

Allison Satter

From: pamela_sparks@comcast.net
Sent: Tuesday, November 17, 2015 8:56 PM
To: Allison Satter
Subject: Bremerton Comp Plan 2035 - public comment submittal

The environmental analysis does not address GHG emissions per WA state executive order for reducing such emissions.

The depletion of energy or natural resources analysis does not include a discussion related to the "mineral resources overlay" proposed land use changes.

What City Bremerton justification for not including a Rec/Park's section into the Draft Comp plan to address bicycle routes/trails instead of discussing the purpose/need for bicycle multi-modal projects in the Transportation section - is it because of LAG funding?

AS for BERK Consulting interpretation of the phased environmental review is INCORRECT you cannot phase a programmatic (non-project) EVER. I am challenging this SEPA addendum!

1.4 Phased Environmental Review

SEPA allows phased review where the sequence of a proposal is from a programmatic document, such as an EIS or SEIS addressing a comprehensive plan, to other documents that are narrower in scope, such as those prepared for site-specific, project-level analysis (WAC 197-11-060(5)). Additional environmental review will occur as other project or non-project actions are proposed to the City of Bremerton in the future. Phased environmental review may consider proposals that implement the Plan, such as land use regulations, specific development proposals, or other similar actions. Future environmental review could occur in the form of Supplemental EISs, SEPA addenda, or determinations of non-significance.

Thank you for your consideration.

Sincerely Pamela Sparks
1800 Ohio Avenue
WA 98337



Department of Community Development
345 6th Street, Suite 600
Bremerton, WA 98337-1873
Telephone: 360-473-5845
Fax: 360-473-5278
Allison.Satter@ci.bremerton.wa.us

Allison Satter, Senior Planner

November 23, 2015

Pamela Sparks
1800 Ohio Avenue
Bremerton, WA 98337

re: Comprehensive Plan Comment #71 (Environmental Review) – Staff's Response

Thank you for your comments on the City of Bremerton Comprehensive Plan Update SEPA Addendum. We appreciate your time and review of the document. Each comment is quoted below along with a corresponding response.

Comment 1: The environmental analysis does not address GHG emissions per WA state executive order for reducing such emissions.

Response 1: Chapter 70.235 of the Revised Code of Washington (RCW), Limiting GHG Emissions, codifies the GHG reduction goals of Executive Order 07-02 and specifies them as "limits" rather than "goals." The law also adds a requirement to help achieve the GHG reduction targets: Decrease the annual per-capita vehicle miles traveled (VMT) 18 percent by 2020, 30 percent by 2035, and 50 percent by 2050. The state law applies only to actions taken by Washington State agencies and local governments that receive state funds for their project. State regulations on GHG emissions include prerequisites for distribution of capital funds for infrastructure and economic development projects, where projects receiving funding must be evaluated for consistency with state and federal GHG limits and state VMT goals (RCW 70.235.070).

The present action is a non-project Comprehensive Plan Update, and not a project obtaining state funding. Nevertheless, the City has studied the potential for GHG emissions in two of the EISs adopted by the City in Section 1.3 of the Addendum – the City of Bremerton, South Kitsap Industrial Area Final Planned Action Environmental Impact Statement (Final EIS), March 29, 2012 and City of Bremerton and Kitsap County, Gorst Creek Watershed Characterization & Framework Plan, Gorst Subarea Plan, and Gorst Planned Action, Final EIS, October 8, 2013. In addition, the Draft 2016 Comprehensive Plan has numerous policies to try to help address greenhouse gas emissions, and that draft document can be seen at www.Bremerton2035.com under "Project Documents."

Addendum Section 2.2 A also provides a summary analysis of compact growth and reduction of VMT, leading to GHG reduction. Addendum Section 2.2 C also notes the City's compact growth pattern as helpful for energy reduction. Mitigation points to the City's South Kitsap Industrial Area Subarea Plan and the climate change policies the City is considering in its Comprehensive Plan Update. The proposed Comprehensive Plan Update includes an analysis of different GHG reduction goals and potential actions to reach the goals in the Environment Appendix.

Comment 2: The depletion of energy or natural resources analysis does not include a discussion related to the "mineral resources overlay" proposed land use changes.

Response 2: Addendum Section 2.2 C focuses on energy. The potential for mineral resources extraction is addressed in Addendum Section 2.2 E. Please also see the Land Use element (in the Draft Comprehensive Plan document) for mineral resources policies.

Comment 3: What City Bremerton justification for not including a Rec/Park's section into the Draft Comp plan to address bicycle routes/trails instead of discussing the purpose/need for bicycle multi-modal projects in the Transportation section - is it because of LAG funding?

Response 3: The City has referenced the Parks, Recreation, and Open Space Plan (adopted in 2014) in the Land Use Element (including additional discussions), City Services Appendix and the general Technical Appendices "Adopted Plans".

The Transportation Appendix focuses on citywide and regional mobility and connections; typically, a facility through a park does not provide a significant connection for mobility, but provides a place for people to recreate. If the facility does provide a significant mobility corridor, such as a regional trail, then it is mentioned.

All park trails are not typically completely ADA compliant (such as unpaved facilities) and generally not eligible for typical roadway funding sources (STIP, etc.) such as a shared-use path, bicycle lane, sidewalk, etc.

Bremerton has a parks and recreation department that plans, funds, manages construction, maintains, etc. facilities in parks. The City's Parks, Recreation, and Open Space Plan remains in effect and has been referenced in the Land Use Element, City Services Appendix and Technical Appendices as mentioned above.

Comment 4: AS for BERK Consulting interpretation of the phased environmental review is INCORRECT you cannot phase a programmatic (non-project) EVER. I am challenging this SEPA addendum!

1.4 Phased Environmental Review SEPA allows phased review where the sequence of a proposal is from a programmatic document, such as an EIS or SEIS addressing a comprehensive plan, to other documents that are narrower in scope, such as those prepared for site-specific, project-level analysis (WAC 197-11-060(5)). Additional environmental review will occur as other project or non-project actions are proposed to the City of Bremerton in the future. Phased environmental review may consider proposals that implement the Plan, such as land use regulations, specific development proposals, or other similar actions. Future environmental review could occur in the form of Supplemental EISs, SEPA addenda, or determinations of non-significance.

Response 4: The discussion of phasing in Addendum Section 1.4 was not intended to imply the City is deferring analysis of its Comprehensive Plan Update, but rather indicates that future actions that flow from the Comprehensive Plan land use plan or policies (e.g. future implementing regulations or future development projects) would be subject to SEPA review as appropriate.

The City has conducted much review of its Comprehensive Plan and associated subarea plans over time, evidenced by the number of EIS documents the City is adopting (Addendum Section 1.3). The City is retaining the fundamental centers concept adopted in its 2004 Comprehensive Plan, and the policy concepts associated with the plan. The Addendum provides non-project analysis that updates past analysis and puts in context the City's Comprehensive Plan Update in 2016.

Please note the following section of the SEPA rules that support the quoted paragraph from the addendum above:

(WAC 197-11-060(5)) (5) Phased review.

(a) Lead agencies shall determine the appropriate scope and level of detail of environmental review to coincide with meaningful points in their planning and decision-making processes. (See WAC 197-11-055 on timing of environmental review.)

(b) Environmental review may be phased. If used, phased review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready. Broader environmental documents may be followed by narrower documents, for example, that incorporate prior general discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

(c) Phased review is appropriate when:

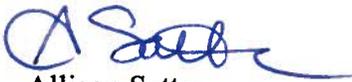
(i) The sequence is from a nonproject document to a document of narrower scope such as a site specific analysis (see, for example, WAC 197-11-443); or

(ii) The sequence is from an environmental document on a specific proposal at an early stage (such as need and site selection) to a subsequent environmental document at a later stage (such as sensitive design impacts).

The City is working towards an adoption date of the Comprehensive Plan by the end of May 2016. As such, there is additional time to comment on the Draft Comprehensive Plan with any follow-up questions or comments. The Comprehensive Plan and all the public documents can be seen at www.Bremerton2035.com (under "Project Documents"). Please feel free to comment through me or the next public meeting will be with City Council (Staff is anticipate deliberating with City Council in the first quarter of next year, starting end of January/beginning of February 2016). I have added you to the interested parties list, thus you will be notified of any upcoming meetings on this project.

Again, we appreciate your time in reviewing this document and hope this helped provide some clarification to your questions.

Best,



Allison Satter
Senior Planner

cc: file

COMMENT #72

Allison Satter

From: noreply@civicplus.com
Sent: Friday, November 20, 2015 11:39 AM
To: Allison Satter; WebMaster
Subject: [SPAM] Online Form Submittal: Bremerton2035 Comments & Feedback
Importance: Low

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	Doug Skrobut
Contact	doug@mccormickwoods.com
Zip Code	98367
Comments	To assist in achieving goals LU-1 through LU-4, I encourage the City to potentially explore a Transfer of Development Rights program as well as other similar programs.

Email not displaying correctly? [View it in your browser.](#)

COMMENT #73



345 6th Street, Suite 300
Bremerton, WA 98337
360-337-5235

November 12, 2015

Andrea Spencer
Director of Community Development
City of Bremerton
345 6th Street, Suite 600
Bremerton, WA 98337

Dear Ms. Spencer,

Thank you for inviting the Kitsap Public Health District (KPHD) to take part in the review process for the City of Bremerton's Comprehensive Plan Update.

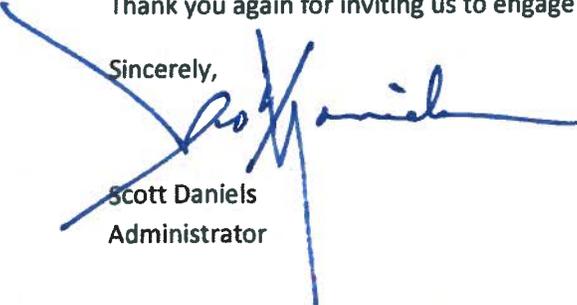
Increasing evidence points to the profound influence that land use planning has on the health of our residents, particularly the impact that land use planning has on physical activity and healthy food access. With nearly 70% of Bremerton residents at an unhealthy weight, KPHD's engagement in this review process is critical to fulfilling our 2011-2021 Strategic Plan goal of "decreasing chronic diseases and their impact in our community".

In our review of Bremerton's Comprehensive Plan, we drew from regulatory and non-regulatory resources to integrate language and policies that promote health. Additionally, with funding from the Centers for Disease Control and Prevention, KPHD had the opportunity to consult with Alta Planning and Design, whose mission is to "create active communities where bicycling and walking are safe, healthy, and fun". Alta's expert staff thoroughly reviewed Bremerton's Comprehensive Plan and offered KPHD specific guidance on relevant policy recommendations to promote public health. We have largely incorporated Alta's recommendations in our comments regarding the Comprehensive Plan.

