

# City of Poulsbo

## Planning & Economic Development



December 31, 2019

Matt Hough  
CPH Consultants  
11431 Willows Rd NE, Suite 120  
Redmond, WA 98052

Ken Allen  
The Holt Group, Inc.  
PO Box 61426  
Vancouver, WA 98666

Subject: Johnson Ridge PRD & Preliminary Plat; P-08-02-19-01

Dear Mr. Hough and Mr. Allen,

This letter is to notify you that the Planning and Economic Development Department (PED) has completed its Technical Staff review of the above referenced application, revisions received on November 25, 2019 and determined to be technically complete on December 17, 2019. It was clear that a substantial amount of thought and work went into the revised application package. As always, we are free for a follow up phone call or in person meeting to talk through some of the issues that are outlined in the attached memos.

The attached memos outline the revisions that must be addressed upon resubmittal. Please include a *Revision Submittal Form* and *Response Matrix* with your resubmittal package which addresses all requested revisions, including those from Engineering, Public Works, and Building.

This letter will place the statutory timeline per [PMC 19.80.030](#) on hold. Please note, per [PMC 19.80.050](#), a technically complete application shall be deemed null and void if the applicant fails to submit the required revisions, corrections, studies or information within 90 calendar days of the date of this letter. An applicant may request one 90-day extension to the time limit if the criteria in [PMC 19.80.050 B](#) are met.

Feel free to contact me at (360) 394-9730 or [ncoleman@cityofpoulsbo.com](mailto:ncoleman@cityofpoulsbo.com) with any questions or comments you may have.

Sincerely,

*Nikole Coleman*

Nikole Coleman, AICP  
Associate Planner

Electronic Attachments: [Revision Submittal Form](#)

Attachments: Planning and Economic Development Department Memo  
Engineering Department Memo  
Building Department Memo  
Peer Review Memo: Grette  
Peer Review Memo: Sound Urban Forestry  
Peer Review Memo: Aspect Consulting  
Public/Agency Comments Rec'd to Date



## PLANNING AND ECONOMIC DEVELOPMENT

200 NE Moe Street | Poulsbo, Washington 98370  
(360) 394-9748 | fax (360) 697-8269  
www.cityofpoulsbo.com | plan&econ@cityofpoulsbo.com

# MEMO

**To:** Matt Hough, CPH Consultants  
**From:** Nikole Coleman, Associate Planner  
**Subject:** Johnson Ridge PRD and Preliminary Plat | P-08-02-19-01  
**Date:** December 31, 2019

The PED Department has reviewed the revised application submitted on November 25, 2019 and deemed technically complete on December 17, 2019. The following comments must be addressed with your resubmittal. If you have any questions regarding these comments, please email me at [ncoleman@cityofpoulsbo.com](mailto:ncoleman@cityofpoulsbo.com) or call my direct line (360) 394-9730.

### Critical Areas

1. Per PMC [Table 16.20.315](#), Bjorgen Creek is a type F1 stream requiring a 200-foot setback. Per PMC [16.20.315 A.5](#), an additional building setback of 25 feet is required from the edge of all fish and wildlife habitat conservation area buffers. *Minor structural or impervious surface* intrusions such as but not limited to fire escapes, open/uncovered porches, landing places, outside walkways, outside stairways, retaining walls fences, and patios may be permitted within the required building setback if the director determines, *upon submittal of a habitat management plan*, that such intrusions will not adversely impact the fish and wildlife habitat conservation area or its buffer.

