

ECOLOGICAL LAND SERVICES REPORT

1838
Franklin st.

SPR-21-002

Chris Roewe
woodford Commercial
208 Vine st
Kelso WA 98626

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June 5, 2017

American Equities, Inc.
Attn: Maureen T. Wile
4225 NE St James Road
Vancouver, WA 98663

Re: Franklin Street Wetland Feasibility in Woodland, Washington

Maureen,

Ecological Land Services, Inc. (ELS) was contacted by Craig Johnson of Investment Real Estate Services, Inc. on your behalf to complete a wetland feasibility for tax parcel 50728 in Woodland, Washington. The subject tax parcel is accessed from Franklin Street, a spur road from Belmont Loop located west of Old Pacific Highway in Section 13, Township 5 North, and Range 1 West of the Willamette Meridian. The study area for this feasibility includes the entire tax parcel, identified as a total of 5 acres by the Cowlitz County Assessor's office. Conditions on adjacent parcels were also considered to determine whether or not any potential offsite surface waters have probable effect on drainage in the subject parcel. The feasibility includes summary of conditions observed onsite, an approximated location of potential wetland boundaries (see attached site map), a summary of the potential wetland's category and buffer designations, and maintenance recommendations for long-term development. This letter is not a formal wetland delineation and does not meet the standards required for jurisdictional review. It is provided solely for planning purposes.

Methodology

Wetland boundaries are determined in accordance with standards defined by the U.S. Army Corps of Engineers (Corps), as defined in *Corps Wetland Delineation Manual* and the manual's regional supplement for the *Western Valleys, Mountains, and Coast* (Version 2.0). The basic tenants of locating wetland boundaries include the presence of hydric soils, hydrophytic vegetation, and hydrology. The Corps and the U.S. Environmental Protection Agency (EPA) define a wetland 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 to support, a prevalence of vegetation typically adapted for life in saturated soil conditions." ELS estimated the location and extent of potential wetland on the subject parcel by reviewing aerial photography from 1990 to the present, talking with land managers who are familiar with the site, and by completing an on-the-ground assessment of vegetation, soils, and hydrology conditions. Fieldwork was completed on May 24, 2017.

Site Conditions

In summary, approximately 2.37 acres of the subject parcel contained hydric soil, a dominance of hydrophytic vegetation, and/or the presence of hydrology within 12 inches of the ground's surface. These areas are identified on the attached site map as Wetland A and Wetland B. It was evident onsite and in aerial photography that portions of the site are seasonally flooded during the wettest parts of most years. Algal matting, topographic depressions dominated by wetland plants, and areas containing surface water at the time of the assessment were among the more significant indications of potential wetland conditions. Portions of the site that were not dominated by wetland indicators include ground west of Old Pacific Highway and east of the Franklin Street access. These areas were higher in elevation, supported typical non-wetland grasses, and appeared to be at least partially formed by material formed from the construction of the Franklin Street spur and the Old Pacific Highway berm, respectively. Potential wetland onsite appears to receive hydrology from the adjacent parcels to the north, south, and west. Parcels south and west were partially ponded during the site assessment; the parcel northward did not have visible signs of ponding. The subject parcel appeared to be slightly lower in elevation than these adjacent parcels and may collect surface runoff and/or have a naturally high groundwater table due to topography.

ELS completed a preliminary wetland rating of the potential wetland areas onsite. Wetland ratings are determined by Washington State Department of Ecology (Ecology) *Wetland Rating Form for Western Washington*. Based on criterion in the form, potential wetland areas onsite could meet the conditions of Category III depressional wetlands. According to Woodland Municipal Code (WMC), Chapter 15.08 *Critical Areas Regulation*, Section 15.08.400 *Wetland Buffers*, Category III wetland adjacent to a high land use development proposal has designated buffer width of 150 feet. ELS assumed high intensity land use for the purposes of this assessment based on the commercial value of the property. High intensity includes land uses such as commercial, urban, and industrial development.

Land Management History

The subject parcel is currently managed for hay production and has been managed for hay for approximately 20 years (since about 1997). Hay mowing is evident in aerial photography and was verified by talking with current land managers. There are two ditches located on the parcel: Ditch 1 is adjacent to the west parcel boundary and Ditch 2 passes through the western quarter of the parcel. Both ditches are constructed to alleviate drainage on the subject parcel and both are in need of maintenance. Ditch 1 is partially functioning but is clogged with vegetation and sediment accumulation. Ditch 2 is not functioning and does not appear to have been maintained for the last 10 years. Ditch 1 is identified on the attached site map. Ditch 2 is identified on an aerial image from 2007 (also attached).

Maintenance Recommendations and Other Considerations

Ditch maintenance without a permit is an allowed activity on land actively managed for agricultural purposes. Cleaning and maintaining these ditches may improve site drainage, reduce the total size of potential wetlands, and increase total buildable land. Ditch maintenance has been a successful preliminary step to achieving development goals on other properties. We recommend working with land managers to complete ditch maintenance prior to requesting a formal wetland delineation or moving forward with a land development proposal. If ditch maintenance is not an effective method for improving drainage onsite and/or a formal wetland delineation demonstrates that onsite wetland conditions are unfavorable for development, WMC allows for "unavoidable and necessary impacts". Unavoidable and necessary impacts are impacts that, if not allowed, would deny all reasonable economic use of the land, provided any such impacts are mitigated. Depending on the development proposal, there are opportunities for onsite mitigation at the subject parcel.

Thank you for the opportunity to provide this information. Please don't hesitate to contact me with any questions regarding the contents of this letter or next steps for development.

Sincerely,



Andrew Robert B. Allison
Senior Wetland Scientist, Principal

Cc: Craig Johnson, CCIM

Attachment:
Feasibility Site Map
2007 Aerial Image



April 3, 2018

Craig Johnson, CCIM
Northwest Equities
Investment Real Estate Services, Inc.
3806 SE 179th Ave
Vancouver, WA 98683

Dear Craig,

At your request, Ecological Land Services, Inc. (ELS) has completed an assessment of the critical areas associated with parcel number 50728 located on Franklin Street near Belmont Loop in the City of Woodland, Cowlitz County, Washington. The purpose of this assessment is to determine the presence or absence of critical areas on or adjacent to the subject parcel, hereafter referred to as the "study area", and to form conclusions about the study area's previous and current permitting, and current development status. The study area is 4.08 acres located south of Belmont Loop, west of Old Pacific Highway, and southeast of Franklin Street, a spur road providing access to the study area from Belmont Loop (Figures 1 and 3). The study area is zoned Highway Commercial (C-2) by the city of Woodland and is part of the Belmont Loop proposed development footprint originally permitted by the Army Corps of Engineers (Corps) and the Washington Department of Ecology (Ecology) in 1993.

