Attachment R

MEMORANDUM

To: Marc Angelillo, Stream Real Estate
Ali Taysi, AVT Consulting

From: Molly Porter, PWS #2064, Northwest Ecological Services, LLC (NES)
Michael Whitehurst, NES

Date: October 13, 2021

RE: Critical Areas Review – 3729 Meridian Street

Northwest Ecological Services, LLC (NES) was retained to review a portion of parcel 380213 491202, located at 3729 Meridian Street, in Bellingham Washington (Section 13, Township 38N, Range 02E W.M.) (Figure 1). The review area included an approximate 4+/- acre portion in the southeast corner of the property currently owned and operated by the Bellingham Golf and Country Club (BGCC). This area is proposed to be platted into a independent parcel, separating it from the larger 133+/- acre site.

Molly Porter [Professional Wetland Scientist (PWS) #2064] and Michael Whitehurst, of NES, conducted a site visit on September 28th of 2021 to document current site conditions. The review included a reconnaissance-level site survey to identify any critical areas (wetlands, streams, and wildlife conservations areas) that may be subject to regulation under the City of Bellingham (COB) Municipal Code (BMC Chapter 16.55) that are present onsite.

The subject parcel is located within an urban setting in the north central portion of the City. Land to the west and south is generally dominated by dense single-family housing. Surrounding land use to the north and east is mainly commercial development.

As previously mentioned, the review area is located within the BGCC property. This portion of the property is bound by Meridian Street to the east and Birchwood Avenue to the south and is primarily undeveloped and forested. The exception are paved/ gravel/ dirt access roads that extend north to south through the review area.

The review area is forested with a canopy dominated of large evergreen trees- western red cedar (*Thuja plicata*), Douglas fir (*Pseudotsuga menziesii*), and some big leaf maple (*Acer macrophyllum*). A few of the trees in this area are quite large and meet the definition of mature with measurements up to 41 inches in diameter at breast height (DBH), but the majority of trees appear to be closer to 23-25 DBH. The sub canopy is somewhat limited and included species such vine maple (*Acer circinatum*), red elderberry (*Sambucus racemosa*), and Indian plum (*Oemleria cerasiformis*). Groundcover is mainly invasive material including: morning glory (*Convolvulus arvensis)*, Himalayan blackberry (*Rubus armeniacus*), Japanese knotweed (*Polygonum cuspidatum*), night shade (*Atropa belladonna*), English Ivy (*Helix hedera*), holly (*Ilex*

sp.), poison hemlock (*Conium maculatum*), old man's beard (*Clematis vitalba*), and herb Robert (*Geranium robertianum*). Native ground cover species also observed included sword fern (*Polystichum munitum*), stinging nettles (*Urtica diocia*), bracken fern (*Pteridium aquilinum*), and trailing blackberry (*R. ursinus*). This area of the property appears to have been used for some time to dispose of yard waste, and piles of branches, leaves, grass clippings, and decomposing organic material are present throughout. Additionally, several debris piles composed of concrete chunks were observed. Topography within this area is generally flat with small variations.

NES documented typical conditions at one sample plot (SP 1) taken mid-site. The data sheet is attached to this memo. Soil throughout the profile was a dark yellowish brown (10YR 3/2) silt loam. Soil within SP 1 did not meet NRCS hydric soil indicators and no indicators of hydrology were observe din the plot or elsewhere within the review area.

Bellingham City IQ maps do not indicate any critical areas within the review area (Figure 2). United States Fish and Wildlife (USFW) National Wetland Inventory (NWI) mapping is consistent with City mapping, showing no wetlands onsite.

Baker Creek is located approximately 575 feet to the west, within the BGCC property. Squalicum Creek and Tributary W are located to the southeast, across the intersection of Meridian and Birchwood Avenue. The review area is located approximately 175 feet from Tributary W at the closest point. Baker Creek, Squalicum Creek, and Tributary W are all mapped as fish bearing streams with known presence of multiple species of salmonids and/or trout. The regulated buffer on these streams does not overlap with the subject parcel. FEMA floodplain and floodway are mapped in this vicinity associated with Squalicum Creek, but floodplain does not appear to extend over the subject site (Figure 2).

No priority species or habitats are indicated within the subject site by the Washington State Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) or SalmonScape mapping. Nor were any priority habitats or species observed in the review area or vicinity by NES during the site visit.

