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**Sewall Wetland Consulting, Inc.**

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Fall City, WA 98024

Phone: 253-859-0515

July 18, 2024

Brett Morris  
Palmer Coking Coal Company, LLP  
PO Box 10  
Black Diamond, Washington 98010-0010

RE: Proposed Buffer Averaging – Palmer 30/Hyde Mine  
SWC Job#16-155

Brett,

This report is an analysis of the proposed buffer averaging of Wetlands A & D for the Hyde Mine project as depicted on the attached Buffer Averaging Plan.

King County Municipal Code 21A.24.325.B states;

*B. The department may approve a modification of the minimum buffer width required by this section by averaging the buffer width if:*

*1. The department determines that:*

*a. the buffer averaging will improve wetland protection if the wetland has significant differences in characteristics that effect habitat functions, such as a wetland with a forested component adjacent to a degraded emergent component or a "dual-rated" wetland with a Category I area adjacent to a lower-rated area; or*

Response:

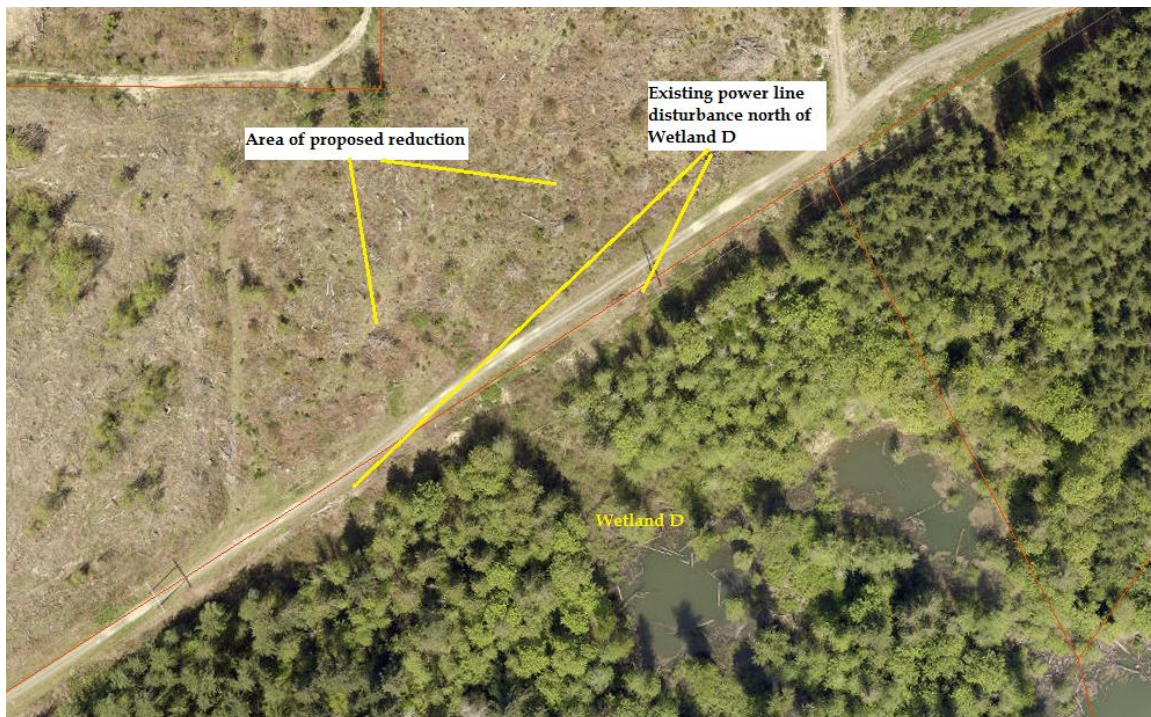
The proposed averaging of Wetlands A & D should not impact the current functions of these two wetlands.

*Wetland A* - The proposed reduction of the 150' buffer of Category III Wetland A on its western side down to 112.5' is in an area that is currently a clear cut. The wetland is located down within a well-defined depression and the proposed averaging will not remove any existing forested buffer. The reduction of buffer will be compensated by adding

an equal area to the north side of the wetland which is currently forested.

