

## INTRODUCTION TO KING COUNTY COMMENT RESPONSES TO THE WATERSHED COMPANY (TWC) ENVIRONMENTAL PEER REVIEW REPORT, DATED MARCH 2017

Pursuant to the City's requirements, King County is providing specific responses to the March 2017 TWC report. The County's responses track TWC's field observations and recommendations, starting at page 5 of the report. King County's responses explain the basis for retaining prior designations or indicate where changes are being made. In addition to those specific responses, King County would like to provide some overview context that inform the discrepancies noted by TWC in its review.

TWC's field visits occurred in February 2017 and, as noted by TWC, this was a period of near-record high precipitation. Precipitation at SeaTac International Airport in February 2017 was 8.85 inches, which is 5.35 inches (253%) more than the long-term monthly average of 3.50 inches (NOAA National Climate Center). In fact, 7.84 inches of rain from Feb. 1 -16, and 2.13 inches were recorded at SeaTac on February 15 and 16. These dates correspond to the TWC review period. Given the record rainfall, observations that reflect abnormal surface water flow or expanded wetland boundaries are not surprising. The timing, rationale and methodology used by Parametrix for wetland delineation were described in the CAS and is reiterated in the accompanying responses where necessary to address specific TWC comments.

Also, TWC made several comments regarding wetlands identified and flagged in trailside ditches. TWC questions whether some wetlands (15D, 15E, 21D, 22B, 22CD, 22AB, 24C, 28A, 28D) should be identified as jurisdictional ditches and not wetlands. With respect to these specific wetlands, if the ditches were vegetated with hydrophytes, water was present, and saturated or inundated soils were present, then it was delineated as a wetland. Hydric soils that were present in the bottom of the trailside ditches often extended upslope into adjacent wetlands. In some cases hydric soils occurred on both sides of the ditches. In other cases soils were confined to the bottom of ditches where sediment accumulated over time. These soils were saturated for long periods of time and supported wetland plants. Thus, they were delineated as wetlands.

In response to TWC's comments, Jeff Meyer, Parametrix senior wetland biologist, reviewed the wetlands and ditches in question on May 12, 2017. On May 11, 0.47 inches of rain was recorded at SEATAC. In general, most of the ditches still contained water. However, in several cases water was stagnate and now flowing. Designated streams were still flowing strongly.

Some of the ditches observed by TWC had been maintained by King County in late summer 2016. In general, maintenance activities removed some, and in other cases all, of the hydric soils in the trailside ditches, and in some wetlands. During the TWC review some wetland ditch bottoms were gravels and did not exhibit dark soils in the bottoms. Because it was still winter in an abnormally cold winter, little vegetation growth was likely evident in the ditches. In addition, with the heavy rainfall, ditches and wetlands were conveying or discharging water, and acting as streams in January and in February. At the time of Jeff Meyer's review, many of the maintained ditches had begun to revegetate with wetland plants. By the end of the 2017 growing season, it is expected that the previously delineated wetlands should have dense vegetation in the ditch bottoms. Sediment will accumulate over time if not disturbed.

Changes in designations deemed appropriate by Parametrix are indicated in the attached response matrix, and are included in a Revised Critical Areas Study, dated July 2017.