

May 4, 2015

Cristian Geitz
City of Kirkland Planning Department
123 5th Avenue
Kirkland, WA 98033

Re: Bakhchinyan Property Wetland Delineation Review

The Watershed Company Reference Number: 120622.62

Dear Christian:

On April 30, 2015, I visited the Bakhchinyan property located at 9032 116th Avenue NE in Kirkland (Parcel #1238501180). The purpose of the visit was to review a wetland delineation completed by Re-Align Environmental (*Bakhchinyan Property Wetland Delineation Report – Revised Wetland Boundary*, Re-Align Environmental, April 13, 2015) (Re-Align Study). This letter describes the results of the review.

Project History

The Watershed Company conducted a wetland delineation study on the property in July 2014 (*Bakhchinyan Property Wetland Delineation Report*, The Watershed Company, July 18, 2014) (Watershed Study). The Watershed Study noted that there was no soil saturation or shallow water table present on the site at the time of the July 2014 inspection. Therefore, consistent with dry-season delineation methodology, other primary and secondary hydrology indicators were relied upon to determine portions of the wetland boundary. Once the delineated boundaries were surveyed, it was determined that the wetland (Wetland A) was less than 2,500 square feet (2,153 square feet total) and, therefore, as a Type 3 wetland, is not regulated by the City of Kirkland (KZC 90.20.3).

You later notified us that you had visually observed shallow inundation outside of the delineated boundary during a site visit that occurred in the dormant/rainy season. Re-Align Environmental was then retained by the property owner re-delineate the wetland boundary. The Re-Align Study determined that a small area satisfying wetland criteria in the southeast portion of Wetland A was not included within the wetland boundary as delineated in the Watershed Study. The revised wetland boundary yielded a 222 square-foot increase in the size of Wetland A to a total of 2,375 square feet according to a survey by D.R. Strong (March 12, 2015).

Results

The area in question was evaluated for wetland criteria during the review inspection on April 30, 2015. Similar to the July 2014 inspection, there was no soil saturation or groundwater present in the area, although water could be squeezed from the soil (no longer an accepted practice for confirming soil saturation). Vegetation in this area is a mix of Douglas spirea (facultative-wetland) and Himalayan blackberry (facultative-upland). While technically not satisfying the criteria for a hydrophytic plant community, Himalayan blackberry is highly invasive and common along disturbed wetland fringes in urban and suburban areas. The presence of blackberry should not be relied upon solely to exclude a wetland area when hydric soil and hydrology indicators are satisfied. The soil in the area satisfied the criteria for the hydric soil indicator Redox Dark Surface (F6). Given the transitive nature of wetland hydrology, it is prudent to defer hydrology observations to the Re-Align Study, which occurred near the beginning of the growing season. Since positive wetland hydrology was confirmed by the Re-Align study in the early growing season, the area should be considered wetland as flagged.

The remaining discrepancies between the wetland boundaries as delineated in the two studies are relatively minor and reflect mostly variations in angles and distances between individual flag locations. The Re-Align Study occurred during the optimal time to gauge wetland hydrology (early growing season). Therefore, we agree with the wetland boundary determined in the Re-Align Study, and the surveyed wetland delineation map included in the report should be the map of record. Since the wetland classification as a Type 3 wetland is not disputed, and the revised wetland area remains less than 2,500 square feet, Wetland A is not a regulated wetland under Chapter 90 of the Kirkland Zoning Code. No buffer is applied to the wetland. However, Wetland A is regulated by the Washington Department of Ecology and, potentially, the U.S. Army Corps of Engineers. Approvals from these agencies would be needed to allow any fill placement or other earthwork within the wetland boundary.

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

Sincerely,



Ryan Kahlo, PWS
Ecologist