



March 14, 2014  
Project No. 0-915-15338 C

Washington Department of Ecology  
Northwest Region  
3190 – 160<sup>th</sup> Ave. SE  
Bellevue, WA 98008-5452

Attention: Ms. Susan Meyer

Subject: Pacific International Terminals Property  
Wetlands Mitigation Plan for Temporal Loss  
Schedule Update

Dear Ms. Meyer:

This letter provides an updated schedule for implementing the *Wetlands Mitigation Plan for Temporal Loss* (dated June 7, 2012) in Whatcom County, Washington. The Plan was developed at Ecology's request to provide compensation for temporal losses as a result of vegetation clearing in wetlands on Pacific International Terminals' property. Implementation of the Plan was originally anticipated to begin in fall 2012 and dates in the version of June 2012 reflect that assumption.

Proposed mitigation actions include enhancing wildlife habitat functions on 2.9 acres of existing wetlands by reducing the presence of invasive vegetation communities (reed canarygrass [*Phalaris arundinacea*] and Himalayan blackberry [*Rubus armeniacus*]), and planting native wetland trees and shrubs.

The U.S. Army Corps of Engineers issued Section 404 Nationwide Permit (NWP) Numbers 6, 27, and 33 on March 7, 2014. And on March 10, 2014, your Agency issued a letter confirming that the requirements of Washington State's 401 Water Quality Certification had been met.

Pacific International Terminals is now able to implement the Plan. This letter provides a revised construction schedule for the implementation of the Plan.

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U:\15338-GPT-L\07 - Permitting Geotech\Task 03- Geotech Clearing\Ecology - 401WQC and Mitigation\Correspondence\20140314 letter to ecology revising TM schedule.docx

## Construction Sequence

The construction sequence presented in the June 7, 2012 Plan has not changed.

The three general stages are:

- 1) Year 1: Protection of existing vegetation and establishment of access corridors, reduction of invasive species biomass, and planting of native trees and shrubs;
- 2) Year 2: Continued treatment of reed canarygrass communities, and planting of live willow stakes amongst the black, geotextile fabric covering these areas; and
- 3) Year 3: Inter-planting with conifer tree seedlings.

## Revised Construction Schedule

The Year 1 actions, including establishment of access corridors and reduction of invasive species biomass, are planned for spring 2014. Specific actions to reduce invasive species biomass are planned to include repeated mowing of reed canarygrass areas and cutting and removing Himalayan blackberry and its root crowns. An approved spray herbicide containing glyphosate (e.g. Rodeo®) is planned to be spot applied to reed canarygrass areas in fall 2014 when these plants are actively translocating carbohydrates (along with the herbicide) down to the root system. In fall 2014, native seedlings and shrubs are to be planted.

Year 2 actions are planned to start in late winter 2015 with the planting of live willow stakes in the treated reed canarygrass areas. Planting of conifer tree seedlings is planned for winter 2016. This revised schedule is summarized in Table 1 below.

**Table 1 Revised Construction Schedule and Expected Completion Dates**

<b>Year</b>	<b>Task</b>	<b>Anticipated Start</b>	<b>Anticipated End</b>
1	Establish access corridors; reduce invasive species biomass	Spring 2014	Fall 2014
	Additional reed canarygrass treatment	Fall 2014	Fall 2014
	Plant native trees and shrubs	Late fall- winter 2014	winter 2014
2	Install live willow stakes	Winter 2015	Winter 2015
3	Interplant with conifer species	Winter 2016	Winter 2016
1 - 10	management of area focusing on invasive species control and planted material health	Fall 2014	Fall 2025

If you have any questions regarding this revised construction schedule, or require additional information, please feel free to give me a call.

Sincerely,

**AMEC Environment & Infrastructure, Inc.**

A handwritten signature in black ink that reads "Kristie Dunkin Ph.D., PMP". The signature is written in a cursive, flowing style.

Kristie Dunkin, Ph.D., PMP

cc: Ari Steinberg, P.E.  
Pacific International Terminals, Inc.  
Bill Lynn  
Gordon, Thomas, Honeywell, LLP