename=Mill_Creek_SAMP.

8. State Certification for PCNs not receiving 45-day response. In the event the U.S. Army Corps of Engineers does not respond to a complete pre-construction notification within 45 days, the applicant must contact Ecology for Individual 401 review.

F. State 401 Certification Specific Conditions for this NWP

Certified, subject to conditions. Individual 401 review is required for projects or activities authorized under this NWP if:

1. The project or activity causes the loss of greater than 300 linear feet of intermittent or ephemeral streambeds.
2. The project or activity disturbs one acre or more of land (including uplands, wetlands, and other aquatic areas) and the post-development stormwater controls are not designed in accordance with Ecology's most recent stormwater manual or an approved equivalent stormwater manual.

G. EPA 401 Certification General Conditions

In order for any NWP authorization to be valid in Washington State, permittees must comply with all applicable 401 Certification general conditions. EPA 401 Certification general conditions apply to all NWP authorizations involving Section 404 activities on Native American Indian Tribal lands (excluding the tribal lands of the Chehalis Tribes, Port Gamble S'Klallum Tribe, Kalispel Tribe, Makah Indian Tribe, Puyallup Tribe, Spokane Tribe, and Tulalip Tribe) and Federal land with exclusive jurisdiction within Washington State.

A. Special Aquatic Sites. Any activities in the following types of wetlands and waters of the U.S. will need to apply for an individual 401 certification: Mature forested wetlands; bogs; bog-like wetlands; wetlands in dunal systems along the Washington coast; vernal pools; aspen-dominated wetlands; alkali wetlands; camas prairie wetlands; salt marshes; or marine water with eelgrass beds.

B. Soil Erosion and Sediment Controls. An individual 401 certification is based on the project or activity meeting established turbidity levels. EPA will be using as guidance the state of Washington's water quality standards [WAC 173-201a] and sediment quality standards [WAC 173-204]. Projects or activities that are expected to exceed these levels or that do exceed these levels will require an individual 401 certification.

C. Compliance with Stormwater Provisions. Individual 401 certification is required for projects or activities not designed in accordance with Ecology's most recent stormwater manual or Ecology approved equivalent manual.

D. Compliance with requirements of the National Pollutant Discharge Elimination System. For projects and activities requiring coverage under an NPDES permit, certification is based on compliance with the requirements of that permit. Projects and activities not in compliance with NPDES requirements will require individual 401 certification.

E. Projects or Activities Discharging to Impaired Waters. Individual 401 certification is required for projects or activities authorized under NWPs if the project will discharge to a waterbody on the list of impaired waterbodies (the 303(d) List) and the discharge may result in further exceedance of a specific parameter the waterbody is listed for. EPA may issue 401 certification for projects or activities that would result in further exceedance or impairment if mitigation is provided that would result in a net decrease in listed contaminants or less impairment in the waterbody. This determination would be made during individual 401 certification review.

F. Notification. For projects requiring individual 401 certification, applicants must provide EPA with the same documentation provided to the Corps (as described in Corps National General Condition 27, Pre-Construction Notification), including, when applicable:

(a) A description of the project, including site plans, project purpose, direct and indirect adverse environmental effects the project would cause, any other U.S. Department of the Army permits used or intended to be used to authorize any part of the proposed project or any related activity.

(b) Delineation of special aquatic sites and other waters of the United States. Wetland delineations must be prepared in accordance with the current method required by the Corps.

(c) A statement describing how the mitigation requirement will be satisfied. A conceptual or detailed mitigation or restoration plan may be submitted.

(d) Other applicable requirements of Corps National General Condition 27, Corps Regional Conditions, or notification conditions of the applicable NWP.

A request for individual 401 review is not complete until EPA receives the applicable documents noted above and EPA has received a copy of the final authorization letter from the Corps providing coverage for a proposed project or activity under the NWP Program.

G. Mitigation. An individual 401 certification is based on adequate compensatory mitigation being provided for wetland and other water quality-related impacts of projects or activities authorized under the NWP Program. Mitigation plans submitted shall be based on the Joint Agency guidance provided in *Wetland Mitigation in Washington State, Parts 1 and 2* (Ecology Publication #06-06-011a and #06-06-011b) and shall, at a minimum, include the following:

1. A description of the measures taken to avoid and minimize impacts to wetlands and other waters of the U.S.
2. The nature of the proposed impacts (i.e., acreage of wetlands and functions lost or degraded).
3. The rationale for the mitigation site that was selected.
4. The goals and objectives of the compensatory mitigation project.
5. How the mitigation project will be accomplished, including proposed performance standards for measuring success and the proposed buffer widths.
6. How it will be maintained and monitored to assess progress towards goals and objectives. Monitoring will generally be required for a minimum of five years. For forested and scrub-shrub wetlands, 10 years of monitoring will often be necessary.
7. How the compensatory mitigation site will be legally protected for the long-term.

