



Department of Ecology
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Shorelands & Environmental
Assistance Program

October 14, 2009

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Lauren Driscoll
WA Dept. of Ecology
Shorelands and Environment Program
PO BOX 47600
Olympia, WA 98504-7600

Dear Ms. Terzi and Ms. Driscoll,

Per your letter dated October 6, 2009, regarding the Snohomish Basin Mitigation Bank service area, Habitat Bank agrees to the changes requested by the IRT, to the SBMB MBI dated July 28, 2005. We have asked the IRT to provide us copies of the CAD files for this mapping which they have agreed to do.

Sincerely,

Victor Woodward
Habitat Bank, LLC

cc: Christina Merten
Kim Harper
Krista Rave-Perkins
Randy Middaugh

9.0 Service Area

The service area for SBMB generally includes WRIA 7 below the 2,500-foot elevation contour (**Figure 10**) downstream to where the Snohomish River starts to mix with the salt water of Puget Sound and becomes estuarine (Cowardin Classification, 1979).

The service area is further defined as follows:

Service Area Boundary Restrictions	Intent/Justification
1. In the Skykomish River basin the service area extends up to and includes to the City of Index.	This portion of the boundary stops short of the 2,500-foot elevation because SBMB is located on the Snohomish River (a glacially formed floodplain), rather than the Skykomish River (a more recently formed floodplain), and impacts in the upper reaches of the Skykomish River are generally not considered appropriately mitigated for at the bank.
2. In the Snohomish River basin the service area extends down to the line identified in the <i>Salmon Overlay to the Snohomish Estuary Wetland Integration Plan</i> (SEWIP Salmon Overlay) (City of Everett and Pentec, 2001) as the line separating Ecological Management Unit 1 from Ecological Management Unit 2.	The area within Ecological Management Units 2-7 in the SEWIP plan was historically estuarine area where most of the wetlands were tidally influenced and exposed to salinity >0.5 parts per thousand. The goal of SEWIP is to restore as much of those wetlands to their historical condition as possible. This watershed plan has been adopted by the City of Everett as part of their Shoreline Master Program. The use of a comprehensive watershed plan for the area is consistent with policies and rules of the agencies on the MBRT and is preferential to use of the bank in EMUs 2-7.
3. Ecological Management Units 2-7 in the SEWIP plan are excluded from the service area.	
4. In the northwest portion of the Snohomish River basin the service area also extends down to the border separating the Quilceda Creek Sub-basin Watershed and the Tulalip Sub-basin Watershed.	The Tulalip Sub-basin Watershed is excluded from the service area because most of it drains directly to Puget Sound rather than to the Snohomish River. The sub-basin lies mostly within the Tulalip Indian Reservation.
5. The service area excludes all brackish marshes, halotrophic wetlands, or wetlands influenced by ocean-derived salt conditions of >0.5 parts per thousand salt at any time during the year.	Due to the substantial historical loss of estuarine wetlands in the Puget Lowlands, the MBRT member agencies generally preclude using freshwater wetlands, such as those occurring at the SBMB, as compensatory mitigation for impacts to estuarine wetlands.
6. In the Everett Drainages Sub-basin the service area excludes any impacts that are large enough to require either an Individual 404 permit or Individual 401 certification.	Most of the Everett Drainages Sub-basin drains directly to Puget Sound rather than the Snohomish River. Even so, the sub-basin is included in the SBMB service area, with project size limitations, because it is very difficult to find mitigation opportunities in this highly developed urban area. Larger impact projects may be more appropriately mitigated for in sub-basins closer to Everett to minimize the potential effects of transferring functions out of the lower Snohomish River sub-basins.

The SBMB may be used to compensate for permitted impacts outside of the service area or in adjacent portions of WRIA 8 (Sammamish River watershed) or other nearby areas within King and Snohomish Counties if specifically approved by the appropriate regulatory agencies and the Signatories, and such mitigation would be practicable and environmentally preferable to other mitigation alternatives.