#### ***Staff Comment:***

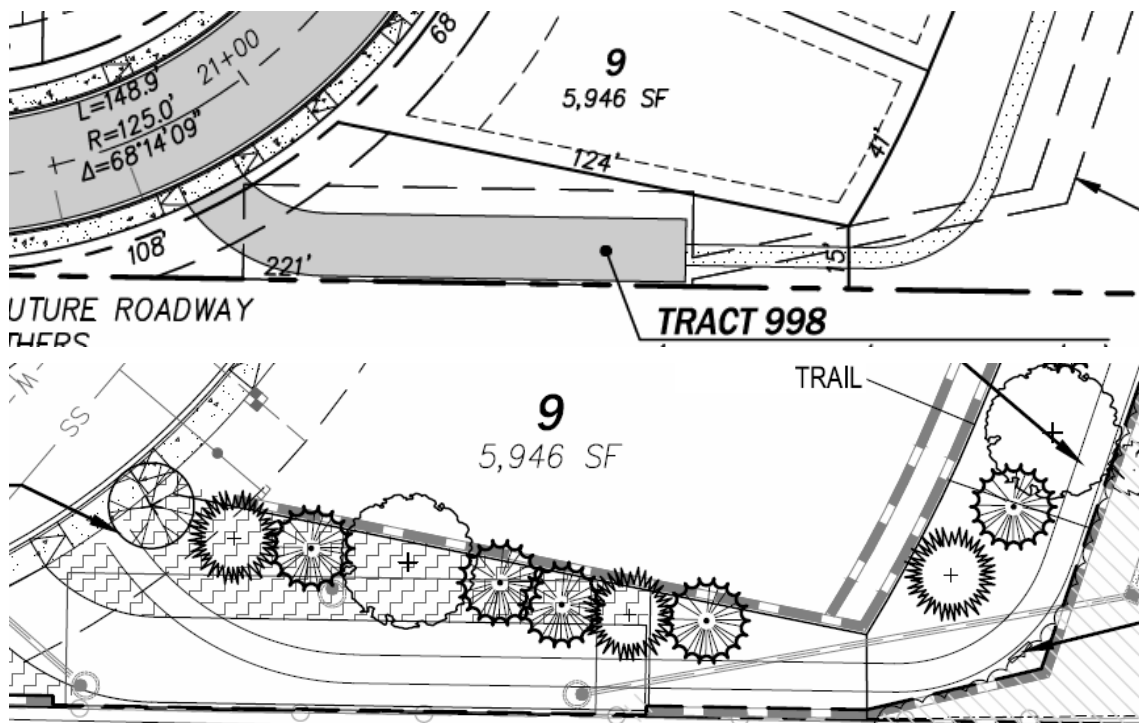
- a. Home sites 1-9 are proposed with a 110' lot depth. However, the PRD allows for a 70' depth. The topography behind lots 1-9 appears to allow for a lot depth less than 110' and moving the proposed path further west. This would decrease the impact proposed to the stream buffer and shall be addressed in your revised design. Keep in mind that staff does not support locating the 25' building setback within proposed lots as an easement.
  - b. Also, the minimum lot width and lot depth allowed for a PRD has not been utilized throughout the plat, which would allow for less encroachment into the required stream buffer. Please address in your redesign. Note, proposed home designs shall also be revised with consideration for a reduced lot width and lot depth.
  - c. The Habitat Management Plan has been peer reviewed by Grette Associates. A memo is provided and, if necessary, shall be addressed upon resubmittal.
2. Per PMC [16.08.130 B](#), the director may decrease the standard buffer or building setback as recommended by a habitat management plan *after consultation with the Washington State Department of Fish and Wildlife and the Suquamish Tribe*, and determine that conditions are sufficient to protect the affected habitat. A habitat management plan shall be required. The director may reduce the buffer or building setback width by up to twenty-five percent, but the buffer width shall not be less than fifty feet.

***Staff Comment:*** The project proposal and Habitat Management Plan has been provided to the Department of Fish and Wildlife and Suquamish Tribe for review. Comments are attached to this letter and shall be addressed upon resubmittal. The applicant is responsible to coordinate with Fish and Wildlife and Suquamish Tribe directly to work through issues. If a site visit is planned, I am available to attend.

3. The geotechnical report has been peer reviewed by Aspect Consulting. A memo is attached.

## Tree Retention/Landscaping

- The tree retention plan has been reviewed by Sound Urban Forestry. A memo is provided and, if necessary, shall be addressed upon resubmittal.
- Please remove any proposed landscaping north of tract 998 that will conflict with the continued maintenance of the stormwater vault (see below).



## Open Space/Amenities

- Per [PMC 18.260.090 D](#), the amount of open space required is set forth in [Table 18.260.090.A](#). The amount of open space required is based upon a range of proposed average lot sizes. The determination of average lot size shall be the sum of all individual lot square footage, divided by the total number of proposed lots.

**Staff Comment:** The calculation of required open space on sheet P2.00 is incorrect. Based on the average lot size of 5,512, the required amount of open space is 10% or 1.375 acres. Of the 1.375, 40% can be located within a required critical area, or .55 acres. Please revise.