H. Temporary Fills. An individual 401 certification is required for any activity where temporary fill will remain in wetlands or other waterbodies for more than 90 days. The 90 day period begins when filling activity starts in the wetland or other waterbody.

H. EPA 401 Certification Specific Conditions for this NWP

Denied without prejudice. Individual 401 certification required.

I. Spokane Tribe of Indians 401 Certification General Conditions

Specific to the Reservation and the Tribal Water Quality Standards, the applicant must comply with the following when there could be a discharge to waters of the Spokane Indian Reservation:

1. The applicant shall be responsible for achieving compliance with the Spokane Tribal Water Quality Standards.
2. The applicant shall submit copies of applications materials to the Spokane Tribal Water Control Board for review and approval at the same time they are submitted to Army Corps of Engineers and prior to any disturbance activities.
3. The applicant shall comply with all Spokane Tribal Integrated Resource Management Plan (IRMP) guidelines for land use activities and disturbances.
4. The applicant shall allow the Tribal Water Control board and Interdisciplinary Team to inspect the area in question and adopt recommendations made throughout its operation.
5. Monitoring of the discharge shall occur at a level indicated by EPA and the Tribe, are subject to change, and shall be submitted to both entities.

J. Tribal 401 Certification Specific Conditions for this NWP

Denied without prejudice by the Chehalis, Kalispel, Makah, Port Gamble S'Klallum, Puyallup, and Tulalip tribes. Certified subject to general conditions by the Spokane Tribe.

K. CZM Consistency Response Specific Conditions for this NWP

Concur, subject to the following condition:

1. Where individual 401 review is triggered, an individual CZM Consistency Response must be obtained for projects located within the 15 coastal counties. A "Certification of Consistency" form must be submitted in accordance with State General Condition 3 (Notification).

L. ADDITIONAL LIMITATIONS ON THE USE OF NWPs

1. District Engineers have authority to determine if an activity complies with the terms and conditions of an NWP.
2. NWPs do not obviate the need to obtain other Federal, state, or local permits, approvals, or authorizations required by law.
3. NWPs do not grant any property rights or exclusive privileges.
4. NWPs do not authorize any injury to the property or rights of others.
5. NWPs do not authorize interference with any existing or proposed Federal project



US Army Corps
of Engineers ®
Seattle District

Appeal Process Fact Sheet

27 April 2006



Our letter cites a Department of the Army administrative appeal rule for permit decisions and approved jurisdictional determinations that went into effect March 9, 1999. In accordance with this rule, we have included a *Notification of Administrative Appeal Options and Process and Request for Appeal* form of which Section I is the Notification of Appeal Process (NAP) fact sheet and Section II is the Request for Appeal (RFA) form.

If a permit decision was made, you may decline to accept a permit if you object to any of the terms or conditions, **and** you believe that these terms or conditions are based on procedural errors; incorrect data; omission of fact; incorrect application of current Federal manual or guidance associated with wetlands; or incorrect application of a law, regulation, or policy that governs our permit program. Once you accept the permit, you waive the right to further appeal unless we later modify the permit.

If you object to this permit decision or jurisdictional determination, you may request an administrative appeal under Corps regulations at 33 CFR Part 331. As stated previously, enclosed you will find a *Notification of Appeal Options and Process and Request for Appeal* form. If you request to appeal this determination, you must submit a completed RFA form to the Division Engineer at the following address:

Division Engineer
U.S. Army Corps of Engineers, Northwest Division
Karen Kochenbach, Regulatory Program Manager
Post Office Box 2870
Portland, Oregon 97208-2870
Telephone: (503) 808-3888

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR part 331.5, and that it has been received by the Division Office within 60 days of the date of the NAP. Should you decide to submit an RFA form, it must be received at the above address by the 60th day. "Day 1" is designated as the date of the NAP form. "Day 60" is designated as the 60th calendar day after the date of the NAP form, with the official counting of calendar days beginning on "Day 1" as designated above. When "Day 60" is a traditional non-working day (e.g., a holiday or a weekend), the 60 day timeframe is extended to the next business day. Our Division Office has 90 days to resolve the appeal with you once your completed and acceptable NAO-RFA form has been received.

