



WETLAND BUFFER MITIGATION PLAN

Revised December 16, 2025, June 5, 2025



Farman Street Property *Enumclaw, WA*

Prepared for

Davis Law Office
7191 Wagner Way, Suite 202
Gig Harbor, WA 98335
(253) 858-9423

Prepared by

Ecological Land Services

1157 3rd Avenue, Suite 220A • Longview, WA 98632
(360) 578-1371 • Project Number 3132.01

SIGNATURE PAGE

The information in this report was compiled and prepared under the supervision and direction of the undersigned.



Joanne Bartlett, SPWS
Senior Biologist



Olivia Mallett
Biologist

TABLE OF CONTENTS

INTRODUCTION	1
PROPERTY DESCRIPTION.....	1
PROJECT DESCRIPTION	1
MITIGATION SEQUENCING.....	2
WETLAND BUFFER MITIGATION PLAN	3
<i>Specifications for Site Preparation</i>	<i>3</i>
<i>Goals, Objectives, and Performance Standards.....</i>	<i>3</i>
<i>Specifications for Planting.....</i>	<i>3</i>
MAINTENANCE PLAN.....	5
MONITORING PLAN.....	5
<i>As-built</i>	<i>5</i>
<i>Vegetation</i>	<i>5</i>
<i>Monitoring Report Contents</i>	<i>6</i>
CONTINGENCY PLAN.....	6
NO NET LOSS ASSESSMENT	6
LIMITATIONS	7
REFERENCES	8

TABLES (IN TEXT)

Table 1. Wetland Buffer Mitigation Plant List

FIGURES

- Figure 1. Vicinity Map
- Figure 2. Site Map
- Figure 3. Proposed Conditions
- Figure 4. Planting Plan

INTRODUCTION

Ecological Land Services, Inc. (ELS) was contracted by Foothill Ridge LLC to create a buffer mitigation plan for the properties in the northeast quadrant of Farman Street and State Route 410, King County Tax Parcel Number 192007-9136, in Enumclaw, Washington. This property is in a portion of Section 19, Township 20 North, Range 7 East of the Willamette Meridian (Figure 1). This report summarizes findings of the non-wetland determination in accordance with the Enumclaw Municipal Code (EMC) Chapter 19.02, Critical Areas Regulations. This wetland buffer mitigation plan was prepared to address and mitigate impacts necessary for infrastructure installation and road widening associated with the proposed multifamily development onsite.

PROPERTY DESCRIPTION

This property is located in the north end of four properties under the same ownership that extend north from State Route 410 (SR 410) along Farman Street in Enumclaw, Washington (Figure 2). It is composed of level field that is regularly maintained and used as a parking area during the King County Fair. The field slopes up to the north, east, and west with the field sloping down very gradually to SR 410. The property is currently undeveloped and is bordered by residential development on the north and west and Farman Road to the west. An existing stormwater pond is located at the southwest corner of the property.

The small wetland is located at the northwest corner, lying below the slope from Farman Road. It is about 400 square feet in size and meets the criteria for a Category IV wetland. There are areas of the field where water stands during the winter and spring, but they do not meet the wetland criteria due to the lack of hydric soil indicators. A buffer of 25 feet is required per the EMC.

PROJECT DESCRIPTION

The project proposes grading and developing the property with multifamily units, an access road, parking spaces, a stormwater pond, and sidewalks. It appears that infrastructure installation and widening of Farman Street is necessary to support the onsite development and will impact the western buffer of Wetland A. To compensate for the impacts of this grading, the buffer will be reduced, and the impacts will be mitigated by planting the entire onsite buffer of Wetland A, in accordance with *EMC 19.02.090.C.3.e*. Buffer enhancement is required when averaging is proposed and the existing buffer vegetation is monotypic, dominated by groundcover, has an overall plant density of 50 percent or less, or allows for unobstructed pollutant pathways from adjacent uplands to the wetland (EMC 2025). Since the affected buffer area currently meets these criteria, the buffer will be improved using native trees and shrubs intended to improve the function and conditions of the buffer. Although buffer averaging is not proposed, mitigation of buffer impacts is proposed to meet this requirement.

