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October 17, 2014

Smith Island Terminal, LLC  
7343 East Marginal Way South  
Seattle, Washington 98108

Attention: John Brigham

Subject: Wetland Buffer Assessment  
Smith Island Terminal  
Everett, Washington  
File No. 10625-001-28

This letter report has been prepared at your request to supplement State Environmental Policy Act (SEPA) and Shoreline Substantial Development permit submittals to the City of Everett (City) regarding wetland buffers at the Smith Island Terminal, LLC (SIT) project site. The basis of the contents of this letter incorporates our long-standing history on the site, in-depth knowledge of the wetland conditions on the site, our understanding of the lower Snohomish River habitat, and our experience with the various regulatory ordinances as well as wetland scientific assessment methods<sup>1</sup>. The attached Figures 1 and 2 illustrate the current and proposed site conditions with wetland buffers identified respectively.

## INTRODUCTION

Wetlands on the subject property have been investigated over many years as the property has gone through various iterations of development proposals. More detail on the wetland function and history of the site is found in the wetland delineation report on file with the City of Everett, Washington State Department of Ecology (Ecology), and the US Army Corps of Engineers (USACE). In general, wetlands on the site are of very low value, consisting primarily of a mono-species stand of reed canarygrass, and receive hydrology from local precipitation. The blind slough along the southern border of the property drains to the Snohomish River estuary but is restricted by a tide-gate. Similarly, the ditch system currently flowing to the north also discharges to Steamboat Slough through a tide-gate.

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<sup>1</sup> Castelle, A.J., C. Conolly, M. Emers, E.D. Metz, S. Meyer, M. Witter, S. Mauermann, T. Erickson, S.S. Cooke. 1992. Wetland Buffers: Use and Effectiveness. Adolfsen Associates, Inc., Shorelands and Coastal Zone Management Program, Washington Department of Ecology, Olympia, Pub. No. 92-10.; and, Cooke Scientific. 2000. Wetland and Buffer Functions Semi-Quantitative Assessment Methodology (SAM). Final Working Draft User's Manual, Feb 2000.

Wetlands on the site will be impacted by the proposed project. Mitigation options of avoidance and reduction of impact are not feasible and has been documented in prior reports already on file with the City of Everett. Compensatory mitigation has been proposed which consists of dike removal and re-connection of a portion of the site to the slough system associated with the lower Snohomish River. Mitigation proposed for this project embraces the salmonid habitat uplift goals of this region as documented in the Snohomish Estuary Wetlands Integration Plan (SEWIP) Salmon Overlay and has considered both aquatic areas and associated buffers in the development of the mitigation plan.

Several buffer modifications are included in the proposed SIT development. The site is bordered to the north by Union and Steamboat Sloughs, which is designated as an Aquatic Conservancy Area with a required buffer width of 200 feet. This buffer will be reduced to below 200 feet in an area about 725 feet in length with the operating area coming within 125 feet at its closest but the average separation between the current Aquatic Conservancy designated area and the edge of the rail terminal operating area is more than 250 feet.

Along the southern border of the site, a small drainage will be enhanced and wetland fringe habitat added. In addition the invasive species that dominate the buffer will be removed and replaced with native trees and shrubs. The standard buffer width for this area is 150 feet and the proposed buffer with added native vegetation will be 75 feet.

The reduced buffers will be consistent with the City's 2011 updated Shoreline Master Program (SMP) pending approval of functional assessment and habitat management documentation contained in this report. This area has had prior substantial legal alterations within the buffer primarily associated with the ongoing agricultural uses of the site. The SMP also states that this buffer shall not be reduced below 100 feet with the following exceptions:

“Standard Wetland Buffer Width Reduction. The planning director may, using the review process described in Title 15, Local Project Review Procedures, reduce the standard wetland buffer width only when there has previously been substantial legal alteration of the wetland and/or buffer on the subject lot or adjoining lots. The planning director shall require buffer width averaging rather than allowing a buffer width reduction except when the proposal includes a wetland and buffer enhancement plan that improves the functional values of the buffer and the wetland. An enhanced buffer shall not result in more than a fifty percent reduction in the standard buffer width, and the reduced buffer shall not be less than the minimum dimension allowed by buffer width averaging.”