- Per [PMC 18.260.090 H](#), for projects that utilize stormwater vaults, the top of the vault may be proposed to also serve as an active recreational amenity (i.e., sport court), if grade and landscaping provide for a usable area. The area proposed to serve as the active amenity can therefore contribute toward the open space requirement.

**Staff Comment:**

- Please provide an active recreational amenity over the stormwater vault on the SW corner. The design of the stormwater vault shall be considered when designing the type and location of the active recreational amenity (i.e. access for maintenance, etc.). Ideas for active recreation include bocce ball courts, basketball court, disc golf basket(s), etc.
- Please provide a fence around tract 997 in its entirety. This will allow city staff to close off the area at the time of required maintenance.

## Individual Building Identity

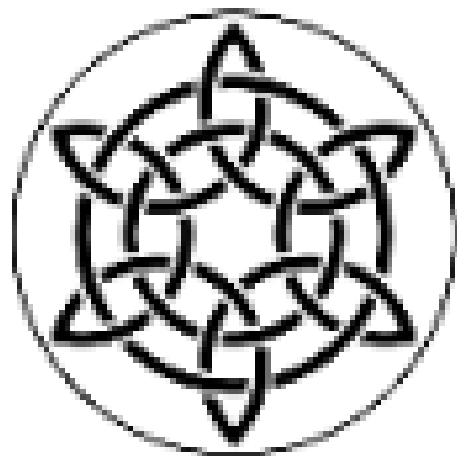
- Home individuality shall be achieved through the methods in [PMC 18.260.060 E](#). Per [PMC 18.260.060 E.4](#), at building permit application submittal, the planning director will review submitted building permits for compliance with the approved PRD site plans, as well as **substantial** compliance with the conceptual architectural renderings.

**Staff Comment:**

- a. A PRD provides for flexibility and creative site design on difficult sites for the applicant, while providing the public, and city, with additional open space/amenities and some assurances on home designs. The current proposal does not meet the requirements in PMC [18.260.060 E](#). As stated in the PMC,
- b. Please provide a narrative showing how *each* submitted house design meets PMC [18.260.060 E.2](#).
  - i. Designs 1842 and 2188 show a rear entry garage, which does not appear to be an actual housing option on this site. Please revise.
  - ii. The garage appears to be the dominant feature in design 1994 (and potentially 2366 with the additional garage). Please revise and/or show how you will mitigate per PMC [18.260.060 E.2](#).
  - iii. Designs 1994 and 2366 do not have a *distinct* entry feature such as a porch or weather-covered entryway.
  - iv. Given the change in grade for lots 10-23 and 53-55, please clarify how the submitted home designs could be built on those lots.
  - v. Please revise your conceptual home siting plan following revisions to the proposes house plans.
- c. Consideration should be given to height measurement at this point in the process. Although it is not necessary to complete height measurements for each proposed home, it would be helpful to provide a representative sample showing that the proposed house designs can legally be built on the lots given the grades. Please note that house design cannot be substantially altered at the time of building permit, including due to site constraints such as difficulty meeting the height requirement. The planning director has the ability to modify any of the standards within PMC [18.260.060 E](#), if the subject site topography precludes the compliance with any of the stated standards. However, the ability to modify is only done through the PRD application and review.

#### General/Other

9. The Engineering Department has worked with a committee to determine the aesthetic scheme for the Noll Rd Corridor project. The wall finish for any retaining walls located at the exterior of the project (i.e. along future Johnson Parkway) shall be “random board finish - variable depth” (see below) and shall include landscaping and/or artwork to break up the size of the walls. The artwork shall be identical or similar in nature to what is shown below.





## ENGINEERING DEPARTMENT

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# MEMO

**To:** Nikole Coleman; Associate Planner  
**From:** Anthony Burgess, Sr. Engineering Technician  
**Subject:** Johnson Ridge Preliminary Plat; Technical Review; P-08-02-19-01  
**Date:** December 31, 2019

The Engineering Department has reviewed the above submittal and provides the following comments to be addressed with the next submittal.