Buffer Impacts Analysis

Currently, the entire property is mowed grass, which does not have the ability to shield the wetland from noise and light pollution generated on Farman Street N both currently and in the future and provides limited habitat for wildlife. However, it has the ability to filter pollutants in surface water runoff that flows into the area from Farnum Street. The proposed wetland buffer reduction for the multi-family development is minor, with only a 108-square-foot decrease, and the buffer width will not be reduced to less than 15 feet. This slight reduction will not negatively impact the wetland or its ability to filter pollutants. The area averaged in will also be 108 square feet and consists of the same mowed lawn conditions.

MITIGATION SEQUENCING

The wetland buffer reductions or alterations is required by local, state, and federal agencies specifies to assess the permanent impacts to wetlands proposed by development to document that the project cannot avoid, minimize, or rectify prior to proposing compensation for the impacts.

Avoiding Wetland Impacts. The project will utilize Farman Street N as the sole access point to the property, as alternative access routes are not feasible due to surrounding private and residential properties. As part of the development, Farman Street will be widened, resulting in impacts to the western edge of the wetland buffer. However, the project has been designed to avoid any impacts to the wetland and other areas of the associated buffer.

Minimizing Wetland Impacts. The project minimizes buffer impacts by limiting road and infrastructure expansion to a 108-square-foot area of maintained grass. No native woody vegetation will be removed, and impervious surfaces within the wetland buffer have been reduced to the greatest extent feasible. However, mitigation will be required to offset the loss of buffer area and associated ecological functions.

Rectifying the Impact. The project cannot rectify impacts associated with the proposed project because they are permanent and necessary along an existing city street.

Reducing or Eliminating Impacts. The project cannot reduce or eliminate the impacts by preservation and maintenance.

Compensating for the Wetland Impacts. Compensation is proposed for the buffer impact and includes enhancing the remainder of the onsite wetland buffer, which currently consists of maintained grass. The buffer compensation area is also significantly larger than the new impacts through the road widening. The mitigation area is 2,903 square feet while the impacts 704 square feet of the wetland buffer, which is a ratio of nearly 4.12:1 in exceedance of the required ratio of 1:1.

Monitoring the Impact and Compensation and Taking Appropriate Corrective Measures

Monitoring of the wetland buffer mitigation area to document the improvement buffer function is proposed for a period of 5 years.

WETLAND BUFFER MITIGATION PLAN

The proposed project will impact 704 square feet of buffer for which 2,903 square feet of buffer mitigation is proposed (Figures 4 and 5). The buffer is dominated by maintained grass and the mitigation proposes to improve the vegetation in the entire onsite buffer. Native plants totaling 141 will be installed and will include coniferous and deciduous trees, high and low growing shrubs, and ferns to create a multilayered forested community. Plant species to be installed include evergreen trees and shrubs (western red cedar, sword fern, and tall Oregon grape). Deciduous species are proposed as well (cascara, red flowering currant, and Nootka rose) to improve vegetation and habitat diversity as well as to improve the visual conditions of the buffer.

SPECIFICATIONS FOR SITE PREPARATION

The mitigation is prepped for plant installation, which shall occur following construction of the project. The buffer shall be mowed prior to the installation of plants to eliminate non-native and potentially invasive plant species as well as tall grasses.

GOALS, OBJECTIVES, AND PERFORMANCE STANDARDS

Project Goal: Improve the remainder of the onsite wetland buffer. The performance standards focus on keeping cover by invasive species low and having a high survival rate of planted species so that there will be a resulting increase in percent cover.

Objective 1: Control invasive species.

Performance Standard 1(a): During Years 1 through 5, invasive species will be removed and suppressed around the plants in the mitigation area as often as necessary to meet a performance standard of no greater than 10 percent cover by invasive species. Percent cover will be recorded annually and included in monitoring reports.

