



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*Northwest Regional Office 3190 160th SE Bellevue, Washington 98008-5452 (425) 649-7000*

January 30, 2013

Bob Zeigler, SEPA/NEPA Coordinator  
Washington Department of Fish and Wildlife  
600 Capitol Way N  
Olympia, WA 98501

Dear Mr. Zeigler:

**RE: Ecology SEPA Comments for Wiley Slough Pump Station**

Thank you for sending a copy of the determination of nonsignificance (DNS) for the Wiley Slough Pump Station to the Washington State Department of Ecology (Ecology) for our review and comment. As the Ecology Wetland Specialist responsible for Skagit County (County), I wish to have the following comments entered for the record. The project involves construction of a pump station on Wiley Slough at the Washington Department of Fish and Wildlife Skagit Wildlife Area on Fir Island in unincorporated Skagit County, WA. The project SEPA submittal provided to Ecology included an environmental checklist and site plans for the project site. The environmental checklist and site plans indicate that there are wetlands on the project site that will be impacted by pump station construction. The wetlands in the project area have apparently not been delineated nor are the area of wetland fill and proposed mitigation specified in the checklist or site plans. The site plans depict the ordinary high water mark (OHWM) but there is no description of the field indicators used to establish the OHWM.

Because pump station construction will require filling wetlands and in-water work, an application for a Section 401 Water Quality Certification will need to be submitted to Ecology for our review and approval. Those impacts will need to be mitigated and require approval from Ecology and the U.S. Army Corps of Engineers (Corps) before construction starts.

Prior to beginning site work, please provide the following information to Ecology:

- A current delineation (within the past five years) of all wetlands within and near the work area by a qualified wetland biologist and survey of the delineated wetland boundaries;
- Ratings of the delineated wetlands using the current *Washington State Wetland Rating System for Western Washington* (Hruby 2004);

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- A jurisdictional determination from the Corps stating whether the delineated wetlands on the project site are under federal jurisdiction;
- A JARPA form for impacts to jurisdictional wetlands or an Isolated Wetlands Information Worksheet for impacts to isolated wetlands; and
- A mitigation plan for unavoidable wetland impacts consistent with the recommended standards in *Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance (Version 1)* (Ecology Publication #06-06-011a).

The wetland delineation and ratings will need to be field-verified by Ecology or Corps staff. The OHWM determination will need to be verified by Ecology for Shoreline Management Act permitting.

If you have any questions or would like to discuss my comments, please give me a call at (425) 649-7148 or send an email to [paan461@ecy.wa.gov](mailto:paan461@ecy.wa.gov).

Sincerely,



Paul S. Anderson, PWS  
Wetland Specialist  
Shorelands and Environmental Assistance Program

PSA: ca

E-cc: Erik Stockdale and Bob Fritzen, Ecology  
Randel Perry and Erin Legge, U.S. Army Corps of Engineers Seattle District Office  
John Cooper, Skagit County