



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

*Northwest Regional Office • PO Box 330316 • Shoreline, Washington 98133-9716 • (206) 594-0000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

July 27, 2021

NorthPoint Holdings, LLC
Attn: Thane Smith
2265 East Murray Holladay Road
Holladay, UT 84117

Re: Administrative Order No. 20160 to permanently fill/impact 0.706 acres of non-federally regulated wetlands and 0.14 acres of non-federally regulated waters of the state at the Cascade Business Park project in the City of Marysville, Snohomish County, Washington

Dear Thane Smith:

The Department of Ecology (Ecology) received your Joint Aquatic Resources Permit Application (JARPA) on June 15, 2021, requesting an Administrative Order for proposed work in non-federally regulated wetlands and waters of the state. Ecology has determined that the proposed work, as conditioned by the enclosed Order, will comply with applicable provisions of Chapter 90.48 RCW and other applicable requirements of state law.

This approval is subject to the conditions contained in the enclosed Order. **You must familiarize yourself with and abide by the conditions in the Order, including all notification requirements.** If you have any questions, please contact Neil Molstad at (425) 389-5549 or neil.molstad@ecy.wa.gov. The enclosed Order may be appealed by following the procedures described in the Order.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Burcar", is written over a horizontal line.

Joe Burcar, Section Manager
Shorelands and Environmental Assistance Program
Northwest Regional Office

Enclosure

cc: Amanda Nadjkovic, U.S. Army Corps of Engineers
Matt DeCaro and Ben Wright, Soundview Consultants LLC
Chris Holland, City of Marysville
Loree' Randall, ECY HQ SEA
Rebekah Padgett, ECY NWRO SEA
Dana Mock, ECY HQ SEA
ECYREFEDPERMITS@ECY.WA.GOV

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

IN THE MATTER OF THE REQUEST BY)	ORDER No. 20160
NORTHPOINT HOLDINGS, LLC)	Corps Ref. No. NWS-2020-571
FOR AN ADMINISTRATIVE ORDER TO)	
CONDUCT WORK IN NON-FEDERALLY)	
REGULATED WETLANDS)	

TO: Northpoint Holdings, LLC
Attn: Thane Smith
2265 East Murray Holladay Road
Holladay, UT 84117

This is an Administrative Order requiring NorthPoint Holdings, LLC to comply with Chapter 90.48 RCW and the rules and regulations of the Department of Ecology (Ecology) by taking certain actions which are described below. RCW 90.48.120(1) authorizes Ecology to issue Administrative Orders requiring compliance whenever it determines that a person has violated or creates a substantial potential to violate any provision of Chapter 90.48 RCW.

On June 15, 2021, Ecology received a request to impact 0.706 acres of non-federally regulated wetland (more specifically, the feature known as the 51st Avenue Ditch) and 0.14 acres of a water of the state (more specifically, the feature known as Ditch U) to construct the Cascade Business Park project in Marysville and Arlington, Snohomish County. The U.S. Army Corps of Engineers (Corps) issued its jurisdictional determination on March 31, 2021 for this project area. The project site is located in portions of Sections 27 and 34, Township 31.N, Range 6.E, within Water Resource Inventory Area (WRIA) 7 (Snohomish).

The proposed project entails the construction of a regional industrial park to include multiple double-loaded and single-loaded buildings and associated infrastructure such as parking, access roads, frontage improvements, utilities, and stormwater management facilities utilizing enhanced water quality treatment for runoff from all impervious surfaces. The proposed project will result in approximately five acres of direct and indirect wetland impacts and involve the relocation of a portion of Edgecomb Creek and an unnamed tributary (Ditch X) to Edgecomb Creek. Impacts to federally regulated wetlands and waters have been authorized by Ecology under separate cover (see Ecology Section 401 Water Quality Certification Order # 20109).

This Administrative Order authorizes 0.706 acres of Category III wetland impacts (the 51st Avenue Ditch) and 0.14 acres of impacts to a water of the state (Ditch U) at the project location. Onsite mitigation for this proposal will occur as described in the *Cascade Business Park Final Mitigation Plan* dated May 27, 2021, prepared by Soundview Consultants LLC.

