

COMMENT #50

Allison Satter

From: Judith Friedberg-Nerf <jnerf@comcast.net>
Sent: Monday, February 23, 2015 11:30 AM
To: Allison Satter
Cc: Eric Younger; Roy Runyon; Greg Wheeler
Subject: Questions re: Comp Plan Update

Hello Allison,

I attended the recent Land Use Open House gathering and appreciate the invitation for citizen feedback.

I'd like to submit some comments soon; but first I'm seeking additional information with respect to land use designations.

I've looked at City website, and I've been unable to find definition of General Commercial development parameters in the CompPlan 2035 section. It would be helpful to have these in hand in order to understand and compare the impacts of proposed changes from Limited Commercial, Commercial Corridor, Neighborhood Center and Neighborhood Business designations to that of General Commercial. Can you please provide a copy General Commercial development parameters?

Also with respect to the re-creation of Multifamily Residential designation, I understand that unintended problems arose when that designation was removed from the existing Comp Plan. I understand that multifamily properties that were "rezoned" became "non-conforming", and that property owners are experiencing negative impacts as a result. Could you please briefly explain what consequences arose from rezoning these properties and why property owners are experiencing constraints - it would be interesting to have an idea about how many properties have been impacted? Is it being proposed that all condo developments across the City be designated "Multifamily Residential" (like the one near the corner of Shorewood Drive and Kitsap Way in Council District 7, Draft Land Use Map #3)? Will there be uniform development parameters for all Multifamily Residential properties - and could you please provide a copy of these?

I live in Council District 7, and have a high interest in proposals that potentially affect the Oyster Bay/Kitsap Way corridor areas. Since our home faces the Oyster Bay Channel, we are strongly connected to the entire residential community surrounding Oyster Bay - as well as to the Kitsap Way commercial corridor that lies just South of R10 zone below Oyster Bay. Council Districts are divided such that issues affecting Oyster Bay area fall into two districts - so some of my questions actually relate to parts of Council District 6 as well.

Thank you so much for any information you can provide.

Also, I want to say that the website postings of council district-by-district profiles - stats and maps - are helpful and useful. I don't know who is responsible, but kudos to all involved in organizing and posting this information. And special thanks to staff and council members who took time to put their feet on the ground to develop these profiles. I hope this effort continues on a regular basis. And maybe in the future, citizens and business owners from each council district will be invited to go along and participate? And as an outcome of this activity, would there ever be a possibility of publishing district-by-district map reflecting empty/underutilized commercial buildings?

Sincerely,

Judy Friedberg-Nerf
1600 Madrona Point Drive
Bremerton 98312

[View this message in context](#)

COMMENT #51

Allison Satter

From: Laura Gardner <laura.u.gardner@gmail.com>
Sent: Tuesday, February 24, 2015 11:38 AM
To: Allison Satter
Subject: Comprehensive Plan Update

Allison,

I represent Gardner Properties, LLC, the owner of a multi-family property located at 1027 Walnut Street, Bremerton.

I understand as part of the Comprehensive Plan Update, you are working on the process of changing the city zoning back to medium density instead of low density on the west side of Schley to Cherry Ave, which includes Walnut Street.

I would like to see our property be considered a duplex again, the way it was originally built. Our company definitely supports the change. I believe the neighborhood supports it as well, as there are several similar duplex buildings in the immediate neighborhood.

Thank you for your work on this matter,

Laura Gardner
Managing Member
Gardner Properties, LLC
Laura.u.gardner@gmail.com

COMMENT #52

Allison Satter

From: Stieber, John S CIV C/2308.2 <john.stieber@navy.mil>
Sent: Friday, March 06, 2015 7:27 AM
To: Allison Satter
Subject: Plans for the 5-Ten Building

Ms. Satter,

Contrary to my email address, I am making a personal inquiry and this has nothing to do with the shipyard or the Navy.

I am not sure who I would direct this question towards. I am curious about the plans for the building at 510 Washington Avenue. This building has been boarded up and empty for a while and I was wondering if it is going to be demolished, to make way for new construction as outlined in the District 3 Profile? It is hard to discern from the plan. If the plan is to demolish, who would I contact about this?

You were asking for feedback on the profile draft. I like the plan overall. The direction it appears to go, with regards toward the new look and feel of Bremerton, is good. However, one of the reasons I liked to come downtown was the combination of the new and the old. It is my belief that that nostalgic feel is being sacrificed just for the sake of a newer look. Additionally, while my wife and I like perusing the art stores/shops/museums, but it really is not something most kids (<17 years old) care to visit. The remaining businesses are not geared toward families either. Besides the new movie theater, there is not a lot commercially to draw the families with kids in. If it is there, it is not advertised. There used to be a couple of larger grocery stores in the downtown area. With no plan to include any larger commercial buildings to provide for basic shopping needs, becomes harder to expect people to rely solely on public transportation to procure their groceries

. The plan mentioned that surface parking would be reduced. This would leave only a few parking structures. With the exception of the old Penny's building, these structures are not located for ease of access to the city center. To visit the city center from any of the outlying structures means a walk of one to three full city blocks. As the city center plan seems to center around the arts, this will draw adults with more refined tastes, many of whom are senior citizens. As with my wife, for many older people walking becomes an issue after walking too far. There is no easy solution to either of these issues, but is my two cents on the issue.

On a positive note, One thing that I do love about the downtown area, is the layout of the waterfront, from the fountain park, along the boardwalk, and up to the new apartments/condominiums. It has a good feel to it, with an easy flowing design and layout, that allows one to relax. The layout is design such that most of the intrusive city background noise is reduced or eliminated. Access to/from the businesses and parking is easy and a short walk. It is my sincere hope that the city continues this flowing walkway design all of the way to the new Manette Bridge. Beside enticing people to walk more, having the walkway separated from the road reduces any safety factors of having a narrow sidewalk immediately next to a busy road.

If you want, I can expand on anything. Please let me know.

V/R
John Stieber

"Those who think they have no time for exercise will sooner or later have to find time for illness."

Allison Satter

From: Andrea Spencer
Sent: Wednesday, March 11, 2015 1:13 PM
To: Allison Satter
Subject: FW: Olympic College Comprehensive Plan Endorsement

Please include in the official record for the Comp Plan.

From: Riveland, Bruce [<mailto:briveland@olympic.edu>]
Sent: Wednesday, March 11, 2015 12:48 PM
To: Andrea Spencer
Cc: Pasquariello, Robert
Subject: Olympic College Comprehensive Plan Endorsement

Dear Andrea Spencer,

The college has reviewed the proposed changes to the Comprehensive Plan in the area around the Olympic College. We agree with the proposed changes to the Higher Education designation that are shown on the plan. These are consistent with our long term plans and with our ongoing conversations with you and other City administrators. Thank you for your good work and collaboration in advancing our collective interests.

Bruce Riveland
V.P. Administrative Services
Olympic College
1600 Chester Avenue
Bremerton, WA 98337-1699
360-475-7501



COMMENT #54

March 20th, 2015

Allison Satter, Sr Planner
City of Bremerton
345 6th Street
Bremerton, WA 98337

Dear Allison:

I am writing to you on behalf of Audrey Robinson and Jim Carlson who own the commercial property at 800 11th Street in greater downtown Bremerton. I represent them regarding this property. The property is a former bank building situated at the NW corner of 11th & Park. The building has more recently been used for office and retail purposes over the past few decades. The building and site improvements are clearly commercial in nature.

The owners have asked me to contact you to express their concern regarding the property's proposed zoning within the draft land use maps for Bremerton 2035. Current zoning of the property is *R-20* with a *Neighborhood Business* overlay within the downtown sub-area plan. The proposed zoning for this property shows as *Low Density Residential (R-20)*, but it is unclear whether there will be any additional consideration given for commercial uses. The ability to have outright approval for commercial uses of this property seems obvious and appropriate for such a commercial building at a high-traffic, high-profile corner location.

If not an outright commercial zone, then providing clearly defined allowance within a sub-area plan is requested by the property owners.

I welcome the opportunity of further discussion with you regarding their concerns. Feel free to call me at (360) 479-6900. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Vict C. Ulsh". The signature is written in a cursive, somewhat stylized font.

Victor C. Ulsh, CCIM
Commercial Sales

Cc: Audrey Robinson
Jim Carlson

Allison Satter

From: Dan Nelson <quogatroid@gmail.com>
Sent: Tuesday, March 31, 2015 1:13 PM
To: Allison Satter
Subject: 3/17/15 Planning Commission meeting comment

Hello

My name is Dan Nelson and I was in attendance at the Planning Commission meeting 3/17/15. I've been attending as many of them as I am able, but made certain to attend the one this month on the economic development update. There were several questions in the room around the lack of specific detail in the economic plan, and it became clear quickly that the comprehensive plan update was not going to tackle this issue, as it seems that is not the nature of the comprehensive plan. However, the questions posed indicate a discussion that of course needs to be had and perhaps city council has a forum to do just that, one that myself and others are perhaps not aware of. I will look into it. It is of course key to long term sustainable growth.

Regardless, there was one item that was discussed that I would like to comment on. Someone was discussing the difficulty in leasing existing commercial space that may need corrections before it can be occupied, due to people being put off by perhaps incorrect assumptions on code limitations or outright misunderstandings, either from outdated info or misinformation on the code. Seems making the correct, and in many cases updated info easier for people to get would help in this regard.

I work for the City of Seattle Department of Planning and Development as a Building Inspector, and we publish a series of online "tips" which basically are brief white sheets that describe aspects of the code in layman's terms. I looked around the City of Bremerton's website for some such thing and didn't find anything (doesn't mean it isn't there, I just couldn't find it).

Seattle DPD's code tips cover anything from how to get a permit to existing building code requirements for substantial alterations. They are available online as PDF. People find these very helpful when trying to understand broad aspects of the code, with some of the more common items spelled out in detail as is appropriate.

Something like this may be useful in Bremerton as well, since, citing the example I heard at the meeting 2 weeks back, any real estate or leasing agent could print and have handy these sheets, likely regarding issues around a specific property's deficiencies or needed repairs/corrections for any potential leasee. This way the potential leasee has an idea of what may *really* be required, and can think about whether they are willing to consider the lease of the building based on accurate info. And of course anyone in Bremerton that was interested could also find these tips for their use as well.

If the changes being made with this comprehensive plan update to zoning and how permits are processed, etc are creating more possibilities for people, getting the info out is of course an important step in bringing the investment in our area; correcting outdated info, especially info that has created an inaccurate bias toward coming to Bremerton, is very important to make public. As a member of the public, I can say that very few people know about the comprehensive plan at all, and I would not assume that people in business necessarily know about it either, or at least what is being done in Bremerton that makes us a great option.

I feel this simple approach may create more possibilities for people around existing properties, rather than having them continue making uninformed assumptions that dissuade people from taking the next step in moving a business to our area.

Just a thought. I look forward to seeing the process continue, and good luck!

Dan Nelson

COMMENT #56

Allison Satter

From: Mark Kuhlman <mark@team4eng.com>
Sent: Monday, April 06, 2015 1:50 PM
To: Allison Satter
Cc: Nicole Floyd; Rob O'Neill (robertdoneill@comcast.net)
Subject: Northridge Redesignation
Attachments: 15.04.06LTRgeorezone.pdf

Hello Allison;

As a follow up to our discussions and my previous email of January 29, 2015, we have completed work with a Geotechnical Engineer and offer the attached letter for your consideration.

Again, we appreciate the City's recognition that the developable portions of these parcels should be designated commercial, but we hope that the portion of the parcels to receive the commercial designation can be enlarged from that currently proposed. We hope the attached letter will help in this regard.

Of course my confidence that the City's Critical Area Ordinance will control future development of the site remains unchanged, which is why we ask you to include the complete parcels under the commercial designation rather than create dual zoned parcels.

Thank you again for your recognition of the true and appropriate uses for the site.