- “When a significant action that restores salmonid rearing habitat is incorporated into the proposal, including actions such as reconnection of a blind tidal channel, a dike breach, or removal of fill to create tidal marsh area.”
- “Public access improvements such as trails and interpretive facilities may be included in portions of the buffer when the biological assessment and habitat management plan (if required) demonstrate no significant adverse impacts or that significant adverse impacts are mitigated.” (Everett SMP Section 3, Regulation 22A)

The native plant list proposed for use in the SIT buffers is excerpted from the mitigation plan and provided in the table below.



**TABLE 1. SNOHOMISH RIVER ESTUARY SALT MARSH AND MARINE RIPARIAN VEGETATION**

Common Name	Scientific Name
Sitka spruce	<i>Picea sitchensis</i>
Pacific crabapple	<i>Malus fusca</i>
Shore pine	<i>Pinus contorta</i>
Oregon ash	<i>Fraxinus latifolia</i>
Red alder	<i>Alnus rubra</i>
Bigleaf maple	<i>Acer macrophyllum</i>
Douglas fir	<i>Pseudotsuga menziesii</i>
Cottonwood	<i>Populus trichocarpa</i>
Oceanspray	<i>Holodiscus discolor</i>
Serviceberry	<i>Amelanchier alnifolia</i>
Snowberry	<i>Symphoricarpos spp.</i>
Douglas aster	<i>Aster subspicatus</i>
Twinberry	<i>Lonicera involucrate</i>
Rose baldhip	<i>Rosa gymnocarpa</i>
Rose nootka	<i>Rosa nutkana</i>
Rose pea fruit	<i>Rosa pisocarpa</i>
Scouler Willow	<i>Salix scouleriana</i>

### Mitigation Area 1 and ATF Mitigation Area

Mitigation Area 1 and the after the fact (ATF) mitigation area has already been constructed and its buffer provides significant habitat opportunities including shallow water interface, dense herbaceous and shrub layers, standing snags, root wads and other large woody debris (LWD). Along the edge of the existing facility, wetland buffers range from approximately 15 to over 100 feet in width. The functional success of these buffers as established by many observations over the past 5 years has been helpful in developing this assessment.

The buffers in this area do not conform to the standard buffer recommendations established in the SMP; however, Mitigation Area 1 is part of a larger overall mitigation strategy for the site, which also includes the creation of tidally influenced salmonid habitat and an expanded pedestrian path. As stated above, the SMP provides exceptions for reduction of Smith Island palustrine wetland buffers beyond 50 percent when significant action that restores salmonid habitat is incorporated into the mitigation design or when public access improvements are included. Thus, we submit that the buffers established for Mitigation Area 1 comply with the City SMP.

Additionally, these buffers are monitored annually to measure the progress of the installed vegetation and provide a qualitative assessment of available habitat and use of that habitat by a variety of wildlife species. Overall, the installed vegetation is growing quickly and has been observed to be actively used by raptors, passerines and other bird species including great blue herons. These species are frequently observed throughout the buffer, including in the reduced buffer area adjacent to the facility. Adaptive Management



was implemented to combat invasive species and increase targeted native plant growth in the winter of 2012-2013. That work resulted in substantial reduction of areas dominated by invasive plant species (reed canary grass especially) and rapid growth of trees, shrubs and herbaceous plants including expanded areas dominated by multiple species of wetland plants. Targeted undesirable species removal is ongoing. The outer portion of the facility adjacent to the Mitigation Area 1 buffer is primarily used for product storage and does not represent a source of frequent noise or visual disturbance. The fence along this portion of the facility also decreases the opportunity for visual disturbance with the inclusion of green lattice type screen material weaved into the chain link fence.

One objective of this mitigation plan is to use native vegetation occurring in the vicinity of the site. The vegetation proposed for planting includes species documented within the Snohomish River estuary. Plant selection is based upon their hydrologic requirements and their functional attributes, such as being able to support wildlife and their ability to improve water quality. Vegetation is a major factor in the distribution of wildlife. Plants provide food, shelter against predators and weather, and areas for nesting, resting, perching and breeding (Leedy et al., 1978). Other areas with existing vegetation that are valuable to wildlife will be maintained within the designated buffer. Tables 4 and 6 of the Mitigation Plan outlines the various plants selected for use at the mitigation site.