Site Description

ELS completed fieldwork on May 24, 2017 and made the following observations: topography in the study area slopes from north to south. The highest ground is situated near Franklin Street and adjacent to Old Pacific Highway; the lowest ground is adjacent to the south study area boundary near a forested corridor. Standing water was present in low areas north of the forested corridor with associated zones of soil saturation as elevation increased. One man-made drainage ditch was located along the south and west study area boundary, partially within the forested corridor (Figure 3). Water was present in the ditch. ELS observed drainage flowing north and west, with outfall into an unnamed slough that is part of the stormwater infrastructure for Belmont Loop's commercial development. The trace of a second man-made ditch was identified in historic aerial imagery (Figure 3); however, the second ditch was not in active use in the study area at the time ELS completed this assessment. Land management in the study area is agricultural crop production, primarily hay. Adjacent land uses included agricultural management to the north and west, an unmanaged forested corridor to the south, and Old Pacific Highway to the east. An existing water pipe with man-hole access points and fire hydrants was located in the right-of-way between the study area and Old Pacific Highway. A third man-made ditch was located along the berm of Old Pacific Highway. Water was present in the ditch, but not flowing. During periods of flow the ditch drains north into a metal grate under Belmont Loop.

GIS data from State and Federal Resources

The National Resources Conservation Service (NRCS) maps one soil unit in the subject parcel, identified as Newberg fine sandy loam 0 to 3 percent slopes. Newberg is described as a well-drained soil that forms in floodplains from alluvial deposits. A typical profile includes fine sandy loam from 0 to 10 inches and very fine sandy loam from 10 to 28 inches (NRCS 2018). *Frequency of flooding* is “occasional” and *Frequency of ponding* is “none”. Newberg fine sandy loam is included in Hydrologic Group A. According to NRCS, soils in this group have low runoff potential when thoroughly wet, water is transmitted freely through the soil, and soil composition is typically less than 10 percent clay and more than 90 percent sand or gravel (NRCS 2007). Newberg fine sandy loam is not considered a hydric soil and is not included on the National Hydric Soils list for Cowlitz County, Washington.

The National Wetlands Inventory (NWI) maps the approximate western four-fifths of the study area as palustrine, emergent, persistent, temporarily flooded wetland (PEM1A) (NWI 2018). ELS observed indicators of temporary flooding in the study area during fieldwork that included the presence of standing water in low-lying areas adjacent to a man-made ditch. NWI maps are designed to provide information on the location, extent, and types of wetlands that may be present in a given area based on a variety of predictors interpreted from aerial imagery. The objective of NWI mapping is to produce medium-resolution information on the location, type, and size of wetlands to be accurate at a scale of 1:12,000.¹ ELS determined that water present in the study area was a result of landscape modifications including drainage revisions for agricultural management, road development, and subsurface infrastructure installment rather than natural drainage patterns.

Permitting History in the Study Area

On October 22, 1991, at the request of a private landowner, the Corps completed a wetland determination on 37.3 acres for the purpose of developing 29.8 acres for what was then proposed as a “mall” and what would become the Belmont Loop business park. The Corps conclusion was that the 37.3-acre study area contained “wetland vegetated ditches” that would require a permit if proposed for fill. The remainder of the study area was determined to be upland and not within Corps jurisdiction (Corps #OYB-4-014265, attached). The 2018 study area (parcel number 50728) is included in the upland portion of the 1991 study area (Figure 2).

On June 28, 1993 David Evans and Associates, Inc. (DEA) submitted an application to the Corps on behalf of the landowner for a permit to fill portions of the ditches that were identified as wetland in 1991. DEA’s application identified the Corps study area, the location of three man-made ditches, and the proposed location of future development in what would become the Belmont Loop business park (Figure 2) (DEA #JOHN0002, attached).

¹ USFS acknowledges the limitations of using remotely sensed information as the primary data source for mapping, and additionally, by policy, excludes some wetland types from its inventory. NWI is not designed or intended to yield legal or regulatory products.

On August 27, 1993 Ecology issued a letter to DEA confirming agreement with the Corps wetland delineation and issuance of wetland fill permits, and further stated the project did not require an individual 401 Water Quality Certification to be issued from Ecology. Two weeks later, on September 9th, the Corps issued a permit to DEA confirming the wetland delineation and allowing fill to be placed as directed per Nation Wide Permits 14 and 18 (permit attached, RE: 93-4-00694).

On December 15, 1997 the Corps reissued concurrence with the wetland ditch locations and necessary permits for wetland ditch fill. The Corps permit reference number is included in the attached Ecology verification letter dated May 28, 1998 (Corps #96-4-00461). The northern end of Belmont Loop was constructed by mid-summer of 2000, providing access from Old Pacific Highway to the north end of the business park. Between 2000 and 2005 construction of Belmont Loop and the existing business park was completed (photo series attached). The study area was intended to be developed in a future phase of the business park. Although later phases of the original design were not completed the study area received utilities and road access in anticipation for the development while continuing to be managed for agricultural purposes.

Preliminary Jurisdictional Determination

The original 1993 Corps wetland delineation identifies the subject parcel as upland. The Corps and Ecology issued concurrence with the upland determination in 1993, 1997, and 1998. Typically, wetland delineation findings are considered to "expire" after a five-year period. The five-year period is intended to define the amount of time typically required for successional changes in soils, vegetation, and hydrology patterns to occur, resulting from the influence of nature. Under such "normal" circumstances the 1993 delineation would have ultimately expired in 2003, five years after the last concurrence date. However, the expiration date may be postponed when the study area is retained in ongoing land management that prevents either reclamation to or successional changes in the natural landscape setting *and* when the study area has remained serviceable through access to or relationship with existing development.