We invite dialogue with the City on how we can further support the plan review and implementation process. We offer our expertise regarding the evidence base for built environment and food system policies and our knowledge of health statistics in Bremerton and the greater community.

Thank you again for inviting us to engage in this important process.

Sincerely,


Scott Daniels
Administrator

kitsappublichealth.org



COMMENT #74

**Comments to Allison Satter, Senior Planner
City of Bremerton DCD**

**Regarding City of Bremerton
Comprehensive Plan**



Propose the rectangular area described below be rezoned to allow a higher density. City of Bremerton, DCD

Boundaries of approximate rectangular area: Sylvan Way on the north, Sheridan Rd on the south. Pine Road on the west side and Phillips Ave on the east.

I believe this rezoning action will allow the City of Bremerton to expand more effectively in the next 20 years.

Of particular interest to me is the TIK Village Complex located at the intersection of Sylvan Way and Pine Rd. The complex is currently condominium, is very attractive and well maintained. The owners would like to convert it to a non-condominium complex which would result in seven individually stand alone properties. The complex has a very desirable feature in that the area is sufficiently large enough to accommodate current buildings (six duplexes and one six unit building) with ample room between them.

By rezoning the rectangular area described above, to higher density, it would allow the conversion of TIK Village from condominium to non-condominium.

Thank you.

Ernie Perez
(360) 271-2519
eperez2666@aol.com

COMMENT #75



PHONE (360) 598-3311
Fax (360) 598-6295
<http://www.suquamish.nsn.us>

December 7, 2015

THE SUQUAMISH TRIBE

PO Box 498 Suquamish, WA 98392-0498

Allison Satter
City of Bremerton
345 6th Street, ste. 600
Bremerton, WA 98337

RECEIVED
DEC 07 2015

Subject: City of Bremerton Comprehensive Plan Updates 2015

The City of Bremerton lies within the Suquamish Tribes "Usual and Accustomed Fishing Area" (U & A). The Tribe seeks protection of all treaty-reserved natural resources through avoidance of impacts to habitat and natural systems. The Tribe urges the City of Bremerton (City) to avoid land use decisions that will impact natural resources within the Tribes U & A. The Tribe has reviewed the draft and found that the document was detailed and gave a good indication of the vision that the City has for future growth. The Tribe has the following comments.

Draft Comprehensive Plan

Page LU-9 Implementing Policy LU3(K). Text states that LID BMP's will be allowed in critical area buffers and will potentially count towards critical area buffer enhancement. The Tribe requests that this be removed or explained in more detail. It is very concerning if left as is.

Page LU-9 Implementing Policy LU4(A). All cultural resources need to be preserved not just "significant" ones.

Page LU-16 Implementing Policy LU2-Cen(A). Streamlining environmental permitting is acceptable if there is a mechanism for meaningful consultation with the Tribe for protection of treaty cultural and natural resources.

Page LU-19 Implementing Policy LU1-DC(D). Does this refer to critical area buffers? See comment for LU3(K) above.

Page E-7 Implementing Policy E2(C). Include mitigation sequencing language. The emphasis should be on avoidance and if mitigation is determined to be necessary there should be a detailed description of what efforts were taken to avoid impacts to the extent possible.

Page E-7 Implementing Policy E2-(E). Include protections for important headwater wetlands and priority habitat areas.

As per the most recent buildable lands analysis the City has enough area currently to address the population and there is no need to expand the UGA at this time. To do so without appropriate need would violate the GMA. The planned future expansion into the Kitsap Lake, NW Corporate Campus and Port Blakely properties will undoubtedly have impacts on fish and wildlife resources. It will be important to review any proposals in these areas thoroughly and ensure adequate protection measures are provided.

Kitsap Lake Neighborhood Reserve Center

The Tribe has concerns with more intensive development and build-out in the Kitsap Lake area. The Chico Creek drainage is one of the largest and most productive in East WRIA 15. Almost 68 miles of streams and tributaries compose the Chico Creek watershed, of which approximately 17 miles are accessible to anadromous salmonids (Kitsap Refugia Study). The four major tributary streams to Chico Creek include Kitsap, Dickerson, Lost, and Wildcat creeks. There are also two major lakes in the watershed, Kitsap and Wildcat lakes. Chico Creek enters Chico Bay on the western shore of Dyes Inlet at the community of Chico. The drainage supports chinook, chum, coho, steelhead, and cutthroat. The Mountaineers have acquired over 400 acres of pristine habitat at the junction of Lost/Wildcat/Chico creeks that should provide essential long-term habitat protection; this acquisition includes one of the only remaining stands of old growth on the Kitsap Peninsula. Kitsap Creek, between Kitsap Lake and the mainstem of Chico Creek, is critical habitat for chum, steelhead (ESA listed), and coho.

Northwest Corporate Campus

The Northwest Corporate Campus is within the watershed of Anderson Creek, which is a salmon-bearing stream. Anderson Creek has documented populations of spawning anadromous fish including coho, chum and steelhead (ESA listed) in the lower reaches and likely resident fish in the upper reaches. In addition, there is a documented active bald eagle nest outside the north boundary of the project site.

Proposed uses involve construction of an industrial park including associated roadways and stormwater management. The associated impacts of this type of development are well documented in scientific research. See, e.g. *Urbanization of Aquatic Systems - degradation Thresholds and the Limits of Mitigation*, Derek B. Booth and C. Rhett Jackson (1994); *Urbanization and the Natural Drainage System - Impacts, Solutions, and Prognosis*, Derek B. Booth (1991); *Consequences of Urbanization on Aquatic Systems - Measured Effects, Degradation Thresholds, and Corrective Strategies*, Derek B. Booth and Lorin E. Reinelt (1993); *Site Planning for Stream Protection*, Tom Schueler (1995); *Policy of Washington Department of Fish and Wildlife and Western Washington Treaty Tribes Concerning Wild Salmonids*; *Washington Department of Fish and Wildlife Management Recommendations for Washingtons Priority Habitats – Riparian*.

For instance, Booth and Reinelt state: “[U]rbanization imposes a variety of watershed changes that profoundly affect runoff processes and the downstream surface-water drainage system. These changes include not only the most obvious manifestation of urban development, namely impervious surfaces which cover the land, but also the associated vegetation clearing, soil compaction, water

Allison Satter
December 7, 2015
3 | Page

conveyance modifications, riparian corridor alterations, human intrusion, and import of chemical contaminants that invariably accompany such development". Booth and Reinelt further provide, "The data ... indicate that [salmonid] population changes may be measurable at rather low levels of urban development and become quite significant much beyond 10-15 percent [overall impervious surface within a watershed]". Intense development in this area is not appropriate despite current zoning.

Port Blakely Employment Center

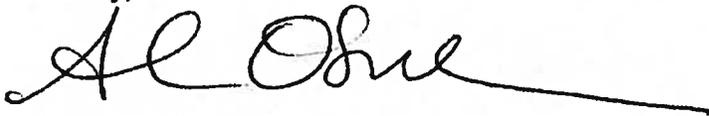
The Port Blakely Employment Center lies partially within the Chico Watershed (see comments above on the Kitsap Lake Neighborhood Reserve Center regarding the Chico watershed and Kitsap Creek). In addition Dickerson Creek is an important chum, coho, and steelhead (ESA listed) spawning and rearing stream. As stated previously higher intensity land uses often result in impacts to wetlands and streams from increased disturbance, buffer impacts, pollution, runoff, and other activities that could occur under the proposed zoning.

Shoreline Master Program and Critical Areas Ordinance

It is the Tribes understanding that the City is considering a SEPA exempt process for any updates that are made. Without knowing what changes are being proposed we are unable to determine whether this is appropriate or not. The Tribe requests staff-level government to government consultation on updates/changes and an adequate opportunity to review and comment on documents prior to submittal to the Department of Ecology to ensure protection of Tribal treaty resources.

Thank you for the opportunity to provide these comments. If you have any questions or would like to discuss these comments, please contact me directly at (360) 394-8447.

Sincerely,



Alison O'Sullivan
Biologist, Environmental Program



**Washington State
Department of Transportation**

Lynn Peterson
Secretary of Transportation

COMMENT #76

Olympic Region
5720 Capitol Boulevard, Tumwater
P.O. Box 47440
Olympia WA 98504-7440
360-357-2600 / FAX: 360-357-2601
TTY: 1-800-833-6388
www.wsdot.wa.gov

December 17, 2015



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

City of Bremerton, DCD

RE: Proposed Amendments to the City of Bremerton Comprehensive Plan

Dear Ms. Satter:

Thank you for allowing the Olympic Region of the Washington State Department of Transportation (WSDOT) the opportunity to review and comment on the proposed amendments to the Comprehensive Plan. We recognize the investment of time and energy that this document represents, and we appreciate the opportunity to comment. The following comments are provided for your consideration as the City completes its update.

We are overall pleased to see the policy direction in this plan – focused on building a multimodal system and land uses that fosters a livable community — providing people access to affordable and environmentally sustainable transportation rather than just completing the connections.

We have comments about the following that you should address before you adopt your plan and development regulation amendments:

Page T-10 of Transportation, Element 5, Policy TR1 (D) and Page 25 of T Appendix; As noted on page 21 of the T Appendix, SR 310 is designated a Highway of Statewide Significance (HSS) and as such the Level of Service Standard (LOS) is set by the WSDOT. WSDOT has established a LOS standard of “D” for SR 310. On page T-10 and page 25 of the appendix the plan states:

“Maintain LOS E or better (V/C less than or equal to 1.0) in the SR 303 (Warren/Wheaton) corridor, Kitsap Way (SR 310), Sylvan Way, and on the Manette Bridge”

Being a HSS route, Kitsap Way (SR 310) should maintain LOS D or better, not LOS E as noted in the plan. Therefore, policy TR1 (D) should be revised accordingly.

December 17, 2015

Ms. Satter

Page - 2

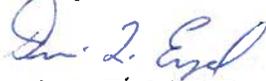
GMA requires local governments to identify state transportation system needs to meet demand, consistent with the statewide multimodal transportation plan.¹ Since Marine Drive and Kitsap Way (SR 310) intersection is already LOS E approaching LOS F, as noted in Figure 11 on, page 24 of the T Appendix, the intersection needs to be addressed.

Page 7, T Appendix; last sentence; the sentence mentions SR 30, since there is no SR 30 in Bremerton, should it read SR 303?

Table 10: PSIC-Bremerton Projects (20+), Section 5: Implementing the Transportation Plan; on the line titled 'State Highway Projects' under the column identified as 'Developers' should be marked. The SKIA subarea plan and EIS identified potential mitigation that developers could be directed to implement such as intersection improvements, therefore one source to contribute to project funding on the state system is through developers.

Again we thank you for the opportunity to review and comment on the proposed comprehensive plan update. If you have any questions related to this letter please contact George Kovich of my office at (360) 704-3207.

