



TECHNICAL MEMORANDUM

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

November 22, 2022

Prepared for: City of Gig Harbor
Attention: Roxanne Robles
3510 Grandview Street
Gig Harbor, WA 98335

File No.: 250.001.2089

Re: The Reserve Development Project – Third Party Review

1 INTRODUCTION

The City of Gig Harbor (City) has contracted with Grette Associates to assist in the review of the Wetland and Fish and Wildlife Habitat Assessment Technical Memorandum (the “Memo”; dated November 7, 2022) that was prepared by Soundview Consultants, LLC (SVC).

The Memo was submitted to the City to document all wetlands, streams, and critical fish and wildlife habitats on or within 300 feet of the subject property located across from the intersection of 101st Street Court and Peacock Hill Ave. (Pierce County parcels 0222323134 and 0222323135) in support of the proposed Reserve Development Project.

2 REVIEW METHODS

2.1 Site Visit

Grette Associates completed a site visit on November 17, 2022 to assess the subject property for consistency with the information contained in the Memo. The subject property and all accessible areas within 300 feet were evaluated.

2.2 Document Review

A Grette Associates biologist conducted a thorough review of the Memo submitted to the City. The review focused on verifying the accuracy of the descriptions within the Memo and compliance with the current version of Title 18 of the Gig Harbor Municipal Code (GHMC).

3 REVIEW RESULTS

3.1 Site Visit Review

Grette Associates concurs with SVC’s wetland delineation and general characterization of Wetland A. This feature is classified as a palustrine scrub-shrub/forested wetland feature and is hydrogeomorphically classified as a slope wetland. Please note that past assessments (Russell and Associates 2016) misclassified Wetland A as a depressional wetland feature. Upon completion of

Grette Associates' November 17, 2022 site visit, Grette Associates concurs with SVC's determination that Wetland A is a slope wetland feature.

In addition to Wetland A, there is a narrow seasonal nature water feature (Stream Z) situated within the eastern portion of the subject property which originates within Wetland A. SVC's Memo accurately characterizes and classifies Stream Z as a Type 4 (perennial/seasonal non-fish habitat) water (GHMC 18.08.162).

In summary, Grette concurs with the wetland and stream determinations summarized in the Memo. No additional critical areas within 300 feet of the proposed project were identified by Grette Associates during the site assessment.

3.2 Critical Areas Review

3.2.1 Wetlands

Per GHMC 18.08.040, wetlands shall be rated according to Ecology's current version of the Wetland Rating System for Western Washington. The Memo uses the appropriate version of the rating system (Hruby 2014). Wetland A was classified by SVC as a Category IV wetland.

Grette Associates disagrees with the Category IV wetland rating. As summarized below, points were not given to several rating questions which would increase the overall score from 14 points (Category IV) to 16 points (Category III). Per GHMC 18.08.100, Category III wetlands that provide moderate habitat (6-7 points) with a proposed high land use are subject to a 150-foot buffer and a 15-foot building setback.

Provided below is a summary of the rating questions where Grette Associates disagrees with scores provided in the rating forms.

Table 1. SVC's and Grette Associates' wetland rating form value discrepancies

Rated by	SVC	Grette	SVC	Grette	SVC	Grette
Rating Function	Water Quality		Hydrology		Habitat	
Site Potential	L	L	M	M	L	M
Landscape Potential	L	L	L	L	L	L
Value	L	M	H	H	H	H
Functional Score	3	4	6	6	5	6