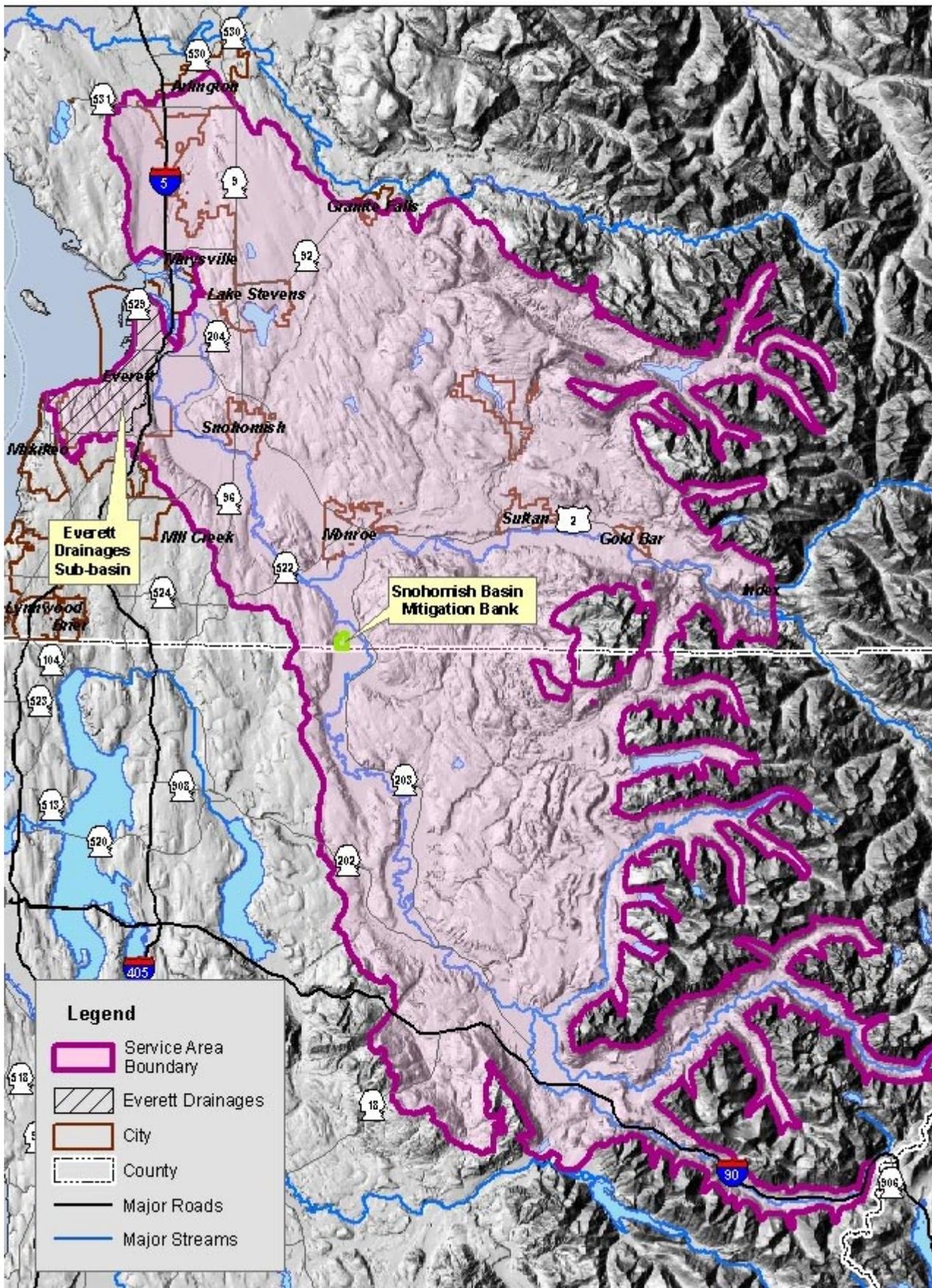


Figure 10: Service Area
 Snohomish Basin Mitigation Bank
