

August 30, 2005

Review & Commentary of TALASAEA Site Reconnaissance Report of January 1, 2005,  
Project Number TAL-892:

- It would appear that the observed northwest-southeast trending swale in the northeastern corner of the overall property is the intended area of the indicated wetland on the National Wetlands Inventory map, and therefore, standard methods should be used to prove or disprove its presence. By its shape alone, that of a depressional swale, which is a typical drainage pattern in a wetland, wetland hydrology should be attributed. This area also is a high groundwater flood zone which is shown in 1996 and 1997 DOT aerial photos. Because of these factors, a careful review of this area is warranted.
- According to the report, the vegetation was difficult to identify on account of heavy grazing and was described as “generally upland” in the area of the swale, however, no plant prevalence or dominance data sheets were provided. Typically, if there is an adjacent ungrazed area with permission to access it, then a better review of the plant species inside and outside of this swale area could be provided. If there is no ungrazed adjacent area and/or no permission to access it, the area in the vicinity of this swale should be temporarily fenced off so that the plant communities can naturally regrow and then a proper identification and prevalence review can be conducted.
- It was noted that Quackgrass was given a FACU indicator status in the report, however according to the 1997 Revision of The National List of Plant Species That Occur in Wetlands, *Agropyron repens* (*Elytrigia repens*) for the Northwest Region has a FAC- indicator. It is suggested that the most recent plant indicators be used for future investigations of the plant species in this area.
- Due to the uncertainty in the type and dominance of the vegetation, and the fact that wetland hydrology is present on account of the drainage pattern, soil test pits should be studied comparatively within the swale area and upland of it to provide additional data for determining the presence or absence of a wetland. Although the soil is indicated from the Soil Survey of Thurston County as a non-hydric black mineral soil, hydric conditions can still develop in this type of soil and is outlined in the 1987 Corps of Engineers Wetlands Delineation Manual under Criteria for Hydric Soils, paragraph 44.
- Based on a re-review of all three wetland parameters (vegetation, hydrology and soils) with field verification data provided, the area should be reassessed as to the presence or absence of a wetland in the vicinity of the swale that was observed in the northeastern corner of the property. A misperception of a wetland in this area, in light of the proposed development, would represent a significant impact to the environment.
- Due to the uncertainty of the status of this swale area as presented, it also should be assessed as to whether it is a potential problem area as defined in paragraph 77 of the 1987 Corps of Engineers Wetlands Delineation Manual. In particular, is the swale area a seasonal wetland, which is common to the western states, or is it a prairie pothole? These two types of problem areas address the possible changes

in morphology to an area due to seasonal changes as well as from annual changes such as from the cycles of drought and flood. Based on the Salmon Creek Drainage Basin study, flood years or those with above average precipitation occur about every 20 years. Our current history shows a drought in 1995 as well as one that started in 2001 which still persists today. The latest flood cycle occurred from 1996 to 1999. If under years of above average precipitation, this swale area presents full wetland characteristics, it should be considered a prairie pothole wetland per the 1997 Manual and have the required buffer applied to it for protection. Wetland studies conducted in similar depressional areas in the City of Yelm during the latest flood years should be reviewed and then compared with their current on-site conditions which are in drought status. This would provide a fair scientific analysis for inference into the status of the swale on the property in question. Again, a misperception of a wetland in this area, in light of the proposed development, would represent a significant impact to the environment.

CONSERVATION NORTHWEST, INC.

A handwritten signature in cursive script, reading "Heidi A. Haslinger".

Heidi A. Haslinger, B.A.Sc.  
Wetland Specialist