Objective 2: Maintain high diversity and survival of the installed plants.

Performance Standard 2(a): The project will maintain 100 percent survival of plants in Years 1 through 3. After Year 3, the plants should be surviving and growing well within the buffer area so additional survival rate monitoring may not be warranted. Plant species number will be recorded annually and compared with as-built conditions for inclusion with the monitoring reports.

SPECIFICATIONS FOR PLANTING

The plants specified for installation are intended to improve the native plant community and improve the wetland buffer function. The specified trees, shrubs and ferns grow relatively quickly, are tolerant of the onsite conditions and if maintained, will establish a multi-layer canopy of vegetation within buffer. The proposed location of the plants is presented in the planting plan (Figure 5). The actual location of the plants may be altered during the implementation.

Plant Materials

Potted Stock

1. 1-gallon potted plants will be purchased from a native plant nursery.
2. Potted stock will have a minimum size of 1.5 to 3 feet tall.
3. Potted stock will be kept in a shaded area prior to being planted.
4. The potted stock will have well-developed roots and sturdy stems with an appropriate root-to-shoot ratio.
5. No damaged or desiccated roots or diseased plants will be accepted.
6. Unplanted stock will be properly stored at the end of each planting day to prevent desiccation.
7. The project biologist will be responsible for inspecting potted stock prior to and during planting and culling unacceptable plant materials.

Planting Specifications

Plants will be installed as roughly indicated on the attached planting plan (Figure 5) or in small groupings to mimic the natural environment and to enhance species survival. Table 1 provides a list of plants proposed for installation within the buffer based on the square footage of the planting area. Plantings will be spaced to allow for removal of invasive plants. Plant species substitutions are often necessary due to lack of availability and must be approved by the project biologist to ensure that they are suitable for the mitigation area and are a viable alternative to the species it is replacing.

Table 1. Wetland Buffer Mitigation Plant List

Species	Spacing (feet)	Quantity	Size
Western redcedar (<i>Thuja plicata</i>)	10	8	1 gallon
Cascara (<i>Frangula purshiana</i>)	5	8	1 gallon
Red flowering currant (<i>Ribes sanguineum</i>)	5	20	1 gallon
Tall Oregon grape (<i>Mahonia aquifolium</i>)	5	20	1 gallon
Nootka rose (<i>Rosa nutkana</i>)	5	20	1 gallon
Sword fern (<i>Polystichum munitum</i>)	4	65	1 gallon
TOTAL		141	

Planting Methods

1. Install the specified plants as listed in Table 1 at any time of the year. Space the plants somewhat irregularly within the mitigation area to create dense heterogeneity in the mitigation area. Plant the potted stock with a tree shovel or comparable tool.
2. Place the potted species in the planting holes so that their roots can extend down entirely and do not bend upward or circle inside the hole.
3. Position the root crowns so that they are at, or slightly above, the level of the surrounding soil.
4. Firmly compact the soil around the planted species to eliminate air spaces.
6. Irrigate all newly installed plants as site and weather conditions warrant.

MAINTENANCE PLAN

Maintenance of the planting areas will occur for 5 years and will involve removing invasive plant species, irrigating planted species, and reinstalling failed plantings, as necessary. The maintenance may include the following activities:

1. Remove and control non-native and/or invasive vegetation from within the wetland buffer a minimum of two times during the growing season for the first 5 years.
2. Irrigate installed plants as needed during the dry season, approximately July 1 through October 15. ELS biologists recommend that watering occur at least twice a week during the dry season for the first 3 years. The most successful method of watering plants is using a temporary above-ground irrigation system set to a timer to ensure the plants are regularly watered.
3. Replace dead or failed plants as described for the original installation to meet the minimum annual survival rate and percent cover performance standards.