Mark



March 23, 2015

ESC015-GL011

Mr. Mark Kuhlman
Team-4 Engineering
5819 NE Minder Road
Poulsbo, Washington 98370

**CITY COMPREHENSIVE PLAN REDESIGNATION PROPOSAL
FOR NORTHVIEW RIDGE PROPERTIES LLC.**

S. R. 16

BREMERTON, WASHINGTON

TAX PARCEL NUMBERS: 322401-4-113-2005, 322401-4-018-2001, 322401-4-017-2002, AND 322401-4-016-2003

Dear Mr. Kuhlman

EnviroSound Consulting, Inc. (EnviroSound) prepared this letter to address concerns raised by the City of Bremerton with regards to the proposed redesignation of the city parcels. The purpose of the letter is to address steeper slopes found on the property which are highlighted on the attached Figure 1. A representative of EnviroSound performed a site visit on March 19, 2015. Representatives of EnviroSound had previously visited the site in September 2012.

Site Description

The subject property is comprised of four parcels as shown on Figure 1. The three smaller parcels located on the north portion of the property have been partially cleared of trees with grass in place. The three parcels all generally gradually sloped toward the north with the steeper ascending slope located on the eastern lot. The larger south parcel had a plateau area on the northeast portion of the parcel with moderate to steep ascending slopes on the south portion of the parcel. A drainage swale is aligned in a southwest to northeast direction on the west portion of the parcel. The large parcel was forested primarily with mid-sized alder and maple trees with scattered mature maple and cedar trees. There was a secondary understory of young trees and ferns.

Access to the subject parcels is by a driveway off of S.R. 16. At the time of the site visit the property was developed on the north portion of the site with single family residences (SFR's) along S.R. 16 and one SFR with several out buildings on the central portion of the eastern small lot. An unnamed stream flowing north borders portions of the property to the east. Commercial development borders the site to the west-northwest and forested land with scattered SFR's borders the site to the east.

Proposed Development

At the time of this letter there is no proposed development for the subject parcels.

Discussion

In addition to the observation of available soil exposures and reconnaissance of the area, the readily available resources listed below were reviewed.

Resources used:

- “Soil Survey of Kitsap County Washington”, United States Department of Agriculture, 1977.
- “Slope Stability, Kitsap County, Washington”, Jerry Deeter, 1979.
- “Geologic map of surficial deposits in the Seattle 30' by 60' quadrangle, Washington”, Yount et al., 1993.
- “Geologic Map of Washington – Northwest Quadrant”, Washington State Department of Natural Resources, Division of Geology and Earth Resources, GM – 50, 2002.
- The Washington State Department of Ecology Coastal Zone Atlas, Kitsap County (Volume 10) dated 1979.
- U.S.G.S. 7.5 minute series topographic map “USGS Bremerton West Topographic Map”.

The majority of the lower (north) portion of the site is mapped as Kitsap silt loam which is typically found on 2 to 8 percent slopes. Permeability and runoff in the soil is slow with a slight water erosion hazard. The upper (south) portion of the site is mapped as Indianola-Kitsap complex typically found on 45 to 70 percent slopes. Permeability and runoff in the soil is rapid with a high erosion hazard.

The Washington Division of Geology and Earth Resource (WDGER), Geologic Map of Washington - Northwest Quadrant, dated 2002 and the 1993 Seattle 30' by 60' Quadrangle Map, indicates that the upper (south) portion of the site is located in an area mapped as Glacial Till (Qgt). The lower (north) portion of the site is mapped as Vashon Advanced Outwash (Qva). Glacial till is an unsorted, unstratified, highly compacted mixture of clay, silt, sand, gravel, and boulders deposited by glacial ice. Vashon advanced outwash is composed of moderately to well stratified sand and gravel and silt and clay.

A review of “Slope Stability, Kitsap County, Washington”, Jerry Deeter, 1979, and the Department of Ecology Coastal Zone Atlas also dated 1979 was performed in conjunction with preparing this study. The southern portion of the site appears to be located in an area mapped as Unstable (U) slopes. These slopes are generally greater than 15 percent and can include slopes without known failures of sand and gravel, till, or thin soils over bedrock. It should be noted that the mapping was performed in the 1970's and does not reflect more recent activity.

There was no visible evidence of groundwater, springs, or significant seeps observed on the slope face at the time of the March 19, 2015 site visit.

Conclusions/Recommendations

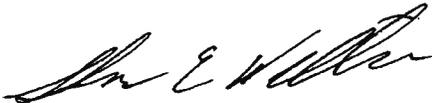
Based upon our reconnaissance's on the subject property and our experience with projects of a similar nature EnviroSound offers the following:

- No visible evidence of recent slides or sloughing was observed on the subject parcels at the time of the site visit. In addition there was no visible evidence of deep rotational slides. There was some minor sliding noted adjacent to the stream to the east at the toe of the slope on the adjacent property.
- It is our opinion that these parcels can be safely developed with a geotechnical engineering study with constructions recommendations for work within/adjacent to the Critical Area Slopes.

Limitations

We have prepared this letter based on standard practices, currently used in this area at the time of preparation. The conclusions are based on the observations made during the site visit. A subsurface exploration program was not conducted as part of this letter. The information presented in this letter was collected and interpreted in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions. Should you have any questions or concerns, which have not been addressed, or if we may be of additional assistance, please call our office at (360) 698-5950.

Sincerely,



Shawn E. Williams, L.E.G.
Senior Engineering Geologist

Attachments: Figure 1- Site Topography



Shawn E. Williams

3-23-15

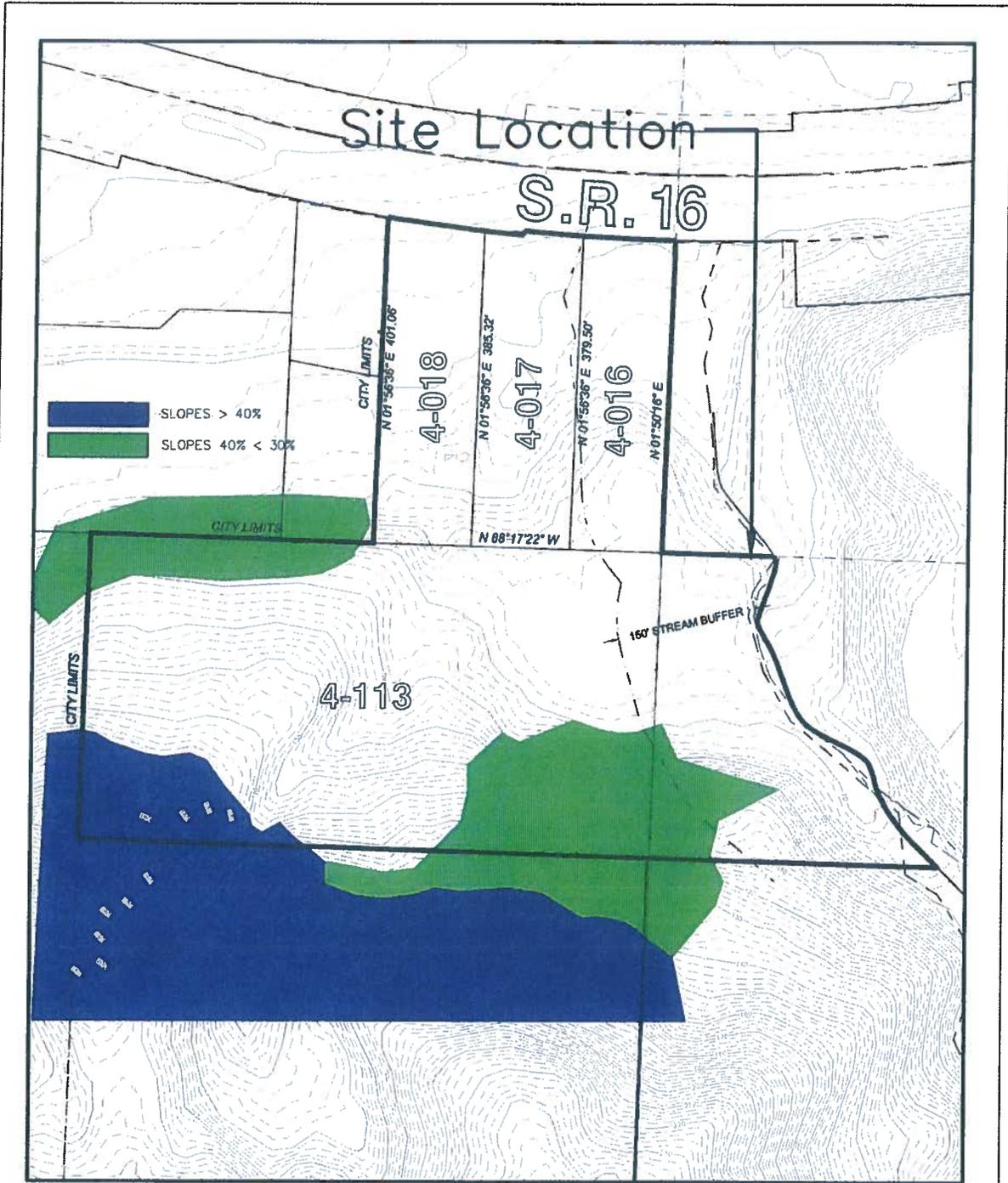


Figure provided by Team-4 Engineering.

Not to Scale



FIGURE 1. Site Topographic

Project: ESC15-GL011
 Project Name: Sinclair Ridge
 Location: Bremerton, WA
 Client: Team-4 Engineering
 Date: March 2015



COMMENT #57

Allison Satter

From: noreply@civicplus.com
Sent: Saturday, April 25, 2015 9:33 PM
To: Allison Satter; WebMaster
Subject: Online Form Submittal: Bremerton2035 Comments & Feedback

If you are having problems viewing this HTML email, click to view a [Text version](#).

Bremerton2035 Comments & Feedback

This is a public forum and any comments made here will be included in the public record. If you wish to remain anonymous, please specifically request so. Thank you for your input.

Name*

Jim McDonald

Contact*

mazama90@msn.com

Zip Code

98310

Comments

The 2010 Comp Plan stifled development in the Sheridan-Lebo triangle (that property west of the Warren Avenue Bridge). The current single family designation has maintained the status quo for an area that contains a large percentage of WWII duplexes (some of the residences refer to it as the "hood"). Before the 2010 update, this area includes several condo developments, apartments, a nursing home facility. All were developed without government subsidy. The latest were the Apple Street Condos. This was built by a private developer who purchased adjacent WWII duplexes, tore them down, and constructed a new residential development. The 2010 Comp Plan prohibited these kind of developments even though the area is surrounded by public transportation, public parks (Lions Park & Stephenson Canyon Park) and is adjacent to designated business center and within walking distance to the downtown core. Request that the plan be amended in this area to allow the continuation of multi-family development in this triangle instead of preserving the status quo with a propensity of antiquated WWII duplex rentals.

The following form was submitted via your website: Bremerton2035 Comments & Feedback

: This is a public forum and any comments made here will be included in the public record. If you wish to remain anonymous, please specifically request so. Thank you for your input.

Name: Jim McDonald

Contact: mazama90@msn.com

Zip Code: 98310

Comments: The 2010 Comp Plan stifled development in the Sheridan-Lebo triangle (that property west of the Warren Avenue Bridge). The current single family designation has maintained the status quo for an area that contains a large percentage of WWII duplexes (some of the residences refer to it as the "hood"). Before the 2010 update, this area includes several condo developments, apartments, a nursing home facility. All were developed without government subsidy. The latest were the Apple Street Condos. This was built by a private developer who purchased adjacent WWII duplexes, tore them down, and constructed a new residential development. The 2010 Comp Plan prohibited these kind of developments even though the area is surrounded by public transportation, public parks (Lions Park & Stephenson Canyon Park) and is adjacent to designated business center and within walking distance to the downtown core. Request that the plan be amended in this area to allow the continuation of multi-family development in this triangle instead of preserving the status quo with a propensity of antiquated WWII duplex rentals.