### **Mitigation Areas 2 and 3**

Mitigating Areas 2 and 3 involves opening an existing tide gate that restricts a small stream/drainage that bounds the site on the south and rehabilitation of the stream course and fringe wetland expansion. The stream will be reshaped within its general alignment with an added wetland fringe zone as shown in Figure 2. The stream habitat will be open to fish and will experience more regular and natural tidal action. The buffers surrounding this area will be 50 feet at the minimum and planted with native shrubs and trees. The existing buffer along this area is a dense stand of blackberry. The proposed buffer will provide shade, enhanced nutrient cycling, and promote streambank stability.

### **Mitigation Area 4**

Mitigation Area 4 is located within the area that would be buffer between the Aquatic Conservancy Zone (ACZ) and the rail facility. Consequently, the wetland areas created within that portion of the site would require wetland buffers of 100 feet. The actual minimum buffer width for about 700 feet of distance between the edge of the track bed and the edge of the ordinary high water mark (OHWM) for the mitigation areas is 60 feet. The same 60 foot buffer will occur along the BNSF right-of-way (ROW) in the extreme northeast of the site covering about 400 feet.

The created tidal marsh (Mitigation Area 4) will contain a vegetated buffer consisting of the setback levee, a pedestrian path, tree and shrub species, and woody structures. The proposed mitigation plan includes a reduction of the Aquatic Conservancy buffer from 200 feet to 125 feet along the northern edge of the site. This reduced buffer will be enhanced with the addition of native tree and shrub species.

The proposed SIT plan will maintain a buffer of 125 to over 250 feet in width at the northern edge of the site along Union and Steamboat Sloughs, but includes buffers reduced to 60 feet along the edges of the proposed tidal marsh area. These reduced buffers are the result of designing the tidal marsh creation area to gain the maximum amount of tidally influenced habitat possible by removing approximately 580 feet of existing levee. The reduced buffers will be enhanced along the margins of the tidal marsh creation area and Union and Steamboat Sloughs through the installation of dense native vegetation as described in the



Planting/Landscaping Plan section of the Mitigation Plan. The installation of native shrub and tree species within these buffers will substantially improve the ecological functions of the buffers where currently, most of the buffer vegetation consists of invasive species such as: reed canary grass, soft rush, and blackberry. The improvements in ecological functions are further described below.

## **BUFFER FUNCTIONAL ASSESSMENT**

The City of Everett Snohomish Estuary Wetland Integration Plan (SEWIP) and Salmon Overlay (SO) require assessment of buffer functions to allow buffer reductions beyond 50 percent of the required buffer width. The following buffer functional assessment sections identify the anticipated shifts in buffer functions from existing to proposed conditions of the buffers at the Smith Island Terminal site. The SEWIP identifies important functions for wetlands and buffers within the Snohomish River Estuary. These functions include water quality, primary productivity, fish habitat, bird habitat, aesthetics, recreation, access to water and several other functions.

### **Current Buffer Function**

A wetland buffer function assessment was developed following protocol developed by Cooke Scientific and Ecology in 2000 and modified in 2004. Buffer functions were evaluated based on existing and proposed conditions to provide a comparison. Results of the buffer assessment indicate that a marked improvement of buffer function will result from the proposed project. This is linked to the improvement in wetland function and the inclusion of active fish habitat in each mitigation area and estuary expansion (Mitigation areas 2, 3, and 4) associated with the compensatory mitigation plan. Overall the existing buffers on the site (except for the already constructed Mitigation Area 1 and ATF mitigation area) offer little habitat structure. They are primarily mono-specific stands of dense to very dense reed canary grass with dense patches of blackberry. Wetlands and buffers that exist on the site today are a major source of reed canary grass seed which can be transported by wind or can contaminate topsoil/compost products as they are transported off the site in open truck beds.