### Traffic Impact Analysis (Dated November 24, 2019)

1. The horizon year is required to be 5 years from the estimated time of completion. The current TIA shows a forecast period of only 3 years and does not address estimated completion date.
2. Please provide narrative which addresses PMC 17.60.040.
3. Please provide narrative which addresses PMC 14.04.
4. Discussion of project generated construction traffic is not included in this TIA. Please discuss the amount of construction traffic the project will generate, traffic routes, and any other pertinent information.
5. Discussion of traffic accidents in the area must be included. The proposed plat will be connecting to a roadway which is yet to be constructed, a small narrative regarding improvements to the SR-305 and Johnson Way intersection might be sufficient.
6. Project Mitigation section of the TIA does not look to be updated with previous City Comments as stated in the 1<sup>st</sup> Engineering request for revision letter comment #29.

### Preliminary-Plat Site Plan

7. The slope of the roadway through the intersection of Road B and Road A exceeds the maximum of 5%, please revise.
8. Sanitary sewer alignment is shown in parking strip – City standards require sanitary sewer manholes to be in the crown of the road.
9. The Fire department has reviewed the location(s) of proposed hydrants and will require a different orientation of hydrants for optimal orientation in a fire event. Please find an attached annotated drawing of proposed new locations of hydrants.
10. Retaining walls over 4-feet in height are considered structures per PMC 18.40 and must meet setback requirements. 10' minimum setback will apply to retaining walls on external plat property lines. Due to the nature of the roadway improvements and joint utility trench associated with the Johnson Parkway project, the City would entertain reducing this requirement adjacent to these improvements. Retaining walls may be on or near internal lot property lines – wall ownership and maintenance responsibility shall be shown on the face of the plat. Maintenance covenants or agreements between properties will be required for walls on property lines. Please reference the annotated drawing of Sheet P3.00.

### Stormwater

11. Proposed wetvaults are not permitted as public stormwater facilities. Additionally, cartridge systems are not allowed by City Standards for water quality treatment in Public Facilities. Standard detention vaults

with external water quality treatment may be used. Suggest Biopod or Modular Wetland as potential water quality solution.

12. Vault setback from property lines 20' per Stormwater manual – may be reduced to 10' by City standards. Proposal shows vault in Tract 997 and 998 on property line.
13. Vault access points must meet Stormwater manual, OSHA and City confined space program requirements. No point in any cell may be more than 50' from an access opening. Vault control structure service openings may not be shared as man access.

Michael Bateman, City of Poulsbo Transportation Engineer, has been in contact with Matt Hough regarding a resubmittal of the stormwater plan prior to sending the report for 3<sup>rd</sup> party peer review. Further comments will be brought to the applicant's attention once the revised report is received and reviewed by the City's 3<sup>rd</sup> party reviewer.

The applicant has indicated in response to Eng. Tech Comment #14 (Tech Comment #1 Memo) that a detailed narrative and exhibits will be submitted at a later date. This is acceptable to the Engineering Department; however it is ultimately the applicant's responsibility to provide an agreeable solution between the City and the Developer, future plat revisions may be necessary to accommodate City requirements. The Engineering Department will work with the applicant and Planning Department on Engineering and Public Works requirements for access and maintenance considerations.



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## BUILDING DEPARTMENT

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# MEMO

To: Holt Distressed Property Fund 2010 LP  
From: Sheila Salerno, Building & Fire (360) 394-9738  
Subject: Johnson Ridge - 61 Lots - Preliminary Plat **P-08-02-19-01**  
Date: December 10, 2019

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The following Building Department comments are provided for the Preliminary Plat, submitted November 27, 2019.

### SITE PLAN:

- Final site plan approval is subject to Poulsbo Fire Department review and approval.
  - Show the proposed fire hydrants at spacing along Johnson Parkway
  - Move fire hydrants per Engineering notes, closer to intersections
- Retaining Walls will require separate Building Permits
- Storm Vault will also require a Building Permit
  - a. Recommend that building applications come in during Grading & Clearing permit process

### BUILDING:

- Submittal of a building permit application(s) showing compliance to applicable Washington state and local laws
  - Holt plans reference Oregon Energy Codes
- City ordinance requires that addressing be in accordance with specific numbering of buildings, with heights of numbers and width of stroke, according to setback from the fronting street. Numbers shall be plainly visible and legible upon a contrasting background, such as black on white, or white on blue. (PMC 12.24.080)
  - Suggest a meeting with Fire Department and our Permit Technician, once the Site Plan has been sufficiently approved by Planning, so that the City can establish and process address at time of final Site Approval.