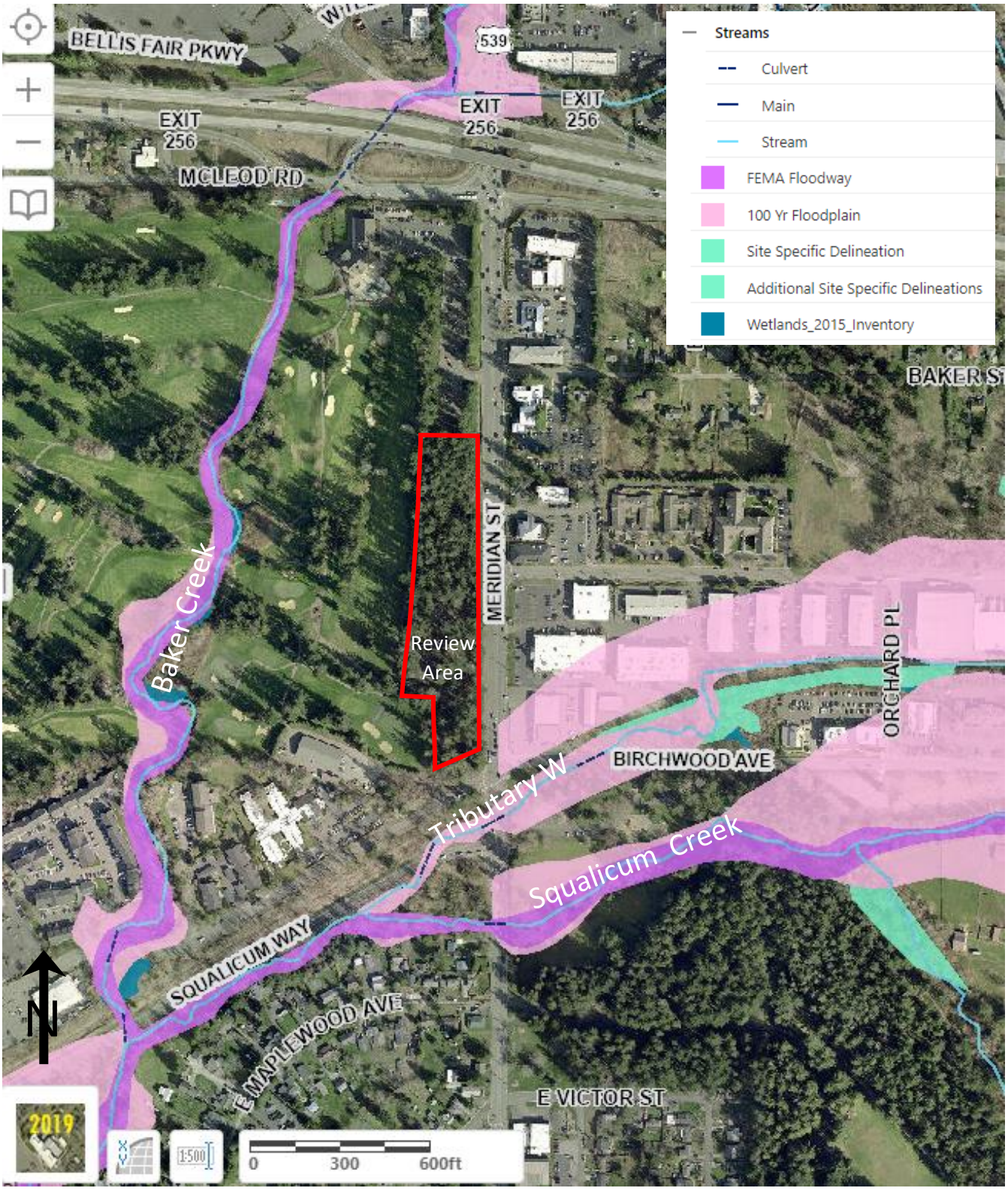
In summary, no wetlands, streams, wildlife conservation areas, or protected species or habitats were identified by NES on site or the immediate vicinity of the subject parcel.

Attachments:
Figures:

1. Vicinity Map
2. Bellingham City IQ Map

Photo Page
Data Sheet

ECOLOGICAL NORTHWEST	**Vicinity Map** **(COB City IQ)** **3729 Meridian Street** **Critical Area Recon Memo**	**Figure 1** **OCT 2021**



ECOLOGICAL NORTHWEST	**City IQ Map** **(COB City IQ)** **3729 Meridian Street** **Critical Area Recon Memo**	**Figure 2** **OCT 2021**

Review area, taken looking south from the BGCC parking lot.

Access road within review area, looking north.

Typical condition of vegetation within review area, containing undisturbed vegetation and yard waste.

