



TECHNICAL MEMORANDUM

Prepared for: Marla Powers
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 City of Poulsbo
 200 NE Moe Street
 Poulsbo, WA 98370

July 1, 2020

Prepared by: Grette Associates^{LLC}
 2102 North 30th Street, Ste A
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File No.: 208.001.1100

Re: Olso Bay Apartments Wetland Delineation and HMP: Third-Party Review

The City of Poulsbo contracted with Grette Associates to assist in the review of a wetland delineation report (August 21, 2019), and a habitat management plan (the “HMP”, August 21, 2019) that were prepared by Ecological Land Services, Inc. (ELS) in support of the Oslo Bay Apartments project.

Grette Associates reviewed and provided comments on the submitted materials on January 31, 2020. In summary, the report and HMP contained several deficiencies in compliance with Chapter 16.20 of the Poulsbo Municipal Code (PMC). In response to Grette Associates’ January 2020 review, a revised wetland analysis report (dated April 27, 2020) and a revised HMP (revised April 28, 2020) were submitted to the City. Upon preliminary review, the City determined that it was appropriate to complete a site visit with the applicant’s representatives and WDFW, the Tribe, City, and Grette Associates staff to determine the extent of the unnamed stream prior to a formal review of revised materials. In summary, it was determined that the unnamed stream extended up to the outlet of the culvert beneath the Kitsap Transit Station (WDFW 2020) and ELS informed the City that revised materials will be submitted to the City for review.

ELS submitted a technical memorandum (dated June 17, 2020) in response to Grette Associates January 2020 and the City’s technically incomplete letter (dated May 18, 2020). The tech memo was intended to resolve the differences between Grette Associates’ wetland ratings (Hruby 2014) and those of ELS in order for ELS to prepare a revised HMP (Table 1).

Table 1. Grette Associates’ January 2020 Review - Wetland Summary

Feature	Rated by	Water Quality	Hydrology	Habitat	Total	Category
Wetland A	ELS	5	4	6	15	IV
	Grette	5	5	7	17	III
Wetland B	ELS	5	4	5	14	IV
	Grette	5	5	7	17	III
Wetland C	ELS	5	4	5	14	IV
	Grette	5	5	6	16	III

Provided below is a summary of the discrepancies identified in the January 2020 review (italic) followed by Grette Associates' response upon review of the rating forms attached to the ELS technical memo. Please note that, with the exception of Wetland C, Grette Associates assumes that the rating forms provided in the tech memo are to supersede those provided in the revised report (April 27, 2020). The Wetland C rating form in ELS' April 2020 wetland analysis report was used in this review.

- *Question S6.1 (all rating forms): Based on the Washington Department of Fish and Wildlife's (WDFW) SalmonScape on-line mapper (queried 1/30/2020), coho and steelhead spawning is documented to occur within Dogfish Creek downstream of the wetlands. The rating forms acknowledge there are surface flooding problems down-gradient of Wetlands A, B, and C; therefore, it appears an additional point should be given to this question which would give this question a score of High.*

The Wetland A and Wetland B rating forms added a point to Question S6.1. Wetland C was not revised to reflect the change; however, is reflected in Grette Associates review (see below).

- *Question H2.3 (all rating form): The rating forms for all the wetlands were given -2 points for this question. However, according to Figure 9 in the Report, only approximately 44.7 percent of the area within one kilometer of the wetland is considered high intensity land use. Based on this information, this question should be given 0 points rather than -2 points which would give this question a score of Moderate.*

ELS has provided clarification regarding the land use intensity within one kilometer of the wetlands. According to the tech memo, it appears that previous calculations utilized an aerial image that did not reflect current land use conditions. Based on the revised figures provided in the tech memo, Grette Associates concurs with the conclusion that over 50 percent of the area within one kilometer is high land use. Therefore, the rating forms should be given -2 points rather than 0. The Wetland A and Wetland B rating forms correctly assign the -2 points to Question H2.3. The Wetland C rating form does not.

Question H3.1 (all rating forms): The rating forms give this question one point for two WDFW priority habitats within 330 feet of the wetlands. These ratings did not include the mature upland forest that occupies much of the subject properties. Based on Grette Associates' professional opinion, the average DBH of the tree species that provide canopy coverage appears to exceed 21 inches. Therefore, 2 points (3 priority habitats) should be given for this question for Wetlands A and B and 1 point (2 priority habitats) for Wetland C.

According to the information provided in the tech memo, the undeveloped areas within the Project meet the criteria of a mature forest. Wetland A was given a point but Wetland B was not. The tech memo doesn't provide a figure to demarcate the mature forest area but does state that average DBH of trees within 330 feet of Wetland B are less than 21 inches. It is also noted that if a point was added to capture a mature forest it would not change the wetland category. Grette Associates concurs with this statement (see below).