Additional Information:

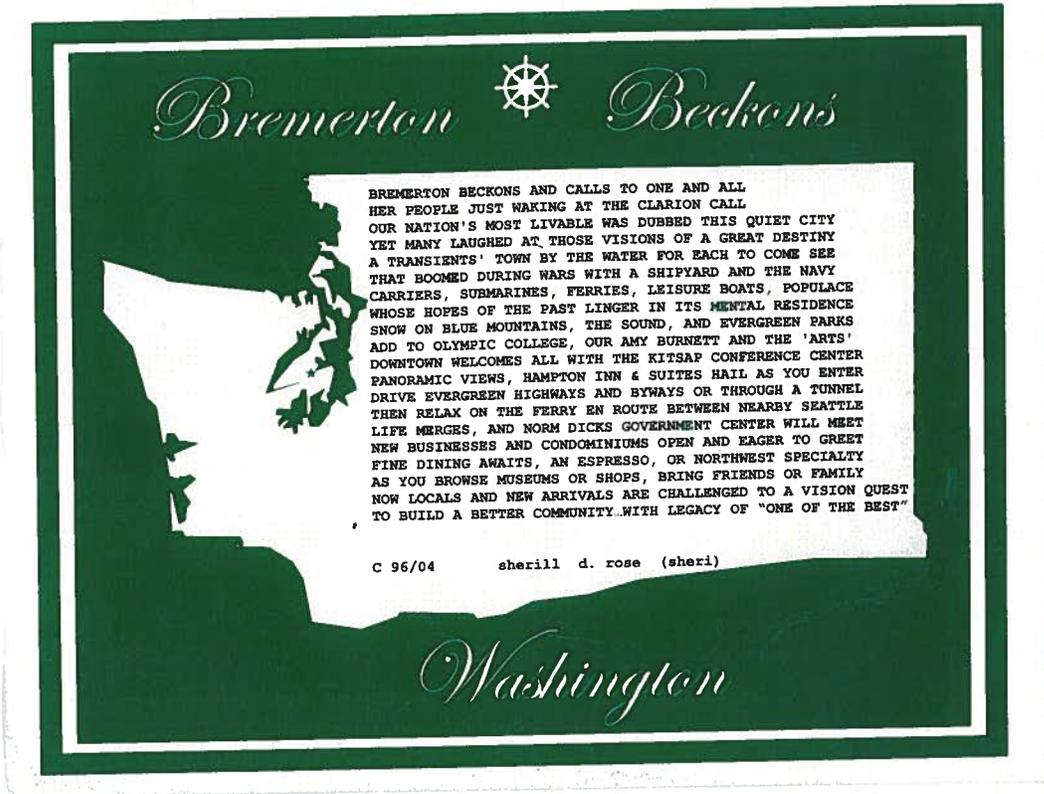
Form Submitted on: 4/25/2015 9:32:54 PM

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Referrer Page: <http://www.ci.bremerton.wa.us/FormCenter/Community-Development-6/Bremerton2035-Comments-Feedback-54>

Form Address: <http://www.ci.bremerton.wa.us/FormCenter/Community-Development-6/Bremerton2035-Comments-Feedback-54>

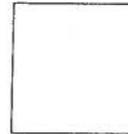
COMMENT #58



(360) 649-2004



3628 "E" Street (W)
Bremerton, WA 98310



COMMENT #59

Allison Satter
Senior Planner
City of Bremerton
345 6th Street Suite 600
Bremerton, WA 98337

RECEIVED
JUN 16 2015

City of Bremerton, DCD

Dear Allison,

Thank you for meeting with me last week to discuss the status of the Bremerton comprehensive plan update, and how it might impact my properties on Hanford Avenue. As we discussed, while we are past the timeframe for submitting formal comments, I would like to ask that my views be considered by the Planning commission in their upcoming meeting on June 16, 2015 before finalizing the recommended updates to the comprehensive plan.

My wife and I own two existing duplexes at 1032 and 1034 Hanford Avenue through our real estate investment company, Wing Point Investments LLC. The duplexes are located just off of Wheaton Way with a pair of bank owned vacant lots between them and the existing Arby's restaurant on Wheaton. The existing zoning is R10, and therefore the duplexes are non-complying with the current code. We would like the planning commission to consider including our lots (1032 and 1034 Hanford) and the adjacent lots (1040 and 1042 Hanford) within the new GC (General Commercial) Zone that is proposed for Wheaton Way. We believe this would serve two goals identified by the comprehensive plan update process:

1. It would bring our existing non-conforming multifamily properties into compliance with the zoning code.
2. It would support a somewhat higher density on the two undeveloped lots in the event that they are developed at some future point.

I have incorporated the photo below for reference:



John Bierly

A handwritten signature in black ink that reads "John Bierly". The signature is written in a cursive style with a long, sweeping underline.



March 3, 2015

Jack Stanfill, President, Chico Creek Task Force
P.O. Box 4773
Bremerton, WA 98312

RE: Chico Creek/ Ueland Tree Farm HMP and Wetland Report Third Party Review

Dear Mr. Stanfill,

I have prepared the 3rd party review and analysis for the proposed Ueland Tree Farm, LLC's mineral mining application at your request. I was asked to review the documents listed below identifying any comments, questions and discrepancies I find in the files.

Ueland Tree Farm Project Resources Reviewed

1. Leyda June 2012. *Draft Mineral Resource Development Wetland Review, Rating, and Impacts: Ueland tree Farm, Kitsap County, Wa.* June 4, 2012 to the Chico Creek Task Force
2. August 5, 2011. *The Ueland Tree Farm, LLC Mineral Resource Development and Preliminary Reclamation Plan.* Civil engineering package.
3. Parametrix. 2009. Wetland Delineation and Stream Identification Report Ueland Tree Farm – Mineral Resource Development.
4. Soundview Consultants. April 2014. DRAFT Wetland and Fish Wildlife Habitat Assessment and Habitat Management Plan. Ueland Tree Farm/Kitsap Quarry Private Access Route
5. GeoResources, LLC. May 2015. Geologic and Hydrogeologic Report Supplement – Ueland Tree Farm Mineral Resource Development (originally dated February 2009- update).
6. Ueland Tree Farm Mineral Resource Development
7. Preliminary Drainage Plan, all by Parametrix, 4660 Kitsap Way, Suite A, Bremerton, WA.
8. Ueland Tree Farm Mineral Resource Development Final EIS dated August 2009, by ESA
9. ESA (Adolfson) June 2009 (2015). Ueland Tree Farm Mineral Resource Development. Final and Supplemental EIS.
10. Wa State Department of Ecology (Stephen Stanley, Susan Grigsby, Kelly Slattery). August 2013. Final Revised Water Flow and Water Quality Assessment for Gorst Watershed.

Project location: Kitsap County

Permit process: SDAP (Site Development Activity Permit)

Project Issues

Although the adequacy of the original EIS was upheld in Superior Court, and the Supplemental EIS submitted only addresses the new access route for the project, there are issues that have still not been resolved that pertain to the original project that the new EIS still fails to address. The major issue pertains to "Wetland 4" (located near the proposed Basalt Quarry C in the Beaver Pond of Dickerson Creek, located at the southern portion of the project area (parcel Nos. 242401-1-006-1003, 242401-1-007-1002; T24N/R1W W.M./S24) in Kitsap County, Washington). There are numerous issues with Wetland 4, the first being there is confusion about this wetland because the project documentation actually lists two wetland 4's. A summary of all the issues I found while reviewing the Supplemental EIS road project and remaining issues with the original project as discussed in the documents listed above are identified and expanded on below:

1. Wetland 4, which one? There seems to be some confusion about which Wetland 4 is being assessed and identified in both the reports and during the Kitsap County hearing (2010), the Hearing Examiner's denial of the SEPA Appeal, and the Superior Court dismissal of the Appeal. This wetland is the closest to the proposed mine and so just ignoring this confusion is not an option with respect to understanding potential impacts as a result of the proposed mining project. Leyda in his (6/4/12) report lays out the confusion about Wetland 4 (Figure 2). Initially, Parametrix identified a Wetland 4 that was separate but located at the north end of Wetland 6. Molly Adolfson (ESA, June 2015) stated this was part of Wetland 6 mentioned in the EIS but this is inaccurate there are actually 2 wetland 4's identified in the materials so there is some confusion that persisted in the hearing (Leyda 6/4/12). It is important that the permit application and record accurately reflect the two wetland 4's and resolve the confusion with respect to Wetland Ratings, and buffer assignments.

2. For Wetland 4 that is part of the Beaver Pond of Dickerson Creek, there is no information available, no wetland boundary determination, no delineation data, and no rating. The second Wetland 4 that is within 200 feet of the proposed quarry as shown on the Parametrix wetland map (Figure 1) but no other information is given. No rating, no data sheets and no information on how it was marked. The County typically requires information on wetlands within 300 feet of the proposed project – the buffer width for Cat I wetlands, AND Mr. Dennis Oost, Kitsap County Environmental Planner, confirmed to Patrick McGraner (email 4/1/15)

“that a note exists within the parent application (Permit 07"44975) that the wetland boundaries and buffers be reconfirmed prior to construction with an emphasis to pay attention to the large wetland complex north of proposed Quarry C due to its headwater supply function for Dickerson Creek.”

Clearly this wetland needs to be assessed, properly delineated, and characterized for the permit file to be complete and the County to be able to evaluate and issue a permit. The County should be requiring this information but it is possible they were not aware of the confusion about which of the two Wetland 4's was being discussed. Leyda (4/1/12) has provided information on this wetland (delineation data and rating for both Wetland 4 of the north lobe of Wetland 6, Wetland 4 of Dickerson Creek, and the revised Wetland 6, and this documentation should be reviewed when the new information is submitted by the Ueland Mine developer. I have attached the wetland characterization information for the Beaver pond wetland as Appendix A attached here. I have reviewed the Leyda documentation, including the delineation and rating data sheets and it all appears to be correct, with respect to the delineation documentation and proposed boundary assignment but I have not been out to the site and so cannot confirm my approval until I am able to review the results of the Leyda assessment on the ground.

“LCI recommends a full delineation, with data to prove the upland edges, and a licensed survey of Wetland 4” (of Dickerson Creek) “to show the actual extent of the wetland in proximity to the proposed Quarry C. The data should include upland sample plots in locations in all low spots where the quarries are planned, and where stormwater features discharge to the low points in the uplands”.

I concur this information should be provided by the Ueland Tree Farm Group. The discharge locations is especially critical because changes to the hydrology and water quality of the wetland near the discharge points can be highly detrimental to the wetland without sufficient mitigation (buffer between the discharge point and wetland edge).

3. Wetland 4 (northern lobe of Wetland 6) would likely be rated as a Category II wetland and as such should have a 200-foot buffer width with the proposed mining activity, which would be considered high intensity. I agree with the Leyda assessment that the Parametrix Delineation Report only rates the wetlands under the current land use conditions but not as they would be under the proposed mining scenario. As Leyda states:

“When land use changes, and new pollution sources are created by the proposed road and quarry developments, the ratings can change. If the ratings change, the buffers can change. If the buffers change, then the proposed quarry developments could fall inside them, compromising protection of the wetlands. LCI describes some of these changes under the developed condition, and some changes under the existing conditions. Wetland 4 scored 18 points for water quality, and has the opportunity to improve water quality because of clear-cut logging in the basin to the west and south and because the logged soil units surrounding the wetland are rated by the NRCS as having “Severe” and “Very Severe” erosion hazard when disturbed”.

When added together, the wetland would score of 59 or a Category II. This would change the buffer width identified in the Wetland Report. This buffer width would need to be assigned and reflected in the permit and design sheets and any encroachment into the buffer by the proposed mining project would need to be mitigated.

