EXHIBIT G

PUBLIC COMMENT

1. Neighborhood Meeting (summarized by applicant)
2. Comment Received

1. Neighborhood Meeting
(summarized by applicant)

AUDREY ESTATES NEIGHBORHOOD MEETING – SEPTEMBER 21, 2022
5:30PM – 6:30 PM, POULSBO FIRE DEPARTMENT (911 LIBERTY ROAD)

In attendance for the applicant's team:

- Berni Kenworthy – Axis Land Consulting
- Holli Heavrin – Core Design
- Gary Lindsey – GL Lindsey Land Solutions
- Levi Holmes – Johnson and Holmes1, LLC
- Debra Purcell – JWJ Group
- Crystal Sasso – JWJ Group

In attendance from the City of Poulsbo:

- Edie Berghoff

In attendance from the community (sign in sheet collected):

- Melinda Wedgewood (17979 Noll Rd, Poulsbo)
- Tony Braeger (17541 Johnson Rd, Poulsbo)
- Martha Koostra (17961 Noll Rd, Poulsbo)

Comments/Questions/Concerns/Recommendations from Melinda Wedgewood:

- Will the trails be public?

  It is unknown at this time and will be determined during the permitting process.

- Perhaps with some of the parcels to the north of this site there could be a small City Park created.

  The parcels to the north are not within the boundary of the project proposal.

- Will there be fiber optics?

  The availability and extension of fiber optics is unknown at this stage of the permitting process.

- Will the future road stub have a sign/be blocked? How long will it be blocked?

  The future road stub will have a sign denoting road termination per city of Poulsbo code. The road will be terminated until such time that properties to the north of the project develop in the future.

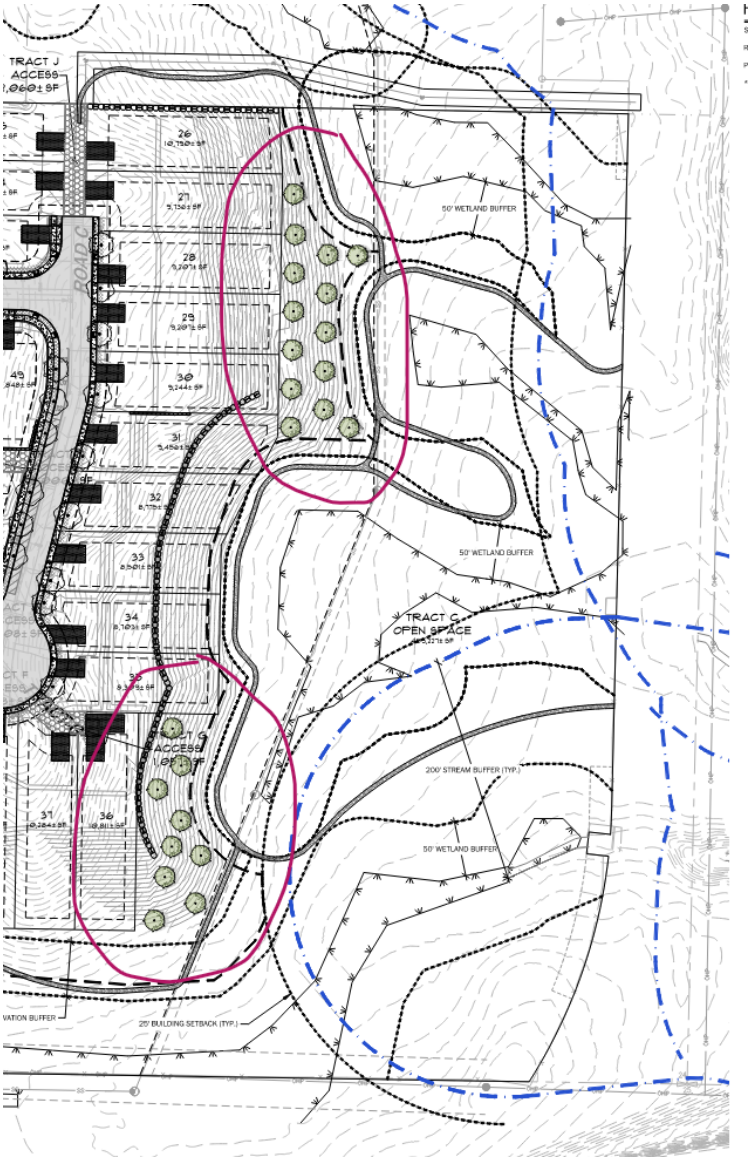
- What tools were used in the field to evaluate the wetlands?

