



Natural Resources Department
Environmental Division
6406 Marine DR NW
Tulalip, WA 98271
.....

Dennis Osborn
Community, Planning and Economic Development

07/09/2021

Project Name: Everett Public Works/Dike District 5 Dike repair
Project #: SMA21-003 & SEPA21-006

Thank you for providing The Tulalip Tribes the opportunity to comment on this project application.

The project proponents state that permanent category III depressional wetland impacts would be compensated for by creation of a replacement dike toe ditch at a 1:1 ratio. It is stated that areas being disturbed above the OHWM would also be revegetated with native plantings. However, to qualify for a 1:1 ratio, compensation must include rehabilitation of natural or historic wetland functions, and reestablishment of former wetland, or creation of new wetland. (EMC19.37.120.B.5) Please clarify.

Dike repair types B and D mention riprap being placed on the waterward slope for scour protection and erosion control. Any addition of riprap below the OHWM results in direct, permanent loss of fish habitat, and cannot be mitigated for by wetland enhancement or bank credits. If impacts will occur below the OHWM, we'd like to see a plan that includes rehabilitation, reestablishment, or creation of in-stream fish habitat. Please advise us of any actions proposed that would accomplish this goal.

We would also like assurance that any and all mitigation plans will adhere to content required in EMC19.37.075.

Thank you for considering our concerns. We appreciate your shared commitment to conservation of our natural environment and resources.

Todd Gray
Environmental Protection Ecologist
The Tulalip Tribes | Natural Resources Dept.
360-716-4620 | toddgray@tulaliptribes-nsn.gov

EXHIBIT 2
Page 1 of 1