Based on field observations, a review of the permitting history, an assessment of the surrounding development, and ongoing agricultural land management, it is our opinion that the non-wetland determination should be retained. Water observed in the study area is the result of landscape modification for infrastructure improvements, not successional changes in soils, vegetation, and hydrology resulting from nature. The study area has been continuously managed for agricultural uses from the original delineation to the present date and its connection with city infrastructure for development purposes has been maintained by the City of Woodland. Based on these circumstances, the subject parcel should be subject to the 1993, 1997, and 1998 Corps and Ecology findings.

Offsite Wetland Determination

The forested corridor south of the study area was not included in the 1993 wetland determination, has not been managed for agriculture, and contained pockets of surface water together with wetland plants in and south of the drainage ditch during ELS fieldwork May 24, 2017. Surface water in this location appeared to meet the criteria of wetland hydrology, a determination that was supported by the presence of wetland plants and the absence of agricultural land management. Dominant wetland vegetation included slough sedge (*Carex obnupta* FACW), Nootka rose (*Rosa nutkana*, FAC), Douglas spirea (*Spiraea douglasii* FACW), and Oregon ash (*Fraxinus latifolia* FACW). When wetland is adjacent to a study area Ecology requires that an offsite wetland assessment be conducted to determine whether or not the wetland's buffer extends into the study area. Accordingly, ELS prepared an offsite wetland assessment for the forested corridor using Ecology's *Wetland Rating Form for Western Washington, 2014 Update*. ELS used a combination of observations in the field, aerial imagery interpretation, and a review of federal and state GIS resources to determine the offsite wetland boundary. Based on observations, interpretations, and criteria in the wetland rating form, the offsite wetland is likely a Category III forested, depressional wetland with a habitat score of 4 (Figures 5 and 6). According to Woodland Municipal Code (WMC), wetland buffers are determined by the overall wetland category, the wetland habitat score, and the proposed land use intensity. The proposed land use intensity for the study area is commercial in accordance with City of Woodland zoning and in keeping with the existing business park. Commercial development is a high intensity land use (WMC 15.08.400 (B)). A habitat score of 3 or 4 points is considered "low" per WMC 15.08.400(C). A Category III wetland with a low habitat score adjacent to a high intensity land use has an 80-foot buffer width (WMC 15.08.400(D)) (Figure 4). Based on these findings, approximately 58,497 square feet (approximately 1.3 acres) of the study area contains jurisdictional wetland buffer. Wetland buffer can be modified to accommodate a development proposal through buffer averaging or reduction provided reduction is accompanied by a mitigation plan (WMC 15.08.400(G)).

Craig, again, thanks for the opportunity to provide this information. The findings in this letter are based on standard scientific methodology and our best professional judgment. In our opinion, local, state, and federal regulatory agencies will agree with our conclusions. However, the findings and opinions described in this letter are only a preliminary jurisdictional determination until they are reviewed and approved in writing by the City of Woodland's Community Development Department. Please feel free to contact me if you have any questions.

Sincerely,



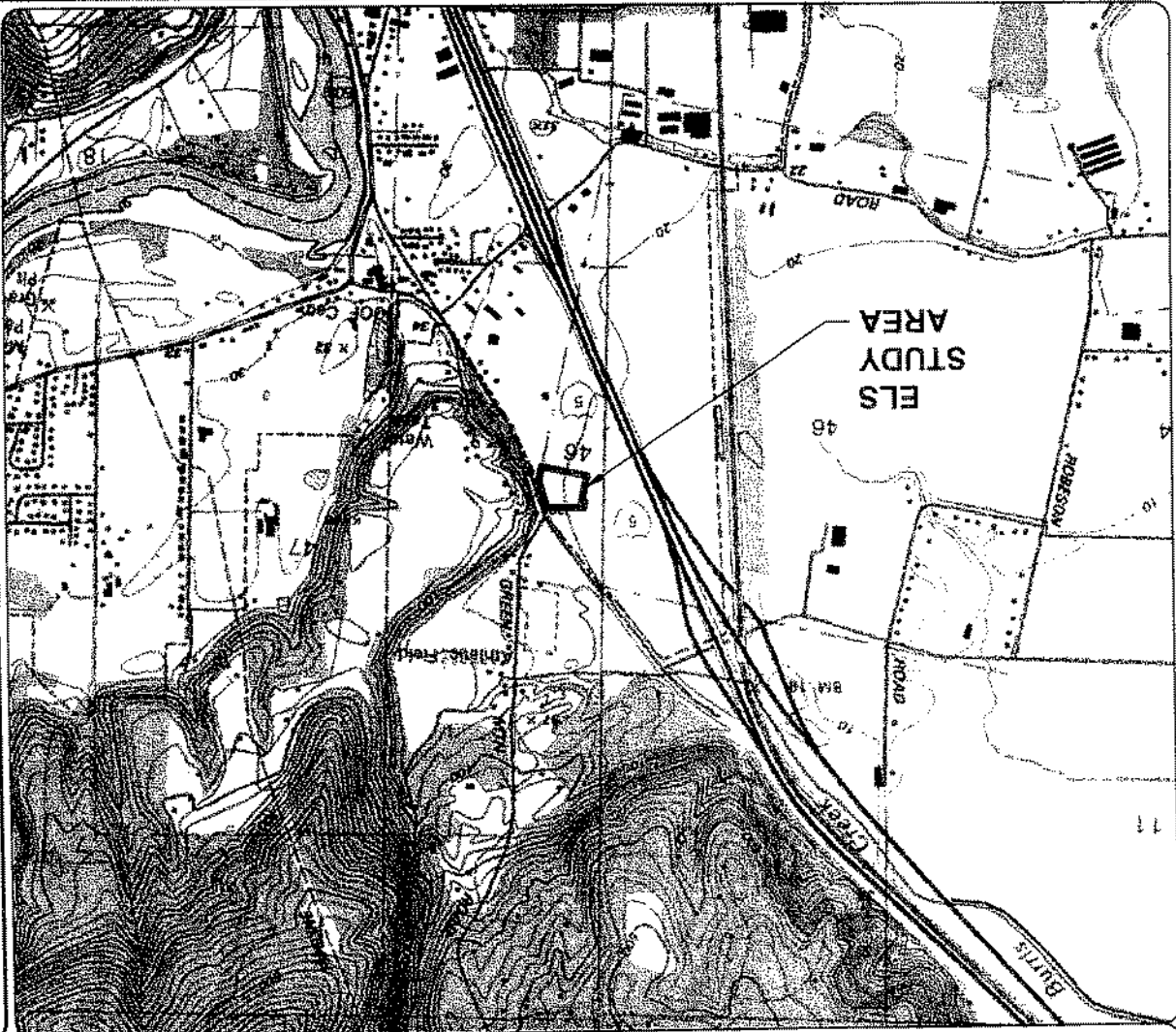
Andrew R. Allison
Senior Wetland Scientist, Principal