4. Wetland 6 was incorrectly rated in the Wetland Delineation report. Leyda (4/1/12) has documented the areas in the rating form that were not correct (see Appendix A). Given the detail documented by Leyda, I would concur with the proposed changes and elevation of the rating from a Cat II to a Cat I. The reasoning being the opportunity scores were not thought to be present (in the Parametrix wetland report), but the detail documented by Leyda clearly indicates to me that there IS opportunity for both water quality improvement and hydrology functions to occur that protect downstream resources. The opportunity score changes for both these functions result in Wetland 6 having a Water Quality score of 30, a Hydrologic score of 24, and a habitat score of 30, for a total of 84 points, which equals a Category I wetland.

With this rating score, the buffer would under current code be 200 feet. County code would determine the mining project to be defined as a “high intensity land use, with a forested class”. Buffers assigned to wetlands that have a high water quality and habitat score would have a buffer width of 250 feet.

Again, I have not been to this wetland and would have to perform a site assessment to be able to definitively concur.

5. The proposed quarries are shown at two different distances from the correct Wetland 4 (in the Beaver Pond of Dickerson Creek) in the project documents (Mineral Resource Development and Preliminary Reclamation Plan (Application package to Kitsap County, 2009) and Wetland Delineation Report (Parametrix, 2009, C11). On Figure 2-1, the distance is 120 feet from the north edge of the proposed quarry and in the application submittal the distance is identified as 200 feet. This discrepancy needs to be resolved and documented in the application submittal and the appropriate impact assessment must address any impacts within the correct buffer distance. Proposed mitigation needs to be developed that addresses the correct impact and added to the application package.
6. The official delineation has expired for the Wetlands (19 in all) on the site. The statute of limitations on the Parametrix delineations is 5 years for the State and Federal Government (US Army Corps of Engineers). Although according to WA State Dept of Ecology Staff (Patrick McGraner 4/1/15), there are staff shortages and it is unlikely that anyone will require a re-delineation unless impacts are proposed’

"At some point in the future adjacent to those areas where impacts may occur due to a specific land-use action such as Quarry C, then the adjacent wetland boundaries should be re-verified. There is no need to re-verify wetland boundaries that are not adjacent to the proposed land disturbance. For example, if at the time of the SDAP, the largest required buffer for the county per its CAO is 300 ft., then typically any wetland areas within 300 ft. of a specific disturbance location would need to be re-verified."

This does not change the fact that the wetland boundaries are no longer valid. Any changes to the project that would potentially impact wetlands within 300 feet of the project activity would need to be re-delineated.

7. Hydrology and Proposed Quarry Stormwater Plan Issues. The proposed Stormwater Plan for the Quarry is shown on sheets C11 and C12 of the *Mineral Resources Development and Preliminary Reclamation Plan* (Parametrix). There are many problems with this plan.
 - The discharge points from the mining operations are shown on the approved drainage plans to have discharge points in a southern portion of Wetland 4 (Beaver Pond). This should not have been approved as discharge should only be designed to occur into an upland buffer. Unfortunately, the Geology Report Geo Resources 2015) identifies that there is severe risk of erosion for the soil found in this area (Figure 3), so any discharge design would need to take the soil type into consideration and the design would need provide extra erosion potential, OR, the discharge location would need to be moved to a less erodible soil type. If the discharge is retained within the 200-foot buffer zone, mitigation will need to be provided. None is currently discussed in the mitigation plan (Soundview Consultants, 2014).
 - The buffer modifications discussed above would increase the buffer width on Wetland 4 (Beaver Pond) and County would require moving the stormwater pond further south past the 200-foot buffer

zone. The current location of the pond with respect to the edge of Wetland 4 is incorrectly mapped in the approved design set and this needs to be corrected.

- The *Preliminary Drainage Plan* shows stormwater ponds (Q-A, Q-B, and Q-C) that are temporary and the design criteria used is not in compliance with the most current Department of Ecology Stormwater Design Manual (*Stormwater Management Manual for Western Washington*, 2014) and the report specifically states they will not hold a 100-year flood event. Not only is this not in compliance with the DOE design criteria, but these ponds will not protect downstream receiving waters. I see no design changes for these ponds identified in the most recent EIS documentation. I would expect that stormwater ponds to contain a 100-year storm event would be much larger than the ponds currently designed and again. The soils in the area need to be addressed as part of the design because much of area is underlain by severe to very severely erodible soil types.
- The issue of maintaining the hydrology of the existing wetlands has NOT been addressed in the EIS. GeoResources (2006 and 2015 report) identifies the stratigraphy of the area surrounding the mine as having: (From Leyda 2012)

“A relatively thin layer of topsoil and weathered material overlies the bedrock. Water that infiltrates the ground surface can only slowly penetrate through the cracks and fissures in the bedrock. Therefore, water tends to accumulate in the soil zone, forming a very water bearing zone overlying the very low permeability bedrock material. Typically, groundwater movement through this interflow zone is restricted to the wet months of the year. This near surface groundwater is strongly influenced by topography and generally flows downslope, parallel to the land surface, closely following surface drainages. Flow direction in the perched interflow zone is therefore highly variable.”

There seems to be no dispute in the EIS that the Quarry activity will disrupt the shallow perched groundwater table. This is mentioned in old and new Geology/hydrology reports. The stormwater design actually shows re-routing flow that would normally travel to Wetland 4 (Beaver Pond) and Dickerson Creek and send it to pond QC north. I have a huge concern that disruption of this shallow groundwater layer will de-water the wetlands and creeks around the Quarry as I have seen this time after time with similar projects around western Washington. You cannot replace groundwater flow with surface flow and expect the hydrologic balance to be maintained. I do not see this addressed in the EIS nor the Supplemental EIS. It is not enough to identify this as a problem. There is no course of action proposed should Wetland 6, Wetland 4 (Beaver Pond), Dickerson Creek, and Heinz Lake begin to show signs of dewatering once the Quarry is constructed and mining activity have begun. By then it will be too late to address this issue.

None of these issues was included in the ESA Supplemental EIS.

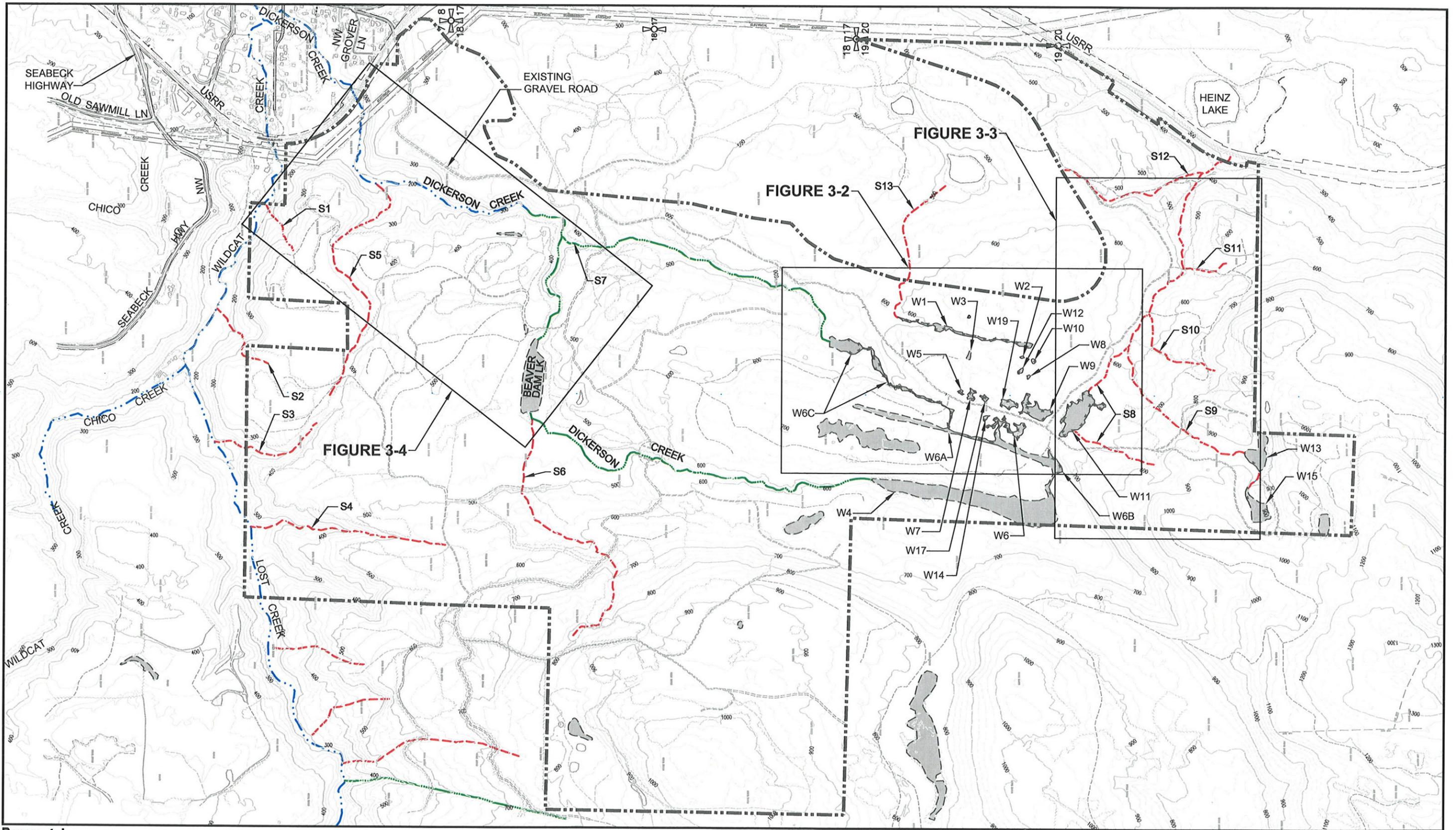
8. Addition of the Heinz Creek drainage to the Gorst Watershed changes the basin configuration and would alter the stormwater design modeling for the proposed mine (Wa State Department of Ecology 2013). This basin size and location change needs to be addressed in the permit application and the stormwater design for the treatment ponds (discharge points, locations, sizing, conveyance) all would need to be addressed and reconfigured as needed. The report states that the model was re-run using the new Assessment unit and given to Parametrix, but it is unclear if this information was incorporated into the Permit and design Sheets submitted for the permit. The new basin was designated as susceptible to degradation and placed in a “conservation” management category. This area provides high groundwater recharge for the basin. This means that flow maintenance, especially recharge is important in this watershed. Heinz Creek is a headwater system so supports downstream receiving waters and helps to maintain base flows in Gorst Creek.

This assessment unit is also in the highly erodible soil unit and has very high sediment export potential. ANY impacts to the soil in this portion of the drainage must be mitigated. Any road design MUST include design criteria that minimize impacts to groundwater (both recharge and discharge) such as infiltration over collection systems that focus on impervious surfaces. The new EIS identifies LID design which is in keeping with these conservation criteria. This means new road construction should be minimized.