Sincerely,



Dennis L. Engel, P.E.

Transportation Planning Manager

DE:yl

GK

cc: Joyce Phillips, Commerce
Yorik Stevens-Wajda, PSRC

¹ "Identification of state and local system needs to meet current and future demand. Identified needs on state-owned transportation facilities must be consistent with the statewide multimodal transportation plan required under chapter 47.06 RCW." RCW 36.70A.070(6)(a)(iii)(F)

COMMENT #77

19 January 2016



Bremerton City Council

345 6th Street

Bremerton, WA 98337-1873

City of Bremerton, DCD

Dear President Eric Younger and Council Members,

I respectfully request you consider this proposal I recently discussed with you in your office regarding a multi-level parking facility to be located at 541 Bruenn Ave., 98312. This is an idea I have also presented to Chief Chaplain at the Traffic Court and Parking Control at PSNS. She has sent it up her chain of command, where I understand it has continued to be advanced.

I do believe the property could accommodate a joint venture with both the City of Bremerton and the needs of our local Naval Base and shipyard at PSNS-IMF. It includes 3.46 acres (3 separate parcels) of freeway commercial zoning with additional two parcels totaling .41 acres residential. Also arterials via Old Belfair Highway to Pendergast (with two branches through West Hills Auto Plex to Warner Road/Loxie Eagans Blvd) and Chico Way-Kitsap Way to Auto Center Way.

I appreciate your (Downtown) Comprehensive Plan, including your goals to attract residents for current and developing condominiums and apartments. And I believe the multi-level parking proposal will assist in those endeavors by diverting thousands of vehicles that overload our main ground entries to the city of Bremerton and PSNS-IMF via highway/state roads, Burwell, Kitsap Way-6th Street, and 11th Street. This congestion at peak periods...and with increasing population due to future developments and attractions that will bring in more tourists and guests...must be addressed pre-emptively.

Having been associated with the Navy since 1969 (through ranks of E-3 to E-7 and retirement) I empathize with personnel and workers who now live in areas from Gig Harbor to the Hood Canal. Most of these are not and will not move downtown, though some are living in apartments and other short-term housing. Many of these do not choose to buy or cannot afford to own...others only expect to be stationed here around two years.

That brings me to envision a multipurpose approach to developing 541 Bruenn Ave. That may require adapting current code(s) to accommodate going higher as well as spreading out over the acreage. Also, depending on the hardpan/etc. below the lot(s), underground level(s) might be considered. Presently on the Naval Base, as you are aware, there is a 7-level parking garage.

I suggest including multi-purpose Veterans Offices and Services on the level above the parking facility. The campus veteran's center at Olympic College greatly needs a larger area. Bremerton might even then attract funding to develop a Technology Training School for military personnel transitioning to civilian occupations. There are only four or five in our nation at the moment. By coordinating with Olympic College, more grants are at least possible. This could feasibly also make available Federal Grants.

Not surprisingly, I would like to see an area on this level to accommodate my Bubblewrap Outreach goals to service more of our Kitsap's homeless, and disaster relief around Washington State, our nation, and the entire world. Some in charge of various veteran's services (as at Olympic College) have intimated the concept of pooling from their clients/students who seek to add volunteer services to their educational endeavors and career resumes. The need is certainly compelling. Again, grants may fund such opportunities.

Including the latest environmentally friendly construction and alternate energy options...i.e. several recharging access locations, solar/wind energy designs that would lower electrical demands and feed back to PSE...may help us qualify for other funding and grants.

Finally, I still believe topping the facility with privatized military housing apartments is a well-considered concept. This would draw into Bremerton those who are, for the reasons I previously noted, not moving nor will move downtown...but would like to live closer to PSNS-IMF and Naval Base. The advantages to Downtown are (especially with support from Kitsap Transit via special shuttles for those utilizing the facility to get to the PSNS-Naval Base):

1. Shuttles obviously decrease congestion at the Base Gates and into Downtown.
2. Those residing in the apartments would probably use the Shuttle service as well.
3. Returning from work, those who are also resident with their parking included, would wait until the major existing traffic dispersed (while they, the residents, changed clothing and relaxed).
4. The residents may then go Downtown for entertainment, "eating out", and browsing shops...often not wanting to use the ferries due to the lateness of returning...especially weeknights and/or considering work-school the next morning.

1) Now considering our Ferry System:

- a) As Bremerton develops attractions, more tourists and friends/families of our residents will often utilize the ferries. THEY will frequently require parking downtown as they visit residents of our downtown condominiums and apartments. This would be alleviated by continuing to use scheduled transit services, which is already routed with a transfer center at 541 Bruenn.
- b) Placing posters of my poem "Bremerton Beckons" on all ferries servicing Kitsap Peninsula for those riding the ferries. Passengers will have up to an hour to read and reflect on the (large) poster representative of our local art and scenic views around Puget Sound.

2) I personally will endeavor to:

Also utilizing the poem "Bremerton Beckons" and even just the title (on items such as posters, banners, pens, caps, T-shirts, and cards) would promote Bremerton through shops, offices, and at military exchanges. Residents, friends, family, visiting business associates, and tourists would purchase these and use personally or give as gifts for unlimited exposure for Bremerton. This presently is a goal that has not been further developed due to funding. But there are definite possibilities to explore.

The impetus would first be insuring that the property at 541 Bruenn, 98312, does not become unavailable for a joint effort with the local military command to develop such a venture...and to conform zoning code(s) to accommodate. Increased revenue from the influx of people staying in or relocating to live within Bremerton will help finance future projections for tourist attractions and improvements. Let's build the dream together.

Sincerely,



Sheri Rose (360-286-4047)

Received by _____

Date _____

RECEIVED
JAN 19 2016

City of Bremerton, DCD

Handwritten initials and date:
KM
1/19/16

COMMENT #78

Allison Satter

From: Jim McDonald <mazama90@msn.com>
Sent: Tuesday, January 26, 2016 3:53 PM
To: Allison Satter
Subject: Comp plan question/comment

Allison,

What part of the current comp plan requires that certain apartment complexes have commercial/retail space on the ground floor and do you anticipate that requirement will continue with the new comp plan?

I was at the Evergreen Park walk on Saturday with Josh Farley and one of the developers of the Evergreen Pointe Apartments was there and was describing the project with commercial space on the ground floor. As of yet...there were no commercial tenants...and the ones they were after....sounded problematic.

I believe the proposed project at sixth and Washington has the same requirement. However, I don't see it on Spy Glass Apartments.

My concern with the requirement is that it doesn't always fit with the market conditions. Why it is nice to have those kind of shops at the ground level, if the market doesn't support it, we are creating negative image for the properties and the city with a bunch of empty office fronts (I know the plan is a twenty-year plan).

To me, the better approach would be to allow that as a flexible option for the developer to decide. If market conditions don't warrant the additional commercial space at this time, why not let them add a couple of additional residential units? They can more easily convert the space if there is demand for it. Look how long the lower space at the Hampton Inn has been vacant. Does that really help the City to have it that way? And the requirement to have that commercial space might cause a project to reach the "no go" decision. At the least....the vacant space must be made up by the rental charges of the remaining units.

Is there a chance to still comment on this regarding the current planning process? Flexibility seems to be in order!

Thanks! r, Jim McDonald

COMMENT #79

Allison Satter

From: Mark Kuhlman <mark@team4eng.com>
Sent: Tuesday, February 09, 2016 11:01 AM
To: Allison Satter
Cc: Kristen Moerler (Kristen.Moerler@ci.bremerton.wa.us); Rob O'Neill (robertdoneill@comcast.net)
Subject: Comp Plan/ Zoning amendments

Hello Allison;

Thank you for our telephone discussion earlier today.

I am following that conversation up with this email so that we are on record with our concerns.

It has been brought to my attention that the proposed code amendments include removal of BMC 20.02.160 , Development Agreement Review Procedures.

As we discussed, I think that the code provisions should remain even though the City may choose to avoid the use of Developer Agreements by policy.

I also understand that the RCW allows Developer Agreements and that the City Council can decide to implement such agreements as allowed under the RCW even though the City Code may not address the issue directly.

Non the less, it is an important toll for the City that may be beneficial for dealing with large projects, unusual circumstances or unique situations where application of current code is counterproductive or unworkable.

The use of Developer Agreements should be addressed in the BMC as I believe that the Public and City Council should be made aware that this opportunities exists to address truly special circumstances.

Thank you for advising me of the upcoming Public Hearings (Planning Commission April 19th) where I will testify on this topic.

Thanks again.

Mark

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

February 2, 2016

Kitsap County Planning Commission

RE: Kitsap 2036 GMA Hearing

Dear Commissioners:

The Chico Creek Task Force strongly opposes Craig Ueland's proposed re-zone Permit No. 15 00522 to convert a large swath of land from Urban Reserve to Rural Industrial south of Kitsap Lake. This property is the Kitsap Lake/Gorst Wildlife Corrido.

EXHIBIT 1.

Ueland Tree Farm Wildlife Corridor Elevation Map, 2009.

Testimony of Kitsap County Expert, Keith Folkerts, concerning the Kitsap Lake/Gorst Wildlife Corridor.

Mark Mauren, Chief Operations Officer for UTF/Bremerton West Ridge, testimony confirming Keith Folkerts' testimony concerning the Kitsap Lake/Gorst Wildlife Corridor.

Kitsap County Determination of Significance and Adoption of existing Environmental Documents for Comprehensive Plan Update 2016.

Document dated November 6, 2015

Title of documents being adopted:

A. Kitsap County 10-year Comprehensive Plan Update - Inter-grated Plan and Environmental Impact Statement, Volume II: Final EIS, December 2006.

The Volume II, Final EIS, December 2006, included the Final EIS from the Port Blakely Joint Planning Area which was used for the Final EIS for UTF and Draft for Bremerton West Ridge.

The 2000 FEIS, Port Blakely Joint Planning Area, identified 25 acres to be used ONLY for infiltration if the 470 acre JPA was developed.

This infiltration is critical for water quality and supply to Dickerson Creek and Kitsap Lake. Unfortunately, Bremerton remained quiet and Kitsap County approved Gravel Mine A and facilities that engulfs the above critical 25 acres. A portion of the 25 acres is in the County, and a portion is in the City of Bremerton.

PLANNING COMMISSION EXHIBIT
DATE: FEBRUARY 16, 2016
SUBMITTED BY: JACK STANFILL,
CHICO CREEK TASK FORCE

Jack Stanfill

EXHIBIT 2.