Figures:

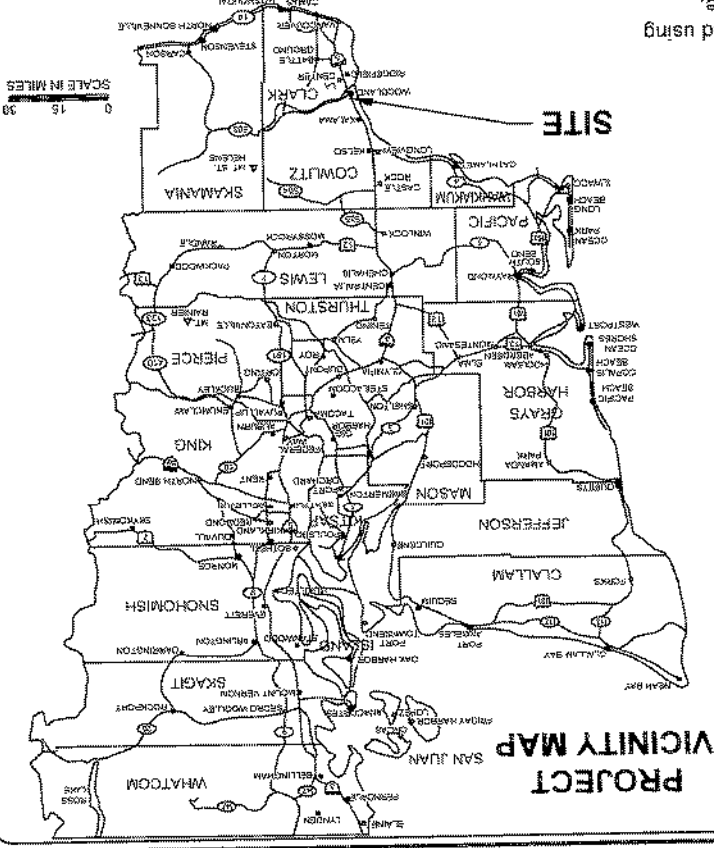
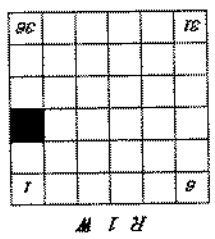
- Figure 1: Vicinity Map
- Figure 2: 1993-1998 Permitted Study Area
- Figure 3: 2018 Overview Map
- Figure 4: Existing Conditions Site Map
- Figure 5: Offsite Wetland Rating 150-FT
- Figure 6: Offsite Wetland Rating 1-KM
- Figure 7: Offsite Wetland Contributing Basin
- Figure 8: 303(d) Map
- Figure 9: TMDL Screen Capture for WRIA 27

Exhibits:

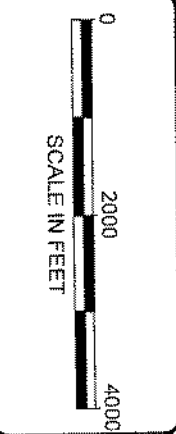
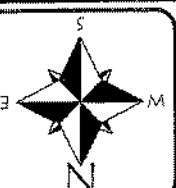
- Exhibit 1: Corps Wetland Determination, Project Number OYB-4-014265
- Exhibit 2: DEA Report Number JOHN0002
- Exhibit 3: Nation Wide Permits 14 and 18, Corps Number 93-4-00694
- Exhibit 4: Ecology Concurrence RE: 93-4-00694
- Exhibit 5: Ecology Concurrence RE: 96-4-00461
- Exhibit 6: Historic Aerial Photo Chronology for Belmont Loop business Park
- Exhibit 7: *Wetland Rating Form for Western Washington, 2014 Update*



NOTE: USGS topographic quadrangle map reproduced using MAPTECH Inc. Terrain Navigator Pro software.



