

**From:** [Heather Tschaekofske](#)  
**To:** [Brett Bures](#)  
**Subject:** RE: initial wetland review for 2023100650  
**Date:** Thursday, July 6, 2023 6:18:00 PM  
**Attachments:** [April 2023 site visit pics.docx](#)  
[July 2023 site visit pics.docx](#)

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Hello Brett,

I am sending this directly to you as the case manager. If you would like me to forward to the applicant, let me know.

County and Department of Ecology staff visited the subject parcel 7/5/23 to verify the recent wetland test pit results, in addition to the original delineation submittal. Staff focused the site visit on the northern half of the site above the currently delineated wetland. This portion of the property had significant areas that were submerged, with hydrophytic vegetation during my original site visit in April. Here are the results from the Ecology assessment of the site yesterday:

“Pit 1 was near the north property line in a depression with patches of slough sedge, lady fern, salmonberry, and false lily of the valley. It met hydric soil indicator F3, depleted matrix, with a layer starting at 10 inches with 5% concentrations (7.5YR4/6) and a matrix of 10YR4/2.

Pit 2 was slightly south of TP-6 (from the consultant). It met A11 (depleted below dark surface). 0-4 inches: 10YR2/1 silt loam. 4-11+ 10YR4/2 with 40% concentrations, 7.5YR4/6.

Pit 3 was very close to TP-6. The matrix color was 10YR5/3 and it didn't meet any hydric soil indicators. Confluence didn't call this area wetland. However, it had plants that are strongly associated with prolonged ponding and saturation, like slough sedge, as well as alder, lady fern, spirea, slough sedge, and salmonberry. Ponding was observed in the early growing season.

I consulted Rick Mraz. He suggested asking the consultant for hydrologic monitoring in the early growing season next spring. Hydric soil indicators are test-positive, meaning that a wetland may still be present even if indicators are absent. You observed ponding in the early growing season, and the definition of hydric soils is “a soil that formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions,” with “long enough” defined in the Army Corps manual as 14 consecutive days. The WETS table shows that precipitation was overall normal in the months prior to your April site visit, while Confluence visited the site during the dry season.

One more suggestion from Rick: this could be a candidate for testing the soil with alpha-alpha dipyrindyl. Are you familiar with that test? If not: it shows if there's reduced iron in the soil by turning pink, so is useful where hydric soil indicators are not visible. It needs to be used on saturated soil, so also requires waiting until Spring. If alpha-alpha shows that reduced iron is present, the soil is hydric.  
“

The end result is that we require additional delineation of the site, during next years growing season. The wetland review remains on hold.

Let me know if you have any questions. I have included photos from both my site visits in April, and July 2023.

Thanks so much,

**Heather Tschaekofske** | Associate Planner/Biologist, MES  
Thurston County Community Planning & Economic Development  
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Main (360) 786-5553 | Fax (360) 754-2939 | TDD (800) 833-6388  
[heather.tschaekofske@co.thurston.wa.us](mailto:heather.tschaekofske@co.thurston.wa.us) | [www.thurstoncountybdc.com](http://www.thurstoncountybdc.com)

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**From:** Caleb Perkins <caleb@rjdevelopment.com>  
**Sent:** Tuesday, June 27, 2023 9:08 AM  
**To:** Heather Tschaekofske <heather.tschaekofske@co.thurston.wa.us>  
**Cc:** Brett Bures <brett.bures@co.thurston.wa.us>  
**Subject:** RE: initial wetland review for 2023100650

Heather and Brett,

Sorry for the delay on getting this to you, but please see attached and below from our consultant.

Attached are the field forms for Heather's review and a PDF where the Test plot, new wetland boundary flagging and soil probes were located.

We revised the wetland boundary to extend slightly farther to the north. Old Flag WA-7 connects to new flags WA-7A to WA-7B to WA-7C to old flag WA-8. As you can see from the map, we dug several soil probes a test pit north of the wetland boundary and did not find either hydric soils and/or presence of hydrology indicators. We also extended the wetland farther south. We did a soil probe, found hydric soils, so moved farther south (to TP-7), where we did **not** have all 3 wetland indicators.