MONITORING PLAN

The wetland buffer mitigation area will be monitored annually for a 5-year period following plant installation. Monitoring reports will be submitted to the Enumclaw Department of Community Development (EDCD) by December 31 of each monitored year. The goal of monitoring is to determine if the previously stated performance standards are being met. The buffer mitigation areas will be monitored once during the growing season, preferably during the same two-week period each year to better compare the data. Photo stations will be established from several locations within the mitigation area to visually document the changes that occur in the buffer during the 5-year monitoring period.

AS-BUILT

An as-built report shall be prepared upon completion of the plant installation to verify that the mitigation plan was implemented as approved. A series of site visits may be conducted to document the before and after conditions and to establish monitoring units and photo stations. Baseline data will be collected in the monitoring units and photos taken during the final as-built visit that will be used to track the success of the mitigation plan. The as built report will also document whether any plant substitutions were needed due to lack of availability of one or more of the specified plants.

VEGETATION

Vegetative monitoring will document the developing native vegetation buffer within the mitigation area. The following information will be collected during each monitoring visit:

- Number and frequency of trees, shrubs, and ferns.
- Species composition of shrubs, including non-native, invasive species.
- Photo documentation of vegetative changes over time.

MONITORING REPORT CONTENTS

The annual monitoring reports will contain at least the following:

- Location map and representational drawing.
- Historic description of the project, including dates of plant installation, current year of monitoring, and restatement of goals, objectives, and performance standards.
- Description of monitoring methods.
- Documentation of plant cover and overall development of plant communities.
- Assessment of non-native, invasive plant species and recommendations for management.
- Photographs from permanent photo points.
- Summary of maintenance and contingency measures proposed for the next season and completed for the past season.

CONTINGENCY PLAN

If the performance standards are not being met during the 5-year monitoring period, contingency measures will be implemented to achieve the standard by the next monitoring season. The contingency measures utilized will depend on the failure of the plants or maintenance activities and will include but are not limited to replacement of dead plants (with the same or a similar species) when the survival rate standard is not met, the addition of plants when the yearly percent cover standard is not met, and more intensive maintenance if the invasive plant cover exceeds 10 percent. All contingency actions will be undertaken only after consulting and gaining approval from the EDCD. The applicant will be required to complete a contingency plan that describes (1) the causes of failure, (2) proposed corrective actions, (3) a schedule for completing corrective actions, and (4) whether additional maintenance and monitoring are necessary.

NO NET LOSS ASSESSMENT

The project proposes to reduce the buffer of Wetland A to accommodate widening of Farman Street on the west side. There will be no net loss of wetland buffer functions because:

- The buffer reduction will be no more than 40 percent or be a width of less than 15 feet.
- The 704 square feet of buffer impact will be compensated through installation of native species, which will significantly improve the function of the buffer because of the quantity and selection of trees, woody shrubs, and ferns.
- The ratio of reduction to mitigation is about 4:1, which exceeds the required 1:1 ratio for buffer impacts.
- The wetland is roughly 400 square feet in size and the retained buffer is more than 7 times larger so there will be no significant reduction in the amount of protection for the small wetland.
- The wetland buffer provides low quality function apart from pollution filtration from upland runoff. By planting the buffer to create a multilayer community, there will be

greater protection for the wetland from the future development and traffic along Farman Street.