"Infiltration Potential Map, Port Blakely, West Kitsap JPA, Associated Earth Science. **Page 44 and 45, Port Blakely Planning Area Sub-Area Plan, County Commission Draft Version 2.4. "To evaluate additional mitigation for storm water from development within the Sub-Area through infiltration into an area of up to 25 acres located adjacent to the north boundary of the UGA...This area SHALL ONLY BE USED for the purposes of infiltration,, roads, trails, and utilities, and SHALL NOT count towards meeting any of the open space requirements."**

Page 47, Port Blakely Sub-Area document, "Drilling and installing and installing observation wells ..Evaluate the proposed project to ENSURE that the extent of the ground water recharge zone under the JPA delivering to Dickerson Creek is identified."

Transcript of Proceedings, Case No. 10-2-00761, FEIS Appeal, December 14, 2009, page 108 Mr. Craig Jones, Esquire, Attorney for Craig Ueland's UTF Conditional Use Permit, testified, "Mr. Struck testified that in fact the considerations raised in the Port Blakely Joint Planning Report were addressed, and he believes , based on his expert opinion, that they complied with each of those recommendations...There's just no merit to the contention that this project did not comply with the Port Blakely Joint Planning Area Report."

Transcript of Proceedings, Case No. 10-2-0076-1 FEIS Appeal, December 10, 2009, Page 159, Phil Struck, Parametric Scientist, cross-examined by Tim Botkin.

Mr. Botkin ask Mr. Struck, ".why the answer, it's possible water can go both ways, because there's some of those factors that you haven't quite yet been able to discern?"

Phil Struck, "I think that a more accurate characterization would be, we can't say with absolute certainty, in fact, where the divide is without, you know, punching holes on a very high frequency, which is just typically not done. We wouldn't pin that down."

The Port Blakely Joint Planning Area EIS made it perfectly clear that drilling was required to establish where the underground water divide was located for Dickerson Creek. This intense drilling procedure to establish the true underground water divide **NEVER** happened. Mr. Struck testified to this on December 10, 2009.

The Chico Creek Task Force request the Kitsap County Board of Planning Commissioners require the crucial underground water divide for Dickerson Creek to ensure a healthy stream flow and water quality for salmon and human habitat for the future.

Jack Stanfill

B. City of Bremerton and Kitsap County, Gorst Creek Watershed & Characterization & Framework Plan, Gorst Subarea Plan, and Gorst Planned Action, October 8, 2013.

EXHIBIT 3. Originally, the Gorst Creek Watershed Analysis and Characterization Study failed to include the upper 500 acres of the Heins Creek Basin, of which 450 acres is the entire southern portion of the Ueland Tree Farm and Mineral Resource mining operations. **This portion of the UTF contains all of "Quarry B", and about half of "Quarry C".**

EXHIBIT 4.

On August 19, 2013, the Washington Department of Ecology issued their **"Final Revised water flow and water quality assessment for Gorts watershed"**.

Page 1. "The purpose of this revised assessment was to add a new assessment unit (#21, Heinz Creek), to the northern portion of the Gorst Watershed.

Page 2. "This results in a management category of **"Conservation"** which suggest permitting land use activities that protect and maintain those water flow processes important to this AU. Recharge is the most important water flow process for the Heins Creek Watershed due to the presence of high permeability deposits..Activities which reduce infiltration and recharge, such as buildings and impervious surfaces should be minimized and located outside of these high permeable deposits."

Page 6. "1. Protection Zone (Green). This area is key to recharge and discharge processes for Gorst Creek. Permitted uses must preserve forest cover and not result in conversion."

Assessment Unit #21 in not suited for rock quarries and machinery that operate rock quarries. Housing developments are also excluded from the "Conservation" zone.

EXHIBIT 5

Patrick McGraner, Department of Ecology's email to Jack Stanfill explaining that ALL 19 of Ueland's wetland delineations are not valid.

EXHIBIT 6.

Dr. Sarah Cooke's Third Party review of UTF wetlands and Heins Basin UA 21. Please see page 3, paragraph 6 for verification that UTF Wetland Delineations are void.

Page 4, paragraph 8 - "Addition of Heinz Creek drainage to the Gorst Watershed changews the basin configuration and would alter stormwater design."

EXHIBIT 7.

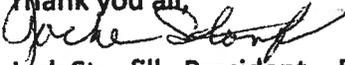
One of four pages of Dr. Cooke's credentials. I will furnish all 4 pages upon request.

EXHIBIT 8. Craig Ueland is not a good neighbor to humans and wildlife. Please see Exhibit 7, Dr. Cooke's Third Party Review of Wetlands 4 and 6 on the Ueland Tree Farm. Ueland willfully

ignored stormwater problems on Leber Lane in January, February, and part of March 2014. There was stormwater problem at the railroad crossing on Leber Lane. Captain Zwolfer, Puget Sound Naval Base Commanding Officer, sent a letter to Craig Ueland in March, 2014, Serial PRB211Y / 00414. On the last page of the letter the Captain wrote, "As a result of the WDOE Complaint regarding water run-off and sedimentation from this road, we are requesting that any repair work be completed in 30 days. If repairs are not completed promptly, the Navy may be forced to close the crossing until such completion."

EXHIBIT 9. February 19, 2014, Chris May, Stormwater Programs Director's email to Anne Dettelbach, cc to Mindy Fohn. Mr. May outlines the problems that prompted the Navy's letter to Craig Ueland and to Kitsap County. "If Leber Lane is rebuilt by Ueland uphill from the RR tracks and the ditches are managed, the silt problem should go away."

Thank you all,



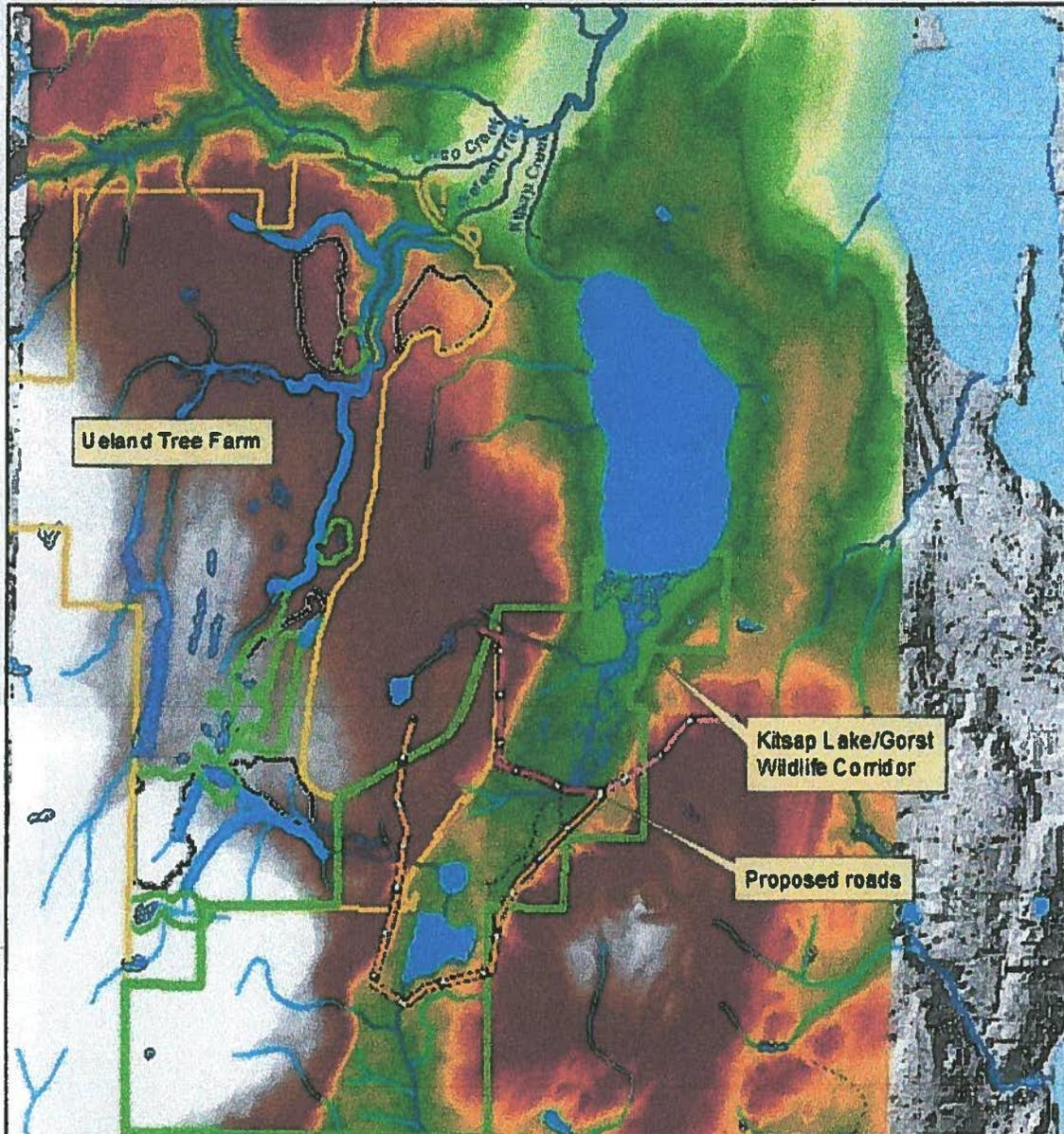
Jack Stanfill, President - Registered Agent

Chico Creek Task Force,

PO Box 4773

Bremerton WA 98312

Ueland Tree Farm Wildlife Corridor Elevation Map



Ueland Tree Farm

Kitsap Lake/Gorst Wildlife Corridor

Proposed roads

Legend

Watercourse (defined in WAC 222-16-030)

Fish Habitat Water Type Code

- (S) Designated Shoreline of the State
- (F) Fish Habitat
- (N) Non-fish Habitat
- (U) Unknown, unmodeled hydrographic feature.

Waterbodies (defined in WAC 222-16-030)

WaterBody Cartographic Feature Code

- Bay, estuary, Puget Sound
- Lake, Pond, Reservoir, Gravel pit or quarry filled with water
- Marsh, wetland, swamp, bog

Elevation

Value

- High : 958.209
- Low : -59.2175



KEITH FOLKERTS TESTIMONY

DEC, 2009

WTF APPEAL

Page 54

1 and then expanded into this large public area, a protected
2 watershed area owned by the City of Bremerton. The northern
3 area goes right up through here, connecting this large
4 wetland and lake complex, again, with the large DNR state
5 forest to the south.

6 **BoTKIN** Q So when you're saying the disruption of the
7 corridor, it's the outflow from Kitsap Lake, or actually,
8 the inflow to Kitsap Lake and the associated wetlands here,
9 essentially, is that what we're talking about?

10 **FOLKERT** A Yes. There's a ridge here to this side and
11 another ridge to this side, and through that is a low
12 elevation corridor that through this network of wetlands and
13 corridor connects and provides good amphibian access between
14 the lake and these smaller areas to the south. It's also a
15 travel corridor for larger mammals.

16 Q Okay. Thank you. Now, again, with regard to the
17 access condition and your concerns and recommendation with
18 regard to the south access, are you familiar with what was
19 formerly known as the Port Blakely property, the 450 acres?