For purposes of this Order, the term “Applicant” shall mean NorthPoint Holdings, LLC, and its agents, assigns, and contractors.

In view of the foregoing and in accordance with RCW 90.48.120(1):

IT IS ORDERED that the Applicant shall comply with the following:

A. General Conditions:

- A.1 The Applicant shall construct and operate the project in a manner consistent with the project description contained in the JARPA received by Ecology on June 15, 2021, or as otherwise approved by Ecology.
- A.2 For purposes of this Order, all submittals required by its conditions shall be sent to Ecology’s Northwest Regional Office, Attn: Neil Molstad, SEA Program, PO Box 330316, Shoreline, WA, 98133-9716, or via e-mail to fednotification@ecy.wa.gov and a cc to neil.molstad@ecy.wa.gov. Submittals via email are preferred. Any submittals shall reference Order No. 20160.
- A.3 The Applicant shall provide access to the project site and mitigation site upon request by Ecology.
- A.4 Copies of this Order shall be kept on the job site and readily available for reference by Ecology personnel, the construction superintendent, construction managers and forepersons, and state and local government inspectors.
- A.5 Nothing in this Order waives Ecology’s authority to issue additional orders if Ecology determines further actions are necessary to implement the water quality laws of the state. Further, Ecology retains continuing jurisdiction to make modifications hereto through supplemental order, if additional impacts due to project construction or operation are identified (e.g., violations of water quality standards, downstream erosion, etc.), or if additional conditions are necessary to further protect the public interest.
- A.6 The Applicant shall ensure that all appropriate project engineers and contractors at the project site have read and understand relevant conditions of this Order and all permits, approvals, and documents referenced in this Order. The Applicant shall provide Ecology a signed statement (see Attachment A for an example) from each project engineer and contractor that they have read and understand the conditions of this Order and the above-referenced permits, plans, documents and approvals. **These statements shall be provided to Ecology before construction begins at the project.**

B. Notification Requirements:

- B.1 The Applicant shall provide written notification to Ecology in accordance with condition A.2 above for the following activities:
 - a. At least ten (10) days prior to a pre-construction meeting

- b. At least ten (10) days prior to the onset of any work on site
- c. At least ten (10) days prior to the onset of in-water work, including wetlands
- d. At least seven (7) days within the start of impacts to wetlands
- e. At least ten (10) days prior to the onset of work at the wetland mitigation site
- f. Immediately following a violation of the state water quality standards or any condition of this Order
- g. Within fourteen (14) days after completion of construction
- h. At least seven (7) days prior to completing each wetland mitigation site

C. Wetland Compensatory Mitigation Conditions

- C.1 The Applicant shall mitigate wetland impacts as described in the *Cascade Business Park Final Mitigation Plan* (hereafter called the “Mitigation Plan”) prepared by Soundview Consultants LLC, and dated May 27, 2021, or as modified by this Order or revised and approved by Ecology.
- C.2 The Applicant shall submit any changes to the Mitigation Plan in writing to Ecology (see A.2) for review and approval before work begins.
- C.3 The Applicant shall get review and written approval from Ecology of any plan changes required if problems arise during construction and planting of the wetland mitigation site.
- C.4 The Applicant shall have a wetland professional at the wetland mitigation site to supervise during construction and planting.

Implementation

- C.5 Unless otherwise approved by Ecology in writing, the Applicant shall begin the compensatory mitigation project before, or concurrently with impacting wetlands, or Ecology may require additional compensation to account for additional temporal loss of wetland functions.
- C.6 If the mitigation site(s) cannot be completed within 13 months of the date of this Order, the Applicant shall inform Ecology, in writing, of the status of:
 - a) The Cascade Business Park project.
 - b) The Cascade Business Park mitigation area.With the:
 - c) Reason for the delay.
 - d) Expected date of completion.

The Applicant shall submit an updated written notification every 12 months thereafter until the Cascade Business Park project and the Cascade Business Park mitigation area are complete.

- C.7 The Applicant shall ensure that all excess excavated site material is disposed of in an appropriate location outside of wetlands and their buffers at the wetland mitigation site and above the 100-year floodplain.