LOCATION MAP
 Latitude: 45.9230°
 Longitude: -122.7496°

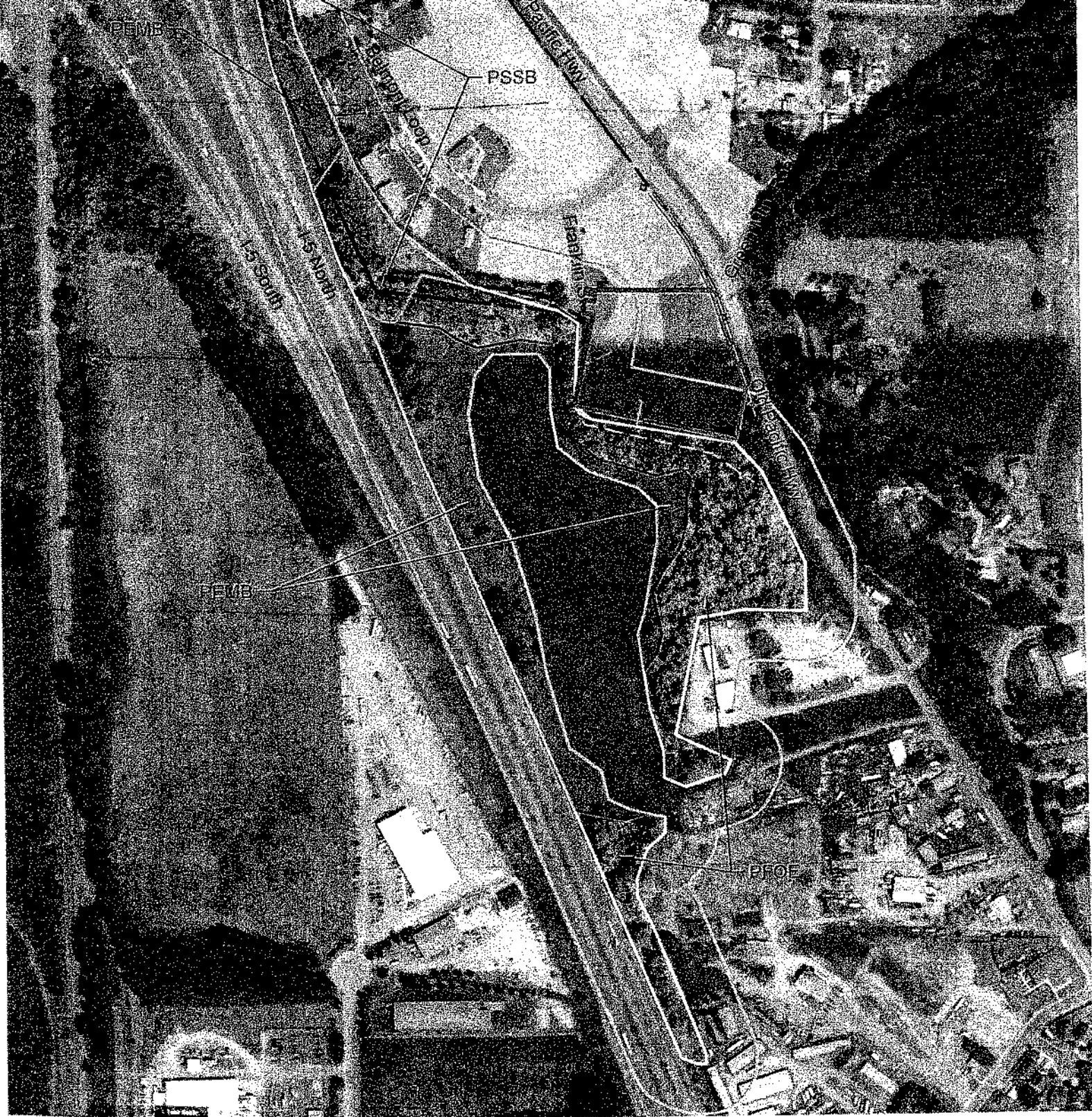


Ecological Land Services

1157 3rd Ave., Suite 220A
 Longview, WA 98632
 Phone: (360) 578-1371
 Fax: (360) 414-9305
 www.eco-land.com




DATE: 4/3/18
 DWN: CDP
 REQ. BY: ARBA
 PRJ. MGR: ARBA
 CHK: ARBA
 PROJECT NO.: 2540.02

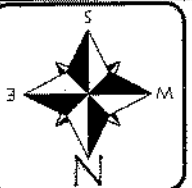
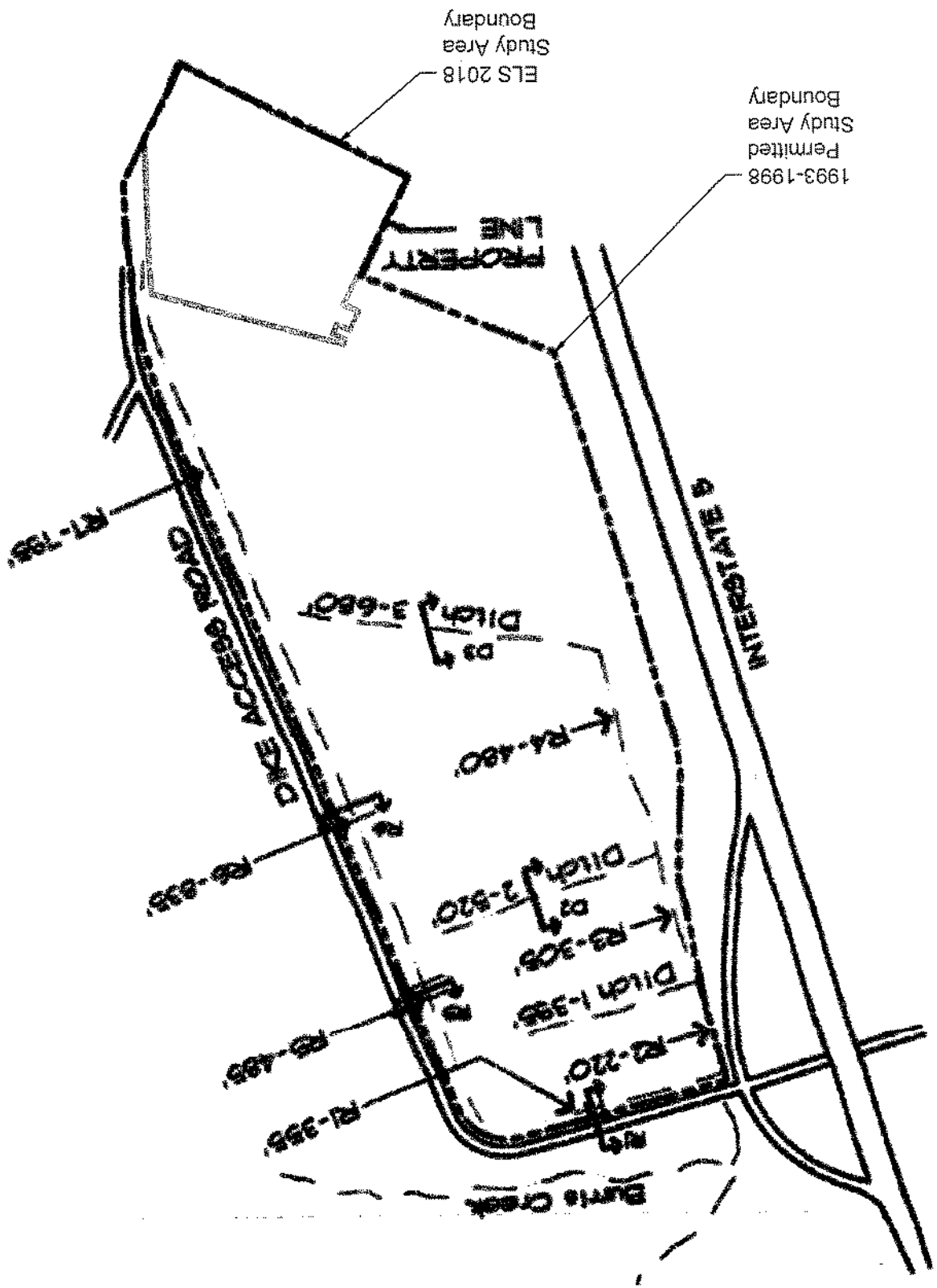
Figure 1
VICINITY MAP
 Franklin Street Development
 American Equities, Inc.
 City of Woodland, Cowlitz County, WA
 Section 13, Township 5N, Range 1W, W.M.