20 A I'm generally familiar with the Port Blakely
21 proposal, yes.

22 Q And you know that it sits right here?

23 A Yes.

24 Q And you know that it actually has approval for
25 very significant development?

1 would like to have those as well.

2 MR. MAUREN: So I guess what I want to point out
3 here is that a hundred years ago they looked for the easiest
4 route up, and it was Lebers Lane. Port Blakely looked for
5 the easiest access route, and they came back to Lebers Lane
6 again. It had to deal with topography. It had to deal with
7 environmental aspects.

8 We looked at it again in 2006, and we came to the
9 same conclusion they did. And then ESM, who was hired by
10 the County, looked at it and came to the same conclusion in
11 their report. So we've had four different times that the
12 access route has been looked at, and all four times they
13 have come to the same conclusion, I guess is the point I
14 want to drive home here.

15 We've heard Keith Folkerts talk about the southern
16 route from an environmental perspective. If you look at
17 Exhibit U76, you'll see an e-mail from him stating his
18 concerns about the southern access and impact that would
19 have on wetlands, streams, and habitat. And if you remember
20 his testimony, he was looking for a map, and I think this
21 was the map he was looking for. What this map shows in red
22 is steep topography or elevation, and then the green is
23 really the habitat, migration corridor that he was talking
24 about in his. So from an environmental perspective, there's
25 issues with wetlands, streams, and wildlife corridor, as

**INFILTRATION POTENTIAL MAP
PORT BLAKELY, WEST KITSAP JPA
KITSAP COUNTY, WASHINGTON**

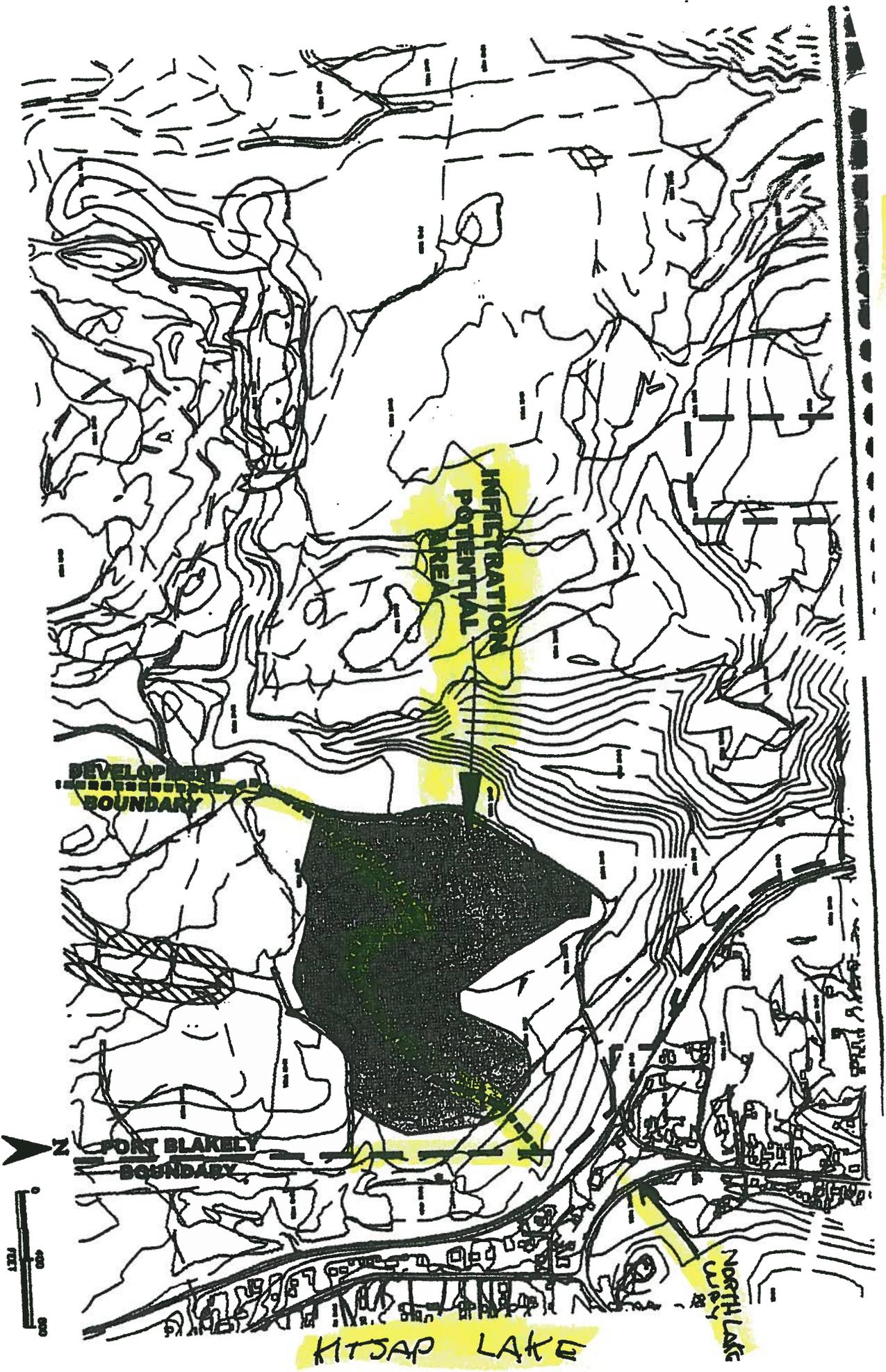


Figure 12
Infiltration Potential Map
Port Blakely Planning Area

<p>E. Erosion</p>		<ul style="list-style-type: none"> ◆ Evaluate the conceptual project Temporary Erosion & Sedimentation Control Plan to ensure that erosion and sediment control measures will be adequate to avoid significant adverse impacts⁷ from sediment transport offsite. ◆ Evaluate the need for seasonal limits on clearing and grading to protect downstream receiving waters
<p>F. Impervious Surfaces/ Drainage</p>	<ul style="list-style-type: none"> • Draft Strategy • See separate summary for elements of the Master Drainage Plan. 	<ul style="list-style-type: none"> ◆ Evaluate the proposed project to ensure that a Master Drainage Plan is developed. This Plan should address site conditions, assess upstream and downstream conditions and impacts, evaluate baseline and projected data and develop site-specific mitigation measures to prevent significant environmental impacts. The mitigation measures shall include, but not be limited to: <ol style="list-style-type: none"> 1. Water quality controls 2. Water quantity controls 3. Construction Temporary Erosion & Sedimentation Control measures 4. Critical Area requirements 5. Appropriate off-site mitigation ◆ Evaluate the proposed project to ensure that a Stormwater Management Plan is developed which adequately incorporates and/or exceeds identified BMP criteria, as well as any additional criteria identified in the relevant studies. ◆ Evaluate the proposed project to ensure that the development of impervious surfaces draining directly to surface waters without detention is minimized to the extent possible while accommodating the proposed projects. ◆ Evaluate the proposed project to ensure that all stormwater from vehicle access surfaces is collected and treated in open water quality treatment facilities. To the greatest extent feasible, stormwater will be infiltrated on-site. ◆ Evaluate the proposed project to ensure that all treated water in excess of that which can be infiltrated and released on-site should be tightlined downslope and released into Kitsap Lake with appropriate detention and treatment. ◆ To evaluate additional mitigation for storm water from development within the Sub-Area through infiltration into an area of up to 25 acres located adjacent to the north boundary of the UGA (as shown in the map attached as Figure 12). If all or some portion of such area is (a) determined to be an appropriate location for infiltration, (b) will help to mitigate storm water impacts of the project, (c) will not adversely impact Dickerson Creek, and (d) would not expand the area available for development, then the County may amend the UGA boundaries in its Comprehensive Plan to include this area, and the City may amend its Comprehensive Plan and annex the area identified for infiltration. This area

⁷ Significant as used in SEPA means a reasonable likelihood of more than a moderate adverse impact on environmental quality (WAC 197-11-794). The threshold of what constitutes a significant impact will be identified during the EIS process for the project by third-party experts retained by the City of Bremerton.

		shall only be used for the purposes of infiltration, roads, trails and utilities, and shall not count towards meeting any of the open space requirements.
2. AIR		
A. Emissions		No significant environmental issues are anticipated. All proposed projects shall adhere to the Sub-Area Plan and the existing performance standards regulations set forth in the development regulations. No projects which involve heavy emission or other air pollutants are proposed.
B. Odors		No significant environmental issues are anticipated. All proposed land uses and construction activities shall adhere to the Sub-Area Plan and the existing performance standards set forth in the development regulations. No land uses which involve heavy odors are proposed.
3. WATER	<ul style="list-style-type: none"> ◆ Reinelt Consulting Services Letter (June 14, 1999) ◆ Recommendations (AES, May 1999) 	

		parties. The monitoring plan will require that the project mitigation measures will be adjusted if monitoring shows the project is causing significant adverse environmental impacts.
B. Ground Water		<ul style="list-style-type: none"> ◆ Drilling and installing observation wells to characterize sub-surface conditions is recommended to complete the hydrologic characterization of the site. ◆ Evaluate the proposed project to ensure that the extent of the ground water recharge zone under the JPA delivering to Dickerson Creek is identified. ◆ Evaluate the proposed project to ensure that ground water delivery to Dickerson Creek is continued via infiltration to match natural conditions ◆ The EIS process shall evaluate the potential impacts on aquifer recharge areas, applying the City's Critical Areas Ordinance standards if warranted.
C. Runoff		See Section: Earth - Drainage.
4. PLANTS		
A. Vegetation		No significant environmental issues are anticipated. Landscaping plans shall accompany all proposals for structures and open spaces development. Native planting located within critical area buffers shall be preserved. Wherever possible, proposed open space areas and parks shall incorporate native plants and trees consistent with the provisions of the Build A Better Kitsap program consistent with the use and character of the park. Plant types for re-vegetation and landscaping will be evaluated and limitations may be applied, to maintain water quality and quantity goals.
B. Endangered/Threatened Species	<ul style="list-style-type: none"> • Washington Department of Natural Resources – National Heritage Database 	
C. Landscaping		
5. ANIMALS		

1 that they could very carefully understand as well as
2 possible the interactions of the natural systems within
3 those watershed basins.

4 There's a concern that they did not reflect the
5 considerations raised in the Port Blakely Joint Planning
6 Area Report. The Appellants contend that the EIS did not
7 ensure that their recommendations in the Port Blakely Joint
8 Planning Area Report were addressed. Mr. Struck testified
9 that in fact the considerations in the Joint Planning Report
10 were addressed, and he believes, based on his expert
11 opinion, that they complied with each of those
12 recommendations.