  As required by city code, a Professional Wetland Scientist delineated and rated the onsite wetlands pursuant to the Department of Ecology Western Washington Wetland Rating System (Updated 2014). The study was conducted in 2016 with verification and updated ratings in 2022.

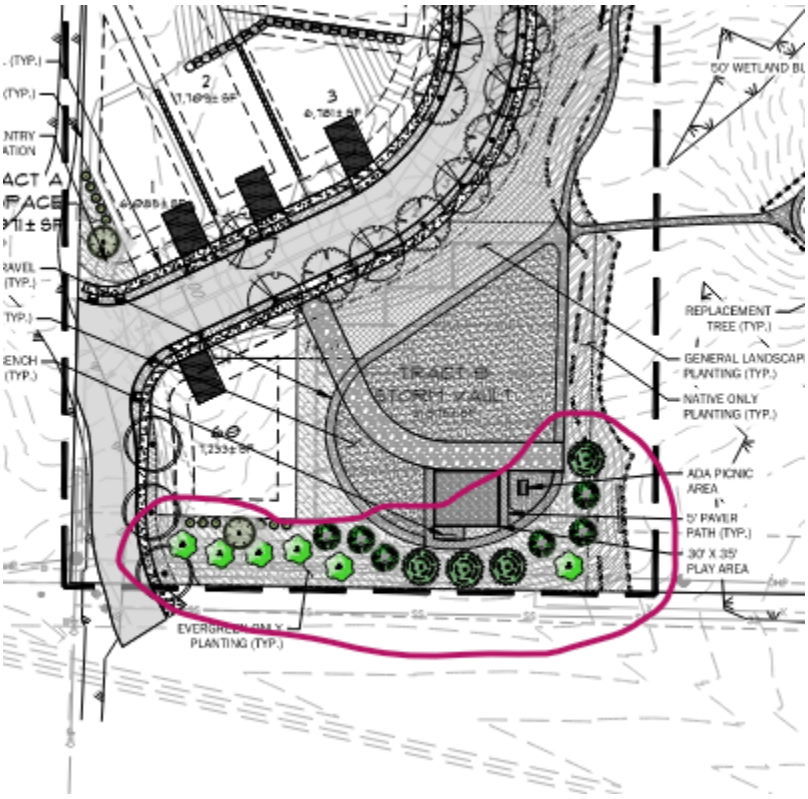
- The storm vault is going to cut off the wildlife corridor, suggests a tree cover.

  Members of the applicant's team have met with Melinda Wedgewood to further discuss disruption of existing wildlife routes on the subject property and surrounding parcels. Approximately 11 acres of the 25.18-acre site will not be disturbed. Of this area, approximately 8.53 acres comprise a wetland and stream system with associated buffers which are tributary to Bjorgen Creek.

  The undisturbed area will accommodate some wildlife corridor. Tree cover is proposed to be retained to the maximum extent possible along the eastern and southern edges of the project as well as within some wetland areas internal to the site. In areas where tree cover will be impacted along this boundary additional trees are proposed as replacement trees (circled areas below).



In addition, tree cover is proposed along the south edge of the vault that will connect to existing vegetation to remain within the Wetland A buffer.



The applicant commits to continue meeting with Melinda to determine other on or offsite opportunities.

- The wildlife are going to be scared.

  Noted.