- C.8 The Applicant shall ensure that no material is stockpiled within existing wetlands or their buffers at the wetland mitigation site(s) at any time, unless provided for in the Ecology-approved Mitigation Plan.
- C.9 The Applicant shall ensure that no construction debris is deposited within existing wetlands or their buffers at the wetland mitigation site(s) at any time, unless provided for in the Ecology-approved Mitigation Plan.
- C.10 The Applicant shall not use polyacrylamide at the mitigation site(s).
- C.11 The Applicant shall not use hay or straw on exposed or disturbed soil at the mitigation site(s).
- C.12 Aquatic herbicides can be used or applied only by certified applicators or persons under the direct supervision of a certified applicator, and only for those uses covered by the certified applicator's license category. Applicators are required to be permitted under Ecology's Noxious Weed Control Permit. Applicators shall comply with all conditions of the Noxious Weed Control Permit.
- C.13 If weed-barrier fabric is used on the site, the Applicant shall use only permeable, fully biodegradable, non-toxic weed-barrier fabric for entire-site and/or individual plant weed control. Non-biodegradable plastic weed-barrier fabric shall be used only at the base of individual plants and shall be removed before it starts to break down, before it interferes with plant growth, or before the end of the monitoring period, whichever comes first.
- C.14 If seeding is used as a best management practice for temporary erosion control, it must be a seed mix consisting of native, annual, non-invasive plant species.
- C.15 The Applicant shall place signs at the mitigation area's(s') boundaries, including buffers, every 100 feet to mark the area as a wetland mitigation site.
- C.16 Upon completion of site-grading and prior to planting, the Applicant shall submit to Ecology written confirmation, from a surveyor or project engineer, that the finished grades are consistent with the approved Mitigation Plan or subsequent Ecology-approved plan changes. The confirmation should indicate how final elevations were confirmed. The written confirmation can be in the form of an email or signed letter.
- C.17 After completing construction and planting of the mitigation sites(s), the Applicant shall submit to Ecology (see A.2) an as-built report, including plan sheets, documenting site conditions at Year Zero. The as-built report must:
 - a) Be submitted within 90 days of completing construction and planting.
 - b) Include the information listed in Attachment B (Information Required for As-built Reports).
 - c) Include documentation of the recorded legal mechanism required in Condition C.18.
- C.18 Within 90 days of completing construction and planting of the Cascade Business Park mitigation area, the Applicant shall record a restrictive covenant, a copy of this Order, and the site map from the final wetland Mitigation Plan or as-built indicating the location of wetlands and their buffers. These documents must be recorded with the County

Recording Office, Registrar of Deeds, or other official responsible for maintaining records for, or interest in, real property.

Monitoring and Maintenance

- C.19 The Applicant shall water and maintain all mitigation site plantings so as to meet the Mitigation Plan's performance standards. If an irrigation system is installed, it shall be removed by the end of year three unless permission is received in writing from Ecology to allow the system to remain for a longer period.
- C.20 The Applicant shall monitor the Cascade Business Park mitigation area for the number of years and shall use the monitoring methods described in the approved Mitigation Plan for the Cascade Business Park project.
- C.21 The Applicant shall submit to Ecology (see A.2) monitoring reports documenting mitigation site conditions on the schedule outlined in the Cascade Business Park Mitigation Plan. The monitoring reports must:
 - a) Be submitted by December 31 of each monitoring year.
 - b) Include the information listed in Attachment C (Information Required for Monitoring Reports).
- C.22 The Applicant shall implement the Mitigation Plan's contingency measures if the Mitigation Plan's goals, objectives, or performance standards are not being met.
- C.23 Prior to implementing contingency measures not specified in the Mitigation Plan, the Applicant shall consult with and obtain written approval from Ecology for the changes.
- C.24 When necessary to meet the performance standards, the Applicant shall replace dead or dying plants with the same species, or an appropriate native plant alternative, during the first available planting season and note species, numbers, and approximate locations of all replacement plants in the subsequent monitoring report.
- C.25 The Applicant shall use the currently approved federal wetland delineation manual and appropriate regional supplement to delineate all compensatory wetlands and include delineation information (e.g. data sheets, maps, etc.) in the monitoring reports.
- C.26 The Applicant shall use the October 2014 or updated version of "Washington State Wetlands Rating System for Western Washington" to rate all wetlands (except those that have been preserved) and include the information in the monitoring report.
- C.27 If the Applicant has not met all conditions, including performance standards, for the mitigation site at the end of the monitoring period, Ecology may require additional monitoring, additional mitigation, or both.
- C.28 Until the Applicant has received written notice from Ecology that the Mitigation Plan has been fully implemented, the Applicant's obligation under Condition C.1 to mitigate for wetland impacts is not met.