9. The wetland assessment for the new road alignment by Soundview Consultants (2014). It is difficult to be sure all possible comments have been amassed without going to the site and verifying the results of this report. I also need more time with examining the site map and the road development map and identifying those wetlands that are at risk from the proposed development because the rating scores of

those wetlands would need to reflect this proposed activity and the opportunity to provide these functions under a developed scenario. I have the following comments:

- 135 –acres is a large area to cover with a wetlands and stream reconnaissance and it would not be unusual to omit small wetlands, especially give this type of landscape dominated by shallow soil layer and shallow groundwater over bedrock. It will be important for the County and US Army Corps of Engineers to verify the wetlands that are within the buffer of the project impact zone. Figure 5 identifies the proposed haul road and the wetlands and environs that would be nearby.
- It is good the project minimizes direct wetland impacts. This does not address the indirect impacts that may result from filling and grading roads and other disturbances to the soil and groundwater near or adjacent to wetlands and streams. Since these wetlands are predominantly groundwater fed they are at higher risk from hydrologic impacts that surface water-fed wetlands.
- I do find it surprising the wetlands all rated so low given the vegetation and hydrology characteristics given on the delineation data forms. As identified above, the opportunity score for both the hydrology and water quality portions of the rating should take into consideration those areas that will be nearby or adjacent to areas that will be developed for roads and the opportunity scores added. This would include at a minimum, wetlands K/L, H, I, J, D, and E) (Figure 5). If the rating were to increase, the buffers would increase and obviously the need for mitigation increase.
- This report does not include an actual mitigation plan. This should certainly be developed prior to the issuance of a permit for the revised project. The EIS should be revised to include mitigation proposed for tis and other impacts not previously addressed (Wetland 4 (Beaver Pond) and Wetland 6 buffer width changes.
- I have to commend the project for using LID designs to infiltrate runoff back to groundwater. This is a perfect application for this particular site that is dependent on groundwater to maintain the hydrology to the wetlands and streams.



Parametrix DATE: May 29, 2007 FILE: BR5528001P02T07.1F-02

LEGEND:

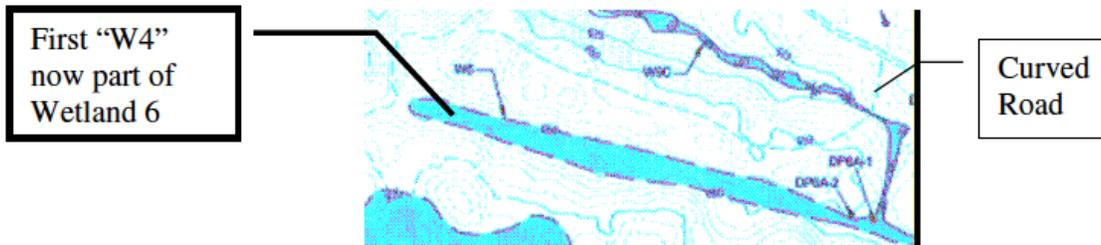
- | | | | | | |
|---|--------------------------|---|-------------------|---|-------------------------------|
|  | DELINEATED WETLANDS |  | PROPERTY BOUNDARY |  | STREAM TYPE F |
|  | ESTIMATED / NWI WETLANDS |  | GRAVEL ROAD |  | STREAM TYPE Np |
| | |  | SERVICE ROAD |  | STREAM TYPE Ns (INTERMITTENT) |

- | | |
|-----|----------------|
| W 2 | WETLAND NUMBER |
| S 7 | STREAM NUMBER |

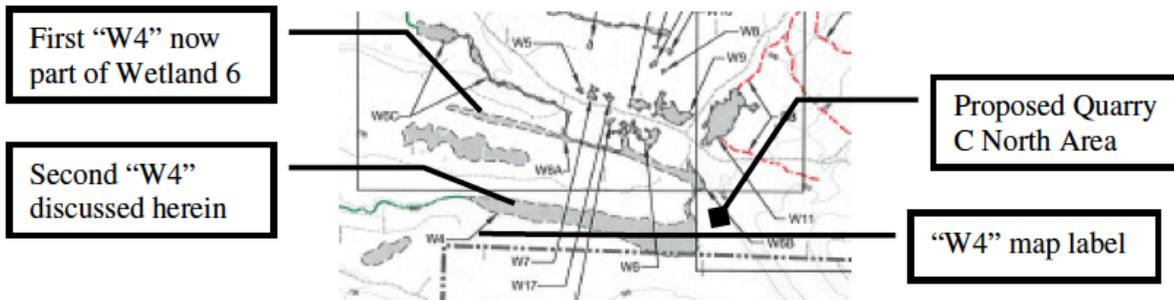
**Figure .1
Ueland Tree Farm
Site Map**



Leyda Report (6/4/12). First mention of Wetland 4 shows it as a separate wetland but at the north end of Wetland 6.



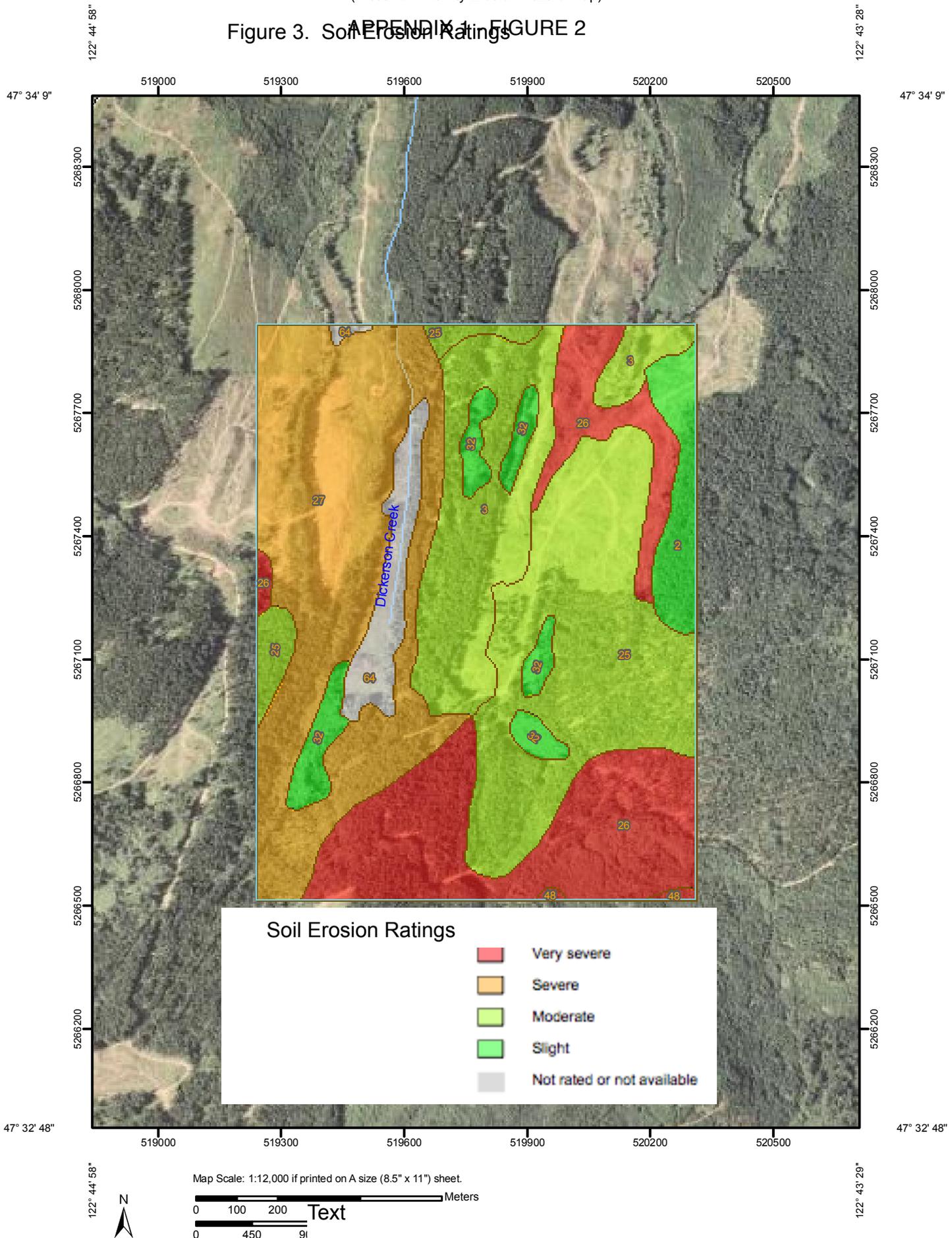
Leyda Report (6/4/12). The Wetland Delineation Report, Figure 3-2 (Parametrix, [date](#)) shows original Wetland 4 now incorporated into Wetland 6.

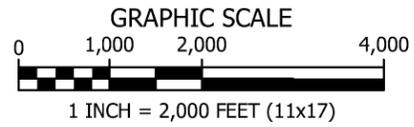
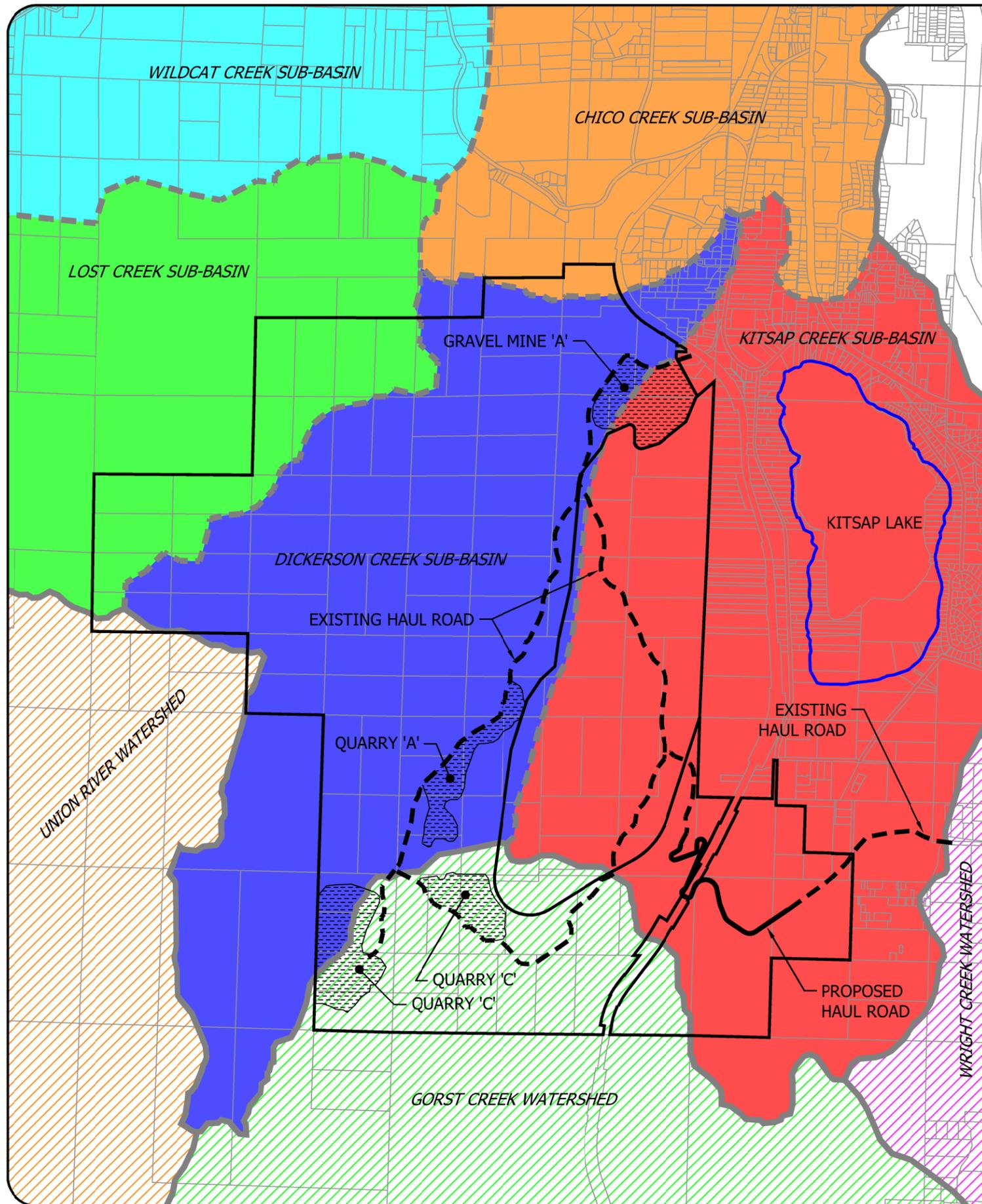


Leyda Report (6/4/12). Same Wetland Delineation Report, Figure 3-1 (Parametrix, [date](#)) shows Wetland 6 and a second Wetland 4 (located at the beaver pond in Dickerson Creek) now incorporated into Wetland 6.