LEGEND:

- ELS 2018 Study Area Boundary
- Wetland Unit Boundary
- 150' Wetland Offset
- 1993 Permitted Area Boundary
- 2018 Cowlitz County Parcel Boundaries
- 1993 Permitted Wetland Ditch Locations
- 2018 Ditch Locations (Approximate)

	PSSB	Palustrine, Scru-Shrub, Saturated
	PEMB	Palustrine, Emergent, Saturated
	PFOE	Palustrine, Forested, Seasonally Flooded/Saturated



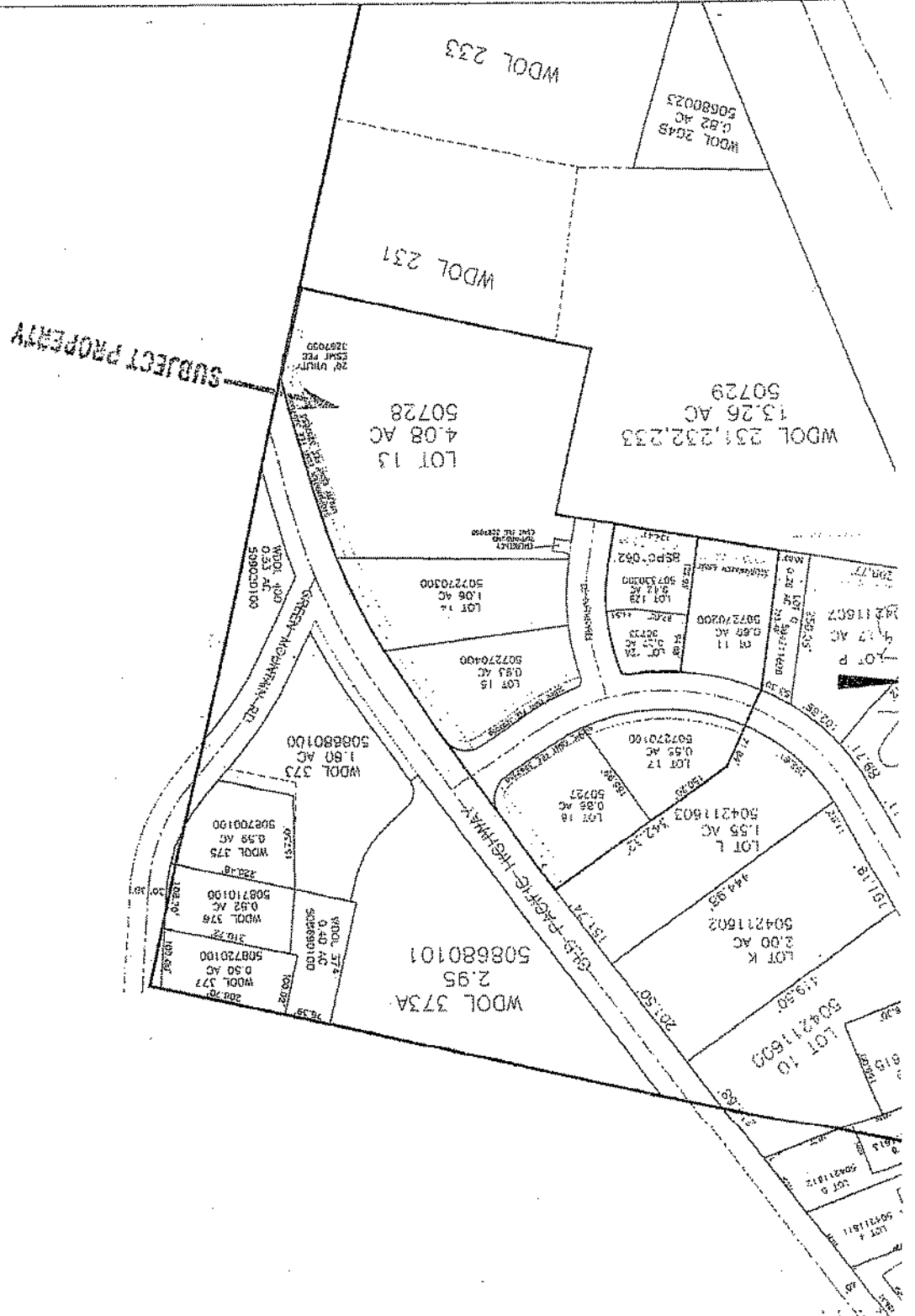
NOT TO SCALE

Ecological Land Services
 1157 3rd Ave., Suite 220A
 Longview, WA 98632
 Phone: (360) 578-1371
 Fax: (360) 414-9305
 www.eco-land.com

DATE: 4/3/18
 DWN: CDP
 REQ. BY: ARBA
 P.R.J. MGR: ARBA
 CHK: ARBA
 PROJECT NO.: 2540.02

Figure 2
 1993-1998 PERMITTED STUDY AREA
 Franklin Street Development
 American Equities, Inc.
 City of Woodland, Cowlitz County, WA
 Section 13, Township 5N, Range 1W, W.M.

THIS SKETCH IS PROVIDED, WITHOUT CHARGE, FOR YOUR INFORMATION. IT IS NOT INTENDED TO SHOW ALL MATTERS RELATED TO THE PROPERTY INCLUDING, BUT NOT LIMITED TO, AREA, DIMENSIONS, EASEMENTS, ENCROACHMENTS, OR LOCATION OF BOUNDARIES. IT IS NOT PART OF, NOR DOES IT MODIFY, THE COMMITMENT OR POLICY TO WHICH IT IS ATTACHED. THE COMPANY ASSUMES NO LIABILITY FOR ANY MATTER RELATED TO THIS SKETCH. REFERENCE SHOULD BE MADE TO AN ACCURATE SURVEY FOR FURTHER INFORMATION.