D. Water Quality Monitoring & Criteria

- D.1 This Order does not authorize the Applicant to exceed applicable turbidity standards beyond the limits established in Chapter 173-201A-200(1)(e)(i) WAC.
- D.2 The 51st Avenue Ditch and Ditch U are categorized under the Water Quality Standards For Surface Waters of the State of Washington as habitat for salmonid spawning, rearing, and migration. The criteria of the categorization apply as described in WAC 173-201A-200(1), except as specifically modified by this Order.
- D.3 For in-water activities within fresh waters (including wetlands) turbidity shall not exceed 5 NTU over background when the background is 50 NTU or less; or a 10 percent increase in turbidity when the background turbidity is more than 50 NTU;
- a. Temporary area of mixing for turbidity established within the state water quality standards for fresh waters (WAC 173-201A-200) is as follows:
 - i. For waters up to 10 cfs flow at the time of construction, the point of compliance shall be one hundred feet downstream from the activity causing the turbidity exceedance.
 - ii. For waters above 10 cfs up to 100 cfs flow at the time of construction, the point of compliance shall be two hundred feet downstream of the activity causing the turbidity exceedance.
 - iii. For waters above 100 cfs flow at the time of construction, the point of compliance shall be three hundred feet downstream of the activity causing the turbidity exceedance.

For projects working within or along lakes, ponds, wetlands, or other non-flowing waters, the point of compliance shall be at a radius of one hundred fifty feet from the activity causing the turbidity exceedance.

- D.4 The Applicant shall conduct water quality monitoring as described in the approved *Cascade Business Park Water Quality Monitoring Plan* (hereafter referred to as the WQMP) prepared by Soundview Consultants and dated May 27, 2021.
- D.5 The Applicant must provide, in writing, any changes or additions to the WQMP and obtain approval from Ecology (email to fednotification@ecy.wa.gov and cc neil.molstad@ecy.wa.gov and rebekah.padgett@ecy.wa.gov prior to implementation of the changes or additions.
- D.6 Monitoring results shall be submitted weekly to Ecology (email to fednotification@ecy.wa.gov and cc neil.molstad@ecy.wa.gov and rebekah.padgett@ecy.wa.gov), per condition A.2 and as described in the WQMP.
- D.7 Mitigation and/or additional monitoring may be required if the monitoring results indicate that the water quality standards have not been met.
- D.8 Visible turbidity anywhere beyond the temporary area of mixing (point of compliance) from the activity shall be considered an exceedance of the standard.
- D.9 If water quality exceedances for turbidity are observed outside the point of compliance, work shall cease immediately and the Applicant or the contractor shall assess the cause of

the water quality problem and take immediate action to stop, contain, and correct the problem and prevent further water quality turbidity exceedances.