Figure 2. Wetland 4 - Solving the Confusion -Maps (Leyda 2012)

Figure 3. Soil Erosion Ratings





LEGEND

- KITSAP CREEK SUB-BASIN
- CHICO CREEK SUB-BASIN
- LOST CREEK SUB-BASIN
- DICKERSON CREEK SUB-BASIN
- WILDCAT CREEK SUB-BASIN
- UNION RIVER WATERSHED
- GORST CREEK WATERSHED
- WRIGHT CREEK WATERSHED
- UTF/BWR PROPERTY

Figure 4. Project Location and Haul Road Routes

WATERSHED DELINEATION NOTE

CHICO CREEK WATERSHED DELINEATED PER THE *CHICO CREEK WATERSHED ASSESSMENT FOR THE IDENTIFICATION OF PROTECTION AND RESTORATION ACTIONS*, PREPARED IN 2014 BY NATURAL SYSTEMS DESIGN, INC AND ICF, INTERNATIONAL.

THE WRIGHT CREEK, GORST CREEK, AND UNION RIVER WATERSHED ARE DELINEATED ACCORDING TO KITSAP COUNTY GIS TOPOGRAPHIC INFORMATION.

SUB-BASIN MAP

UELAND TREE FARM
KITSAP COUNTY, WASHINGTON

BY: K. MAUREN

PROJECT: 13-094

DATE: 5.1.15

FIGURE NO. **5**
9

Figure 5. Proposed Haul Road Wetlands and Road Alignment

Site Overview



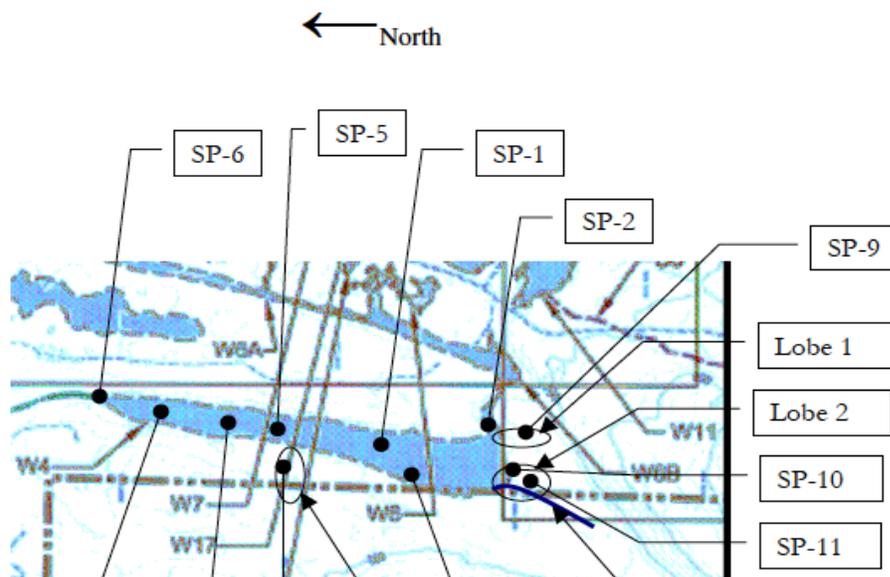
Appendix A. The two different Wetland 4 datum from Leyda Delineation

Wetland 4 as part of the Wetland 6 complex and the Dickerson Creek Wetland 4

The wetland identification procedures used in this memorandum follow the U.S. Army Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory, 1987), Interim Regional Supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Corps, 2008), and the Washington State Wetlands Identification and Delineation Manual (WA DOE, 1997).

LCI circumnavigated Wetland 4 as mapped in the wetland delineation report and recorded data in 11 locations on May 5 and 22, 2012. This wetland is a depressional class wetland created by a beaver dam in Dickerson Creek at the north end, and by groundwater discharge at the toe of slopes on the south end, and to a lesser extent by Dickerson Creek flooding. The soil texture in 7 locations in the beaver pond was very high in organic matter (histosols), up to three feet thick, dark brown in color (10YR 2/2), and producing methane in at least one location. The vegetation was diverse and largely native, with 25 different species observed growing in the wetland on 5/4/2012. Most of the interior of the wetland was vegetated with rushes and sedges, with two forested portions on the south end. The soil was saturated or inundated between 6 inches and three feet in locations sampled, and deeper in places. Water regimes observed included soil saturation, and permanent inundation with seasonal and/or occasional inundation likely in some locations.

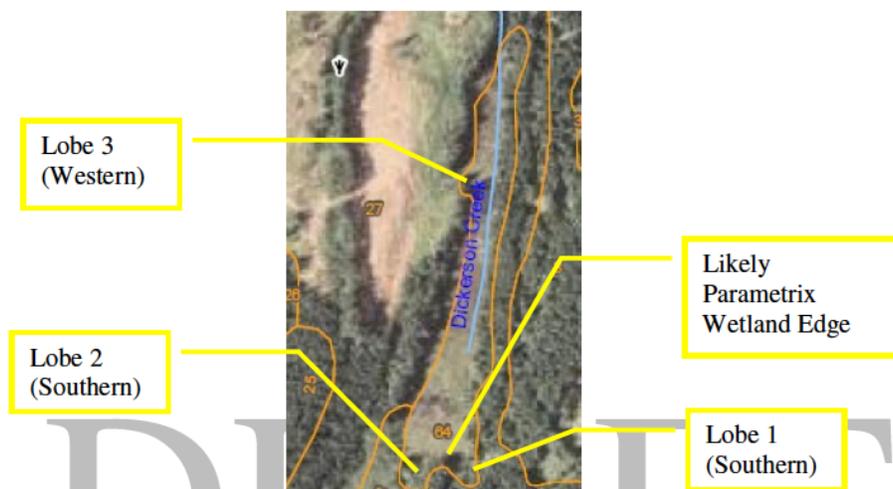
Wetland 4 Sample Plot Map
Not to Scale
All Locations Approximate



Historical air photos on Google Earth show inundation in the beaver pond as early as 1997, and most likely earlier. The outlet where the water over-tops the beaver dam was approximately four feet wide at the time of observation. Water depth in the wetland is dependent on the height of the dam, the flows in Dickerson Creek, rainfall and runoff, infiltration, and evaporation/transpiration. Vegetation patterns on the eastern bank to the south of the dam shows water levels were one of more feet higher in the past or at other times of high flow. A beaver lodge was identified a few hundred feet south of the dam. A more recent beaver gnaw was observed with the wood chips lacking decomposition or fungal staining. An older blown-out beaver dam was observed in the ventral portion of the wetland.

The Wetland 4 boundary observed by LCI in the field was different from the boundary as shown by Parametrix and in the Mineral Resource Development and Preliminary Reclamation Plan. Notably, two lobes were found on the south end (Lobe 1 and Lobe 2) that project toward the proposed Quarry C, and one additional lobe (Lobe 3) was found on the western edge. Lobe 2 on the south end has Dickerson Creek running through it, with a defined channel and ordinary high water mark (Photo 24). LCI did not follow the channel to the source, but observed it within the boundary of Wetland 4. Lobe 1 is forested with tree, partial shrub, and herb layers, and mostly inundated soils (see Sample Plot 9). Lobe 1 is the smaller of the two, and is approximately 75-feet wide at the beaver pond end, and approximately 75-feet long (approximately 5,625 square feet or less). Lobe 2 is forested, with tree, shrub, and herb layers, and two western redcedar (*Thuja plicata*) trees were observed near Sample Plot 10 that had diameters greater than 24", and one of those approximately 36" in diameter. The soils in Lobe 2 are mostly saturated at or below the soil surface, with puddles in places. Lobe 2 is approximately 275' wide at the junction with the beaver pond, and approximately 200' long (approximately 55,000 square feet, or 1.26 A, or less).

Dickerson Creek was observed in Lobe 2, and the channel was approximately 5-feet wide at the observation point with a fine gravelly substrate and flowing water. A portion of the Lobe 2 wetland could be flooded by the creek during times of high flows. However, the presence of leaf litter, the location of the wetland at the base of the surrounding hills and the larger size of the wetland indicate that it is not completely inundated by creek flooding (as riverine class wetlands are), so this Lobe 2 wetland is can be classed as a sloped portion of the depressional beaver pond/wetland.



Inset 4. NRCS Color Soil Map (Unit 64: Water) showing three lobes not mapped by

slopes, from runoff, and a portion from creek flooding. This conclusion is supported by the vegetation, which is mostly facultative with fewer obligate wetland species than Lobe 1, which is mostly inundated.

The southern lobes appear in Figure 5-1 of the habitat management plan, which is an NWI wetland shape. This lobed NWI wetland shape is different from the NWI wetland shape on the NWI map in Appendix A of the wetland delineation report.

The southern and western lobes appear on the NRCS Web Soil Survey (Figure 1, attached), accessed online on May 6, 2012. This soil unit map is the closest representation to LCI's observations in the field.

It appears as though the straight wetland boundary on the Parametrix wetland delineation maps might be the same as the forest-herb boundary shown in the air photo on Figure 1. If so, the Parametrix Wetland 4 boundary might have been drawn from an air photo such as this one, which would explain the lack of data along that southern boundary. The lobes extend beyond the Parametrix boundary, and so they would project a buffer into the proposed Quarry C area. LCI recommends a full delineation, with data to prove the upland edges, and a licensed survey of Wetland 4 to show the actual extent of the wetland in proximity to the proposed Quarry C. The data should include upland sample plots in locations in all low spots where the quarries are planned, and where stormwater features discharge to the low points in the uplands.

Wetland 4 as part of Wetland 6 rating:

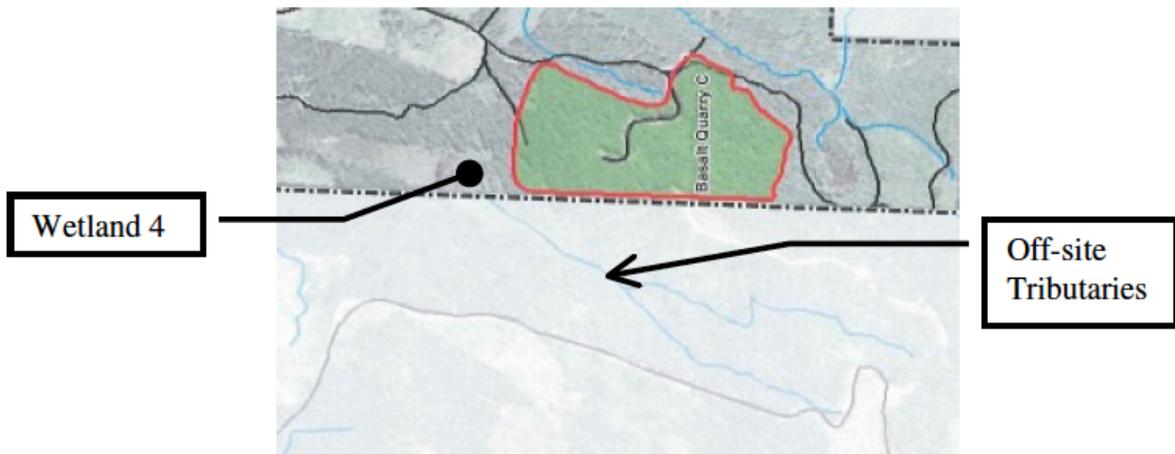
The manual used for the rating was the Washington State Wetland Rating System for Western Washington – Revised (Annotated Version August 2006), by the Washington State Department of Ecology [DOE], Publication # 04-06-025. The latest Wetland Rating Form was downloaded from the DOE web site (<http://www.ecy.wa.gov/programs/sea/wetlands/ratingsystems/index.html>) on 5/7/2012 in pdf form.