## Peer Review Memo's



## TECHNICAL MEMORANDUM

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

December 18, 2019

Prepared by: Grette Associates<sup>LLC</sup>  
2102 North 30<sup>th</sup> Street, Ste A  
Tacoma, WA 98403

File No.: 208.001.1000

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

Grette Associates contracted with the City of Poulsbo (City) to assist in the review of the Wetland Delineation Report (the "Report", dated May 2, 2019) prepared by Ecological Land Services, Inc. (ELS) in support of the Johnson Ridge PRD project (Project). Grette Associates completed a third party review and provided comments on the Report on August 29, 2019. In summary, while the Report was compliant with Section 200 (Wetlands) of the Poulsbo Municipal Code (PMC), the Report did not meet the minimum requirements defined in Section 300 (Fish and Wildlife Habitat Conservation Critical Areas) of the PMC.

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

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

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

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



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

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

*The Report inaccurately classifies the portion of Bjorgen Creek within the vicinity of the proposed Project as a Type F2 stream. Based on the documented salmonid use and WAC 222-16-030, the appropriate classification for the portion of Bjorgen Creek is a Type F1 stream. Per PMC 16.20.315, Type F1 stream are subject to a 200-foot buffer and a 25-foot building setback.*

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

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

The review of this HMP was conducted using the best available scientific information and methodologies and the best professional judgement of Grette Associate's staff biologists. Final acceptance and approval is at the discretion of City staff.

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

Regards,

A handwritten signature in black ink, appearing to read 'Chad Wallin', written in a cursive style.

Chad Wallin  
Biologist



## Memo

**To:** Nikole Coleman, City of Poulsbo Associate Planner  
**From:** Kevin M. McFarland, City of Poulsbo Contracted Arborist  
**Date:** 12/11/19  
**Re:** Johnson Ridge PRD Tree Retention Review

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Upon the request of the City of Poulsbo, I have assessed the revised tree retention plan and arborist report dated November 22, 2109, for the proposed Johnson Ridge project at 17504 Johnson Road NE. I have been asked by the City to provide a peer review related to my original findings dated 8/28/19.

### **Comments**

Overall, the arborist report is thorough and is what should have been submitted with the initial package. As requested in my original memo, all trees within the site have been accounted for and assessed with the information clearly presented. The tree protection measures outlined are appropriate and I recommend that they be considered conditions of approval by the City. I would still like to review the locations and installation of the fencing with the contractor prior to *any* site work.

I am concerned about the discrepancies between the arborist report and the tree retention plan regarding the tree retention calculations. While both sets of the reported numbers show the project remaining above the 25% retention requirement, I am concerned that the numbers do not match and would like to see a brief explanation. There still seems to be some issues with what trees are to be retained along the top of the slope. The report expresses the need to protect Trees #968, #969 and #1004 and that they can be retained with the correct installation of the soft trail while the retention plan shows the trees to be removed. I agree with the report that these trees are worth retention and that the trail can be amended to accommodate them. I would need to see the latest grading and utilities plans to assess the total impacts.

If you should have questions, please feel free to contact me at 360-870-2511 or suf1234@comcast.net



December 18, 2019

Nikole Coleman, AICP, Associate Planner  
City of Poulsbo  
200 NE Moe Street  
Poulsbo, Washington 98370

**Re: Third-Party Geotechnical Review**

Johnson Ridge PRD  
17504 Johnson Road NE  
Poulsbo, Washington  
Project No. 160285-03

Dear Ms. Coleman:

At your request, Aspect Consulting, LLC (Aspect) reviewed consultant responses to our geotechnical review comments for the Johnson Ridge PRD project, which we provided to the City of Poulsbo in our letter dated August 30, 2019. For this resubmittal, we reviewed the following two documents:

- “Response to Comments, Proposed Residential Plat, 17504 Johnson Road Northwest, Poulsbo, Washington,” dated November 25, 2019, by GeoResources, LLC (GeoResources).
- “Updated Geotechnical Engineering Report, Proposed Residential Plat, 17504 Johnson Road Northwest, Poulsbo, Washington,” dated November 25, 2019, by GeoResources.

Based on our review, it is our opinion that GeoResources has generally satisfied our review comments and associated geotechnical-related requirements within the Poulsbo Municipal Code. We recommend the updated geotechnical engineering report be approved.

The geotechnical engineer of record should review the updated site grading plans, including wall details and wall designs, and should submit a letter to the City of Poulsbo confirming the updated site grading plans and retaining wall designs have appropriately incorporated all of the geotechnical engineering recommendations for the project.