E. Construction

General Conditions

- E.1 All work in and near waters of the state shall be conducted to minimize turbidity, erosion, and other water quality impacts. Construction stormwater, sediment, and erosion control Best Management Practices (BMPs) suitable to prevent exceedances of state water quality standards shall be in place before starting maintenance and shall be maintained throughout the duration of the activity.
- E.2 All clearing limits, stockpiles, staging areas, and trees to be preserved shall clearly be marked prior to commencing construction activities and maintained until all work is completed for each project.
- E.3 No stockpiling or staging of materials shall occur at or below the OHWM of any waterbody.
- E.4 The Applicant shall comply with the conditions of the Construction Stormwater Permit (National Pollutant Discharge Elimination System – NPDES) issued for this project.
- E.5 Within the project limits¹ all environmentally sensitive areas including, but not limited to, wetlands, wetland buffers, and mitigation areas shall be fenced with high visibility construction (HVF) prior to commencing construction activities. Construction activities include equipment staging, materials storage, and work vehicle parking. *Note: This condition does not apply to activities such as pre-construction surveying and installing HVF and construction zone signage.*
 - a. If the project will be constructed in stages² a detailed description and drawings of the stages shall be sent to Ecology for review at least 20 days prior to placing HVF.
 - b. Condition 2.a. shall apply to each stage.
 - c. All field staff shall be trained to recognize HVF, understand its purpose and properly install it in the appropriate locations.
 - d. HVF shall be maintained until all work is completed for each project or each stage of a staged project.
- E.6 All clearing limits, stockpiles, staging areas, and trees to be preserved shall clearly be marked prior to commencing construction activities and maintained until all work is completed for each project.
- E.7 No petroleum products, fresh concrete, lime or concrete, chemicals, or other toxic or deleterious materials shall be allowed to enter waters of the state.

¹ Project limits include mitigation sites, staging areas, borrow sources, and other sites developed or used to support project construction.

² A stage is part of a project that has been separated into at least two distinct areas to be built during separate timeframes.

- E.8 All construction debris, excess sediment, and other solid waste material shall be properly managed and disposed of in an upland disposal site approved by the appropriate regulatory authority.
- E.9 Turbid de-watering water associated with in-water work shall not be discharged directly to waters of the state, including wetlands. Turbid de-watering water shall be routed to an upland area for on-site or off-site settling.
- E.10 Clean de-watering water associated with in-water work that has been tested and confirmed to meet water quality standards may be discharged directly to waters of the state including wetlands. The discharge outfall method shall be designed and operated so as not to cause erosion or scour in the stream channel, banks, or vegetation.
- E.11 All equipment being used below the ordinary high water mark shall utilize biodegradable hydraulic fluid.

Equipment & Maintenance

- E.12 Staging areas will be located a minimum of 50 feet and, where practical, 200 feet, from waters of the state including wetlands. If a staging area must be located within 50 feet of waters of the state, then the Applicant shall provide a written explanation and obtain approval from Ecology's Federal Permit Manager before placing the staging area in the 50-foot setback area.
- E.13 Equipment used for this project shall be free of external petroleum-based products while used around the waters of the state, including wetlands. Accumulation of soils or debris shall be removed from the drive mechanisms (wheels, tires, tracks, etc.) and the undercarriage of equipment prior to its use around waters of the state, including wetlands.
- E.14 No equipment shall enter, operate, be stored or parked within any sensitive area except as specifically provided for in this Order.
- E.15 Fuel hoses, oil drums, oil or fuel transfer valves and fittings, etc., shall be checked regularly for drips or leaks, and shall be maintained and stored properly to prevent spills into state waters.
- E.16 Wash water containing oils, grease, or other hazardous materials resulting from washing of equipment or working areas shall not be discharged into state waters. The Applicant shall set up a designated area for washing down equipment.
- E.17 A separate area shall be set aside, which does not have any possibility of draining to surface waters, for the wash-out of concrete delivery trucks, pumping equipment, and tools.

Dewatering Conditions

- E.18 It is anticipated that dewatering will not be necessary and that any work within the 51st Avenue Ditch and Ditch U will be conducted in the dry. However, if dewatering is necessary, the procedures described in the WQMP shall be implemented.
- E.19 All equipment associated with dewatering activities shall be properly operated and maintained.

Culvert Work & Stream Bypass

- E.20 All culvert work shall be conducted in the dry or in isolation from stream flow.
- E.21 Stream flow isolation work shall not scour the stream channel or banks of the water body in which the work is being done.
- E.22 To minimize sediment releases into downstream water, water reintroduced to the channel shall be done gradually and at a rate not exceeding the normal stream flow.
- E.23 Culverts shall be installed to avoid inlet scouring and prevent downstream bank erosion.
- E.24. Fill associated with culvert installation shall be protected from erosion to the 100-year peak flow.