SANITARY
L=136.06'
035

WATER LINE
L=23.03'

INSTALL SAN
MH #525
10" PVC SANITARY
SEWER L=49.48' *
SL=0.0035
10' WATER-SEWER
SEPARATION

47.80'

SL=0.0035 *
0.0035

12" PVC C-900
WATER LINE
L=157.28' R=360'

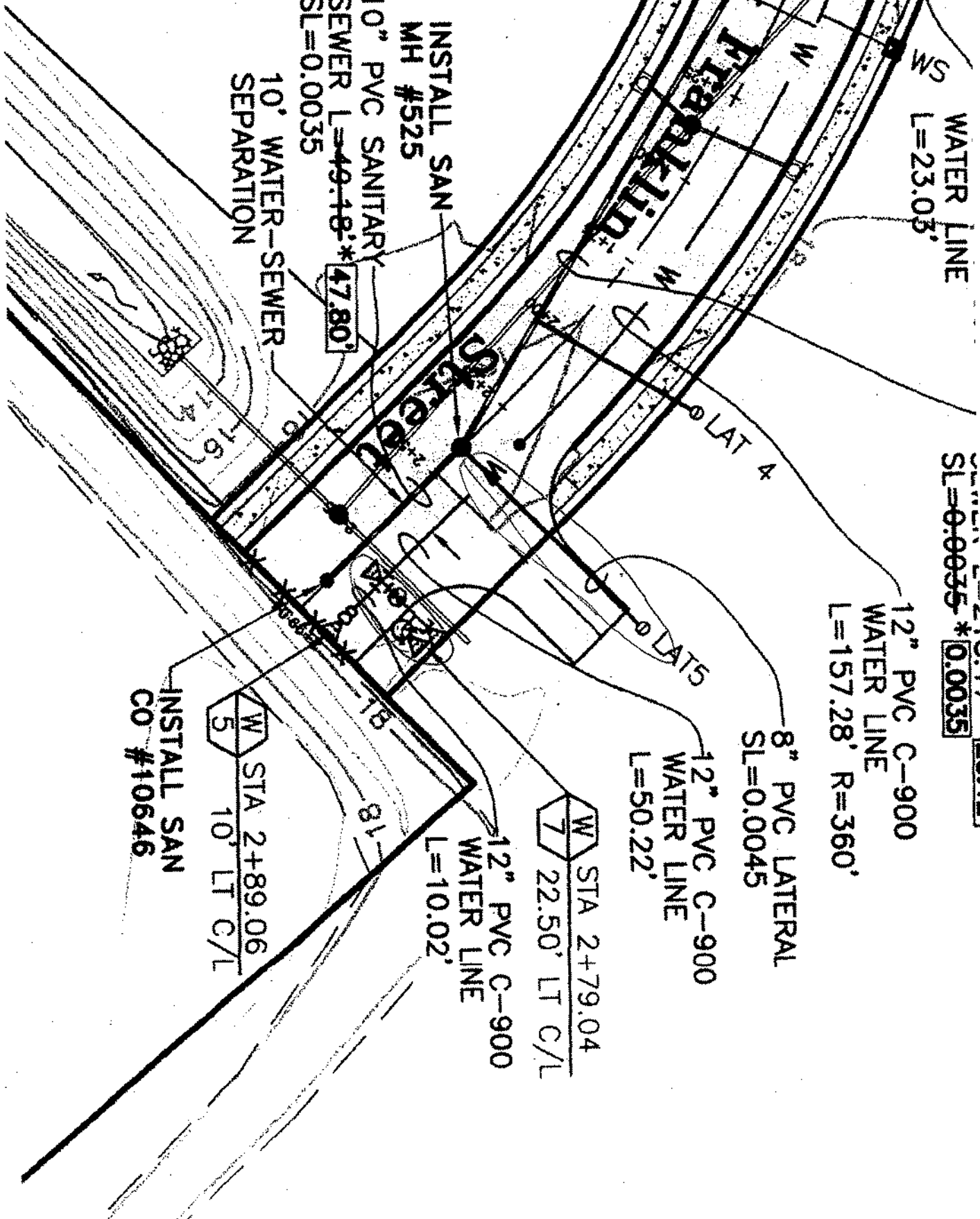
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SL=0.0045

12" PVC C-900
WATER LINE
L=50.22'

12" PVC C-900
WATER LINE
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W STA 2+79.04
22.50' LT C/L

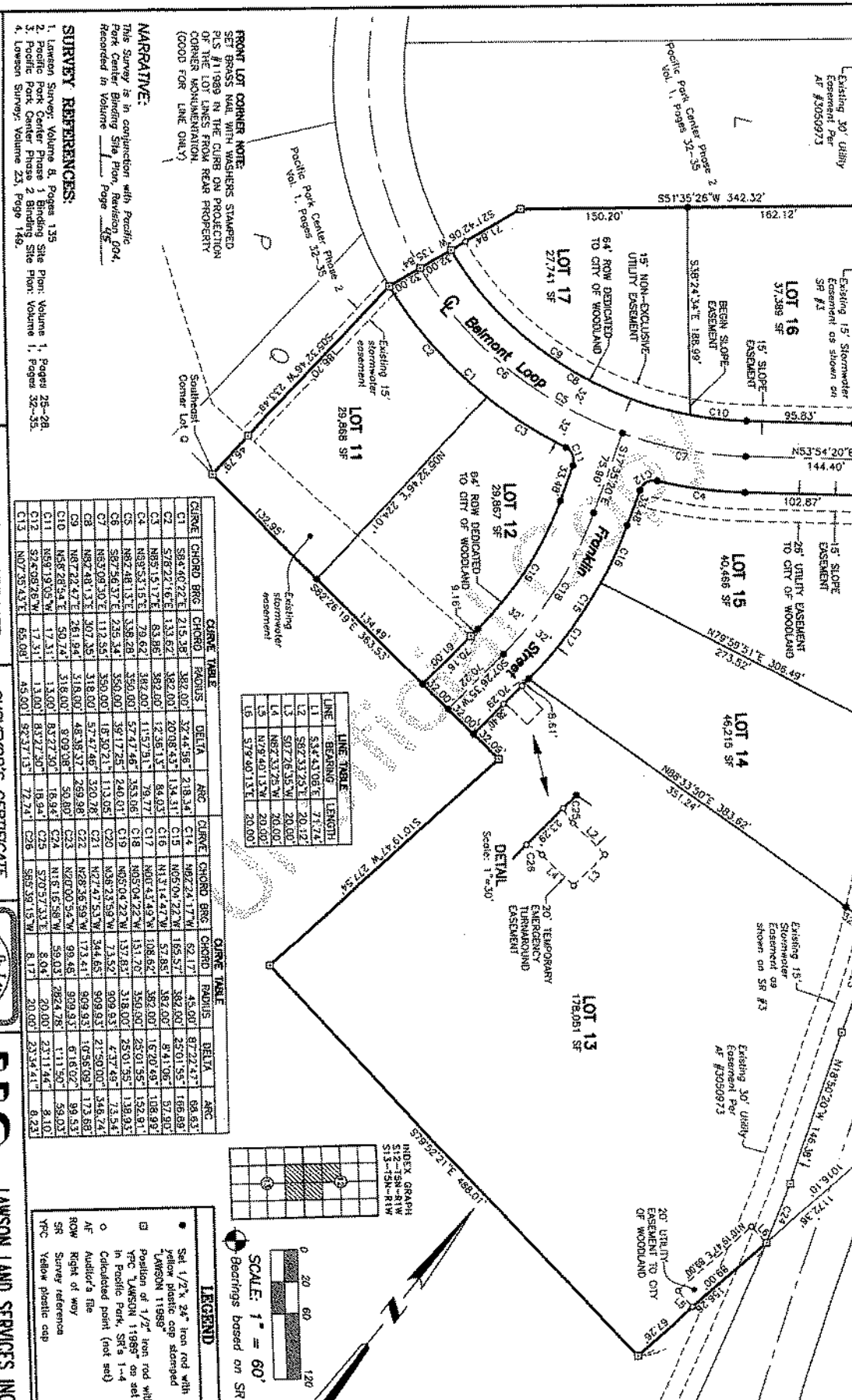
W STA 2+89.06
10' LT C/L
INSTALL SAN
CO #10646