#### *Wetland D/Fish Lake*

Wetland D is a Category I wetland with a 300' buffer. The buffer on the north side of the wetland is currently bisected by a power line that has maintained gravel roads and substantial disturbance. The proposed averaging will reduce generally non-functional, logged buffer north of the power line. The proposed reduction of buffer will be compensated and averaged by adding existing, higher functioning forested buffer to the existing buffer on the northwest side of Wetland D.



*Above: North end of wetland A and areas of proposed buffer reduction north of the existing power line crossing of the buffer.*

*b. averaging includes the corridors of a wetland complex; and*

Response: NA

*2. The resulting buffer meets the following standards:*

*a. the total area of the buffer after averaging is equivalent to or greater than the area of the buffer before averaging;*

Response: The total area of buffer reduction (47,920sf) on both Wetlands A & D will be compensated by adding equal area (47,922sf), slightly over 1:1 for the reduction.

*b. the additional buffer is contiguous with the standard buffer;*

Response: The additional buffer on both wetlands will be contiguous with the existing buffer.

*c. the buffer at its narrowest point is never less than either seventy-five percent of the required width or seventy-five feet for Category I and II, fifty feet for Category III, and twenty-five feet for Category IV, whichever is greater;*

Response: The buffer reduction at the narrowest point on both wetland A (112.5') and Wetland D (225') is 75% of the standard buffer as required.

*d. the averaged buffer will not result in degradation of wetland functions and values as demonstrated by a critical area report from a qualified wetland professional; and*

Response: As previously described, the reduced buffers on both of these wetlands should not impact the existing functions of the buffer and the associated wetlands. The proposed use within the outer part of the buffer is generally the edge of the pit mine. The pit will not be excavated into the water table which would impact either of these wetlands.

Wetland A appears to be a depression in which an aquitard is located which creates wetland conditions by perching water within the wetland soil profile. There is no plan to disturb this impervious geologic feature which creates this wetland.

Wetland D/Fish Lake is a large wetland which has no outlet with the exception of leakage through the permeable till on the perimeter of the wetland in which it is located. The proposed mine will be over 225' away from the wetland and will not be excavated to a depth which would

impact any hydrologic functions or change the hydrologic patterns of the wetland. As previously stated, the functional vegetated buffer stops at the south edge of the power line and there is no significant forested vegetation from the power line north in the area that is within the standard 300' buffer.

*e. the buffer is increased adjacent to the higher functioning area of habitat or more sensitive portion of the wetland and decreased adjacent to the lower-functioning or less-sensitive portion as demonstrated by a critical area report from a qualified wetland professional.*

Response: As previously stated, the proposed added buffer to both Wetlands A and D are forested areas which would be considered high functioning buffer.

The reduced areas of the buffer are currently low function, cleared/logged areas as well as power line easement with a heavily utilized gravel road through it.

If you have any questions in regards to this report or need additional information, please feel free to contact me at (253) 859-0515 or at [esewall@sewallwc.com](mailto:esewall@sewallwc.com).

Sincerely,  
Sewall Wetland Consulting, Inc.

A handwritten signature in dark ink, appearing to read 'Ed Sewall', is written on a light-colored rectangular background.

Ed Sewall  
Senior Wetlands Ecologist PWS #212

Attached: Buffer Averaging Plan

## REFERENCES

King County Municipal Code

Cowardin, L., V. Carter, F. Golet, and E. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Fish and Wildlife Service, FWS/OBS-79-31, Washington, D. C.

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Munsell Color. 1988. Munsell Soil Color Charts. Kollmorgen Instruments Corp., Baltimore, Maryland.

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Reed, P.B. Jr. 1993. 1993 Supplement to the list of plant species that occur in wetlands: Northwest (Region 9). USFWS supplement to Biol. Rpt. 88(26.9) May 1988.

USDA NRCS & National Technical Committee for Hydric Soils, September 1995. Field Indicators of Hydric Soils in the United States - Version 2.1