

December 30, 2016

Mike Meadows
Director, Construction Management
Puyallup School District
302 – 2nd Street SE, Puyallup, WA 98372
Via email: MeadowME@puyallup.k12.wa.us

Re: Firgrove Elementary School – NGPA Wetland Verification Report
The Watershed Company Reference Number: 160932

Dear Mike:

The Firgrove Elementary School project spans two adjacent properties, the current Firgrove Elementary site and Ballou Junior High School site (Parcels 041916-4005 and -4008). These schools are located off of Meridian Avenue East and 136th Street East, respectively, in unincorporated Pierce County. A wetland and buffer were recorded with the County in 2005. According to County Biologist Dara Kessler, the recorded wetland regulatory conditions are vested, so current wetland study requirements for this project are limited to a wetland verification report (phone discussion 10/27/2016). Per Ms. Kessler, a wetland verification study entails a site visit to review the Native Growth Protection Area (NGPA) for compliance with the wetland conditions recorded on title. The following title document was reviewed for this report.

- Ballou Jr. High School Portables, Wetland Application No. 401415, Parcel No. 0419164008, Address 9916 136th Street E, dated September 2005

The recorded NGPA is on the west side of the Ballou Jr. High School property. A wetland and buffer area lie within the NGPA. Wetland conditions from the notice of title are listed below in italics; a response to each condition based on the November 2016 site visit are provided below.

Wetland Conditions Review

1. *As is allowed per Section 18E.20.020.D., in order to provide permanent protection of the site wetland and its associated buffer, a six-foot chain link fence or Pierce County-approved substitute fence, is required to be installed and maintained around the perimeter of the on-site wetland buffer. This is being required to distinguish the wetland*

buffer form the developed portions of the site and help protect the wetland and wetland buffer from intrusion and other human impacts.

Response: A six-foot tall chain link fence with small critical area signs surrounds the onsite perimeter of the NGPA (see photos 1 and 2). The chain link fence is damaged or falling in a few locations (see photo 3) and should be repaired. No evidence of intrusion into the NGPA was observed. The NGPA is intact. However, critical area signs are small and cracked; posting current replacement critical area signs on a 50-foot spacing is recommended.

- 2. All wetland and buffer areas currently existing on the site shall remain undisturbed. There shall be no grading, clearing, or other kind of vegetation removal, filling, or construction of any kind within the undisturbed wetland and buffer areas.*

Response: No work is proposed within the NGPA.

- 3. A minimum building setback line of eight feet shall be established from the edge of the wetland buffer for the current proposed portables. Any future development proposals will be required to comply with regulations in effect at the time of such proposals. As of March 1, 2005, building setbacks from critical areas and buffers increased to 15 feet.*

Response: The existing portables comply with this condition. The current site plan does not show any new structures in close proximity to the NGPA. A fire lane would be located directly adjacent to the NGPA.

- 4. Storing or stockpiling of materials or soil is not allowed in the wetland or buffer. All on-site stockpiled soils shall be stabilized or protected to prevent soil loss.*

Response: Stockpiling is not proposed within the NGPA.

- 5. All construction vehicles' fueling and staging areas shall be located outside of the wetland and buffer.*

Response: No construction vehicle fueling or staging is proposed in the NGPA.

- 6. Burning of land clearing slash and other materials in the wetland or buffer is prohibited.*

Response: No burning or land clearing is proposed in the NGPA.

- 7. Construction materials, land clearing debris, lawn clippings, and other garden debris shall not be placed in the wetland or buffer.*

Response: No evidence of prior debris disposal in the wetland/buffer was observed. The current project will not dispose of materials or yard waste in the NGPA.

8. *Due to the sensitive nature of the wetland application of pesticides, fertilizers, and/or other chemicals in the wetland and/or buffer is prohibited.*

Response: No evidence of chemical controls or applications within the wetland or buffer was observed.

9. *All appliances, tires, and other non-organic trash shall be removed from the wetland and buffer. Items shall be disposed of at an approved solid waste handling facility.*

Response: Visible portions of the NGPA were relatively free of trash; no tires or appliances were observed.

10. *All exotic, invasive, or noxious vegetation, and all weeds listed on the State Noxious Weed List may be removed from the wetland and buffer by clipping, hand pulling, hand digging, or by an alternative plan, upon approval of Pierce County Planning and Land Services.*

Response: The wetland buffer contains locally dominant patches of non-native blackberry and reed canarygrass. The area does not appear to be maintained.

11. *All down and dead woody material, including logs and fallen branches, shall be left in the wetland and buffer to provide structure, habitat, and nutrients to the wetland system.*

Response: A few snags and pieces of large woody debris were noted in the NGPA. Dead woody material has been left in place.

12. *All trees, including snags (dead trees) and perch trees (trees with broken tops or limbs) shall be left in the wetland and its buffer, as they provide an important wildlife habitat component to the buffer and wetland. Trees located within the wetland or the buffer, which are in imminent danger of falling outside of the wetland buffer, shall only be cut or removed with the permission of Pierce County Planning and Land Services.*

Response: No evidence of recent or active tree management was noted in the NGPA.

13. *Any maintenance of outfall or inlet culvert pipe located within the wetland or buffer areas shall be done by hand.*

Response: No outfall or inlet was observed. Site plans indicate a stormwater collection feature northeast of the NGPA drains to the wetland buffer. It is presumed that periodic maintenance is done by hand.

14. *The following notes shall be included on the face of the site plan and shall apply to the development of the site:*

“The wetland boundary was delineated by Gary Kucinski on May 14, 1998 and June 2, 1998 and was field surveyed by Sitts & Hill Engineers, Inc. Then wetland boundary was subsequently re-verified by John Comis on January 29, 2005.

“Notice: This site contains a critical area, as defined within Title 18E Pierce County Code. Restrictions on use or alteration of the site may exist due to natural conditions of the site and resulting regulations.

“The wetland approval for the proposed development was recorded at the Pierce County Auditors office on 9/6/05.

Response: Since the text in condition 14 above was written for an older project, the County may choose to update it for the current project. The NGPA should be labeled on site plans for the current project. The following language is recommended:

The NGPA recorded on parcel 0419164008 with Pierce County in 2005 remains under protection from development; the functions and values this wetland and buffer provide will not be diminished by the current proposed site improvements.

Conclusion

The NGPA is intact and meeting the wetland conditions stated in the Notice of Title. However, repair or replacement of some fencing and signage is recommended to fully comply with the intent of the NGPA. Bent or broken segments of the chain link fence should be repaired. New critical area signs should be posted at a 50-foot spacing.

While invasive plants may be removed manually from the NGPA, their removal is not required under the wetland conditions. The outer edge of the NGPA contains some dense non-native blackberry brambles. Non-native blackberry vines continue to grow over the fence, requiring on-going maintenance. The district may choose to remove the invasive blackberry and replace it with native trees and/or shrubs to limit future maintenance.

Please call if you have any questions or if we can provide you with any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nell Lund". The signature is fluid and cursive, with the first name "Nell" and last name "Lund" clearly distinguishable.

Nell Lund, PWS
Senior Ecologist

Enclosures



Photo 1. Six-foot tall chain link fence around the NGPA.



Photo 2. Posted 'Wetland Buffer Boundary' signs.



Photo 3. NGPA Fence damaged or failing in a few locations.



Photo 4. Fencing was placed further east than required to mark the NGPA.