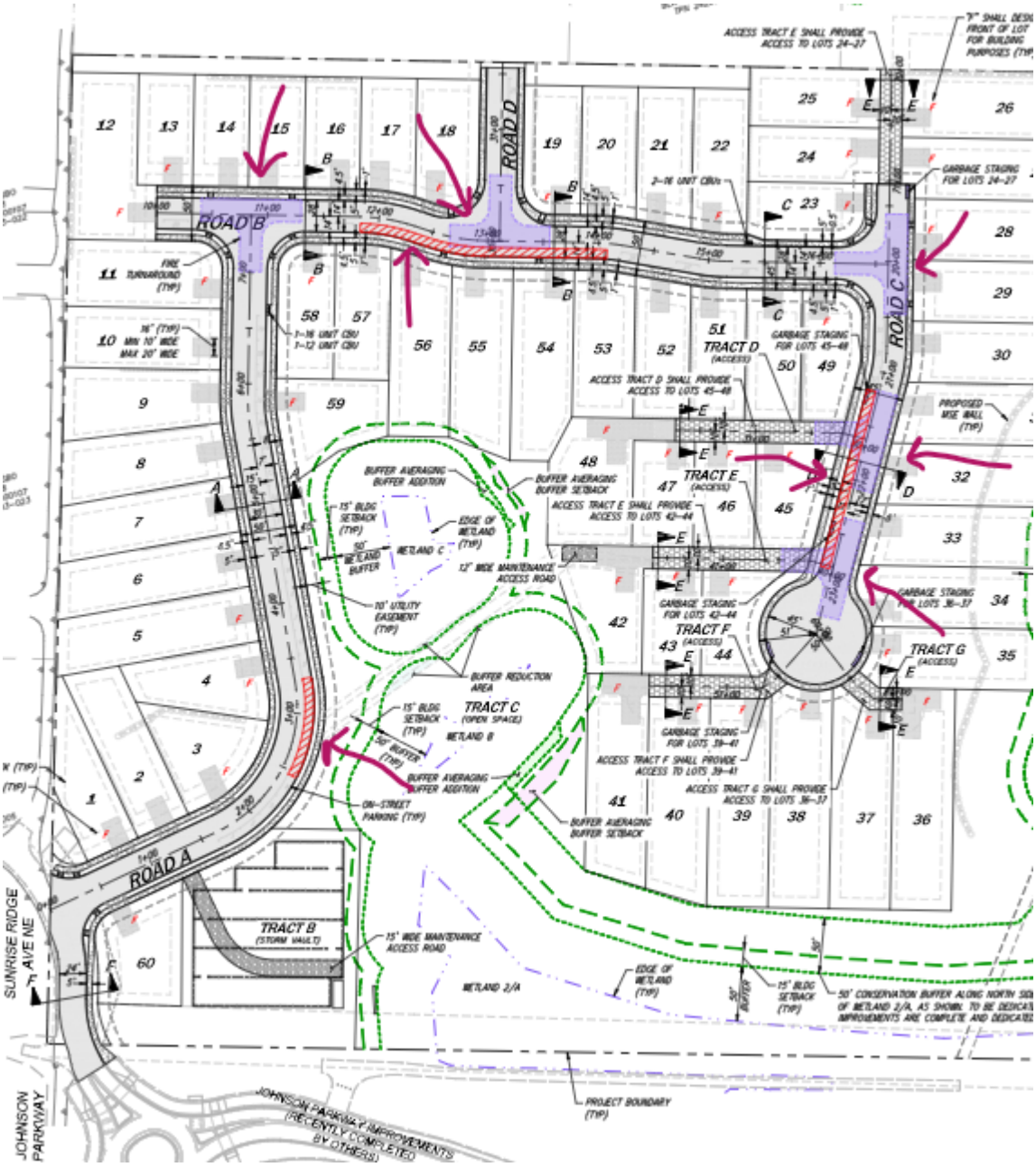
- Will there be a fence around this?

  Fencing is not currently proposed.