We saw the ditch/channel feature that Heather mentioned. However it did not have defined bed/bank/ordinary high water mark indicators (OHWM) and therefore would be classified as a stream and not a wetland. Based on looking at historical aerials from 1969, 1973, 1980, and 1981 there is no indicator or a stream channel in this area. We also pulled the short plat maps from the development to the east. It clearly shows several stormwater drains that discharge into this ditch area. Therefore I think this is a man-made feature. Due to the lack of OHWM indicators, but with water flow, it might be classified as a wetland. However, we did not find a "connection" to Wetland

A (TP-7 shows a separation between the 2). Therefore, the presence of this feature (whether regulated as a wetland or not) would not alter the wetland rating as Heather asked about because this feature would not meet the “instream” nor “riparian” WDFW priority habitat type.

**Caleb Perkins, PMP**

*Project Manager*

**RJ Development**

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Mobile ▪ (360) 819-6150

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**From:** Heather Tschaekofske <[heather.tschaekofske@co.thurston.wa.us](mailto:heather.tschaekofske@co.thurston.wa.us)>  
**Sent:** Thursday, June 22, 2023 5:16 PM  
**To:** Caleb Perkins <[caleb@rjdevelopment.com](mailto:caleb@rjdevelopment.com)>  
**Cc:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** RE: initial wetland review for 2023100650

Hello,

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Thanks so much,

**Heather Tschaekofske** | Associate Planner/Biologist, MES  
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**From:** Caleb Perkins <[caleb@rjdevelopment.com](mailto:caleb@rjdevelopment.com)>  
**Sent:** Thursday, June 22, 2023 8:52 AM  
**To:** Heather Tschaekofske <[heather.tschaekofske@co.thurston.wa.us](mailto:heather.tschaekofske@co.thurston.wa.us)>  
**Cc:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** RE: initial wetland review for 2023100650  
**Importance:** High

Heather,

We finally got feedback from our consultant and were wondering whether it be possible for you to conduct another site visit and confirm the revised wetland boundary with just the field data forms and revised maps. We are trying to be efficient with time and having you confirm the revised wetland boundary before revising the critical areas report would save a considerable amount of time. If that's possible, I will get you the field data forms and revised maps. Please let me know as soon as you can. Thanks!

**Caleb Perkins, PMP**

*Project Manager*

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**From:** Heather Tschaekofske <[heather.tschaekofske@co.thurston.wa.us](mailto:heather.tschaekofske@co.thurston.wa.us)>  
**Sent:** Monday, May 15, 2023 9:56 AM  
**To:** Caleb Perkins <[caleb@rjdevelopment.com](mailto:caleb@rjdevelopment.com)>  
**Cc:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** FW: initial wetland review for 2023100650

Hello Caleb,

I checked with Brett, and he agreed that I should send you my wetland review comments directly, in the interest of capturing conditions while we are still within the growing season. Please see my original email below, for your review. These items are required for further critical area review. Please submit all information within 180 days or the application shall expire. I have photos from my site visit documenting conditions if your consultant needs more information.

Thanks so much,

**Heather Tschaekofske** | Associate Planner/Biologist, MES  
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**From:** Heather Tschaekofske  
**Sent:** Wednesday, April 12, 2023 5:59 PM  
**To:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** initial wetland review for 2023100650

Hello Brett,

I have completed the initial review of the wetland report submitted for parcel 09750029001, and a site visit was conducted on 4/12/23 to review report results. Please thank the consultant for submittal of a thorough assessment, and request the following additional information and/or revisions:

- Per the County site visit today, it appears the wetland onsite may have been underestimated. Wetland A currently has standing water, and hydrophytic vegetation which extends up to the northern property line. Further wetland delineation is required to assess this area in depth, especially since this is the appropriate time frame for a wetland review to occur during the early growing season.
- Wetland A appears to continue offsite to the south, until it meets up with Burbank Ave, at which point it appears to be more channelized into a drainage. Presence of instream/riparian habitat within 330 feet of the wetland unit would trigger additional habitat points for rating question H 3, which would at minimum result in a Medium rating. This will change the total habitat score to at minimum M, M, L, which results in a standard wetland buffer of 160 feet.
- There are some considerably large trees within proximity to the wetland onsite, which would potentially trigger the additional buffer requirements per TCC 24.30.065. Please re-evaluate the wetland and buffer area per this section of code, to determine if additional tree protection areas are required.
- The report states the buffers in Section 4.0. as 140 feet for Wetland A, and 100 feet for Wetland B. It does not however show these distances, or what the averaged buffer distances are on any of the site plans. This will be required to be added to all the site plans.
- The depiction of the averaged Wetland A buffer within the wetland report does not look the same as the submitted site plan for the plat. This again will need to be shown with buffer distances on the site plans.
- The buffer averaging proposed is the only mitigation they are offering, and this is acceptable per TCC 24.30.060. However, the report author does not demonstrate how they are meeting mitigation sequencing, as it appears there is room for the project to occur without buffer averaging.

These are my final comments, let me know if you have questions.

Thanks so much,

**Heather Tschaekofske** | Associate Planner/Biologist, MES  
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**From:** [Brett Bures](#)  
**To:** [Caleb Perkins](#); [Heather Tschaekofske](#)  
**Cc:** [Brett Bures](#)  
**Subject:** RE: initial wetland review for 2023100650  
**Date:** Monday, July 10, 2023 2:18:07 PM  
**Attachments:** [RE initial wetland review for 2023100650.msg](#)

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Caleb:

Please see attached email from Heather Tschaekofske regarding the results of the last site visit. In summary, additional information is needed to complete the review of this application.

Please let me know if you have any questions.

Thanks.

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**Brett Bures | Development Services Manager**

**Thurston County Community Planning & Economic Development**

3000 Pacific Ave SE, Suite 100, Olympia, Washington 98501

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**From:** Caleb Perkins <[caleb@rjdevelopment.com](mailto:caleb@rjdevelopment.com)>  
**Sent:** Monday, July 10, 2023 1:38 PM  
**To:** Heather Tschaekofske <[heather.tschaekofske@co.thurston.wa.us](mailto:heather.tschaekofske@co.thurston.wa.us)>  
**Cc:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** RE: initial wetland review for 2023100650

Brett,

Can you provide an update on next steps and timeline for this review and approval? We are quickly running out of time in our purchase agreement and having this wetland area squared away is extremely critical. Please let me know as soon as you can. Thanks.

**Caleb Perkins, PMP**

*Project Manager*

**RJ Development**

401 Central St SE

Olympia, WA 98501

Direct ▪ (360) 810-8356

Mobile ▪ (360) 819-6150

**From:** Caleb Perkins  
**Sent:** Friday, June 30, 2023 9:32 AM  
**To:** Heather Tschaekofske <[heather.tschaekofske@co.thurston.wa.us](mailto:heather.tschaekofske@co.thurston.wa.us)>  
**Cc:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** RE: initial wetland review for 2023100650

Brett,

Can you please provide an update on next steps and timeline until approval?

**Caleb Perkins, PMP**

*Project Manager*

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---

**From:** Heather Tschaekofske <[heather.tschaekofske@co.thurston.wa.us](mailto:heather.tschaekofske@co.thurston.wa.us)>  
**Sent:** Thursday, June 29, 2023 4:54 PM  
**To:** Caleb Perkins <[caleb@rjdevelopment.com](mailto:caleb@rjdevelopment.com)>  
**Cc:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** RE: initial wetland review for 2023100650

Hello,

That would be based on Brett's time line.