Water quality function of the existing buffers is minimal since hydrology sources are limited to precipitation falling on the property and no outflow from depression wetland areas exists. The developed portions of the site have approved and maintained stormwater treatment systems installed. The site is flat therefore erosion risk is minimal.

Buffers on the site currently offer little to no wildlife habitat. Raptors have been observed hunting the fields of reed canary grass and coyote scat has been observed along the walking path as well. Prey for these species supported by the wetlands and their buffers on the site are mostly rodents. The immediate buffer along the walking trail and estuary has a strip of larger trees and shrubs that do provide perches for bird species and some higher perches (power poles, pilings, etc.) that are used by raptors. Osprey are the most frequently observed raptor in the vicinity using higher perches to sight fish in the slough while hunting.

### **Proposed Buffer Function**

Buffers resulting from the proposed development and mitigation plan are focused to the north and are designed to increase protection and integration with the estuary expansion. The specific functions of the buffer are addressed as subsections below.



**Water Quality**

This area of Smith Island is identified in the SO as water quality limited. Specifically, the existing palustrine wetland buffers have been managed as agricultural lands which were frequently hayed and tilled. These activities result in the disturbance of surface soils and emergent ground cover, thus reducing the water quality improvement function of the wetland buffers. The proposed SIT plan entails collection and treatment of stormwater generated in the working areas of the project utilizing a mechanical treatment system. Consequently, the buffers are not expected to treat stormwater other than that which falls on the buffer itself. The southern and eastern edge of the buffers for Mitigation Area 4 will slope from the edge of the rail line development to the re-established tidal marsh areas. In the area where the track will be closest to the Aquatic Conservancy Zone the fill will be at a higher elevation, dropping from the rail edge (16 feet) to the edge of the existing tree berm (12 feet). A substantial compost layer will be installed over the fill prior to planting to obtain optimal soil conditions to speed desired plant growth. Native trees and shrubs will be installed throughout the permanent buffers to slow water velocities through the buffers and herbaceous plants and enhanced soils will assist in filtering stormwater to improve water quality. Some treated stormwater will be used to irrigate the planted buffer areas.

**Primary Productivity**

The existing palustrine wetland buffers do not contribute to the primary productivity of the Snohomish River Estuary due to the presence of dikes that separate the wetland buffers from tidal interactions with the river. The proposed tidal restoration mitigation area will provide a brackish marsh environment that is connected directly to Union Slough. This tidal marsh will contain a vegetated buffer which will support the primary productivity associated with the created tidal marsh area. This type of brackish habitat is known to provide very high rates of primary production (Port of Everett, 2001), thus the proposed enhanced buffers will limit disturbance within the created tidal cell, promoting greater primary productivity for the Snohomish River than the existing palustrine wetland buffers.

**Fish Habitat**

The proposed tidal marsh creation area will provide fish habitat that does not currently exist at the site. The proposed buffer enhancement activities include the installation of trees, shrubs and LWD along the margins of the created tidal cell. The addition of LWD will provide additional habitat during high tide and high flow events, while the tree and shrub layers will provide overwater shading and habitat for prey species such as invertebrates. The proposed buffers will stabilize the banks of the created fish habitat while also providing shade, habitat complexity, and improving nutrient transport to the shoreline margins of the estuary.

**Bird Habitat**

The proposed buffer enhancement activities include the addition of numerous tree and shrub species. Currently, the buffers at the Cedar Grove site are frequently used by raptors such as bald eagles, red-tailed hawks and osprey. These raptors use structures including live power poles and light fixtures to perch in the current buffer area and as the trees installed since 2005 continue to mature are increasing the use of the buffer trees. Therefore the proposed buffer enhancement activities provide safe perching areas for raptor. Also, enhancement of the onsite buffers will provide additional opportunities for prey species within the area, which will likely increase the amount of prey available to raptors within the buffers. Passerines will also benefit from the enhanced buffers due to the increase of native shrubs and trees, which will provide shelter foraging and nesting opportunities for these birds. Thus, the proposed buffer enhancement activities will provide increased functional value for bird habitat when compared to the buffers that they will replace.