 Date: October 6, 2009
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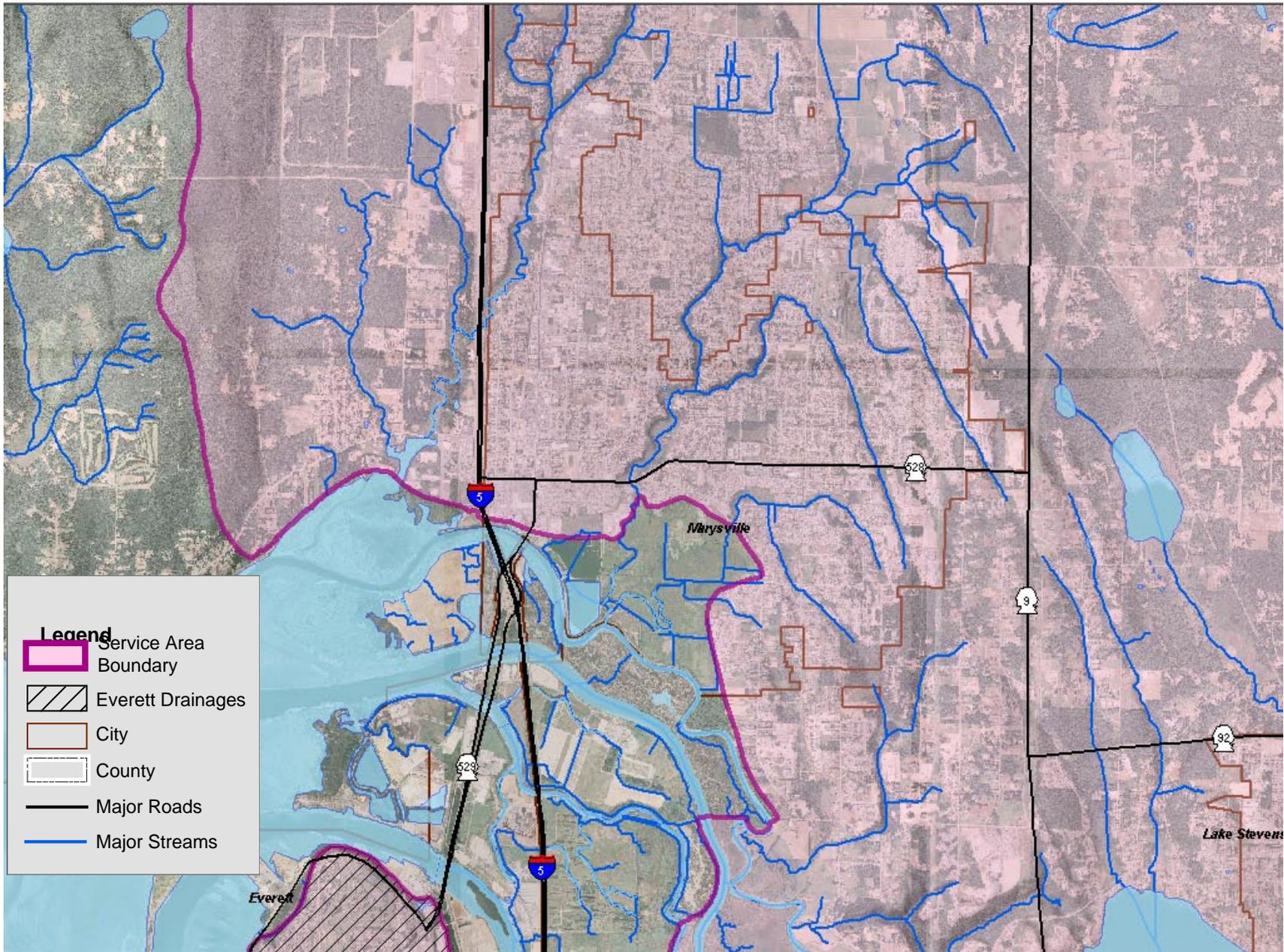