Before rating the wetland, the wetland must be divided into rating units according to guidelines in the manual. Some wetlands have distinct sections that are influenced by different factors, and although they may be connected they may be functioning differently in the ecosystem. Water source and flow patterns, constrictions, and blockages may indicate the need to rate parts of the contiguous wetland as separate units.

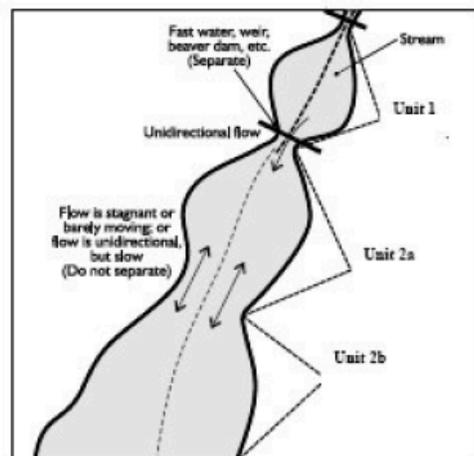
Although they are connected, Wetland 4 should be rated as a separate unit from Wetland 6, and not as part of Wetland 6. The reason is that the water shows a unidirectional, down-gradient flow through a constriction where Wetland 6 joins Wetland 4. A similar constriction is present where Dickerson Creek enters Lobe 2 of Wetland 4.

The inundation (ponding) in Wetland 4 is mostly from backed up stream flow. Two small streams join offsite to form Dickerson Creek, which enters the Ueland property from the southwest. The beaver dam in the creek backs up the water to form Wetland 4, along with shallow groundwater and precipitation inputs.

Because of the position of Wetland 4 along the creek, the rating rules for "Wetlands in a Series of 13



Inset 5. Clipped from Habitat Management Plan, Fig. 4-1 (north is to the left). Two tributaries joining offsite from the southwest add considerable flow to Wetland 4.

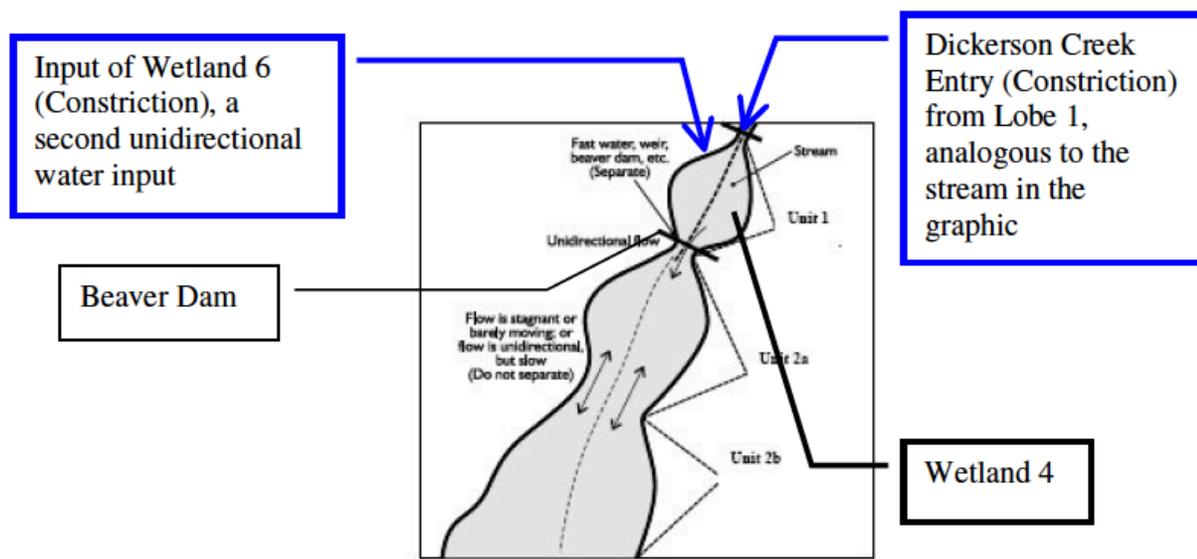


Inset 6a. Graphic from DOE Wetland Rating Manual (p. 13, Figure 1) showing theoretical divisions of the same wetland into different rating units (Units 1 and 2a, 2b).

Dickerson Creek has a narrow width formed by natural banks as it enters Lobe 1, then widens into the beaver pond. This change in width from constricted to wide is analogous to the very top of the graphic in Inset 6a.

Wetland 4 was created by a beaver dam in a stream, like the theoretical wetland in the graphic. Wetland 4's configuration matches this theoretical configuration shown in Inset 6a. They both have a beaver dam, a stream in the middle, and a natural constriction at the top where the stream enters (edge of Lobe 2).

In addition to the creek entering through a constriction, Wetland 6 also enters through a constriction as it drains into Wetland 4. Inset 6b shows the theoretical example from the manual marked with the actual site features in diagrammatic form. Imagine the theoretical example with two constrictions on top, one from the creek, and one from Wetland 6. This is the case with Wetland 4.



Inset 6b. Graphic from manual, marked with features from Wetland 4 to illustrate the similarity of Wetland 4 to the graphic. The blue arrow callouts symbolize the water inputs to Wetland 4.

The Wetland 6 section says,

“The primary source of wetland hydrology is an intermittent stream from the north fed by precipitation and sustained by a high groundwater table. Depending on the topography, this stream runs either north or south, and is topographically confined to a ravine that widens and narrows throughout the course of the wetland. Soils were inundated or saturated in the upper 12 inches, and most of Wetland 6 had flowing water. The southern end of the wetland was dammed by old beaver activity while the northern section of the wetland ended in a large body of ponded water at least three to five feet deep with signs of recent beaver activity (Figure 3-2)” (p. 3-20).”

The only mapped “stream from the north” is S-7. No ordinary high water mark is mapped in Wetland 6, which implies that the entire area is a wetland with no stream in the middle but with moving water. So, according to the above statement, Wetland 6 receives water from S7, rather than draining to it, as stated in the stream description quoted above. Inspection of the topography on delineation Figure 3-2 shows the labeled north end of Wetland 6 at approximately 540 feet in elevation; the labeled south end shows a small contour line that would be 630 feet in elevation. For this rating, LCI considers Wetland 6 to mostly drain to the north, except for some smaller portion of it that LCI observed draining into Wetland 4 near the data point SP-2 in this study.

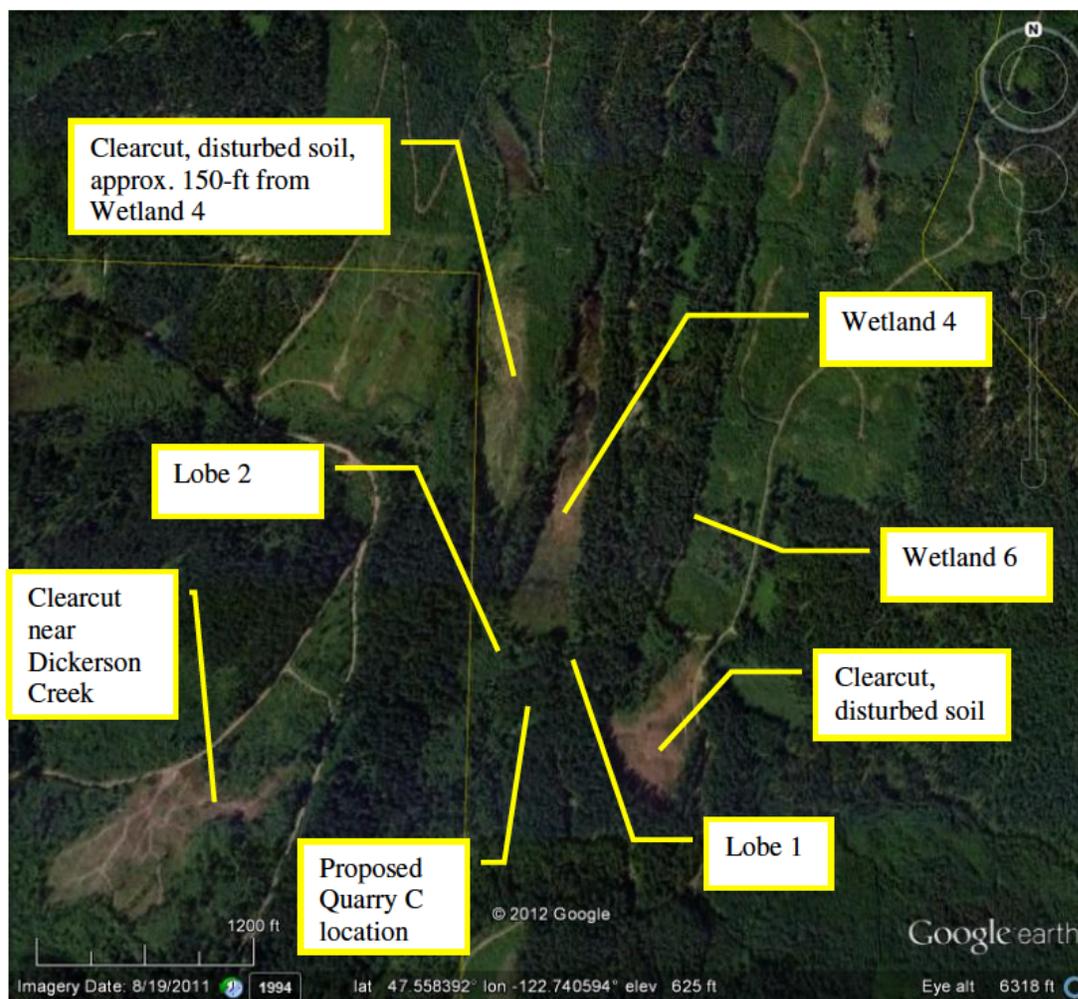
In summary, according to the manual, since the water flow through Wetland 4 is “unidirectional, down-gradient, with an elevation change from one part to the other, then a separate unit should be created” (p.13).

Wetland 4 of Dickerson Creek rating:

LCI completed a rating form for Wetland 4 during and following the field visit. One characteristic of the Parametrix wetland ratings is that the report shows categories based only on the current land use and conditions, and ignores the changes that the proposed quarry developments will precipitate. When land use changes, and new pollution sources are created by the proposed road and quarry developments, the ratings can change. If the ratings change, the buffers can change. If the buffers change, then the proposed quarry developments could fall inside them, compromising protection of 15

Severe" erosion hazard when disturbed (Figure 2, attached). These soils are very likely to erode and be trapped by Wetland 4. The cleared area to the west is visible on the Erosion Hazard Map, and the

more recently logged area is visible on aerial imagery shown here.



