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July 8, 2018

Mr. John Priebe  
Raging River Mining, LLC

Re: **ADDENDUM - Technical Response for Wetland A Rating, Raging River Quarry (Parcel # 222407-9011): Clearing & Grading Permit # GRDE15-0004 King County, WA.**

Dear Mr. Priebe:

Per your request this letter is written as an addendum to the previous technical response letter (Technical Response for the Raging River Quarry (Parcel # 222407-9011): Clearing & Grading Permit # GRDE15-0004 King County, WA 4/10/18, Schulz). The purpose of this letter is to clarify and re-address the rating for Wetland A. The key point is the term "Relatively undisturbed" as used and defined in wetland rating Questions H2.1 and H2.4. The County's first review of the Wetland A rating in 2015 agreed with the answer for H2.4 that states connections between 3 other wetlands within ½ mile are disturbed. The County's recent review memo disagrees with the same rating answer for Question H2.4 (5/8/18 Memo - Laura Casey, Environmental Scientist III- Ecologist). Listed as follows are the clarifications and reasons that support the wetland rating answer for question H2.4 as having connections that are disturbed.

1)

The 2004 wetland rating method considers a 330-foot area around a wetland to be wetland buffer. Due to the need for a more detailed description of the 330-foot area and the other wetlands with ½ mile of Wetland A, the Annotated Version for the 2004 rating method was included in the 4/10/18 Technical Response. Also included was a Disturbance Map using an aerial photograph to identify disturbances around Wetland A. Much of the area south of Wetland A is undeveloped forest land. This was confirmed in Question H2.1 as 330 feet of relatively undisturbed area around Wetland A at more than 25% but less than 50%. As previously stated the area north of Wetland A has a disturbed buffer that includes residential development with regular disturbances of automobile traffic, lawn mowing, and pets in the area. The loop road (324<sup>th</sup> Pl. SE) situated next to off-site wetlands and Wetland A serves 18 single-family residences. This County ROW should be considered a heavily used gravel road. The memo from Laura Casey does not comment on the presence of regular disturbances or areas of frequent use in between the subject wetlands.

2)

The County memo states “Schulz reports that the gravel driveways between the on-site and off-site wetlands should be considered heavily-used gravel roads”. This is either a misstatement or misunderstanding. The 4/10/18 Technical Response (Schulz) states on page 5 - “The habitat connections between Wetland A and the wetlands located to the north have some natural forest cover but are largely disturbed from residential development. There are 3 frequently used gravel driveways between the wetlands”. The driveways serve permanent residences. As is stated in the rating method question for H2.4 “connections should NOT be bisected by paved roads, **fill**, fields, pastures, or **other development**”. The subject driveways are “fill” material associated with residential development. Residential development is considered to be “other development” whether it is High intensity use (urban density, > 1 unit/acre) or Moderate intensity use (rural density, < 1 unit/acre). High intensity uses and Moderate intensity uses are considered disturbances.

3)

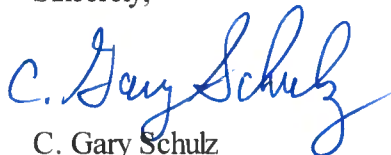
Per the request of the Quarry ownership, consultation with the WA Dept. of Ecology has been initiated for clarification. The definition of “Relatively undisturbed” was not substantially changed between the annotated 2004 version of the rating system and 2014 update (6/26/18 Email Communication from Amy Yahnke, Senior Wetlands Ecologist, WADOE). Amy Yahnke referenced page 101 of the 2014 update in her email. Page 101 has a call-out in a gray box that defines the term “Relatively undisturbed”. Much of this definition is the same text that was listed in the 2004 Annotated Version and included in the 4/10/18 Technical Response letter (Schulz). There are 4 notes listed in the definition. **Note 4** states “A rarely used path or gravel road can be considered relatively undisturbed if it is used less than once or twice a week. Daily usage of a road or area is considered disturbed”. In addition to the other disturbances associated with residential development, daily usage of three driveways separating wetlands and bisecting the connections does not meet Ecology’s definition of “Relatively undisturbed”.

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In summary three wetlands have been identified by the County reviewer as being located within ½ mile of Wetland A. The small wetland reported to be located on Parcel # 2224079109 (5610 324<sup>th</sup> Pl. SE) was not surveyed and the presence is questionable. Wetland A and the identified off-site wetlands have disturbed and degraded buffers including gravel roads and other uses associated with residential development. The disturbances from residential development include the presence of pets, frequently used gravel roads and driveways, and related lawn mowing or maintenance activities. The majority of the disturbances are considered daily usage. The existing quarry and 324<sup>th</sup> Pl. SE roadway may not entirely bisect a habitat connection but are physical barriers and do impact the connections between wetlands. Therefore the types of disturbances present between the identified off-site wetlands and Wetland A do not meet the definition of, or qualify as “Relatively undisturbed”.

Due to County review comments, new and accurate information has been provided to support a rating of Category III for Wetland A. This technical information also supports a Habitat score of 18 points instead on 20 points. The Habitat score of less than 20 points for Wetland A requires a standard wetland buffer of 80 feet. Please feel free to contact me if there are questions.

Sincerely,



C. Gary Schulz  
Wetland/Forest Ecologist