

EXHIBIT F.2

Peer Review Wetland Delineation Prepared by Grette Associates



TECHNICAL MEMORANDUM

Prepared for: Nikole Coleman
Associate Planner
City of Poulsbo
200 NE Moe Street
Poulsbo, WA 98370

August 29, 2019

Prepared by: Grette Associates^{LLC}
2102 North 30th Street, Ste A
Tacoma, WA 98403

File No.: 208.023

Re: Johnson Ridge – Wetland Delineation Report: Third-Party Review

1 INTRODUCTION

Grette Associates is under contract with the City of Poulsbo (City) to assist in the review of the Wetland Delineation Report (the “Report”, dated May 2, 2019) prepared by Ecological Land Services, Inc. (ELS) that was prepared in support of the Johnson Ridge development project.

The proposed project is located at 17504 Johnson Road NE (Kitsap County parcel 252601-2-004-2008) within the City of Poulsbo. Please note that the proposed project is utilizing the future road alignment associated with the City’s Noll Road Improvements Project. Grette Associates assumes that the Johnson Road NE and Noll Road improvements shown in Figure 3 of the Report are consistent with the City’s Noll Road Improvement Project.

2 REVIEW METHODS

2.1 Site Assessment

Grette Associates completed an evaluation of the subject property on August 23, 2019. The subject property was traversed and evaluated for consistency with the information contained in the Report. All accessible areas within 300 feet of the subject property were visually assessed to identify any potential critical area features that may have a buffer extending onto the property.

In addition, Grette Associates completed a previous assessment in the vicinity of the proposed project on December 14, 2018 to assess all areas within 300 feet of the City’s Noll Road Improvement Project for consistency with the submitted critical area documents associated with the City’s project. Grette Associates completed a third-party review of these documents for compliance with Chapter 16.20 of the Poulsbo Municipal Code (PMC [Grette Associates 2019a and 2019b]).

2.2 Document Review

Grette Associates conducted a thorough review of the Report submitted to the City. The review focused on verifying the accuracy of the descriptions within the Report and compliance with Chapter 16.20 of the PMC.

3 REVIEW RESULTS

3.1 Site Assessment Results

During the site assessments, Grette Associates identified one wetland (Wetland A) and one perennial stream (Bjorgen Creek). No additional wetland and/or stream features were identified. Grette Associates concurs with the baseline conditions summarized in the Report and the mapped locations of Wetland A and Bjorgen Creek.

3.2 Document Review Results

Based on Grette Associates' review, the Report is largely compliant with Chapter 16.20 of the PMC. However, as summarized below, there are two discrepancies associated with Bjorgen Creek.

Wetlands

Per PMC 16.20.210, Wetlands shall be delineated according to the procedures defined in the U.S. Army Corps of Engineers (USACE) *Federal Wetland Delineation Manual* (1987) and the USACE's *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0)* (2010) and rated according to Ecology's current wetland rating system (Hruby 2014). In our professional opinion, the Report accurately delineated Wetland A based on the USACE's manual (1987) and supplement (2010). Furthermore, Wetland A was rated using Ecology's current wetland rating system (Hruby 2014). Grette Associates concurs with the rating of Wetland A as a Category IV wetland which is also consistent with a previous rating of Wetland A (Parametrix 2019).

Per PMC 16.20.230, Category IV wetlands are subject to a 50-foot buffer and 15-foot building setback. The Report conforms to these requirements. Therefore, the Report complies with Section 200 of Chapter 16.20 of the PMC.

Fish and Wildlife Habitat Conservation Areas

Per PMC 16.20.310, all Type F, Np, and Ns streams, as defined in WAC 222-16-030, are designated as Fish and Wildlife Habitat Conservation Areas (FWHCAs). As summarized above, one FWHCA (Bjorgen Creek) is located on or within 300 feet of the proposed project. Per PMC 16.20.750, a habitat assessment report shall be prepared for any regulated activity within 300 feet of a FWHCA. With the exception of acknowledging that Bjorgen Creek is located east of the proposed project, the Report does not provide any habitat analysis.