**Aesthetics**

Aesthetics within the project site are currently limited due to the recent agricultural uses of the wetlands and surrounding buffers. The site essentially looks like a fallow field with little to no shrub or tree cover. The proposed mitigation will improve the aesthetics of the site by creating dense native vegetation communities along the margins of the tidal creation area and along Union and Steamboat Sloughs. The site will primarily be viewed by recreational utilization of the pedestrian trail and boaters/kayakers. The proposed buffer enhancement activities will provide dense native vegetation that will screen the facilities from the aquatic features, providing enhanced views of native vegetation and the wildlife that will utilize these areas as opposed to clear views of the surrounding industrial facilities.

**Social Significance**

Smith Island was settled over 100 years ago and has seen many transitions (see delineation report for historical context). The site supports a walking trail along the northern boundary of the property that has been paved and maintained as a public access amenity since Cedar Grove Composting began operation. The proposal will maintain that walking trail within the buffer elements. Several community groups have expressed support for this trail segment. More on this element of the plan is in the following section. The buffer planting plan includes only native species and many that are important medicinal or cultural species known to be important to native peoples.

**Recreation and Water Access**

Recreational opportunities are also limited in this area. The SEWIP identifies the installation of a raised walkway and with parking as recreational goals for Ecological Management Unit (EMU) 3, which encompasses Smith Island. The proposed mitigation plan will increase low impact recreational use opportunities in this portion of the estuary by relocating the first leg of the existing pedestrian path along the proposed levee and relocating the parking area to a location that provides greater security for users. With the relocated access and parking the trail will wind through a portion of the Mitigation Area 4 buffer on the upland side to connect with the existing trail. The new section of trail will be a soft wood chip base or washed aggregate. A pedestrian bridge will span an area that is presently a ditch to connect the relocated trail to the existing trail.

Relocation of the access road will allow trail users to access the site without crossing an at-grade railroad crossing, thereby improving safety conditions. The existing parking area is remote from any operating areas and views are obscured. Those factors combined with the remote location have resulted in the substantial criminal activity ranging from drug transactions to illegal dumping. The new location will allow for viewing of the parking area from active operating areas of both SIT and Cedar Grove Composting which will deter its use for illegal activities. The proposed recreational improvements included in the mitigation plan are expected to substantially improve the pedestrian recreation experience at the site.

**FUNCTIONAL ASSESSMENT SUMMARY**

Table 2 provides the summary of the assessment of buffer function of existing and proposed conditions. Existing functions of the freshwater wetland buffers at the site are limited. The proposed project is expected to have a long term net benefit to fish and wildlife habitat compared to existing conditions as well as nutrient transport cycling by reconnecting portions of the site to the active estuary habitat. Fish and bird habitat, as well as aesthetics, will be enhanced through the installation of native tree and shrub species and LWD structures. Recreational opportunities will also be increased through the continuation of the existing



pedestrian path through the tidal marsh creation area buffer. The applicant has agreed to provide maintenance of these buffers until the performance standards are met. At that time, they will work with the City of Everett to establish the long term course of action to manage the trail system and associated vegetation.

**TABLE 2. SUMMARY OF THE ASSESSMENT OF BUFFER FUNCTION**

Function/Character	Existing Buffers	Proposed Buffers	Functional Change
<b>Vegetation Structure</b>	Low	Moderate	Current buffers are dominated with herbaceous vegetation. Purposed buffer swill include native trees, shrubs and herbaceous plants.
<b>Vegetation Species Diversity</b>	Low	Moderate	Monotypical, invasive and exotic species dominate the current buffers. Proposed plantings will substantially increase species diversity.
<b>Habitat Interspersion</b>	Low	Moderate	Proposed plantings include multiple and highly interspersed vegetation types.
<b>Presence of Native Vegetation</b>	Low	High	Non-natives dominate the current buffer. Proposed buffer planting plan is 100% native species.
<b>Amphibian Utilization</b>	Low	Moderate	Increased plant diversity and structure will provide more refuge to amphibian species.
<b>Fish Habitat Protection</b>	None	High	Proposed buffers will be immediately adjacent to fish habitat and will provide shade, food source, etc.
<b>Avian Utilization</b>	Low	Moderate	Waterfowl and shorebirds are expected to utilize the proposed buffer.
<b>Mammalian Utilization</b>	Low	Moderate	Buffers will be immediately adjacent to newly established estuary zone that will provide good access for hunting/fishing by mammals.
<b>Habitat Connectivity</b>	Low	Moderate	Proposed buffer will be adjacent to the estuarine habitats of the Snohomish River.
<b>Habitat Features</b>	Low	High	Proposed buffer includes habitat features not currently found at the site including standing snags/piles, nest boxes and downed wood.
<b>Water Quality Potential</b>	Low	Moderate	Proposed buffer may provide stormwater treatment.
<b>Aesthetics</b>	Moderate	Moderate	Subjective designation. Proposed buffer will provide public access with views of the river, Cascade Mountains.
<b>Adjacent Land Use Disturbance</b>	Moderate	High	SIT will increase adjacent land use disturbance/noise.