F. Timing

- F.1 This Order is valid until the Applicant meets all its requirements and the Applicant has received written notification from Ecology to that effect.
- F.2 In-water work shall be conducted in the 51st Avenue Ditch and Ditch U between July 16 and September 15 of any year, unless otherwise approved by Ecology.
- F.3 Any project change that requires a new or revised Hydraulic Project Approval (HPA) from the Department of Fish and Wildlife should be sent to Ecology for review before the change is implemented. Proposed changes shall be implemented only with written approval from Ecology.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

YOUR RIGHT TO APPEAL

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do both of the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order on Ecology in paper form by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503 Pollution Control Hearings Board 1111 Israel Road SW, Suite 301 Tumwater, WA 98501	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608 Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

CONTACT INFORMATION

Please direct all questions about this Order to:

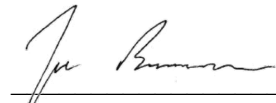
Neil Molstad
Department of Ecology
Northwest Regional Office
(425) 389-5549
neil.molstad@ecy.wa.gov

MORE INFORMATION

- **Pollution Control Hearings Board Website**
<http://www.eluho.wa.gov/Board/PCHB>
- **Chapter 43.21B RCW - Environmental and Land Use Hearings Office – Pollution Control Hearings Board**
<http://app.leg.wa.gov/RCW/default.aspx?cite=43.21B>
- **Chapter 371-08 WAC – Practice And Procedure**
<http://app.leg.wa.gov/WAC/default.aspx?cite=371-08>
- **Chapter 34.05 RCW – Administrative Procedure Act**
<http://app.leg.wa.gov/RCW/default.aspx?cite=34.05>
- **Chapter 90.48 RCW – Water Pollution Control**
<http://app.leg.wa.gov/RCW/default.aspx?cite=90.48>
- **Chapter 173.204 WAC – Sediment Management Standards**
<http://apps.leg.wa.gov/WAC/default.aspx?cite=173-204>

- **Chapter 173-200 WAC – Water Quality Standards for Ground Waters of the State of Washington**
<http://apps.leg.wa.gov/WAC/default.aspx?cite=173-200>
- **Chapter 173-201A WAC – Water Quality Standards for Surface Waters of the State of Washington**
<http://apps.leg.wa.gov/WAC/default.aspx?cite=173-201A>

DATED July 27, 2021, at Shoreline, Washington.



Joe Burcar, Section Manager
Shorelands and Environmental Assistance Program
Northwest Regional Office

Attachment A
Statement of Understanding
Water Quality Certification Conditions

Cascade Business Park
NorthPoint Holdings, LLC
Administrative Order No. **20160**
and
Corps Reference No. **NWS-2020-0571**

I, _____, state that I will be involved as an agent or contractor for NorthPoint Holdings, LLC in the site preparation and/or construction of the Cascade Business Park located in Marysville and Arlington, Snohomish County, Washington. I further state that I have read and understand the relevant conditions of Washington Department of Ecology Water Quality Certification Order No. 20160 and the applicable permits and approvals referenced therein which pertain to the project-related work for which I am responsible.

Signature

Date

Title

Phone

Company

Attachment B

Information Required for As-built Reports

Cascade Business Park
Administrative Order # 20160
And
Corps Reference # NWS-2020-0571

Ecology requires the following information for as-built reports submitted under this Order. Ecology will accept additional information that may be required by other agencies.

Background Information

- 1) Project name.
- 2) Ecology Order number and the Corps reference number.
- 3) Name and contact information of the person preparing the as-built report. Also, if different from the person preparing the report, include the names of:
 - a) The applicant
 - b) The landowner
 - c) Wetland professional on site during construction of the mitigation site(s).
- 4) Date the report was produced.

