

October 10, 2013
C3H13PR08

City of Poulsbo Planning and Building Department
Attention: Alyse S. Nelson (Associate Planner)
200 NE Moe Street
Poulsbo, Washington 98370

RE: PEER REVIEW BLUE HERON PRELIMINARY PLAT (Planning File #11-27-07-1)

C3 Habitat Corporation (C3) has reviewed several documents regarding the Blue Heron Preliminary Plat with focus mainly on the BGE Environmental, LLC (BGE) Technical Memorandum dated August 15, 2013. BGE addressed questions posed by City of Poulsbo staff regarding the Wetland and Stream Report by B&A, Inc. dated July 11, 2008. The outlying issues in the BGE report clarify the confirmation on the presence or absence of a Type 5 Stream in the northeast corner of the plat; clarification and discussion on the interrupted buffer conditions to regulated water bodies, offsite and east of the project area; and discussion of wetland areas outside of and within 150 feet of the project site (Heron Pond) in the southeast vicinity of the project.

C3 has assessed the site during a field study on September 29, 2013 and reviewed several documents with focus on the BGE report.

FINDINGS

1. The Type 5 Stream: C3 found no surface waters that meet the definition of streams as outlined in WAC-222-16-031 where an average - 2 foot channel widths must be present at a length of at least 500 feet with at least 10 evenly spaced measurement points along the normal stream channel while excluding unusually wide areas. As stated in the BGE report, "The project site does not contain a channel and therefore, does not contain a Type 5 Stream" – C3 confirmed this finding as well as the approximate distance of visual observation of channeling offsite and down gradient. Because of the timing of my field investigation and recent rainfall, there would have been surface water present if it existed as the ground was saturated. Surface water was observed offsite at a distance of 77 feet from the fence line. However, where surface water was observed, it was not in an average bankfull width of 2 feet. C3 stopped offsite review at 100 feet from the fence line as the seasonal buffer would not reach the project.
2. Interrupted Buffer: BGE is requesting an exemption by means of an "Interrupted Wetland and Fish and Wildlife Conservation Area Buffers" as outlined in Title 16.20.120 of the Poulsbo Municipal Code. Roads can both sever a buffer or not sever a buffer depending on similar habitat value and vegetation cover on both sides of the road as well as the ability for hydrology to pass under the road. This application is often complicated to determine an exact point when a portion of the buffer has agricultural use and habitat function is not equal to the undisturbed side of the road. NE Heron Road Ln is the roadway that dissects the subject buffer.

Although a majority of the road dissection does not meet the "Interrupted Buffer" exemption, C3 finds that the area chosen to apply the interrupted buffer is acceptable as the west side of NE Blue Heron Ln is mainly comprised of agricultural use and future development will not adversely change the overall function and value of the stream's critical area attributes. The only disagreement C3 found in the BGE report is that there *are* proposed lots for houses where the interrupted buffer is planned. BGE states that no structural component is proposed in the uninterrupted buffer (paper buffer) and only the stormwater facility is the proposed change. Regardless, allowing structural changes where the interrupted buffer is proposed is not likely to affect the integrity of the buffer on the east side of the road and should be allowed.

3. Heron Pond: The City of Poulsbo raised concern regarding discharging stormwater into wetlands or ponds. Heron Pond meets the definition of a wetland as stated in the BGE Report but also meets the exempted interrupted buffer criteria as NE Heron Pond Ln severs the project area from the pond. C3 did not review any technical stormwater management for this project and did not request for any stormwater reports due to the fact that BGE addressed this in their report as meeting stormwater criteria by not altering hydrologic function to the surrounding water bodies and watershed. Based on the paper review for the project, no stormwater is planned to be discharged into Heron Pond and therefore no adverse impacts are anticipated to the pond and/or its assumed buffer.

CONCLUSION

C3 concludes the Technical Memorandum prepared by BGE Environmental, LLC effectively addressed concerns from the City regarding the aforementioned points.

Respectfully submitted,

C3 Habitat Corp.



Christy Christensen

Senior Biologist

cc: Barry Berezowsky, Planning Director