It is not necessary to submit an RFA form to the Division office if you do not object to the decision or determination in our letter.

If you have any questions about your options or the appeal process in general, please contact the project manager indicated on the form.

NOTIFICATION OF ADMINISTRATIVE APPEAL OPTIONS AND PROCESS AND REQUEST FOR APPEAL

Applicant: Kirkland Development, LLC	File Number: NWS-2008-1072	Date:
Attached is:		See Section below
☐	INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission)	A
☐	PROFFERED PERMIT (Standard Permit or Letter of permission)	B
☐	PERMIT DENIAL	C
X	APPROVED JURISDICTIONAL DETERMINATION	D
☐	PRELIMINARY JURISDICTIONAL DETERMINATION	E

SECTION I - The following identifies your rights and options regarding an administrative appeal of the above decision. Additional information may be found at <http://usace.army.mil/inet/functions/cw/cccw/reg> or Corps regulations at 33 CFR Part 331.

A: INITIAL PROFFERED PERMIT: You may accept or object to the permit.

- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- **OBJECT:** If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the district engineer. Your objections must be received by the district engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the district engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the district engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.

B: PROFFERED PERMIT: You may accept or appeal the permit

- **ACCEPT:** If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.
- **APPEAL:** If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

C: PERMIT DENIAL: You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

D: APPROVED JURISDICTIONAL DETERMINATION: You may accept or appeal the approved JD or provide new information.

- **ACCEPT:** You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice, means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.
- **APPEAL:** If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

E: PRELIMINARY JURISDICTIONAL DETERMINATION: You do not need to respond to the Corps regarding the preliminary JD. The Preliminary JD is not appealable. If you wish, you may request an approved JD (which may be appealed), by contacting the Corps district for further instruction. Also, you may provide new information for further consideration by the Corps to reevaluate the JD.

SECTION II - REQUEST FOR APPEAL or OBJECTIONS TO AN INITIAL PROFFERED PERMIT

REASONS FOR APPEAL OR OBJECTIONS: (Describe your reasons for appealing the decision or your objections to an initial proffered permit in clear concise statements. You may attach additional information to this form to clarify where your reasons or objections are addressed in the administrative record.)

ADDITIONAL INFORMATION: The appeal is limited to a review of the administrative record, the Corps memorandum for the record of the appeal conference or meeting, and any supplemental information that the review officer has determined is needed to clarify the administrative record. Neither the appellant nor the Corps may add new information or analyses to the record. However, you may provide additional information to clarify the location of information that is already in the administrative record.

POINT OF CONTACT FOR QUESTIONS OR INFORMATION:

If you have questions regarding this decision and/or the appeal process you may contact:

Steve Gagnon, Project Manager
U.S. Army Corps of Engineers, Seattle District
Post Office Box 3755
Seattle, Washington 98124-3755
Telephone: (360) 750-9046

If you only have questions regarding the appeal process you may also contact:

Division Engineer
U.S. Army Corps of Engineers, Northwestern Division
David W. Gesl, Appeals Officer
Post Office Box 2870
Portland, Oregon 97208-2870
Telephone: (503) 808-3825

RIGHT OF ENTRY: Your signature below grants the right of entry to Corps of Engineers personnel, and any government consultants, to conduct investigations of the project site during the course of the appeal process. You will be provided a 15-day notice of any site investigation, and will have the opportunity to participate in all site investigations.

Signature of appellant or agent.

Date:

Telephone number:



US Army Corps
of Engineers ®
Seattle District



CERTIFICATE OF COMPLIANCE WITH DEPARTMENT OF THE ARMY PERMIT

Permit Number: NWS-2008-1072

Name of Permittee: Kirkland Development, LLC

Date of Issuance: _____

Upon completion of the activity authorized by this permit, please check the applicable boxes below, sign this certification, and return it to the following address:

Department of the Army
U.S. Army Corps of Engineers
Seattle District, Regulatory Branch
Post Office Box 3755
Seattle, Washington 98125-3755

Please note that your permitted activity is subject to a compliance inspection by a U.S. Army Corps of Engineers representative. If you fail to comply with the terms and conditions of your authorization, your project is subject to suspension, modification, or revocation.

- ☐ The work authorized by the above-referenced permit has been completed in accordance with the terms and conditions of this permit.
- ☐ The mitigation required (not including monitoring) by the above-referenced permit has been completed in accordance with the terms and conditions of this permit.

Signature of Permittee