LIMITATIONS

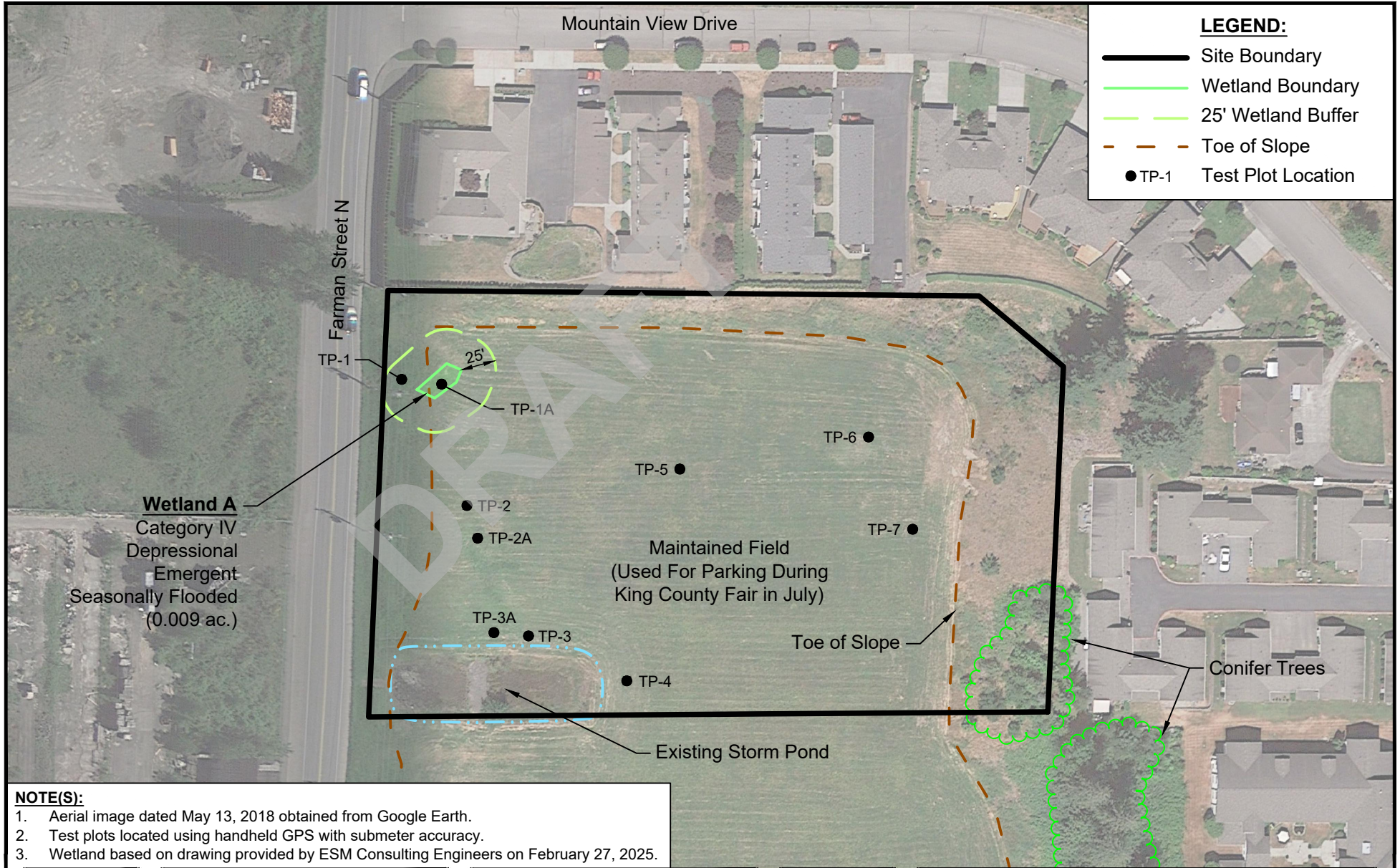
ELS bases this report's determinations on standard scientific methodology and best professional judgment. In our opinion, local, state, and federal regulatory agencies should agree with our determinations. However, the information contained in this report should be considered preliminary and used at your own risk until it has been approved in writing by the appropriate regulatory agencies. ELS is not responsible for the impacts of any changes in environmental standards, practices, or regulations after the date of this report.

REFERENCES

Ecological Land Services, Inc. (ELS). (2025). Wetland Delineation Report for Foothills Ridge LLC – Farman Street Property. March 4, 2025.