3238514 V25 P178

SURVEY

PHASE 3 OF PACIFIC PARK CENTER
RECORDED IN VOLUME 1, PAGES
25-28 AND VOLUME 1, PAGES 32-35
RECORDS OF COMULIZ COUNTY ALSO
BEING IN A PORTION OF THE SOLOMON
STRONG D.L.C. LOCATED IN SECTIONS
12 & 13 T5N, R1W W.M.
COMULIZ COUNTY, WA



FRONT LOT CORNER NOTE:
SET BRASS NAIL WITH WASHERS STAMPED
PLUS #11989 IN THE CURB ON PROJECTION
OF THE LOT LINES FROM REAR PROPERTY
CORNER MONUMENTATION.
(GOOD FOR LINE ONLY)

NARRATIVE:
This Survey is in conjunction with Pacific
Park Center Binding Site Plan, Revision 004,
Recorded in Volume 1, Page 45.

SURVEY REFERENCES:
1. Lawson Survey, Volume 8, Pages 135
2. Pacific Park Center Phase 1 Binding Site Plan, Volume 1, Pages 25-28
3. Pacific Park Center Phase 2 Binding Site Plan, Volume 1, Pages 32-35
4. Lawson Survey, Volume 23, Page 149.

AUDITOR'S CERTIFICATE
I have examined the above plat and find it correct in accordance with the original field notes and computations of the Surveyor, and I certify that the same are true and correct.

W. J. ...
Auditor

SURVEYOR'S CERTIFICATE
I, the undersigned, being a duly Licensed Surveyor in the State of Washington, do hereby certify that I am the Surveyor of the above described land, and that the foregoing plat is a true and correct copy of the original field notes and computations of the Survey, and that the same are true and correct.

W. J. ...
Surveyor

LINE TABLE

LINE	BEARING	LENGTH
L1	S 84° 43' 06" E	71.72
L2	S 87° 33' 25" E	20.12
L3	S 87° 26' 35" W	20.00
L4	N 87° 53' 25" W	20.00
L5	N 76° 40' 13" W	20.00
L6	S 79° 40' 13" E	20.00

CHORD TABLE

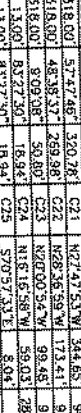
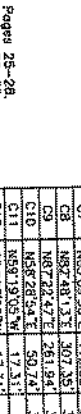
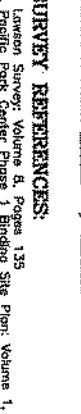
CHORD BEG.	CHORD END.	BEARING	LENGTH
C1	C2	S 84° 43' 06" E	71.72
C2	C3	S 87° 33' 25" E	20.12
C3	C4	S 87° 26' 35" W	20.00
C4	C5	N 87° 53' 25" W	20.00
C5	C6	N 76° 40' 13" W	20.00
C6	C7	S 79° 40' 13" E	20.00
C7	C8	S 84° 43' 06" E	71.72

CHORD TABLE

CHORD BEG.	CHORD END.	BEARING	LENGTH
C9	C10	S 84° 43' 06" E	71.72
C10	C11	S 87° 33' 25" E	20.12
C11	C12	S 87° 26' 35" W	20.00
C12	C13	N 87° 53' 25" W	20.00
C13	C14	N 76° 40' 13" W	20.00
C14	C15	S 79° 40' 13" E	20.00
C15	C16	S 84° 43' 06" E	71.72

CHORD TABLE

CHORD BEG.	CHORD END.	BEARING	LENGTH
C17	C18	S 84° 43' 06" E	71.72
C18	C19	S 87° 33' 25" E	20.12
C19	C20	S 87° 26' 35" W	20.00
C20	C21	N 87° 53' 25" W	20.00
C21	C22	N 76° 40' 13" W	20.00
C22	C23	S 79° 40' 13" E	20.00
C23	C24	S 84° 43' 06" E	71.72



LEGEND

- Set 1/2" x 24" iron rod with yellow plastic cap stamped "LAWSON 11989"
- Position of 1/2" iron rod with yellow plastic cap on set in Pacific Park, SR's 1-4
- Calculated point (not set)
- AF Auditor's file
- ROW Right of way
- SR Survey reference
- YFC Yellow plastic cap

LAWSON LAND SERVICES, INC.
113 South Parkway Avenue
Belle Glade, WA 98604 (360) 687-0500

CALCULATED BY: JDL
CHECKED BY: JDL
DRAWN BY: MCB
JOB NO.: 85-082
FILE NO.: 04161
SHEET 1 OF 1

K: 95-082 (dmg) Survey 18992354.dwg Aug 13, 2004 11:30am