

EXHIBIT F.4

**Peer Review of Habitat Management Plan
Prepared by Grette Associates**



TECHNICAL MEMORANDUM

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

December 18, 2019

Prepared by: Grette Associates^{LLC}
2102 North 30th Street, Ste A
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File No.: 208.001.1000

Re: Johnson Ridge Habitat Management Plan: Third-Party Review

Grette Associates contracted 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) in support of the Johnson Ridge PRD project (Project). Grette Associates completed a third party review and provided comments on the Report on August 29, 2019. In summary, while the Report was compliant with Section 200 (Wetlands) of the Poulsbo Municipal Code (PMC), the Report did not meet the minimum requirements defined in Section 300 (Fish and Wildlife Habitat Conservation Critical Areas) of the PMC.

In response to Grette Associates' August 2019 review, ELS submitted a habitat management plan (the "HMP", dated October 8, 2019) to address the identified deficiencies. Provided below is a summary of deficiencies identified in the August 2019 review (*italic*) followed by Grette Associates' response upon review of the HMP.

Per PMC 16.20.750, a habitat management plan shall be completed for any regulated activity within 300 feet of a Fish and Wildlife Habitat Conservation Area (FWHCA). The Report does not meet the minimum reporting requirements defined in PMC 16.20.750.

The HMP meets the minimum requirements defined in PMC 16.20.750. More specifically, the HMP provides sufficient analysis evaluating the potential effects of the proposed Project and provides a summary of the best management practices (BMPs) that will be implemented to ensure no adverse impacts to the identified FWHCA (i.e. Bjorgen Creek) will result from the proposed Project.

In addition, the proposed Project is requesting a 25 percent buffer reduction of the 200-foot buffer associated with Bjorgen Creek. Per PMC 16.20.315(B), stream buffers can be reduced up to 25 percent if a habitat management plan has provided sufficient rationale to demonstrate no adverse impacts will occur to the FWHCA. In summary, the HMP accurately describes the existing conditions of the outer 50 feet where the stream buffer will be reduced. This area largely contains the lowest coverage of native vegetation and the buffer reduction to 150 feet will not extend into the ravine slope that is predominantly native forest vegetation. To ensure no

adverse impacts will occur within the stream and/or reduced stream buffer, the proposed Project will enhance the understory of the reduced stream buffer with approximately 1,370 assorted native shrubs and trees. Furthermore, buffer enhancement will include invasive species control.

With the exception of a post-installation inspection (as-built), the proposed enhancement plan contains the appropriate monitoring program to ensure the enhancement actions are successful. In summary, the enhancement areas will be monitored for a five year period post plant installation (Years 1, 2, 3, and 5). Additionally, the monitoring program contains sufficient performance standards to evaluate the success of the enhancement actions. These performance standards include invasive species control, survival rates for the planted native vegetation, and sub-canopy coverage requirements. A monitoring report will be submitted to the City after each monitoring effort during the monitoring period.

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 and WAC 222-16-030, the appropriate classification for the portion of Bjorgen Creek is a Type F1 stream. Per PMC 16.20.315, Type F1 stream are subject to a 200-foot buffer and a 25-foot building setback.

The HMP classifies Bjorgen Creek as a Type F1 stream and provides the applicable buffer and building setback. As summarized above, the proposed Project requests that the standard 200-foot stream buffer be reduced to 150 feet (PMC 16.20.315). Pending approval from the City, the proposed Project will not extend into the reduced 150-foot stream buffer. However, according to the HMP, there is no feasible alternative to relocate the proposed pedestrian trail outside of the 25-foot building setback. While the HMP states that the trail will be constructed of gravel (pervious surface), Chapter 16.20 of the PMC does not specifically address features that are allowed within the applicable building setback. Given the nature of the feature (pervious pedestrian trail) and its proposed location outside of the reduced stream buffer, it is Grette Associates' professional opinion that the construction of the trail will not have any adverse impacts to stream and/or stream buffer functions. Furthermore, according to the HMP, a split rail fence will be installed along the stream buffer to ensure no unauthorized uses will occur within the stream buffer.

In conclusion, the HMP adequately addressed Grette Associates' August 2019 comments. With the exception of an as-built report, the HMP meets the minimum reporting requirements defined in PMC 16.20.750 and includes sufficient rationale to demonstrate that the proposed enhancement actions will ensure that no adverse impacts to the stream and/or buffer will occur with the proposed 25 percent stream buffer reduction. Grette Associates recommends that a post-installation inspection be performed upon completion of the proposed buffer enhancement actions and the HMP be revised accordingly. Once revised, Grette Associates recommends that the City accept the HMP.

The review of this HMP 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,

A handwritten signature in black ink, appearing to read "Chad Wallin". The signature is fluid and cursive, with the first name "Chad" being more prominent than the last name "Wallin".

Chad Wallin
Biologist