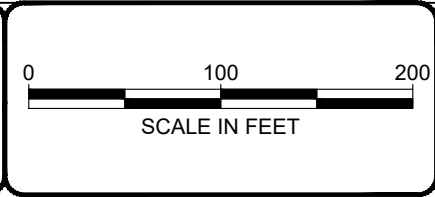
Enumclaw Municipal Code (EMC). 2025. *Title 19.20 Critical Areas Regulations*.

FIGURES



NOTE(S):

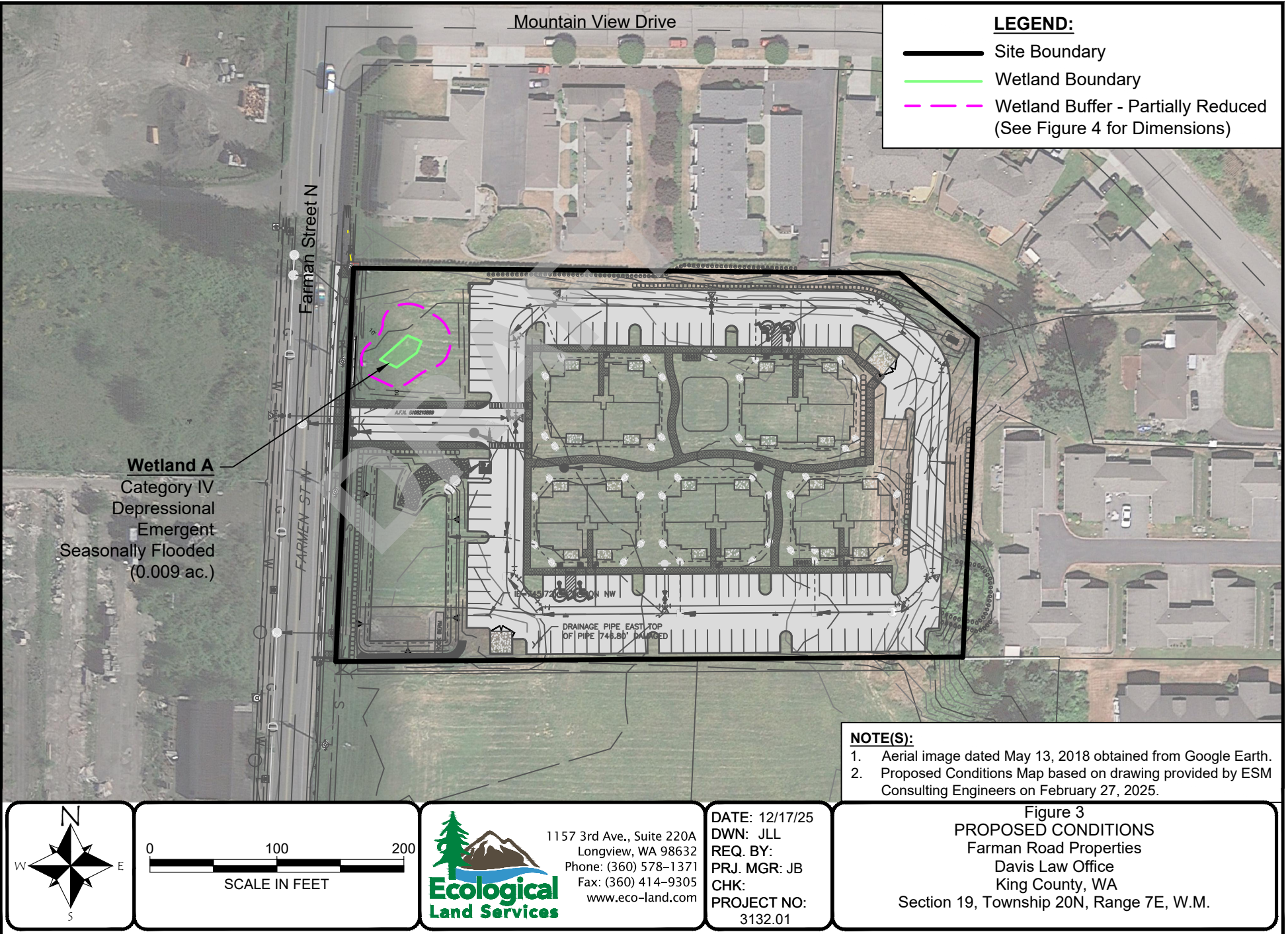
1. Aerial image dated May 13, 2018 obtained from Google Earth.
2. Test plots located using handheld GPS with submeter accuracy.
3. Wetland based on drawing provided by ESM Consulting Engineers on February 27, 2025.