Comments/Questions/Concerns/Recommendations from Tony Braeger:

- With only one access point will that suffice for emergency vehicles?

  The applicant's team has met with the Fire Department to discuss their concerns. Fire lanes and fire truck turnaround areas have been provided pursuant to those discussions to create unobstructed emergency vehicle movements throughout the site.



- Will there be grading? Will compactors be in use? I think my house, drainage, well and pipes were damaged from the Crystal View project using a compactor.

  Yes, grading and compaction are required during project construction. The applicant will meet at Tony's residence prior to commencement of construction to review existing concerns and develop a plan for monitoring during construction. Preliminary contact has been made with Tony. The applicant will follow up.

- How big is this vault compared to the Crystal View storm vault?

  The dimensions of the Crystal View vault were unknown at the meeting. However, the proposed vault for this project was designed in compliance with the Department of Ecology Stormwater Management Manual for Western Washington (2019).

- How many trees are going to be cut down?

  Approximately 14.15 acres of the 25.18-acre site will be cleared.

- How will you tackle the slope on this site?

  Site construction and slope creation will adhere to recommendations from the project geotechnical engineer.

- What about the ground water on this site? I was told by someone onsite there was groundwater @ 6 inches.

  Groundwater depths have been assessed by the geotechnical engineer and are provided in the geotechnical engineering report.

- Consultants have been using my driveway.

  If consultants have been using the driveway, this was not known by the applicant. Please contact the applicant in the future with any concerns.

- There is going to be less wildlife in the area when this development goes up.

  Noted.

- With all these new houses what will the impact be on schools?

  The project will be subject to school impact fees to mitigate for impact on local schools.

Comments/Questions/Concerns/Recommendations from Martha Koostra:

- There is going to be less wildlife in the area when this development goes up.

  Noted.

- How wide is the greenbelt to the north?

  20 feet.

- Equipment was driven onto my property and took some of my trees down.

  Preliminary contact was attempted on September 26th, 2022 via email. The applicant would like to meet with Martha to view any cleared trees that may have occurred on her property as the applicant is unaware of when or why that would have occurred.

2. Comment Received

From: Alison Osullivan
To: Edie Berghoff
Cc: Rod Malcom; Siu, Nam (DFW)
Subject: RE: Audrey Estates Subdivision - Routing for Technically Complete Review
Date: Thursday, December 15, 2022 2:52:42 PM

Just a follow up. Nam (WDFW) and I have been heavily involved on the culvert work mentioned below and are monitoring post construction work.
Alison

Alison O'Sullivan
Senior Biologist, Natural Resources Department

THE SUQUAMISH TRIBE

P.O. Box 498 (mailing)
18490 Suquamish Way
Suquamish, WA 98392
phone: (360) 394-8447

NOTE: The Suquamish Tribal offices will be closed from December 23, 2022 through January 2, 2023 for winter break.

From: Rod Malcom
Sent: Friday, December 9, 2022 4:29 PM
To: Edie Berghoff <eberghoff@cityofpoulsbo.com>
Subject: RE: Audrey Estates Subdivision - Routing for Technically Complete Review

Suquamish provided initial comments on the proposal (Table 1) On 8 December, 2022, the Suquamish Tribe participate in a site visit with representatives of the proponent.

Bjorgen Creek lies to the east of the project site. Two onsite streams will discharge to Bjorgen Creek, a salmon bearing stream. Instream and streambank work was observed where Bjorgen Creek passes under Storhoff Road NE/Johnson Parkway NE just Northeast of the project (Fig 1). A wetland restoration or mitigation project was observed to the south of the project site in the headwaters of stream 1. Additionally, there are additional proposed projects (such as P-10-19-22-01 Poulsbo Middle School) in this basin, that will contribute to cumulative stormwater impacts. As noted in the Tribe's initial feedback to the City, stormwater management does not consider direct impacts of stormwater induced changes in stream hydroperiod upon rearing salmonids.

