

City of DuPont  
1700 Civic Drive  
DuPont, Washington 98327  
Phone: 253-912-5393  
Fax: 253-964-1455

MEMORANDUM

TO: Andy Estep  
FROM: Bill Kingman *BK*  
RE: Sequelitchew Creek Flow/Ecosystem Restoration JARPA Application  
DATE: June 18, 2010

The Sequelitchew Creek Flow/Ecosystem Restoration JARPA Application must be submitted to the Washington Department of Fish and Wildlife (WDFW) Headquarters Office in Olympia for a Hydraulic Project Approval (HPA). One HPA submittal requirement is "notice of completion of any applicable requirements of the SEPA Act".

A SEPA decision on the project will be issued by DuPont as part of the DuPont Sensitive Area Ordinance (SAO) application for the proposed work. The SEPA review and SAO application filing fees total \$4,500 and will require approximately 4.5 months to process to the public hearing with the DuPont Hearing Examiner and final decision.

The DuPont SAO application submittal requirements include:

- SAO application requirements discussed in DuPont Municipal Code (DMC) 25.105.060,
- \$3,000 Type III SAO application filing fee,
- Answers to the issues raised below,
- SEPA Checklist,
- \$1,500 Type I SEPA Checklist filing fee, and
- One set of prestamped enveloped addressed to all property owners within 300 feet of the Edmond Marsh and list of addressees.

DuPont SAO Application Issues:

1. If the work "alters" Edmond Marsh as defined by DMC 25.10.010, then it is prohibited per DMC 25.105.070(f) as indicated below. A qualified professional wetland biologist should answer this question based on the scope of work discussed in the JARPA permit and two DMC citations below.

DMC 25.10.010 defines alteration of critical areas as, "any human-induced action which adversely impacts the functions and value of a sensitive area or buffer. Alterations include but are not limited to grading, filling, dredging, draining, channelizing, cutting of trees, clearing, paving, construction, dumping, and demolition."

DMC 25.105.070(f), Wetland alteration, states alteration of a Class I wetland is prohibited. (Note: Edmond Marsh is classified as a Class I wetland by a

document titled, *Northwest Landing Assessment of Wetland Categories*, dated December 11, 1992, which was prepared by Raedeke Associates for Weyerhaeuser Real Estate Company. The Assessment is based on the October 1991 DOE wetland rating system.)

2. A watershed restoration plan should be prepared, adopted and used as the policy document to review the proposed stream restoration project. The plan should discuss methods to improve fish and wildlife habitat, remove identified impediments to migration of fish, and enhance the fishery resource available for use by all citizens of the state, as defined by RCW 89.08.460.
3. The proposal is intended to restore Sequelitchew Creek instream flows. Water presently flows both east and west within Edmond Marsh. Will increased stream flows require down stream improvements/repairs to existing culverts under the Pierce County Sewer line and culverts under DuPont Steilacoom Road?
4. The proposal is intended to permanently change the surface water elevation of the Edmond Marsh complex and restore in-stream flows. Will these actions reduce the size of the wetland complex, cause fluctuations of water levels as a result of new beaver activity and subsequent beaver deceivers and adversely affect the scrub-shrub community that dominates the majority of the wetland complex which has a limited tolerance to inundation during the growing season?
5. How will the elevation of the 12 to 14 proposed beaver deceiver structures be established to provide continuous gravity flow throughout Edmond Marsh?
6. Is the elevation of the west outlet of Edmond Marsh and the elevation of the inlet of the upper reach of Sequelitchew Creek suitable for gravity flow into the upper dry reach of Sequelitchew Creek?

For reference, the previous projects submitted SAO applications:

- Yehle Village McNeil Street wetland buffer reduction for road,
- Hoffman Hill Div 4 steep slope reduction for road,
- Hoffman Hill Div 4 steep slope reduction for trail,
- Hoffman Hill Div 5 steep slope reduction for road,
- Bell Hill Replat wetland buffer reduction for parks and steep slope reduction for home sites,
- Glacier NW Mine Expansion wetland elimination and wetland alteration for mine expansion, and
- Bell Hill Lots 1 and 2 wetland buffer reduction for home sites.