1157 3rd Ave., Suite 220A
Longview, WA 98632
Phone: (360) 578-1371
Fax: (360) 414-9305
www.eco-land.com

DATE: 12/17/25
DWN: JLL
REQ. BY:
PRJ. MGR: JB
CHK:
PROJECT NO:
3132.01

Figure 2
SITE MAP
Farman Road Properties
Davis Law Office
King County, WA
Section 19, Township 20N, Range 7E, W.M.



LEGEND:

-  Site Boundary
-  Wetland Boundary
-  25' Wetland Buffer
-  15' Building Setback
-  Wetland Buffer - Partially Reduced
-  Building Setback - Partially Reduced
-  Building Setback Impact (108 sq. ft.)
-  Enhanced Planting Area (2,903 sq. ft.)

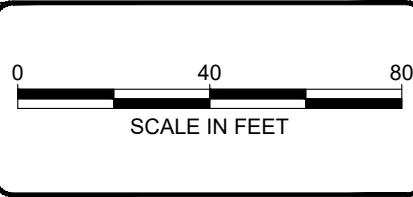
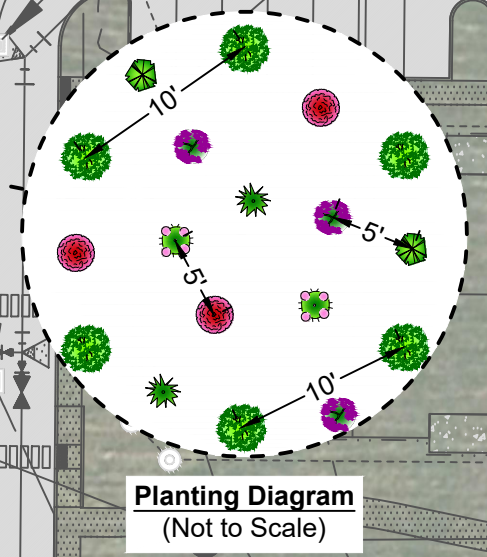
Wetland Buffer Enhancement Plant List

Species	Spacing (feet)	Quantity	Size
Western redcedar (<i>Thuja plicata</i>)	10	8	1 gallon
Cascara (<i>Frangula purshiana</i>)	5	8	1 gallon
Red flowering currant (<i>Ribes sanguineum</i>)	5	20	1 gallon
Tall Oregon grape (<i>Mahonia aquifolium</i>)	5	20	1 gallon
Nootka rose (<i>Rosa nutkana</i>)	5	20	1 gallon
Sword fern (<i>Polystichum munitum</i>)	4	65	1 gallon
TOTAL		141	



Wetland A
 Category IV
 Depressional
 Emergent
 Seasonally Flooded
 (0.009 ac.)

NOTE(S):
 1. Aerial image dated May 13, 2018 obtained from Google Earth.
 2. Proposed Conditions Map based on drawing provided by ESM Consulting Engineers on February 27, 2025.




1157 3rd Ave., Suite 220A
 Longview, WA 98632
 Phone: (360) 578-1371
 Fax: (360) 414-9305
 www.eco-land.com

DATE: 12/17/25
 DWN: JLL
 REQ. BY:
 PRJ. MGR: JB
 CHK:
 PROJECT NO:
 3132.01

Figure 4
PLANTING PLAN
 Farman Road Properties
 Davis Law Office
 King County, WA
 Section 19, Township 20N, Range 7E, W.M.