Instream work as recently been conducted on stream 1 where it passed under the road. The slope from the culvert outlet to the downstream extent of the stream work is very steep (Fig 2). If not already down following the stream work, this reach should be analyzed to determine its stability compared to the expected stormwater flows. Additionally, there is material inside the culvert (Figs 3 and 4). The culvert should be checked to determine the potential for this material to trap material leading to a potential blockage that could become displaced and result in a sudden downstream movement of material that could damage the downstream stream reaches.

The wetland mitigation plan is based upon buffer averaging (see Table 2).

A short walk of portions of Bjorgen Creek indicate it is hydraulically simple. This is most likely the result of past land use practices. Stream rearing salmonids are more vulnerable to elevated flows in hydraulically simple channels than more complex ones. As noted in the table below, at some time during the stormwater discharge cycle it is probably more stormwater will leave the site during a specific unit time than prior to development, an impact to salmonids. Wood is often used in restoration projects to increase instream habitat complexity, which is often the same as increasing hydraulic complexity. Numerous large conifer trees will be removed to prepare the site. It is suggested that some of the trees, with a minimum dbh of 18 inches be stubbed at 20 feet above the ground and then pushed over so that rootwad is attached to the tree. These trees should then be donated to a salmon restoration group for projects in Bjorgen Creek or a nearby creek.

Fig. 1. Work on Bjorgen Creek.

Fig. 2 Looking upstream to where stream 1 passes through a culvert.

Fig. 3. Material in stream 1 culvert.

Fig. 4. Material in stream 1 culvert.

Table 1.

Page	Document Narrative	Comment

Preliminary Storm Drainage Report		
1-1	Stormwater design for the project will follow the requirements of the 2019 Stormwater Management Manual for Western Washington (2019 SWMMWW).	The 2019 Stormwater Management Manual for Western Washington, page 129, emphasis added reads. *"The objective of this Minimum Requirement is to prevent increases in the stream channel erosion rates that are characteristic of natural conditions (i.e., prior to disturbance by European settlement). The Flow Control Performance Standard intends to maintain the total amount of time that a receiving stream exceeds an erosion-causing threshold based upon historic rainfall and natural land cover conditions. That threshold is assumed to be 50% of the 2-year peak flow.* ***Maintaining the naturally occurring erosion rates within streams is vital, though by itself insufficient, to protect fish habitat and production****."* At stormwater onsite will not be infiltrated, at some point of the discharge cycle, more water will leave the site per unit time than under background conditions. Stormwater flow control management looks at the potential of water to erode the stream channel or cause flooding. It does not consider direct impacts – such as increased velocities or durations of velocities – upon salmonids. Stormwater induced changes in hydro-period are calculated for wetlands, but not for salmonid bearing streams. Though stormwater flow duration control measures may reduce the magnitude of flows (hence velocities) in the stream channel, that comes at the expense of extending the duration of flows before the channel returns to the pre-storm flow. Direct impacts to aquatic life (arising from either point and non-point sources of stormwater), such as downstream displacement, increased energy expenditures to maintain position, or reduced feeding as fish shelter from high flows will occur at flow events lower than those cause erosion – what the manuals target. Some of the stormwater from the project site will discharge to salmon bearing stream, Bjorgen Creek. Thought the stormwater report does not make such an assumption, it should not be assumed that compliance with the 2019 Manual prevents direct altered stream hydrology impacts to salmonids. The SEPA Checklist "Proposed measures to preserve or enhance wildlife, if any" will do nothing to mitigate this impact. Project review must consider that onsite stormwater engineering solutions might not mitigate offsite impacts and offsite mitigation or contribution to a funding source to partially mitigate off-site impacts might be required.
5-1	Downstream analysis	The analysis looked at erosion, but as common in such analyses, did not consider how the change in

		hydroperiod of flows less than that required to cause erosion might directly impact aquatic life, such as stream rearing juvenile salmonids. See comment to page 1-1.

Table 2.