13 The Port Blakely Joint Planning Report was directed
14 to protections necessary for massive urban growth area
15 development. As mentioned, this was thousands of homes,
16 thousands of square feet of commercial and retail property,
17 and \$2.25 million of industrial development. Nonetheless,
18 Ueland Tree Farm has been cognizant of those
19 recommendations, has evaluated the recommendations, and has
20 made a determination that it has complied with the
21 considerations and recommendations therein. There's just no
22 merit to the contention that this project did not comply
23 with the Port Blakely Joint Planning Area Report. It's not
24 actually relevant to this matter in the first place, but
25 they did comply.

1 reason why the answer, it's possible water can go both ways,
2 because there's some of those factors that you haven't quite
3 yet been able to discern?

4 A I think that a more accurate characterization
5 would be, we can't say with absolute certainty, in fact,
6 where the divide is without, you know, punching holes on a
7 very high frequency, which is just typically not done. We
8 wouldn't pin that down.

9 I think that the information that we do have is
10 relatively uniform, it's relatively consistent. There don't
11 appear to be any highly conflicting geologic information
12 that would indicate or suggest that the interpretation that
13 we have made is not correct.

14 Q And as far as you've described as far as mining
15 projects, this is actually a very highly scrutinized project
16 for a mining project; is that correct?

17 A Yes, that's correct.

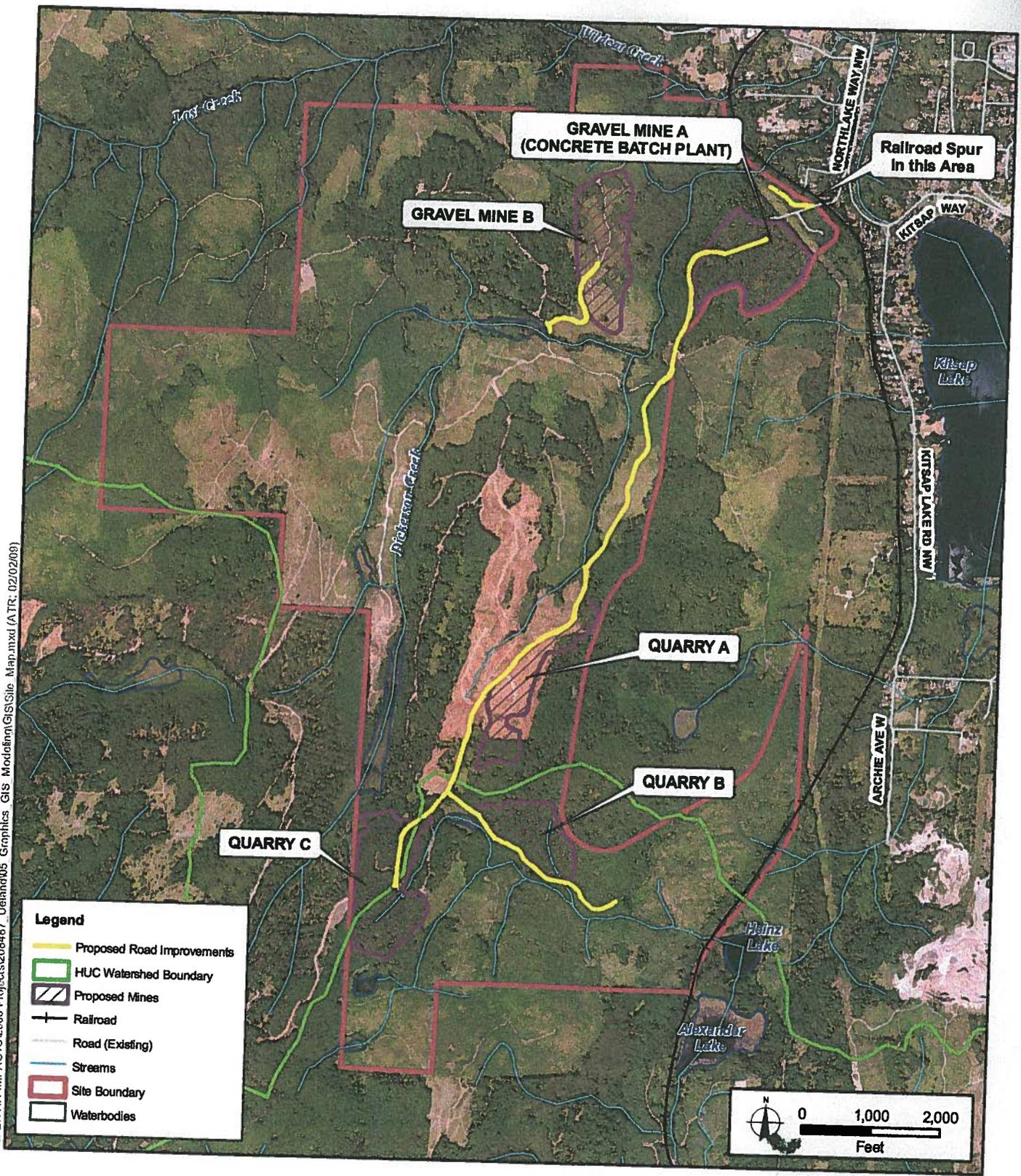
18 Q Now, this is also in a basin that is one of the
19 most pristine that we have, around here anyway.

20 A Right.

21 Q Is it not appropriate then that the scrutiny be
22 higher for this level of the analysis, is that the way you
23 would approach it?

24 A Well, I think so. I think that that is a
25 reasonable approach, that when there are resources that --

G:\ENVIR IMPACTS\2008 Projects\208487_Ueland\05 Graphics GIS Modelling\GIS\Site Map.mxd (ATR: 02/02/09)



SOURCE: DAIS, 2001 (Aerial); Kitsap Co, 2008; Parametrix, 2008; WDNR, 2008; WSDOT, 1997.

Ueland . 208407
Figure 1-2
Site Map with Project Elements
Kitsap County, WA

4

To: Allison Daniels, City of Bremerton; Lisa Grueter, Berk Consultants; Bill Webb, AECOM Consulting

From: Stephen Stanley, Susan Grigsby and Kelly Slattery; Washington Department of Ecology

RE: Final Revised water flow and water quality assessment for Gorst watershed

August 19, 2013

Introduction

The purpose of this revised assessment was to add a new assessment unit (#21, Heinz Creek), to the northern portion of the Gorst watershed. Based on citizen input during the current comment period for the Gorst Subarea Master Plan EIS, the City and its consultants in conjunction with the County and Department of Ecology determined that a portion of the northern watershed boundary required adjustment. The existing boundaries for the watershed assessment are based on the Department of Fish and Wildlife Salmon and Steelhead Habitat Inventory Assessment Program (SSHIA - 1995) work.

Because this work is based on spacial data that approximates stream locations at a scale of 1:24000 and greater, it can be subject to errors especially in areas that are relatively flat at the headwaters for two or more watersheds. The subject area in question is a large flat saddle, part of which drains north into the Chico Creek watershed and the other part south

into the Gorst Creek watershed. Recent field work by the City determined that the current boundary for the Heinz Creek sub-watershed was too far south. Upon additional review of topography and discussion with city officials with expert, long term knowledge of this area, the Gorst watershed boundary was moved north and new assessment unit for Heinz Creek was created. This new assessment unit incorporates Heinz Lake, a tributary immediately to the west of the lake and a riparian wetland associated with Heinz Creek (Figure 1 and Figure 2).

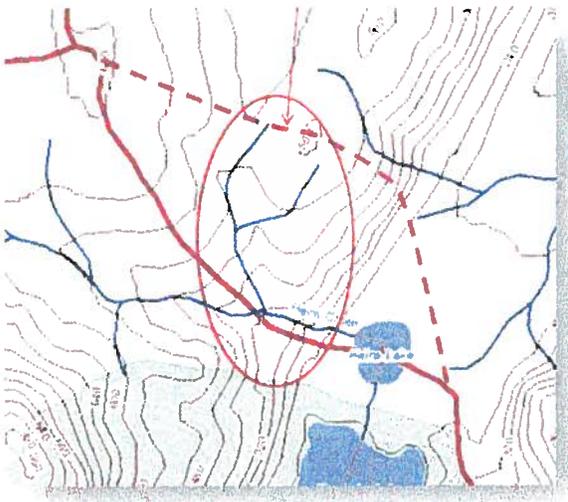
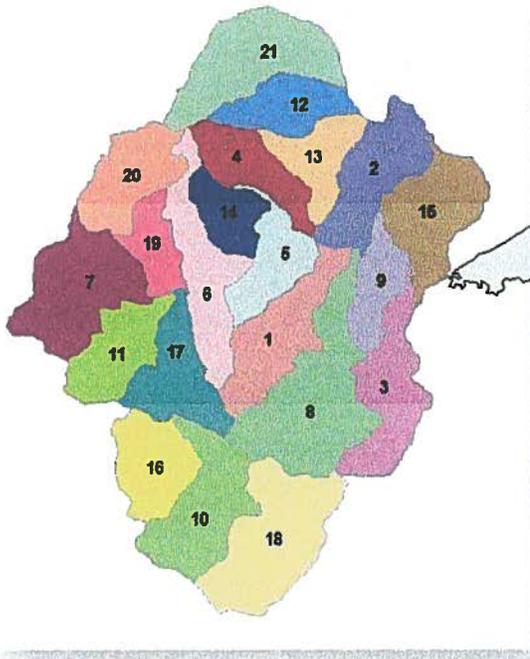


Figure 1 – Boundary adjustment (dotted red line to include Heinz Lake & tributary for Heinz Creek sub-watershed. Gorst Watershed to south in shaded "green" area.

Once the new assessment unit was created the assessment model for water flow and water quality was run the week of July 14th, 2013. The results of the revised assessment are summarized below; these results are an addendum to the watershed assessment produced by Parametrix and not a substitute for the detailed analysis of and recommendations for the overall watershed.

Summary of Assessment Results



The addition of the Heinz Creek assessment unit (AU 21) increased the total number of assessment units to 21. This has two effects on the overall assessment results: 1) slightly increases the size of the quartile bins for models 1 and 2 of the water flow and water quality results; and 2) introduces new data and results against which the other 20 assessment units are evaluated. As a consequence, there can be shifting of ranking of priority for protection, restoration and development. The results for the new Heinz Creek assessment unit are presented below.