## LIMITATIONS

We have prepared this Wetland Buffer Assessment for use by Smith Island Terminals, LLC for the Smith Island Terminal in Everett, Washington. Within the limitations of scope, schedule and budget, our services have been executed in accordance with generally accepted environmental science practices in this area at the time this report was prepared. No warranty or other conditions, express or implied, should be understood.

Sincerely,  
GeoEngineers, Inc.



Wayne S. Wright, PWS  
Principal Wetland Scientist

WSW:leh

Figure 1. Smith Island Terminal Wetland Exhibit

Figure 2. Smith Island Terminal Wetlands Mitigation Area Footprint

One copy submitted electronically

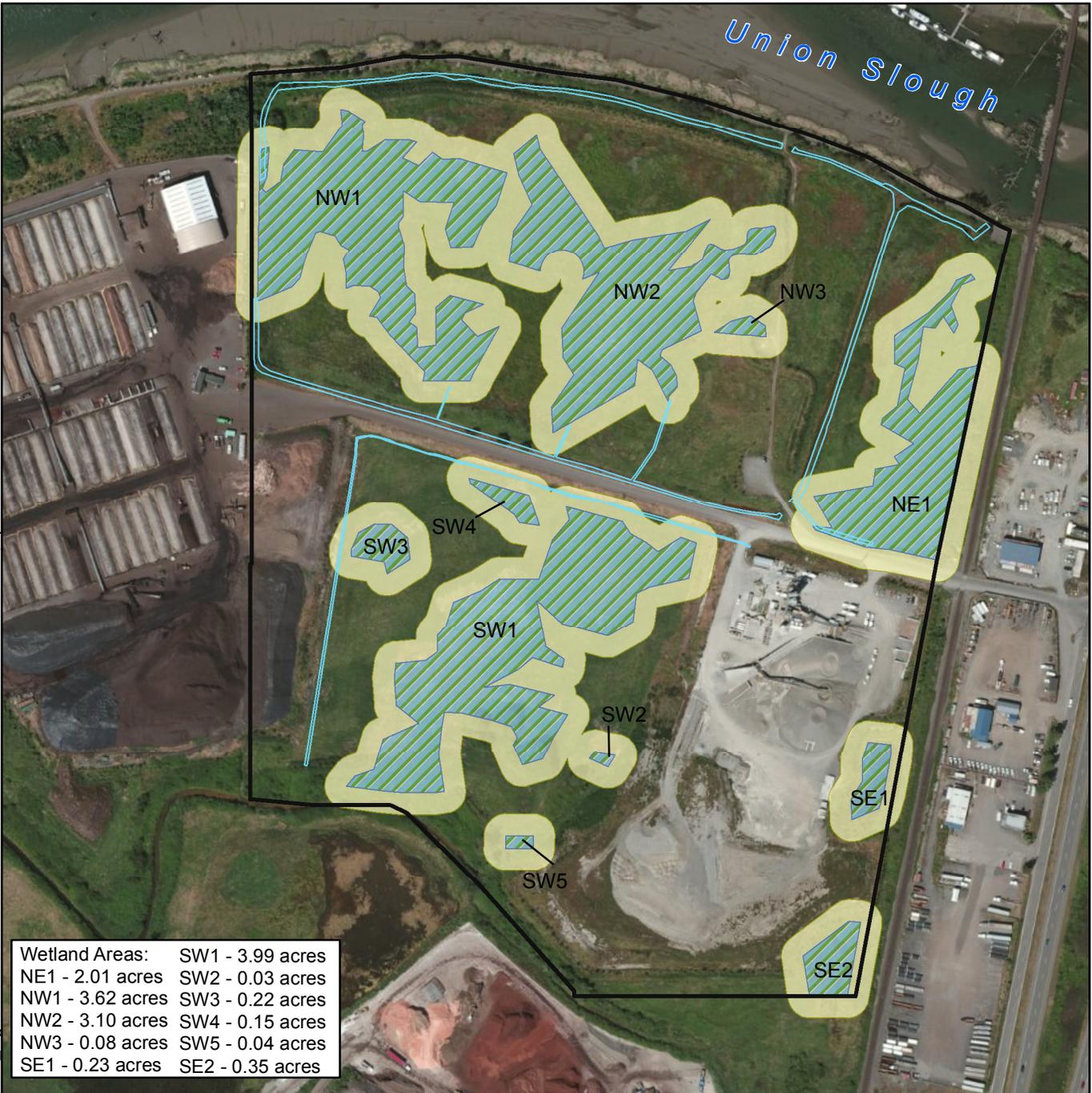
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Map Revised: 10/16/2014 TCK:AMM