Water Quality

Question S 3.2

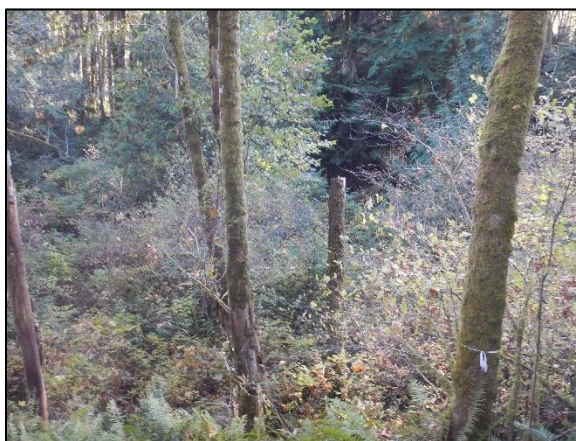
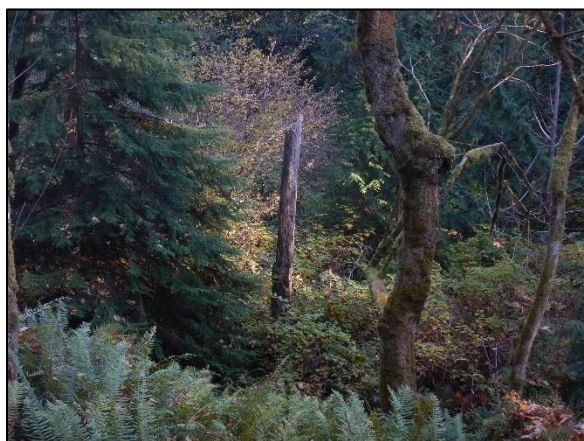
This question was not given a point for the wetland being situated in a basin or sub-basin where water quality is an issue. According to a November 17, 2022 query of Ecology's *Water Quality Atlas*, Crescent Creek is a mapped 303d water (see attached). According to Ecology's rating system (Hruby 2014), a point should be given to this question if the wetland being rated is within the basin of a polluted water even if it doesn't discharge directly to said water. Based on this information, a point should be given to Question S 3.2 and the rating form should be revised accordingly.

Habitat

Question H 1.5

Grette Associates identified several snags within Wetland A (Figure 1). In addition, the 2016 wetland evaluation (Russell and Associates 2016) also noted large down woody debris and standing snags within Wetland A. No points were given for having standing snags within the wetland; therefore, an additional point should be given to Question H 1.5.

Figure 1. Observed wetland snags



According to Figure 1 of Appendix A of the Memo, Stream Z appears to extend into Wetland A for over 33 feet. No point was given to this question for having at least 33 feet of overhanging vegetation along the stream. Given the dense forested and sub-canopy vegetation within Wetland A, an additional point needs to be given for Question H 1.5.

3.2.2 Streams

The Memo provides the appropriate analysis and accurately characterizes Stream Z as a Type 4 water for compliance with GHMC 18.08.183. Per GHMC 18.08.184, Type 4 waters are subject to a 25-foot buffer and a 15-foot building setback. According to the provided site plans, the proposed project will be constructed in the western portion of the subject property and will not extend near Stream Z's buffer or associated building setback. Therefore, the Memo is compliant with the stream reporting requirements defined in GHMC 18.08.183.

3.2.3 Critical Fish and Wildlife Habitat Areas

Per GHMC 18.08.186, critical fish and wildlife habitat areas include those streams that provide habitat for federal or state endangered, threatened, and/or sensitive species of fish or those streams that provide habitat for state-listed monitor or candidate, or federally listed candidate species.

Given that Stream Z does not provide suitable habitat for fish, this section does not apply.

4 SUMMARY AND RECOMMENDATIONS

In summary, Grette Associates disagrees with the rating for Wetland A as a Category IV wetland. The accurate rating for Wetland A is Category III. Although the provided site plans show that the proposed project will not extend into the 150-foot Category III wetland buffer or the applicable 15-foot building setback, prior to acceptance of the Memo Grette Associates recommends that the rating comment summarized below be addressed and the document be revised accordingly. Once

revised, Grette Associates recommends that the City verify these changes and the Memo be approved.

- Per GHMC 18.08.040, wetlands shall be rated according to Ecology's current version of the Wetland Rating System for Western Washington (Hruby 2014). As summarized above, the rating form provided in the Memo did not give a point to Question S 3.2 for the wetland being situated in a basin with a mapped water quality issue or given two additional points to Question H 1.5 for having snags and overhanging vegetation over the portion of stream within the wetland. Including these changes increases the rating score from 14 points (Cat. IV) to 16 points (Cat. III) and increases the habitat score from low (5 points) to moderate (6 points). The Memo and rating should be revised accordingly.

The review of the Memo was conducted using the best available scientific information and methodologies and the best professional judgment of Grette Associates staff wetland biologists. Final acceptance and approval of the report is at the discretion of City staff.