During construction, we recommend that the construction permit require an experienced, licensed engineering geologist inspect the site after it is cleared and grubbed to observe bare-earth conditions and look for evidence of movement. If any evidence of ground fault movement is noted, then further mitigation may be needed based on the type of movement determined. Aspect is available to undertake this geologic assessment during construction.



## Limitations

This review was performed for City of Poulsbo (Client), with an emphasis on compliance with the Poulsbo Municipal Code, and recognized standards of geotechnical engineering professionals in the same locality and involving similar conditions, at the time the work was performed. Our comments and recommendations are based on our review of Poulsbo Municipal Code and the information provided to us for review. No warranty is made by Aspect Consulting, LLC (Aspect).

Variations may exist between the soil and groundwater conditions reported and those actually underlying the site. The nature and extent of such soil variations may change over time and may not be evident before construction begins. If soil conditions are encountered at the site during construction, that are materially different from those described in the geotechnical report, Aspect should be notified.

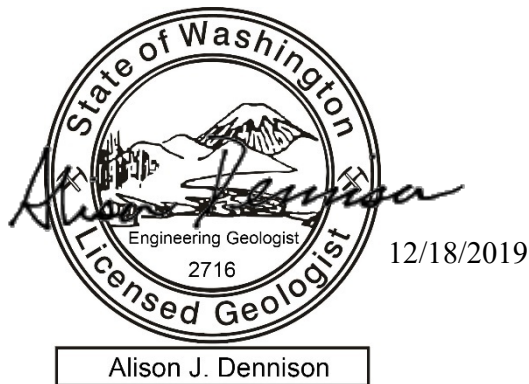
At the time of this review, elements of the site grading plans, wall designs, and construction methods have not been finalized, and our review comments are based on the information provided. If project developments result in changes from the project information provided, Aspect should be contacted.

All reports prepared by Aspect for the Client apply only to the services described in the Agreement(s) with the Client. Any use or reuse by any party other than the Client is at the sole risk of that party, and without liability to Aspect. Aspect's original files/reports shall govern in the event of any dispute regarding the content of electronic documents furnished to others.

We trust this letter meets the needs of your permit processing. If you have any questions, please contact us.

Sincerely,

**Aspect consulting, LLC**



**Alison J. Dennison, LEG**  
Senior Engineering Geologist  
adennison@aspectconsulting.com



**Erik O. Andersen, PE**  
Principal Geotechnical Engineer  
eandersen@aspectconsulting.com

## Public/Agency Comments Received

**From:** [John Kiess](#)  
**To:** [Nikole CH. Coleman](#)  
**Subject:** Johnson Ridge plat P-08-02-19-01 comments  
**Date:** Wednesday, November 27, 2019 11:43:30 AM

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**CAUTION:** This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello Nikole – Health District comments are as follows:

1. The existing septic tank must be pumped and decommissioned in accordance with Health District requirements.
2. Existing wells must be decommissioned by a licensed well driller in accordance with Chapter 173-160 WAC.

Thank you, please let me know if you have questions.

**John Kiess, RS | Environmental Health Director**

Kitsap Public Health District

345 6<sup>th</sup> St., Suite 300 | Bremerton, WA 98337

(360) 728-2290 Office | (360) 620-0538 Cell

[john.kiess@kitsappublichealth.org](mailto:john.kiess@kitsappublichealth.org) | [kitsappublichealth.org](http://kitsappublichealth.org)





**From:** [Alison Osullivan](#)  
**To:** [Nikole CH. Coleman](#); [Nam.Siu@dfw.wa.gov](mailto:Nam.Siu@dfw.wa.gov)  
**Subject:** RE: Johnson Ridge PRD  
**Date:** Sunday, December 22, 2019 9:21:04 PM  
**Attachments:** [image003.png](#)

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**CAUTION:** This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Literature indicates that a buffer of 200' or greater is needed to protect riparian ecosystems (Management Recommendations for Washington's Priority Habitats – Riparian, WDFW). And buffers needed for various species (bird and mammal) are much greater. Various species depend on these adjacent upland undeveloped areas not only for migration but also for basic food and shelter needs.