Path: P:\10110625001\GIS\1062500126 CGMP Figure1.mxd  
Office: SEA



**Legend**

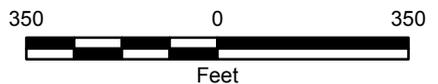
- Project Area
- Ditches = 1.12 acres
- Wetland Areas\* = 13.82 acres
- Wetland Area 50-foot Buffer

\*All Category II per Everett Municipal Code Title 19, Chapter 33D.0901(36)

**Notes:**

1. The locations of all features shown are approximate.
2. This drawing is for information purposes. It is intended to assist in showing features discussed in an attached document. GeoEngineers, Inc. can not guarantee the accuracy and content of electronic files. The master file is stored by GeoEngineers, Inc. and will serve as the official record of this communication.
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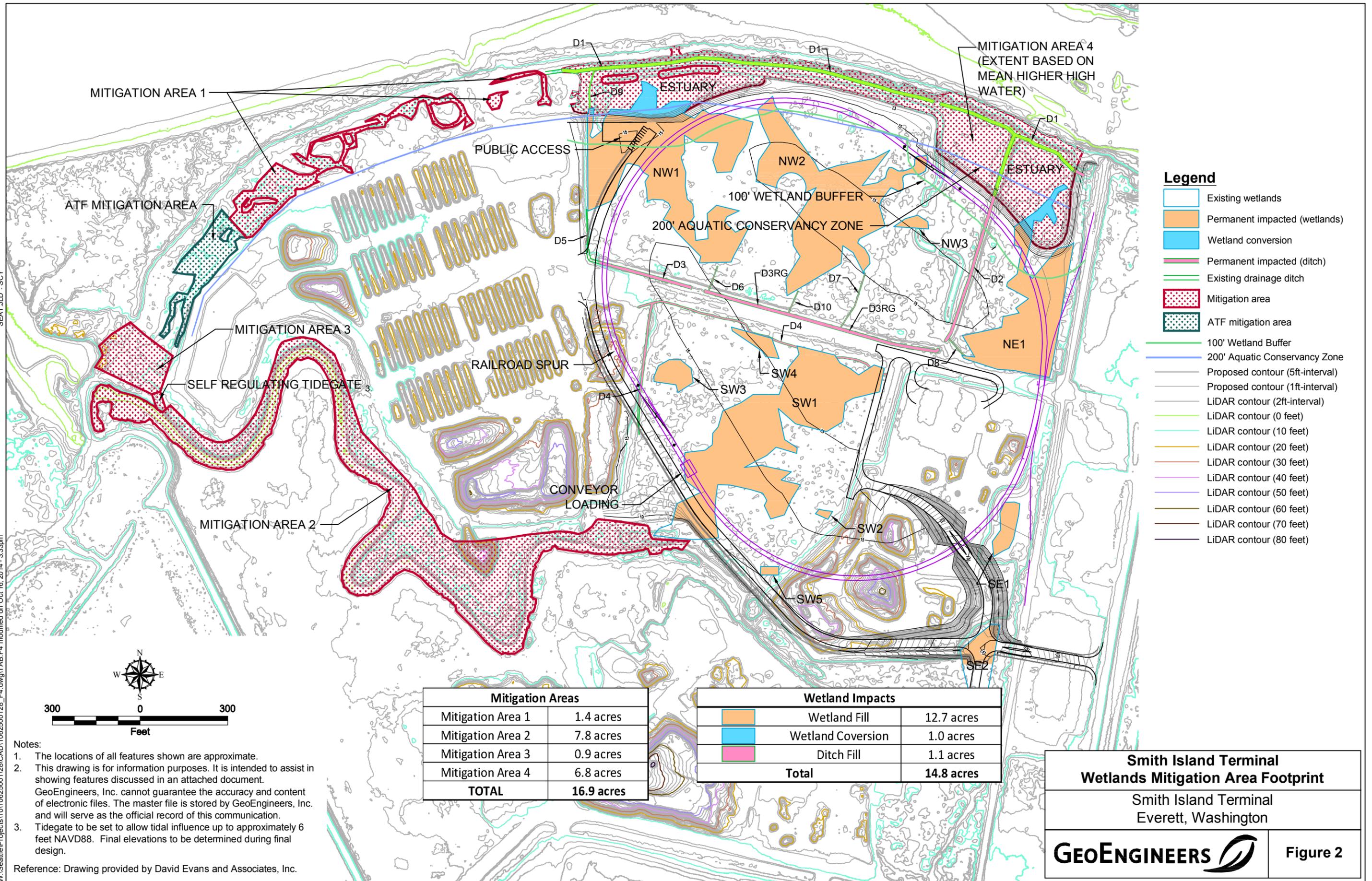
Data Sources: ESRI Data & Maps  
 Projection: NAD 1983, Washington North (feet)  
 North arrow oriented to grid north