Mitigation Project Information

- 5) Brief description of the **final** mitigation project with any changes from the approved plan made during construction. Include:
 - a) **Actual** acreage of Cowardin classes and mitigation type(s) (re-establishment, rehabilitation, creation, enhancement, preservation, upland, buffers).
 - b) Important dates, including:
 - i. Start of project construction.
 - ii. When work on the mitigation site began and ended.
 - iii. When different activities such as grading, removal of invasive plants, installing plants, and installing habitat features began and ended.
- 6) Description of any problems encountered and solutions implemented (with reasons for changes) during construction of the mitigation site(s).
- 7) List of any follow-up actions needed, with a schedule.
- 8) Vicinity map showing the geographic location of the site(s) with landmarks.
- 9) Mitigation site map(s), 8-1/2" x 11" or larger, showing the following:
 - a) Boundary of the site(s).
 - b) Topography (with a description of how elevations were determined).
 - c) Installed planting scheme (quantities, densities, sizes, and approximate locations of plants, as well as the source(s) of plant material).
 - d) Location of habitat features.
 - e) Location of permanent photo stations and any other photos taken.Include the month and year when each map was produced or revised. The site map(s) should reflect on-the-ground conditions after the site work is completed.
- 10) Photographs taken at permanent photo stations and other photographs, as needed. Photos must be dated and clearly indicate the direction from which each photo was taken. Photo pans are recommended.

Order # 20160, Corps No. NWS-2020-0571,

July 27, 2021

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- 11) A copy of any deed notifications, conservation easements, or other approved site protection mechanism.

Attachment C

Information Required for Monitoring Reports

Cascade Business Park
Ecology Administrative Order # 20160
And
Corps Reference # NWS-2020-0571

Ecology requires the following information for monitoring reports submitted under this Order. Ecology will accept additional information that may be required by other agencies.

Background Information

- 1) Project name.
- 2) Ecology Order number and the Corps reference number.
- 3) Name and contact information of the person preparing the monitoring report. Also, if different from the person preparing the report, include the names of:
 - a) The applicant
 - b) The landowner
 - c) The party responsible for the monitoring activities.
- 4) Dates the monitoring data were collected.
- 5) Date the report was produced.

Mitigation Project Information

- 6) Brief description of the mitigation project, including acreage of Cowardin classes and mitigation type(s) (re-establishment, rehabilitation, creation, enhancement, preservation, upland, buffers).
- 7) Description of the monitoring approach and methods. For each performance standard being measured provide the following information:
 - a) Description of the sampling technique (e.g., monitoring point for soil or hydrology, line or point intercept method, ocular estimates in individually placed plots). If you are using a standardized technique, provide a reference for that method.
 - b) Size and shape of plots or transects.
 - c) Number of sampling locations and how you determined the number of sampling locations to use.
 - d) Percent of the mitigation area being sampled.
 - e) Locations of sampling (provide a map showing the locations), how you determined where to place the sampling locations (e.g., simple random sample), and whether they are permanent or temporary.
 - f) Schedule for sampling (how often and when).
 - g) Description of how the data was evaluated and analyzed.
- 8) Summary table(s) comparing performance standards with monitoring results and whether each standard has been met.

- 9) Discussion of how the monitoring data were used to determine whether the site(s) is meeting performance standards.
- 10) Goals and objectives and a discussion of whether the project is progressing toward achieving them.
- 11) Summary, including dates, of management actions implemented at the site(s), for example, maintenance and corrective actions.
- 12) Summary of any difficulties or significant events that occurred on the site that may affect the success of the project.
- 13) Specific recommendations for additional maintenance or corrective actions with a timetable.
- 14) Photographs taken at permanent photo stations and other photographs, as needed. Photos must be dated and clearly indicate the direction the camera is facing. Photo pans are recommended.
- 15) Vicinity map showing the geographic location of the site(s) with landmarks.
- 16) Mitigation site map(s), 8-1/2" x 11" or larger, showing the following:
 - a) Boundary of the site(s).
 - b) Location of permanent photo stations and any other photos taken.
 - c) Data sampling locations, such as points, plots, or transects.
 - d) Approximate locations of any replanted vegetation.
 - e) Changes to site conditions since the last report, such as areas of regrading, a shift in the location of Cowardin classes or habitat features, or a change in water regime.Include the month and year when each map was produced or revised. The site map(s) should reflect on-the-ground conditions during the most recent monitoring year.