Buffer reductions and Reasonable Use Exceptions should not be used in a business as usual scenario but reserved for those instances where the site is truly constrained and there are no other options not just to ensure maximum financial return. It seems that lots 1-9 need to be looked at and reduced and/or reconfigured to ensure that the buffer is maintained. Elimination of square feet of buffer cannot be mitigated via a habitat management plan.

In looking at reconfiguring the lots the trail also needs to be moved preferably outside of the buffer. Trails should not be located within wetland or riparian (freshwater or marine) habitat areas for most of their length. Instead, locate trails well away from streams, wetlands, shorelines, and their associated buffers.

Alison O'Sullivan  
Senior Biologist, Suquamish Tribe Fisheries Department



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18490 Suquamish Way  
Suquamish, WA 98392  
phone: (360) 394-8447

Holiday Hours:  
December 24-January 1 (Winter Break)  
Have a safe and happy holiday season!

**From:** [Siu, Nam \(DFW\)](#)  
**To:** [Alison Osullivan](#); [Nikole CH. Coleman](#)  
**Subject:** RE: Johnson Ridge PRD  
**Date:** Monday, December 23, 2019 9:17:13 AM  
**Attachments:** [image003.png](#)

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Thanks for your thorough review and breakdown of this Alison. I agree with everything you said, especially regarding the Habitat Management Plan and its mitigation, and as I mentioned in my previous email I did not think the mitigation in the targeted area is needed and/or adequate for the impact of reduced buffers.

Cheers,

*Nam Siu*

Area Habitat Biologist, North Kitsap and Bainbridge Island  
Habitat Program, Region 6, Port Orchard Office  
Washington Department of Fish and Wildlife  
[Nam.Siu@dfw.wa.gov](mailto:Nam.Siu@dfw.wa.gov)  
(360)522-6035



---

**From:** Alison Osullivan <aosullivan@suquamish.nsn.us>  
**Sent:** Sunday, December 22, 2019 9:21 PM  
**To:** Nikole CH. Coleman <ncoleman@cityofpoulsbo.com>; Siu, Nam (DFW) <Nam.Siu@dfw.wa.gov>  
**Subject:** RE: Johnson Ridge PRD

Literature indicates that a buffer of 200' or greater is needed to protect riparian ecosystems (Management Recommendations for Washington's Priority Habitats – Riparian, WDFW). And buffers needed for various species (bird and mammal) are much greater. Various species depend on these adjacent upland undeveloped areas not only for migration but also for basic food and shelter needs.

Buffer reductions and Reasonable Use Exceptions should not be used in a business as usual scenario but reserved for those instances where the site is truly constrained and there are no other options not just to ensure maximum financial return. It seems that lots 1-9 need to be looked at and reduced and/or reconfigured to ensure that the buffer is maintained. Elimination of square feet of buffer cannot be mitigated via a habitat management plan.

**From:** [Berni Kenworthy](#)  
**To:** [Michael J. Bateman](#); [Anthony W. Burgess](#)  
**Cc:** [Rob Ekelmann \(rekelmann@yahoo.com\)](#); [Nikole CH. Coleman](#)  
**Subject:** Johnson Ridge Comments  
**Date:** Monday, December 16, 2019 3:17:09 PM

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Hi Michael and Anthony,

I'm working with Rob Ekelmann who is located directly south and adjacent to the proposed Johnson Ridge plat. A future road connection is shown along the southern boundary of the plat to connect to the Ekelmann parcel which is in the UGA, but is in the process of being proposed for annexation. We are happy to see a future location for traffic connectivity and water looping. However, this proposed road connection may be problematic as it is at a location where a 3-4' high wall has been designed for the plat and where existing terrain slopes away from the wall to the south on the Ekelmann parcel. If this will be a required future public road connection, the intersection should be designed now to confirm feasibility of this future connection. My client would give access permission to obtain any additional topo needed for the intersection design.

Additionally, the grading in the southwest corner of the plat creates a 10-15' high exposed vault wall on top of an 8-12' high wall. Walls are inevitable given the topography of the Johnson Ridge site. But, I'm wondering if there is a way to soften the up to 27' of vertical by elongating the vault and removing the southernmost bay so that another terrace wall could be inserted to break up this vertical change?

Also, it was mentioned that access to the Ekelmann property may not be allowed at the current access location along the northernmost property line and that primary access would be at the location shown on the proposed Johnson Ridge plat – can you confirm that is the case?

Thank you,  
Berni

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