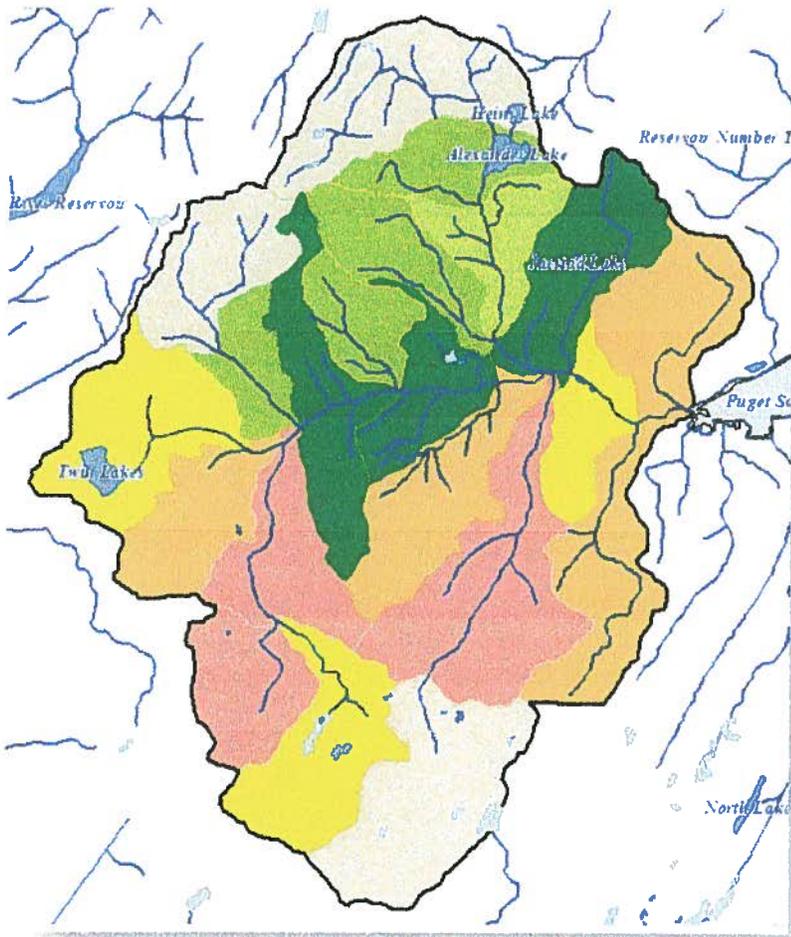
Figure 2. Assessment units for Gorst Watershed Study Area and Heinz Creek Assessment Unit #21

Heinz Creek Results

The overall water flow results indicate that Heinz Creek has a low importance for water flow and a low degree of degradation. This results in a management category of "Conservation" which suggests permitting land use activities that protect and maintain those water flow processes important to this AU.

Recharge is the most important water flow process for the Heinz Creek watershed due to the presence of high permeability deposits. Because Heinz Creek AU is located in the headwaters, its recharge process most likely contributes to and supports areas of downstream discharge which helps maintain low flows in Gorst Creek. Activities which reduce infiltration and recharge, such as buildings and

impervious surfaces should be minimized and located outside of these high permeability deposits. Though not as significant in size, existing areas of storage should also be protected in this AU since surface storage in headwater watersheds have a significant effect on maintaining the normal range of downstream flows (e.g. less flooding and erosion).



The water quality assessments indicate that the Heinz Creek AU has a high potential for export of sediment due to the presence of outwash deposits. Export of sediment from a headwaters AU can have adverse effect on the entire stream ecosystem including reduction in the structural complexity of streams due to alteration of erosion and deposition patterns. Additionally, sediment can clog spawning gravels and negatively affect water quality due to the increased transport of phosphorous and increase in algae blooms. Results also indicate that metals and pathogens could potentially be exported from this AU.

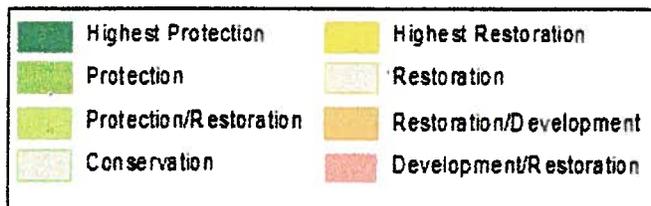


Figure 3. Overall Results for Water Flow Assessment. Results indicate that Heinz Creek AU has a “conservation” management category. This result does not represent the overall integrated result for the assessments, which is presented in Table 1 and Figure 5.

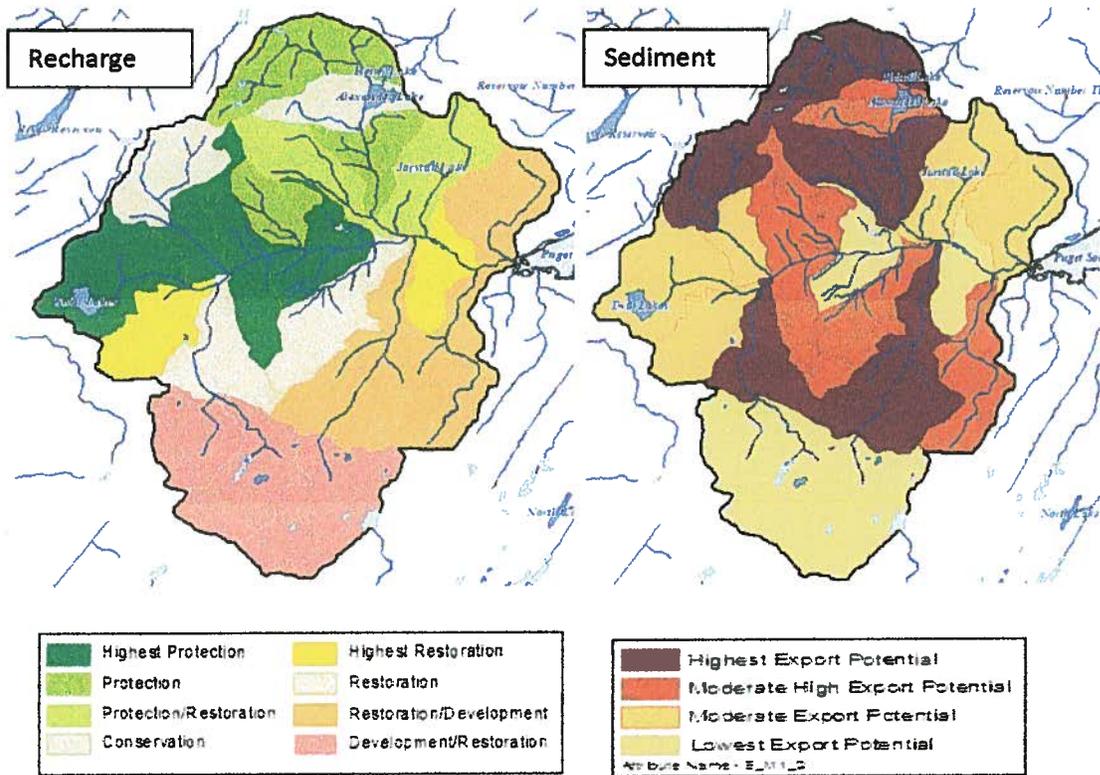


Figure 4. Results for recharge process (left panel) and sediment process (right panel). Results indicate that Heinz Creek has a management category of “protection” and a high export potential for sediment. This would suggest that the existing forest or native cover be maintained (facilitates recharge & minimizes erosion) and areas that retain sediment (wetlands and lakes) be protected.

Because Heinz Creek presently experiences a low level of degradation, recharge is predicted to be high and sediment export low relative to other AUs in the study area. Existing land use features such as native cover and wetlands and lakes play a role in retaining sediment and should be protected. However, given the higher potential for erosion in the Heinz Creek and adjacent AUs (4,14,20) additional finer scale modeling should be conducted to identify the actual degree of potential erosion and transport, the appropriate type and design of future land uses and the necessary best management measures to control any erosion from identified future land uses.

Changes in Overall Assessment for Gorst Watershed

The results of the revised assessment have also resulted in a small shift in the management categories of the assessment units. This has not changed the integrated results of the assessment (table 1 and figure) which includes “protection” management categories for the northern portion of the watershed and restoration and development for the southern portion.

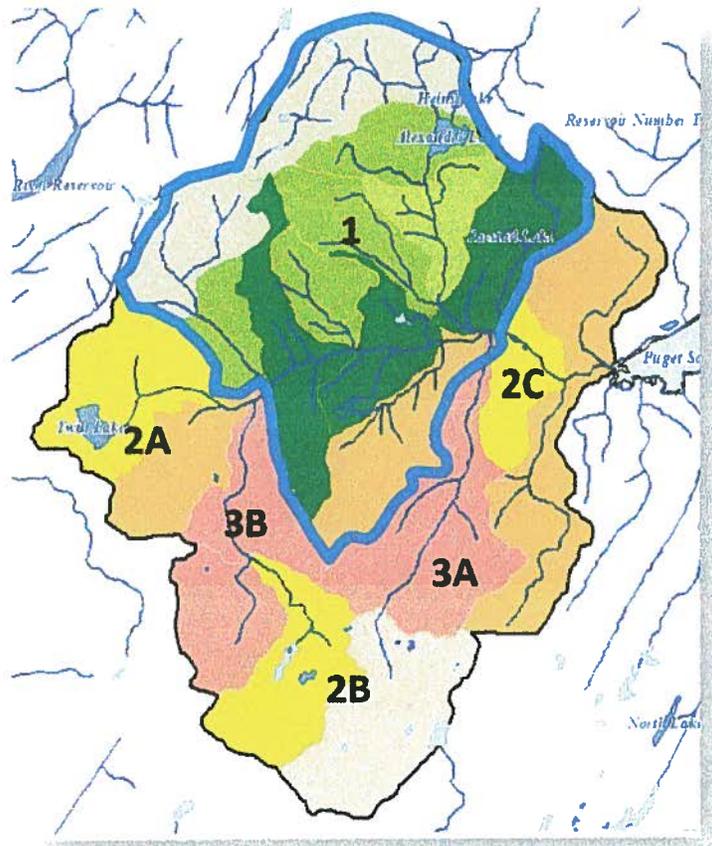
Listings of the key changes in the management categories, prior to integration, for the overall water flow results are as follows:

- 1) AU 13 up from “conservation” to “protection/restoration” category
- 2) AU 14 up from “protection/restoration” to “protection” category
- 3) AU 2 up from “protection” to “highest protection”
- 4) AU 1 down from “conservation” to “restoration/development”

Other changes occurred for the results of the sub models (delivery, storage, recharge and discharge) and water quality models. These results are documented in Appendix A.

Integrated Results

Table 1 and Figure 5 present the final integrated results of the water flow, habitat and sediment models.



1. Protection Zone (Green). This area is key to recharge and discharge processes for Gorst Creek. Permitted uses must preserve forest cover and not result in conversion.

2. Restoration Zone (Yellow). Lower intensity uses.

A – Restore recharge, discharge and delivery processes, limit urban development, maintain in open space uses.

B – Residential uses but protect/restore storage functions of wetlands.

C – Restore recharge/discharge processes using LID measures.

3. Development Zone (Pink & Orange). Moderate to higher intensity urban uses.

A – Protect against erosion & sediment export with adequate setbacks, buffers & vegetation cover. Cluster development.

B – Restore stream corridor; cluster development.