Figure 10A: Service Area – Marysville Detail
 Snohomish Basin Mitigation Bank
 Date: October 6, 2009
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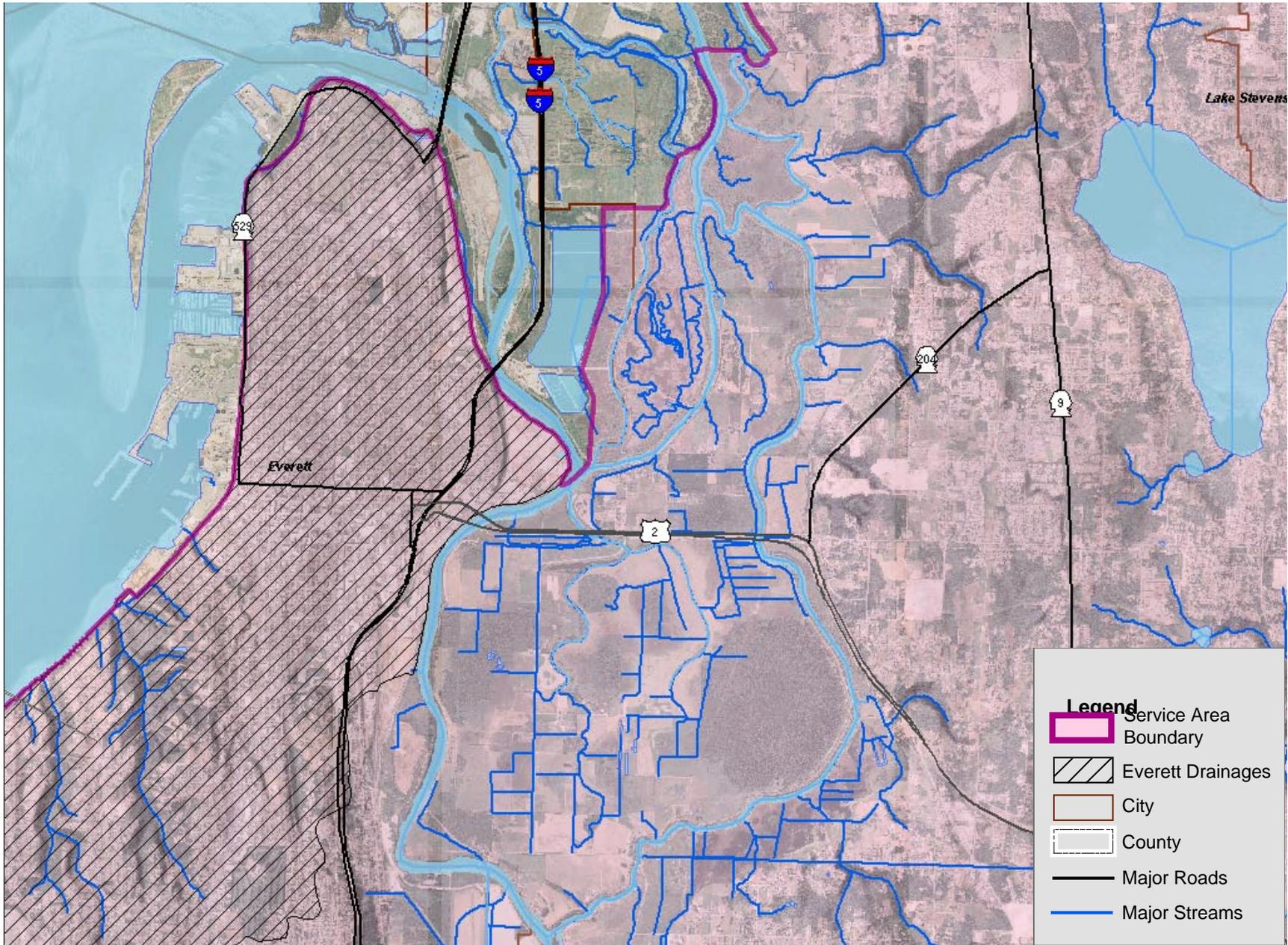


Figure 10B: Service Area – Everett Detail
 Snohomish Basin Mitigation Bank
 Date: October 6, 2009
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