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

Regards,

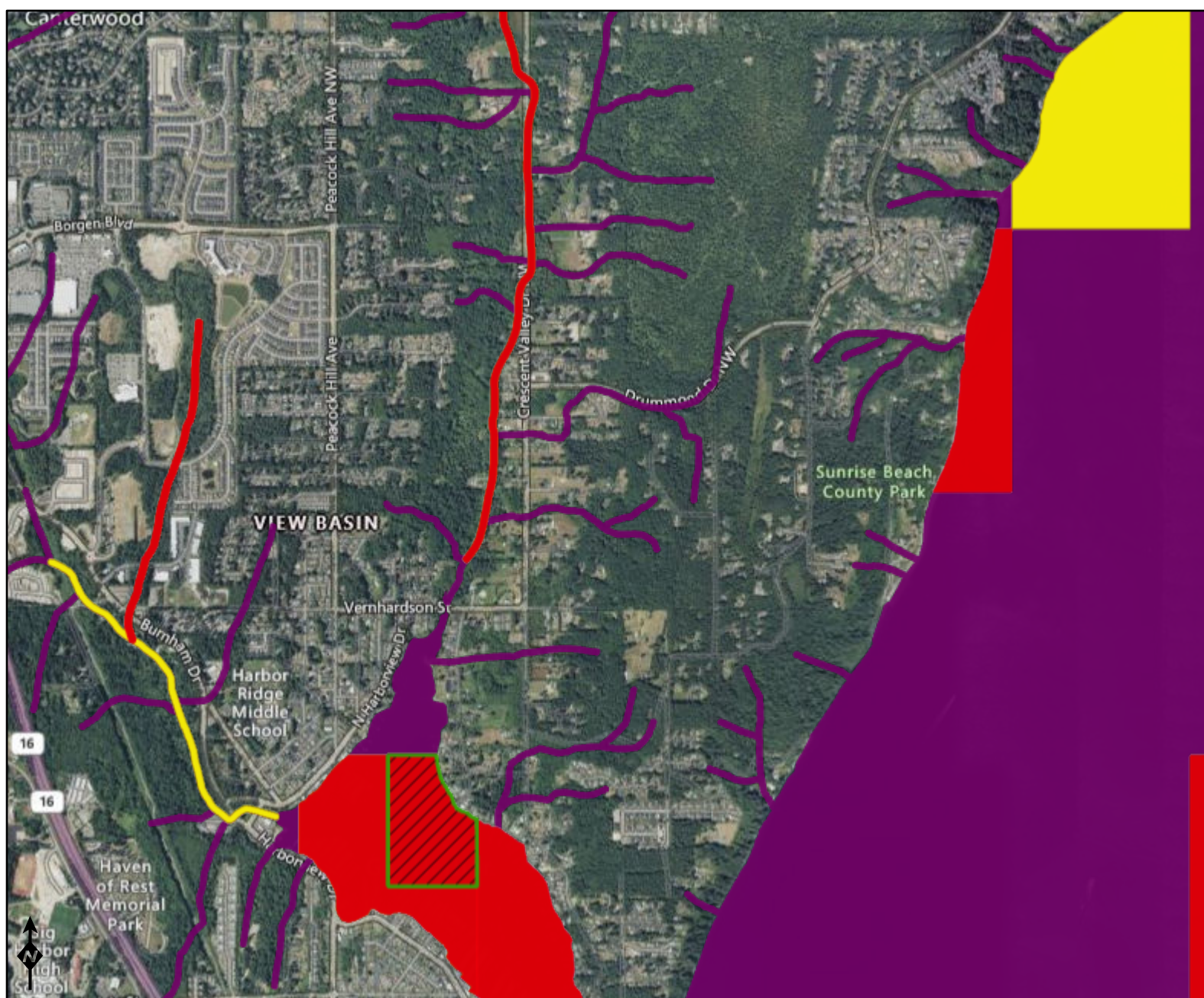








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References:







- Environmental Laboratory (Corps). 1987. Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1, US Army Engineer Waterways Experiment Station, Vicksburg, Mississippi.
- Hruby, T. 2014. Washington State Wetland Rating System for Western Washington: 2014 Update. Washington State Department of Ecology Publication # 14-06-029.
- Russell and Associates. 2016. Wetland Analysis Report – The Reserve Preliminary Plat. Prepared for Resource Properties, LLC. Revised October 31, 2016.
- U.S. Army Corps of Engineers (USACE). 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Version 2.0)*, ed. J. S. Wakeley, R. W. Lichvar, and C. V. Noble. ERDC/EL TR-10-3. Vicksburg, MS: U.S. Army Engineer Research and Development Center.

Category 5 - 303d

**Assessed Water/Sediment****Water**

-  Category 5 - 303d
-  Category 4C
-  Category 4B
-  Category 4A
-  Category 2
-  Category 1

Sediment

-  Category 5 - 303d
-  Category 4C
-  Category 4B
-  Category 4A
-  Category 2
-  Category 1

Water Quality Standards

-  All Standards