



TECHNICAL MEMORANDUM

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

April 16, 2021

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

File No.: 208.001.1100

Re: Oslo Bay Apartments – Critical Areas Report: Third-Party Review

1 INTRODUCTION

The City of Poulsbo contracted with Grette Associates to assist in the review of the revised Critical Areas Report (revised February 24, 2021) and the revised Habitat Management Plan (the “HMP”; revised March 4, 2021) that were prepared by Ecological Land Services, Inc. (ELS) in response to Grette Associates’ January 20, 2021 third-party review.

In summary of Grette Associates’ January 2021 review, the KCPW Report (ELS 2020a) and the Critical Areas Report (ELS 2020b)¹ meet the minimum reporting requirements defined in Chapter 16.20 of the PMC. However, prior to acceptance Grette Associates recommended that the HMP (ELS 2020c) be revised to address the discrepancies identified in the review.

Provided below is a summary of the discrepancies identified in the January 2021 review (*italics*) followed by Grette Associates’ response upon review of the revised HMP.

- *Per PMC 16.20.315(B), stream buffers may be reduced up to 25 percent if the resulting conditions are sufficient to protect the affected habitat. The proposed planting plan associated with the buffer reduction to construct the western stormwater pond does not include any tree species. The HMP also describes temporary disturbance during the construction of the stormwater pond which may include the removal of some native trees. To ensure the construction of the pond would not adversely impact existing buffer functions, Grette Associates recommends that the planting plan be revised to include an assortment of native trees;*

Table 4 of the revised HMP includes a native conifer in the proposed planting schedule to address the temporary disturbance within the buffer and ensure that the proposed reduction will not have

¹ Please note that the January 2021 review identified one minor inconsistency with Table 1 and Grette Associates recommended that the table be revised to accurately reflect the wetland rating forms. Table 1 in the revised critical areas report (2/24/21) was updated to be consistent with the rating forms. Therefore, the revised critical areas report is considered complete and is not addressed further in this review.

a significant impact on existing buffer functions. Based on this information, the revised HMP has adequately addressed this comment.

- *Per PMC 16.20.315, minor intrusions may be allowed within the 25-foot building setback. The project proposes to reduce a portion of the 150-foot Type F2 stream to facilitate the construction of Vetter Rd. Figures in the HMP show that the project can retain the standard 150-foot buffer and that the only encroachment would be within the 25-foot building setback. Based on this information, there appears to be no need to reduce the buffer in this area;*

The revised HMP and figures have been revised to omit the proposed buffer reduction associated with the construction of Vetter Rd.; therefore, the revised HMP has adequately addressed this comment.

- *The HMP does not address the two stormwater outfalls that would be constructed in the buffer of Wetland A. Furthermore, the application materials inconsistently show where the outfalls (both western and eastern) will be located. Grette Associates recommends that materials be revised accordingly for consistency and compliance with Chapter 16.20 of the PMC;*

A site meeting with WDFW, City, Grette Associates, and Project team members was held on January 22, 2021 to determine the locations of the proposed stormwater outfalls and type of flow control device that should be installed on the outfalls to ensure no adverse wetland and stream impacts occur as a result of the proposed stormwater discharge (see attached). The revised HMP accurately maps where the proposed outfalls will be located based on the January 2021 site meeting; therefore, this comment has been adequately addressed.

- *The HMP does not provide any analysis with respect to potential impacts from stormwater discharge. As summarized above, Grette Associates cannot concur with the HMP that there will be no direct and/or indirect impacts that will occur as a result of the stormwater outfalls. Three of the four outfall pipes are sized to be 24 inches which suggests there would be stormwater discharge at a volume that would have the potential to scour, which would likely cause erosion and water quality issues if not adequately diffused. Per PMC 16.20.305, the purpose of Section 300 of Chapter 16.20 of the PMC is to preserve existing ecological functions of fish and wildlife habitat conservation areas. Grette Associates recommends that the HMP be revised to provide an analysis to clearly demonstrate that the proposed outfalls will adequately diffuse velocities to mitigate any potential erosion and/or water quality issues;*

The revised HMP has been updated to reflect the stormwater outfall determinations that were completed with WDFW, City, Grette Associates, and Project team members (see attached). In summary, the stormwater outfalls will be equipped with in-line dissipaters and positioned at the locations defined in the field. In addition, the revised HMP provides an impact analysis that demonstrates no significant impacts will occur as a result of the stormwater outfalls. Based on this information and implementing the recommendations from WDFW, the revised HMP has adequately addressed this comment.

- *The civil plans provided to Grette Associates show the 24-inch stormwater outfall associated with the western stormwater pond extending into the Type F2 stream (Figure 1). If the civil plans show the correct location where this outfall will be constructed the HMP will need to be revised to address the direct impacts to the stream for compliance with Chapter 16.20 of the PMC;*

Based on the information provided to Grette Associates, application materials have been revised to reflect what is shown in the revised HMP. Therefore, this comment has been adequately addressed.

- *Per PMC 16.20.320, the proposed crossing shall not diminish flood-carrying capacity. The HMP needs to provide a brief discussion to demonstrate that the proposed culvert size will not diminish flood-carrying capacity.*

The revised HMP was updated to include information demonstrating that the proposed crossing meets the standards defined in 16.20.320. Based on the information summarized in the revised HMP, Grette Associates concurs with its analysis; therefore, the revised HMP has adequately addressed this comment.

In conclusion, the revised HMP has addressed all of the comments summarized in Grette Associates' January 2021 third-party review. Therefore, Grette Associates recommends that the City accept this document.

This review 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 of the reports is at the discretion of City staff.

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

Regards,

GRETTE ASSOCIATES^{LLC}



Chad Wallin
Biologist

References:

Ecological Land Services. 2020a. Non-Wetland Determination: KCPW Recycling Center. Kitsap County parcel 102601-4-028-2003. Prepared for Edward Rose and Sons. Revised November 4, 2020.

Ecological Land Services. 2020b. Critical Areas Report: Oslo Bay Apartments. Prepared for Edward Rose and Sons. Revised November 4, 2020.

Ecological Land Services. 2020c. Habitat Management Plan: Oslo Bay Apartments. Prepared for Edward Rose and Sons. Revised November 4, 2020.