Figure 5. Management Zones for Gorst Watershed. These zones represent the integration of the water flow, water quality (sediment) and habitat assessments. See Table 1 for the summary of results for each assessment unit.

[Print](#)[Close](#)

5

From: McGraner, Patrick (ECY) (patrick.mcgraner@ecy.wa.gov)
Sent: Thu 4/02/15 6:27 AM
To: Jack Stanfill (jackstanfill@hotmail.com)
Cc: Iyer, Raman (ECY) (RIYE461@ECY.WA.GOV); doost@co.kitsap.wa.us (doost@co.kitsap.wa.us); David Greetham (dgreetha@co.kitsap.wa.us); ryan (ryan@vancillaw.com); Deirdre McKeel (deirdre_mckeel@yahoo.com); Bob Buck (bobbuck69@gmail.com); Kathy Stanfill (kathystanfill@gmail.com); calypso (children1st@wavecable.com); Christopher Dunagan (chrisbdunagan@gmail.com); chrisminor (cndminor@msn.com)

Good Morning Jack and All,

Please see my response(s) below.

Sincerely,

Patrick McGraner
Wetlands Specialist
Department of Ecology/NWRO
3190 160th Ave SE
Bellevue, WA 98008
425-649-4447
patrick.mcgraner@ecy.wa.gov

From: Jack Stanfill [mailto:jackstanfill@hotmail.com]
Sent: Wednesday, April 01, 2015 6:13 PM
To: McGraner, Patrick (ECY)
Cc: Iyer, Raman (ECY); doost@co.kitsap.wa.us; David Greetham; ryan; Deirdre McKeel; Bob Buck; Kathy Stanfill; calypso; Christopher Dunagan; chrisminor
Subject: RE: wetland note and ERTS #654791 Ueland Tree Farm/Quarry C/Wetland 4

Mr. McGraner,

Thank you for contacting Kitsap County DCD for clarification of the future of Wetland 4 on the UTF property. We need to have clarification as to which "large wetland complex north of Quarry C" that Kitsap County intends to review in the SDAP. Just last week, March 26, 2015, Ms. Adlofson testified before the Kitsap County Hearing Examiner that the UTF Wetland 4 is actually a part of Wetland 6 and was included in the EIS. This is totally inaccurate as you can see in Mr. Leyda's Wetland Memo. But, we'll wait for the SDAP and work from there.

You said that Ecology typically only recognizes wetland boundaries for a period of 5 years following the verification of wetland boundaries. If this is the case, then the 19 wetlands that Parametrix delineated for the Ueland Tree Farm Mineal Resource in 2007 need to be re-verified. 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. Is the SDAP the time for us to request this action Yes, or will you notify Kitsap Country that the 19 wetlands need to be re-verified? – Never – there are three wetland specialists in our office for seven counties and all of the local-city jurisdictions. The Department of Ecology does not have the capacity to track every project in all these jurisdictions in seven counties nor does the state have the authority to do so even if our resources were unlimited. Washington is a “home rule” state – the local jurisdictions have primary authority over land-use decisions within their own jurisdictions. There are state and federal requirements for authorizations to directly impact waters of the state and waters of the United States which any applicant must also abide by if/when it is determined that direct impacts to jurisdictional waters are being proposed.

Below is a brief summary of some of the duties of the regional specialists at the Department of Ecology:

- Wetland permitting, technical assistance and enforcement, including delineation and rating verification
- JARPA technical assistance
- Section 401 water quality certification technical assistance
- Shoreline technical assistance and enforcement
- Shoreline/wetlands restoration and mitigation review and compliance
- Verification of ordinary high water mark determinations on fresh and marine/estuarine waters
- Policy technical assistance to local jurisdictions including CAO and SMP updates
- Instructors for various technical classes on wetland science and shorelines through the Coastal Training Program

Thank you,

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



COOKE SCIENTIFIC

4231 NE 110th ST, SEATTLE, WA 98125

PHONE: (206) 695-2267 FAX: 206-368-5430

COOKESS@COMCAST.NET

WWW.COOKESSCIENTIFIC.COM

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 (206 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 (Washington 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 re-configured 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 than 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 this 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.



Cooke Scientific

4231 NE 110TH STREET
SEATTLE, WA 98125
COOKESS@AOL.COM

PHONE: (206) 695-2267
FAX: (206) 368-5430
WWW.COOKESSCIENTIFIC.COM

Sarah Spear Cooke, Ph.D.

Wetlands Ecologist, Soil Scientist, Plant Ecologist and Taxonomist

Expertise

- Wetlands creation, restoration, and enhancement, CAD design and plant installation oversight
- Wetland Functional Evaluation, including the "SAM" method and a botanical expert on the development of the State wetland manual
- Regulatory and Permitting Assistance, on local, state and national levels, (ESA, 404b, 401 WQ Cert, NEPA, SEPA)
- Rare plant species and vegetation community surveys and mapping
- Soil scientist (hydric soils), soils mapping and classification
- Stream typing methodology-trained 2012, Oregon method
- Watershed Analysis
- Project Management and Staff Supervision, senior level scientist
- Masters in Botanical taxonomy, Doctorate in Botany and soils, specializing in wetland plants
- Author *A Field Guide to the Common Wetland Plants of Western Washington & Northwestern Oregon*, published by the Seattle Audubon Society
- Invasive weed identification and development of control strategies, control manuals, and field oversight of control efforts
- Mine reclamation ecology and uplands restoration
- Ordinary High Water Mark (OHWM) determinations and instruction.

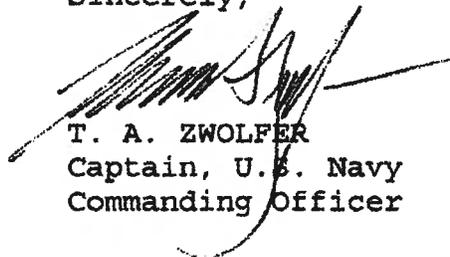
Dr. Cooke has 32 years of experience in wetlands ecological research and environmental consulting, and 29 years of experience in ecological and geological research, in the Pacific Northwest. She has run her own company, run Environmental Sections of large consulting firms, and managed very large civil projects. She specializes in habitat creation, restoration and enhancement projects, both in design and implementation. She excels in permitting assistance on the local, state, and national level in Washington State. She was a co-senior investigator for the Puget Sound Wetland and Stormwater Management Research Program, a 10+-year systematic wetland ecosystem study conducted under the auspices of the Environmental Protection Agency, The US Geological Survey, Washington State, and King County in Washington State. Dr. Cooke's areas of expertise include: wetland and stream inventories, delineation, restoration/mitigation designs, baseline studies, permitting, and monitoring programs; weed identification and control; rare plant surveys and vegetation mapping; soil assessments; watershed analysis; and environmental assessments in the region. She has more experience in developing assessment methodologies than any other private wetlands consultant in the PNW. She has extensive experience in classroom instruction of wetlands ecology, restoration ecology and implementation, delineation protocols, functional assessment, weed identification and control, hydric soils, and wetland plant identification. She has 24 years experience in managing multidisciplinary teams, supervising subcontractors, and generating reports, and marketing from a consulting perspective. She currently teaches restoration ecology and implementation, wetland botany, and weed ecology and control at Portland State University. She is a former instructor for the Wetland Certification

11011
Ser PRB211Y/00414
5 Mar 14

As a result of the WDOE complaint regarding water run-off and sedimentation from this road, we are requesting that any repair work be completed within 30 days. If repairs are not completed promptly, the Navy may be forced to close the crossing until such completion. Please contact PSAP Railroad to coordinate any work within 20 feet of the track (Roadmaster, Ken Bush, (360) 359-1084 or Track Supervisor, David Franklin, (360) 239-8337)).

For further coordination with the Navy or questions, please contact Daniel Read of my staff at (360) 476-8148 or dan.read@navy.mil.

Sincerely,



T. A. ZWOLFER
Captain, U.S. Navy
Commanding Officer

Copy to:
Kitsap County
Attn: Public Works Director
614 Division Street
Port Orchard, WA 98366-4686

Genesee & Wyoming Railroad
Attn: Marc Bader
VP Maintenance
200 Hawthorne Ave SE, #C-320
Salem, OR 97301

Kitsap County
Attn: Kevin Howell
Assistant Prosecuting Attorney
614 Division Street
Port Orchard, WA 98366

NAVFAC Northwest (PRB211Y:DR, PRBD:RM, 09C:JM, OP3B:JP, AM:LW,
PRB41:MH, PRB112:RR)

From: [Chris May](#)
To: [Dettelbach, Anne \(ECY\)](#)
Cc: [Mindy Fohn](#); [Chuck Smiley](#); [Jacques Dean](#); [Ron Coppinger](#)
Subject: RE: Leber Lane
Date: Wednesday, February 19, 2014 11:34:00 AM

Anne – Chuck and I just went out there to look at things in the calm between storms – here’s what I see

1. There definitely needs to be some attention paid to whatever logging ops are going on up there, but we could not get in to look – gate is locked and area is posted as no trespassing
2. Leber Lane from the logging gate to the RR crossing needs to be rebuilt – the road is poor, needs to be regraded and the ditches reconstructed then rocked – maybe add some silt-sock check dams too
3. The RR crossing is also problematic – I think I was originally designed for some local access, but the logging trucks may be too much – Ueland and the Navy may need to chat on that upgrade
4. There is no pipe under/perpendicular to the RR tracks as some have said – it is really just the two cross pipes under Leber on either side of the RR tracks – these are plugged and should be the responsibility of the Navy as they lie within the RR ROW – the uphill side is the really problem – it is totally plugged with silt coming from Leber and Ueland – that one may actually be the responsibility of whoever owns Leber (Ueland). The downhill cross-pipe adjacent to our part of Leber is clear and can take flows
5. Runoff is running down the RR tracks in the parallel side ditches along the tracks and eventually gets to Dickerson, although it is quite a ways – I really don’t think any sediment is reaching the creek, but there’s a good deal of water flowing along the track ditches – the real problem is that this flow is causing erosion on the slope of the tracks where it flows into Dickerson through a small ravine – that area is very unstable – looks like a long-term problem area that the Navy may have dealt with in the past – lots of large rock dumped into the ravine – I’d be worried about that is I was the Navy

If Leber is rebuilt by Ueland uphill from the RR tracks and the ditches are managed, the silt problem should go away – the Navy (or Ueland) needs to clear the cross culvert at the RR tracks to allow flows on both sides of the tracks and the ravine problem is dealt with, all will be well

I just don’t see where we (KC-PW) fits into the equation – it is all happening on private property or Navy ROW outside our jurisdiction

Mindy will be sending some more info along – I am out in meetings all afternoon

Chris May

Kitsap County Public Works
 Stormwater Program Director
 360-337-7295
 614 Division Street (MS-26A)
 Port Orchard WA 98366-4614