Detail within review area, midsite.

Detail within the review area, south end of the site.

Forest edge along the southwestern edge of the review area.

WETLAND DETERMINATION DATA FORM – Western Mountain, Valley Coast Region

Project Site: 3729 Meridian Street	City/County: Bellingham	Sample Date: 9/28/21
Applicant/Owner: Stream Realestate	State: WA	Sample Point: SP 1
Investigator: M. Porter & M. Whitehurst	Section/Township/Range: S13/T38N/R02E	
Landform (hillslope, terrace, etc):	Local Relief (concave, convex, none) :	Subregion: LRR A
Soil Map Unit Name: Kickerville-Urban land complex, 0 to 3 percent slopes (82)		NWI Classification: None

Are climatic/hydrologic conditions on the site typical of 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: Upland. Positive indicators for all three parameters were not observed at this location.	

VEGETATION

Tree Stratum (Plot size: 30 feet)	Absolute % Cover	Indicator Status	Dominant Species?
Pseudotsuga menziesii	100	FACU	☒
		-	☐
		-	☐
		-	☐
Total Cover:	100		
Sapling/Shrub Stratum (Plot size: 15 feet)			
		-	☐
		-	☐
		-	☐
		-	☐
		-	☐
Total Cover:			
Herb Stratum (Plot size: 5 feet)			
Convolvulus arvensis	100	FACU	☒
		-	☐
		-	☐
		-	☐
		-	☐
		-	☐
Total Cover:	100		
Woody Vine Stratum (Plot size: 30 feet)			
		-	☐
		-	☐
		-	☐
Total Cover: % Bare Ground in Herb Stratum: 0			

Dominance Test worksheet Number of Dominant Species that are OBL, FACW, or FAC:	0 (A)
Total number of dominant species across all strata:	2 (AB)
Percent of dominant species that or OBL, FACW, FAC:	0 (A/AB)

Prevalence Index worksheet

OBL species:	x 1=
FACW species:	x 2=
FAC species:	x 3=
FACU species:	x 4=
UPL species:	x 5=
Total: (A)	(B)

Prevalence Index = B/A =

Hydrophytic Vegetation Indicators:

- ☐ Dominance Test is > 50%
- ☐ Prevalence Index is ≤3.0[1]
- ☐ Morphological Adaptations[1] (provide supporting data in Remarks or on a separate sheet)
- ☐ Wetland Non-Vascular Plants[1]
- ☐ Problematic Hydrophytic Vegetation[1]

[1]Indicators of hydric soil and wetland hydrology must be present.

Remarks: The dominant species observed at this location were not hydrophytic.

Hydrophytic Vegetation Present?

Yes ☐ No ☒

SOIL **Sample Point:**

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

Depth	Soil Color		Redox Features					
(inches)	Color (moist)	%	Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
0-4					-	-	Duff	
4-16	10YR 3/2	100			-	-	Silt Loam	with cobble
					-	-		
					-	-		
					-	-		
					-	-		
					-	-		
					-	-		

[1]Type: C=concentration D=depletion RM=reduced matrix [2]Location: PL=pore lining RC=root channel M=matrix

Hydric Soil Indicators: (applicable to all LRRs unless otherwise noted)

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

Indicators for Problematic Hydric Soils[3]:

- ☐ 2 cm Muck (A10)
- ☐ Red parent material (TF2)
- ☐ Very shallow dark surface (TF12)
- ☐ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present.

Restrictive Layer (if present):

Type:

Depth (inches):

Hydric Soil Present? Yes ☐ No ☒

Remarks: Soil at this location did not meet NRCS hydric soil indicators.

HYDROLOGY

Wetland hydrology Indicators:
Primary Indicators (any one indicator is sufficient)

- ☐ 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 along living roots (C3)
- ☐ Presence of Reduced Iron (C4)
- ☐ Recent Iron Reduction in Tilled Soils (C6)
- ☐ Stunted or Stresses Plants (D1) **(LRR A)**
- ☐ Other (Explain in Remarks)

Secondary Indicators (2 or more required)

- ☐ Water-stained (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)
- ☐ Frost-heave Hummocks (D7)
- ☐ FAC-neutral (D5)

Field Observations:

Surface Water Present? Yes ☐ No ☒ Depth (inches):

Water Table Present? Yes ☐ No ☒ Depth (inches):

Saturation Present? Yes ☐ No ☒ Depth (inches): (include capillary fringe)

Wetland Hydrology Present?

Yes ☐ No ☒

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

Remarks: Indicators of hyrology were not observed at this location.