According to the tech memo, there is no riparian area associated with Dogfish Creek within 330 feet of Wetland A. This contradicts the rating form provided in ELS' 2019 report which Grette Associates reviewed in January 2020. The rating form in the 2019 report gave a point for instream habitat and a point for riparian habitat but the tech memo now argues that areas along the upland portion along Dogfish Creek within 330 feet do not meet the definition of riparian area. Grette

Associates disagrees. Per the WDFW Priority Habitats and Species List report (2008), riparian priority habitat areas are those areas beginning at the OHWM and extending to the portion of the terrestrial landscape that is influenced by, or that directly influences, the aquatic system. Riparian areas include areas of wetlands that are directly connected to stream courses (WDFW 2008).

Portions of Wetland A and Dogfish Creek contain ecological processes that mutually influence each other. Wetland A provides organic matter to the stream and likely provides an opportunity to reduce periodic high flows (rigid vegetation along the stream banks) and Dogfish Creek likely provides some hydrology support to Wetland A during the dry months. In addition, while relatively small in size and likely providing limited function, the offsite areas along the margin of the stream channel within 330 feet are considered riparian areas given the vegetation communities along the channel. Grette Associates’ rationale to support the riparian determination was verified by Nam Sui at WDFW (personal communication June 30, 2020). Therefore, an additional point to Question 3.1 for Wetland A should be given to capture the riparian areas associated with Dogfish Creek.

Provided below in Tables 2, 3, and 4 are summaries of ELS’ revised ratings and Grette’s ratings.

Table 2. ELS and Grette Associates Wetland A rating form value discrepancies

Rated by	ELS	Grette	ELS	Grette	ELS	Grette
Rating Function	Water Quality		Hydrology		Habitat	
Site Potential	L	L	L	L	M	M
Landscape Potential	L	L	L	L	L	L
Value	H	H	H	H	M	H
Score Based on Rating	5	5	5	5	5 ¹	6 ²

¹ Question H3.1 was given one point for two priority habitats (mature forest and instream) which resulted in a moderate value score.

² Question H3.1 was given two points for three priority habitats (mature forest, riparian, and instream) which resulted in a high value score.

Table 3. ELS and Grette Associates Wetland B rating form summary

Rated by	ELS	Grette	ELS	Grette	ELS	Grette
Rating Function	Water Quality		Hydrology		Habitat	
Site Potential	L	L	L	L	L	L
Landscape Potential	L	L	L	L	L	L
Value	H	H	H	H	M	H
Score Based on Rating	5	5	5	5	4 ¹	5 ²

¹ Question H3.1 was given one point for two priority habitats (riparian and instream) which resulted in a moderate value score.

² Question H3.1 was given two points for three priority habitats (mature forest, riparian, and instream) which resulted in a high value score.

Table 4. ELS and Grette Associates Wetland C rating form summary¹

Rated by	ELS	Grette	ELS	Grette	ELS	Grette
Rating Function	Water Quality		Hydrology		Habitat	
Site Potential	L	L	L	L	M	M
Landscape Potential	L	L	L	L	M	L
Value	H	H	M	H	L	M
Score Based on Rating	5	5	4 ²	5	5 ³	5 ⁴

³ As noted above, the tech memo did not include a revised rating form for Wetland C. ELS' scores reflect those summarized in the revised wetland analysis report (April 2020).

⁴ Question H2.3 was revised according to the ELS' revised land use figure and Question H3.1 was given one point for two priority habitats (mature forest and riparian) which resulted in a high value score. The instream habitat does not appear to be within 330 feet of Wetland C.

In conclusion, Grette Associates concurs with the revised ratings for Wetlands B and C (Category IV); however, does not agree with ELS' rating for Wetland A as a Category IV. Based on the analysis provided above, it is our professional opinion that Wetland A should be rated as a Category III wetland. Riparian areas are within 330 feet of all the wetlands and as a result Wetland A should receive 2 points for Question H3.1 in the rating form (three PHS habitats within 330 feet).

The review of the wetland ratings 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,

GRETTE ASSOCIATES^{LLC}



Chad Wallin
Biologist

References:

Hruby, T. 2014. Washington State Wetland Rating System for Western Washington: 2014 Update. Washington State Department of Ecology Publication # 14-06-029.

Washington Department of Fish and Wildlife (WDFW). 2008. Priority Habitat and Species List. Olympia, Washington. 292pp. Updated February 2020.

Washington Department of Fish and Wildlife (WDFW). 2020. Olso Bay Apartments: Stream Typing Determination Letter. Prepared by Nam Sui, Area Habitat Biologist. June 5, 2020.