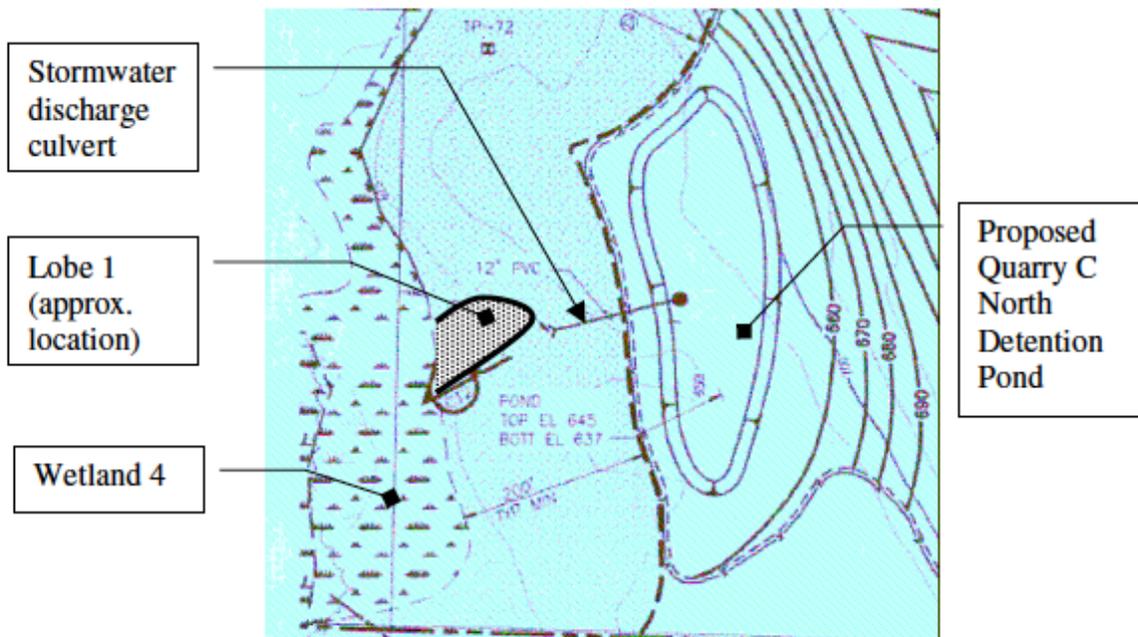
Inset 7. Clear-cut logging and disturbed soils in vicinity of Wetland 4.

The opportunity to improve water quality will exist after the proposed quarry construction, since the proposed Quarry C North detention pond is shown to discharge to a topographic low point in the Wetland 4 buffer about 120' from the edge on the map (Mineral Resource Development Plan, Sheet C11). In reality, that topographic low point is either in or very close to the unmapped Lobe 1. Because 50% of the stormwater will be untreated (see F. Wetland 4 Hydrology and Proposed Quarry Stormwater Plan, and because the rating manual says even treated stormwater is polluted, Wetland 4 will have the opportunity to improve water quality after construction.

Although the Construction Notes on Sheets G2 says that deviations from the plan may be necessary (from the general Erosion & Sediment Control Notes, Note 6), which means the exact culvert discharge point could deviate from the plans, the topographic low point will not change, and the stormwater will flow to that topographic low point which could be lobe 1 of Wetland 4.

All wetlands receiving stormwater from the proposed quarries will also have the opportunity to process pollutants, as the post-construction ratings may change for any wetland that currently does

by Kitsap County's Dickerson Creek Culvert Replacement Project. Repairs are planned for the downstream areas of the creek where roads are flooded regularly.



Inset 8. Approximate location of Lobe 1, and the proposed stormwater discharge to the Wetland 4 buffer, which is very likely in or near the unmapped Lobe 1 of Wetland 4. (Clipped from *Mineral Resource Development Plan*, Sheet C11).

The score for Habitat Functions is 31. This score could increase if portions of the wetland dry out in summer (Question H1.2, Hydroperiods). In the beaver pond portion, LCI observed permanent flooding to the height of the beaver dam, and areas that are only saturated occurring on the edges, and the permanently flowing Dickerson Creek, which flows through the wetland. Lobe 2 does have areas that are only saturated, and possibly has some areas that are either seasonally or occasionally flooded (depending on the creek level). Monitoring may show that inundation in the lobed areas are seasonally and/or occasionally flooded, if they draw down in the dry season when the beaver ponded area remains inundated. If so, this score could increase.

LCI observed 25 species of plants, mostly native, growing in the wetland. Recent beaver activity was present in the form of a gnawed log and stump, with fresh unstained chips. Snags and large downed logs are present throughout the wetland, and more than ¼ of an acre of thin-stemmed vegetation is present. Lobes 1 and 2 have tree, shrub, and herb layers over an area approximately 1.26 acres in size.

The Priority Habitats (per WDFW definitions, linked by the DOE at <http://www.ecy.wa.gov/programs/sea/wetlands/ratingsystems/index.html>) present for Wetland 4 include a biodiversity corridor, riparian area, instream habitat, and snags and logs. The Parametrix rating forms lack the “instream habitat” check box; those wetland ratings may change if revised with the current definitions. The DOE rating form is available in pdf form only, to restrict modification and ensure that the current definitions and instructions are included with each rating (DOE Scientist Thomas Hruby, personal communication on 5/24/2012).

Wetland 6 rating changes:

soils in 3 of the 5 data points in Wetland 6. The report says the soils are predominantly mucky

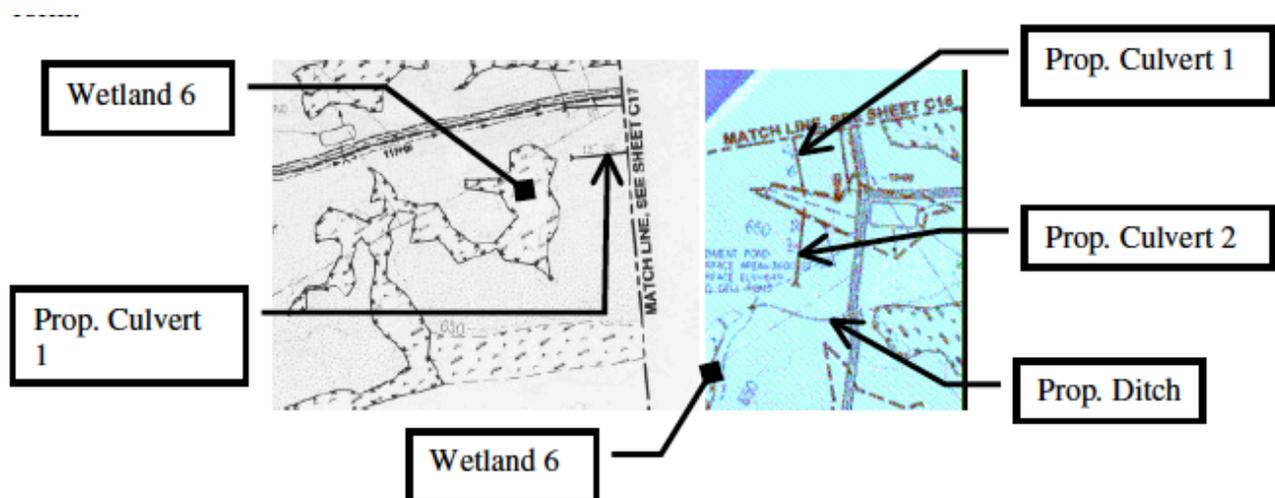
organic soils (histosols):

“Soil examined in the southern portion of the wetland (DP W6-1) consisted of a black (10YR 2/1) muck with organic debris to a depth of eighteen inches. In the middle of the wetland (DP W6A-1), soil examined here consisted of a black (10YR 2/1) mucky loam with few, small and prominent dark yellowish brown (10YR 5/8) mottles to a depth of twelve inches. Below this horizon was a very dark grayish brown black (10YR 3/2) silt loam with few, medium-sized and prominent dark yellowish brown (10YR 4/6) mottles. Organic streaking was noted in the lower horizon of this soil profile. At the northern end of the wetland (DP W6C-1), a black (10YR 2/1) sandy muck was observed to a depth of eighteen inches. This horizon had strong brown (10YR 5/8) mottles that were few, fine and distinct. Hydric soil indicators include high organic content in the surface layer, low chroma matrix colors, and redoximorphic features.” (p. 3-20).

So, the box on the rating form for Question D1.2 should be checked “Yes,” and four points added to the score. This addition will make the “Total for D1” box read 15 points instead of 11 points.

Question D2 asks if the Wetland 6 has the opportunity to improve water quality. The recorded answer is “no”. The correct answer is “Yes” , for similar reasons that Wetland 4 has the opportunity to improve water quality discussed above. Wetland 4 and most of Wetland 6 are in the same drainage basin (see inset 6) and will experience similar reactions to the same pollution sources. Wetland 6 has the opportunity to do the same water quality improvement because of clear-cut logging in the basin to the south, and has the opportunity in the past based on the previously cut area to the east, (see inset 7).

Like Wetland 4, the opportunity will exist for Wetland 6 to improve water quality after the proposed quarry and road construction, since the proposed roadside detention pond is shown to discharge to a topographic low point in the Wetland 6 buffer (Mineral Resource Development Plan, Sheets C20 and C21), and will likely cause stormwater to enter the wetland. Because 50% of the stormwater will be untreated (see F. Wetland 4 Hydrology and Proposed Quarry Stormwater Plan herein), and because the rating manual says even treated stormwater is polluted (p. 45, comment 38), Wetland 6 will have the opportunity to improve water quality after construction. All wetlands receiving treated and untreated stormwater from the proposed roads will also have the opportunity to process pollutants, so the post-construction ratings may change for any wetland that currently does not have the opportunity box checked on its respective rating form.



Inset 9. Sheets C20 (left) and C21 (right) from *Mineral Resource Development Plan*. The Match Lines apply to each of these insets (they are labeled with the incorrect sheet numbers on

Based on the engineering drawings, Wetland 6 will receive road runoff, so the opportunity will exist to improve water quality if the proposed construction takes place. This will cause the multiplier to double the Water Quality score from 15 to 30.

Question D4 asks if Wetland 6 has the opportunity to reduce flooding and erosion. The box is marked "No," but the correct answer is "Yes." The Dickerson Creek drainage basin has flooding problems, and roadways in the area are flooded during large storm events. Kitsap County's Dickerson Creek Culvert Replacement Project is directed at reducing flooding, and shows the importance of the hydrologic function of Wetland 6 in attenuating flood flow. Wetland 6 is a headwater wetland since stream S7 emerges from it. But no stream enters the wetland. Also, Wetland 6 drains to S7, which drains to Dickerson Creek. Another portion of Wetland 6 drains Wetland 4, which is the beaver pond formed from Dickerson Creek. For these reasons, Wetland 6 clearly has the opportunity to reduce flooding, so the Hydrologic Function score is doubled from 12 to 24.

The opportunity score changes result in Wetland 6 having a Water Quality score of 30, a Hydrologic score of 24, and a habitat score of 30, for a total of 84 points, which equals a Category I wetland. The base buffer is therefore 200 feet, and under a high intensity land use, with a forested class, and with a high water quality and habitat score, the buffer changes to 250 feet.

Wetland name or number 4

WETLAND RATING FORM – WESTERN WASHINGTON
Version 2 - Updated July 2006 to increase accuracy and reproducibility among users
Updated Oct 2008 with the new WDFW definitions for priority habitats

Name of wetland (if known): WETLAND 4 Date of site visit: 5/4, 5/22/2012

Rated by Joseph Leyda Trained by Ecology? Yes No Date of training _____

SEC: 24 TOWNSHIP: 24N RANGE: 1W Is S/T/R in Appendix D? Yes No

Map of wetland unit: Figure R1 Estimated size 14.45A
"Insets" refer to LCI memorandum

SUMMARY OF RATING

Category based on FUNCTIONS provided by wetland

I II III IV

Category I = Score >=70
Category II = Score 51-69
Category III = Score 30-50
Category IV = Score < 30

Score for Water Quality Functions	18
Score for Hydrologic Functions	10
Score for Habitat Functions	31
TOTAL score for Functions	59

Category based on SPECIAL CHARACTERISTICS of wetland

I II Does not Apply

Final Category (choose the "highest" category from above)

II

Summary of basic information about the wetland unit

Wetland Unit has Special Characteristics	Wetland HGM Class used for Rating	
Estuarine	Depressional	<input checked="" type="checkbox"/>
Natural Heritage Wetland	Riverine	<input type="checkbox"/>
Bog	Lake-fringe	<input type="checkbox"/>
Mature Forest	Slope	<input checked="" type="checkbox"/>
Old Growth Forest	Flats	<input type="checkbox"/>
Coastal Lagoon	Freshwater Tidal	<input type="checkbox"/>
Interdunal		<input type="checkbox"/>
None of the above	Check if unit has multiple HGM classes present	<input checked="" type="checkbox"/>