Page	Document Narrative	Comment
Audrey Estates Buffer Mitigation Plan		
8	Approximately 838 square feet of area will be added to the total wetland buffer area to compensate for a loss of 838 square feet of wetland buffer.	A one-for-one ratio in buffer averaging does not allow for uncertainty. A larger ratio should be used, particularly if these are not fenced, they will be used by the residents.
9	The total area of buffer after averaging is equal to the area required without averaging.	
9	The area of buffer that will be impacted will be seeded with native herbaceous vegetation which will further decrease functional impacts.	
10	Areas within the buffer that have ground disturbance (buffers of Wetlands B, C, F, and Z) will be seeded with a native erosion control species mix such as the one listed in Table 4 below. This mix should be placed in the buffers of Wetlands B, C, F, and Z after the utility lines have been installed.	
10	The total area of buffer after averaging is equal to the area required without averaging.	
10	However, no plantings will be installed as a result of the mitigation; therefore, monitoring and maintenance is not proposed.	The mitigation plan relies upon seeding as mitigation of the impacts. The success of this should be monitored.

Thank you.

Regret the delayed response.

Rod

Roderick Malcom
Biologist/Ecologist
Natural Resources Department

THE SUQUAMISH TRIBE

P.O. Box 498 (mailing)
18490 Suquamish Way
Suquamish, WA 98392
phone: (360) 394-8449

From: Rod Malcom
Sent: Wednesday, December 7, 2022 4:54 PM
To: Edie Berghoff <eberghoff@cityofpoulsbo.com>
Subject: Audrey Estates Subdivision - Routing for Technically Complete Review

Below are some initial comments on the technical review of project. On Thursday 8 December, Suquamish is taking part in a site visit. Additional comments may follow after that.

Page	Document Narrative	Comment
	Preliminary Storm Drainage Report	
1-1	Stormwater design for the project will follow the requirements of the 2019 Stormwater Management Manual for Western Washington (2019 SWMMWW).	The 2019 Stormwater Management Manual for Western Washington, page 129, emphasis added reads. *"The objective of this Minimum Requirement is to prevent increases in the stream channel erosion rates that are characteristic of natural conditions (i.e., prior to disturbance by European settlement). The Flow Control Performance Standard intends to maintain the total amount of time that a receiving stream exceeds an erosion-causing threshold based upon historic rainfall and natural land cover conditions. That threshold is assumed to be 50% of the 2-year peak flow.* ***Maintaining the naturally occurring erosion rates within streams is vital, though by itself insufficient, to protect fish habitat and production****."* At stormwater onsite will not be infiltrated, at some point of the discharge cycle, more water will leave the site per unit time than under background conditions. Stormwater flow control management looks at the potential of water to erode the stream channel or cause flooding. It does not consider direct impacts – such as increased velocities or durations of velocities – upon salmonids. Stormwater induced changes in hydro-period are calculated for wetlands, but not for

		salmonid bearing streams. Though stormwater flow duration control measures may reduce the magnitude of flows (hence velocities) in the stream channel, that comes at the expense of extending the duration of flows before the channel returns to the pre-storm flow. Direct impacts to aquatic life (arising from either point and non-point sources of stormwater), such as downstream displacement, increased energy expenditures to maintain position, or reduced feeding as fish shelter from high flows will occur at flow events lower than those cause erosion – what the manuals target. Some of the stormwater from the project site will discharge to salmon bearing stream, Bjorgen Creek. Thought the stormwater report does not make such an assumption, it should not be assumed that compliance with the 2019 Manual prevents direct altered stream hydrology impacts to salmonids. The SEPA Checklist "Proposed measures to preserve or enhance wildlife, if any" will do nothing to mitigate this impact. Project review must consider that onsite stormwater engineering solutions might not mitigate offsite impacts and offsite mitigation or contribution to a funding source to partially mitigate off-site impacts might be required.
5-1	Downstream analysis	The analysis looked at erosion, but as common in such analyses, did not consider how the change in hydroperiod of flows less than that required to cause erosion might directly impact aquatic live, such as stream rearing juvenile salmonids. See comment to page 1-1.