Thanks,

**Heather Tschaekofske** | Associate Planner/Biologist, MES  
Thurston County Community Planning & Economic Development  
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**From:** Caleb Perkins <[caleb@rjdevelopment.com](mailto:caleb@rjdevelopment.com)>  
**Sent:** Thursday, June 29, 2023 8:57 AM  
**To:** Heather Tschaekofske <[heather.tschaekofske@co.thurston.wa.us](mailto:heather.tschaekofske@co.thurston.wa.us)>  
**Cc:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** RE: initial wetland review for 2023100650

Will do. If your site visit confirms, what is the next step and timeline we can expect to get final approval?

**Caleb Perkins, PMP**

*Project Manager*

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**From:** Heather Tschaekofske <[heather.tschaekofske@co.thurston.wa.us](mailto:heather.tschaekofske@co.thurston.wa.us)>  
**Sent:** Thursday, June 29, 2023 7:43 AM  
**To:** Caleb Perkins <[caleb@rjdevelopment.com](mailto:caleb@rjdevelopment.com)>  
**Cc:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** RE: initial wetland review for 2023100650

Hello,

I forwarded the submitted test pit information onto Dept of Ecology, and we will need to make a site visit next week to confirm results. Can you request site access from the owner for 10 am next Wednesday?

Thanks so much,

**Heather Tschaekofske** | Associate Planner/Biologist, MES  
Thurston County Community Planning & Economic Development  
3000 Pacific Ave SE, Suite 100, Olympia, Washington 98501  
Main (360) 786-5553 | Fax (360) 754-2939 | TDD (800) 833-6388  
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**Caleb Perkins, PMP**

*Project Manager*

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**Importance:** High

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**Caleb Perkins, PMP**  
*Project Manager*

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**From:** Heather Tschaekofske  
**Sent:** Wednesday, April 12, 2023 5:59 PM  
**To:** Brett Bures <[brett.bures@co.thurston.wa.us](mailto:brett.bures@co.thurston.wa.us)>  
**Subject:** initial wetland review for 2023100650

Hello Brett,

I have completed the initial review of the wetland report submitted for parcel 09750029001, and a site visit was conducted on 4/12/23 to review report results. Please thank the consultant for submittal of a thorough assessment, and request the following additional information and/or revisions:

- Per the County site visit today, it appears the wetland onsite may have been underestimated. Wetland A currently has standing water, and hydrophytic vegetation which extends up to the northern property line. Further wetland delineation is required to assess this area in depth,

especially since this is the appropriate time frame for a wetland review to occur during the early growing season.

- Wetland A appears to continue offsite to the south, until it meets up with Burbank Ave, at which point it appears to be more channelized into a drainage. Presence of instream/riparian habitat within 330 feet of the wetland unit would trigger additional habitat points for rating question H 3, which would at minimum result in a Medium rating. This will change the total habitat score to at minimum M, M, L, which results in a standard wetland buffer of 160 feet.

- There are some considerably large trees within proximity to the wetland onsite, which would potentially trigger the additional buffer requirements per TCC 24.30.065. Please re-evaluate the wetland and buffer area per this section of code, to determine if additional tree protection areas are required.

- The report states the buffers in Section 4.0. as 140 feet for Wetland A, and 100 feet for Wetland B. It does not however show these distances, or what the averaged buffer distances are on any of the site plans. This will be required to be added to all the site plans.

- The depiction of the averaged Wetland A buffer within the wetland report does not look the same as the submitted site plan for the plat. This again will need to be shown with buffer distances on the site plans.

- The buffer averaging proposed is the only mitigation they are offering, and this is acceptable per TCC 24.30.060. However, the report author does not demonstrate how they are meeting mitigation sequencing, as it appears there is room for the project to occur without buffer averaging.

These are my final comments, let me know if you have questions.

Thanks so much,

**Heather Tschaekofske** | Associate Planner/Biologist, MES  
Thurston County Community Planning & Economic Development  
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