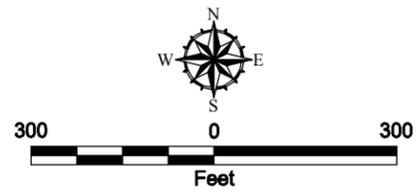
<b>Smith Island Terminal Wetland Exhibit</b>	
Smith Island Terminal Everett, Washington	
<b>GEOENGINEERS</b>	<b>Figure 1</b>

SEAT-JLD : SCY

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- Legend**
- Existing wetlands
  - Permanent impacted (wetlands)
  - Wetland conversion
  - Permanent impacted (ditch)
  - Existing drainage ditch
  - Mitigation area
  - ATF mitigation area
  - 100' Wetland Buffer
  - 200' Aquatic Conservancy Zone
  - Proposed contour (5ft-interval)
  - Proposed contour (1ft-interval)
  - LiDAR contour (2ft-interval)
  - LiDAR contour (0 feet)
  - LiDAR contour (10 feet)
  - LiDAR contour (20 feet)
  - LiDAR contour (30 feet)
  - LiDAR contour (40 feet)
  - LiDAR contour (50 feet)
  - LiDAR contour (60 feet)
  - LiDAR contour (70 feet)
  - LiDAR contour (80 feet)



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  3. Tidegate to be set to allow tidal influence up to approximately 6 feet NAVD88. Final elevations to be determined during final design.

Reference: Drawing provided by David Evans and Associates, Inc.

Mitigation Areas	
Mitigation Area 1	1.4 acres
Mitigation Area 2	7.8 acres
Mitigation Area 3	0.9 acres
Mitigation Area 4	6.8 acres
<b>TOTAL</b>	<b>16.9 acres</b>

Wetland Impacts		
	Wetland Fill	12.7 acres
	Wetland Conversion	1.0 acres
	Ditch Fill	1.1 acres
<b>Total</b>		<b>14.8 acres</b>

**Smith Island Terminal  
Wetlands Mitigation Area Footprint**

Smith Island Terminal  
Everett, Washington

**Figure 2**