If you have any questions, please let me know.

Roderick Malcom
Biologist/Ecologist
Natural Resources Department

P.O. Box 498 (mailing)
18490 Suquamish Way
Suquamish, WA 98392
phone: (360) 394-8449

From: Rod Malcom
To: Edie Berghoff
Cc: Berni Kenworthy
Subject: Poulsbo P-11-10-22-01 Audrey Estates Technical Review Memo
Date: Tuesday, March 19, 2024 8:39:11 PM

The applicant's consultants meet with the representatives of the Tribe onsite, has hosted a meeting to exchange technical concerns, as well as kept the Tribe informed of site updates. That was greatly appreciated.

The most recent SEPA Checklist prepared (29 February 2024) prepared for the project contains some statements that are typically not found in SEPA documents, but most welcome.

Page 13 contains the following statement, rarely found in SEPA documents:

> *While the project stormwater design complies with 2019 Stormwater Management Manual for Western Washington as required by the Poulsbo Municipal Code, the applicant acknowledges the tribe's concern that maintaining the naturally occurring erosion rates is insufficient by itself to protect fish habitat and production*

Though the above is a concern of the Tribe, that concern is found in *2019 Stormwater Management Manual for Western Washington.* Page 122 contains the following statement (emphasis added).

> ***"The BMPs listed in this section are likely insufficient by themselves to prevent significant hydrologic disruptions and impacts to streams and their natural resources.*** *Therefore, local governments should look for opportunities to change their local development codes to minimize impervious surfaces and retain native vegetation in all development situations"*

Page 129 is more explicit (emphasis added) and implies the need for additional mitigation:

> ***"The objective of this Minimum Requirement is to prevent increases in the stream channel erosion rates that are characteristic of natural conditions (i.e.,. prior to disturbance by European settlement).*** *The Flow Control Performance Standard intends to maintain the total amount of time that a receiving stream exceeds an erosion-causing threshold based upon historic rainfall and natural land cover conditions.* ***That threshold is assumed to be 50% of the 2-year peak flow. Maintaining the naturally occurring erosion rates within streams is vital, though by itself insufficient, to protect fish habitat and production."***

One method to mitigate this extended duration of flows below the channel forming event upon aquatic live, particularly juvenile salmonids, is to increase stream hydraulic complexity that provides area of high flow refugia for juvenile salmonids. The applicant statement on page 13 of the SEPA Checklist to provide twenty (20) tree stumps with root balls to a local habitat restoration non-profit as compensatory mitigation is a method supported by the Tribe. Ideally, the stumps should be at least 20 to 35 long on the bole and 10 to 36 inch in diameter.

One issue the Tribe has recently been giving more attention to recently is quantification of the impact of development upon the total annual of water that is infiltrated at a site. The

quantification of this concern post-dates the Tribe's meeting with the applicant. The current stormwater manuals as well as the reports looking at Critical Aquifer Recharge Areas do not quantitatively address the issues of potential reduction in infiltration at a project site and what this might mean, particularly for shallow groundwater that might discharge into nearby streams. Page 12 of the SEPA Checklist states, "*The use of low impact development and infiltration was explored but deemed infeasible due to a shallow depth to an impermeable layer throughout the site.*" This wording suggests that development will exceed the infiltration capacity of the undeveloped areas to infiltrate stormwater generates at the project site.

However, the proposed measures on page 13 of the Checklist to "*include establishing a system of weirs composed of native plants and organic materials to both expand the stormwater flow path and create areas of water storage which will attenuate stormwater volumes*" should help mitigate this impact.

Thank you.

Rod

Roderick Malcom
Biologist/Ecologist
Natural Resources Department

THE SUQUAMISH TRIBE

P.O. Box 498 (mailing)
18490 Suquamish Way
Suquamish, WA 98392
Phone: (360) 394-8449