The City separates Type F waters into two sub-types with respect to assigning buffers. Type F1 streams provide habitat for salmonids while Type F2 streams provide habitat for non-salmonids. According to WDFW (2019a), coho salmon (*Oncorhynchus kisutch*) and resident cutthroat trout (*O. clarkii*) are documented to use the upper reaches of Bjorgen Creek. In addition, Parametrix's *Noll Road Corridor Improvements: Wetland Delineation and Stream Characterization Report* (2019) concludes that the segment of Bjorgen Creek east of the proposed project is a Type F1 stream based on the documented use of coho and cutthroat and previous stream crossing

improvement projects. The historic fish passage barrier beneath SR 305 was replaced with a fish passible culvert in 2010/2011 (WDFW 2019b). Prior to the replacement, the extent of anadromous fish access was likely limited to areas downstream of SR 305.

While there is a total fish barrier mapped by WDFW (2019b) downstream beneath Lemolo Shore Drive, according to WAC 222-16-030, *fish habitat is habitat used by fish at any life stage at any time of year, including potential habitat likely to be used by fish which could be recovered by restoration*. Given this information and documented use of coho and cutthroat upstream of the Lemolo Shore Drive crossing, the portion of Bjorgen Creek in the vicinity of the proposed project is classified as a Type F1 stream. Per PMC 16.20.315, Type F1 streams are subject to a 200-foot buffer and a 25-foot building setback.

The Report inaccurately classifies the portion of Bjorgen Creek within the vicinity of the proposed project as a Type F2 stream. As a result, the Report does not assign the appropriate buffer. The supporting figures show a Type F2 150-foot stream buffer instead of a Type F1 200-foot stream buffer. As proposed, it appears that the Type F1 200-foot buffer and 25-foot building setback would extend into Lots 1-5 – refer to Figure 3 within the Report.

4 CONCLUSION

Upon thorough review, Grette Associates identified two discrepancies with Chapter 16.20 of the PMC within the Report. Per PMC 16.20.750, a habitat assessment report shall be completed for any regulated activity within 300 feet of a FWPCA. The Report does not meet the minimum requirements defined in PMC 16.20.750; therefore the Report should be revised accordingly for compliance with Section 300 of Chapter 16.20 of the PMC.

In addition, the Report inaccurately classifies the portion of Bjorgen Creek within the vicinity of the proposed project as a Type F2 stream. Based on the documented salmonid use (WDFW 2019a, 2019b, and Paramatrix 2019) and WAC 222-16-030, the appropriate classification for this portion of Bjorgen Creek is a Type F1 stream. Per PMC 16.20.315, Type F1 streams are subject to a 200-foot buffer and a 25-foot building setback. Therefore, the Report should be revised accordingly for compliance with Section 300 of Chapter 16.20 of the PMC.

The review of this Report was conducted using the best available scientific information and methodologies and the best professional judgement of Grette Associate’s staff biologists. Final acceptance and approval is at the discretion of City staff.

If you have any questions from this review, please contact me at (253) 573-9300, or by email at chadw@gretteassociates.com.

Regards,



Chad Wallin
Biologist

References:

- Environmental Laboratory (Corps). 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1, US Army Engineer Waterways Experiment Station, Vicksburg, Mississippi.
- Grette Associates, LLC. 2019a. Noll Road Corridor Improvements Project: Third Party Review. Prepared for the City of Poulsbo. March 4, 2019.
- Grette Associates, LLC. 2019b. Noll Road Corridor Improvements Project: Third Party Review. Prepared for the City of Poulsbo. June 5, 2019.
- Hruby, T. 2014. Washington State Wetland Rating System for Western Washington: 2014 Update. Washington State Department of Ecology Publication # 14-06-029.
- Parametrix. 2019. Noll Road Corridor Improvements: Wetland Delineation and Stream Characterization Report. Prepared for the City of Poulsbo. May 2019.
- U.S. Army Corps of Engineers (Corps). 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0)*, ed. J. S. Wakeley, R. W. Lichvar, and C. V. Noble. ERDC/EL TR-10-3. Vicksburg, MS: U.S. Army Engineer Research and Development Center.
- Washington Department of Fish and Wildlife (WDFW). 2019a. SalmonScape [map online]. All SalmonScape Species. Queried August 28, 2019. URL: <http://wdfw.wa.gov/mapping/phs/>.
- Washington Department of Fish and Wildlife (WDFW). 2019b. Washington State Fish Passage [map online]. WDFW fish passage inventory database. Queried August 28, 2019. URL: <https://geodataservices.wdfw.wa.gov/hp/fishpassage/index.html>