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April 6, 2026

Nicole Coleman
City of Poulsbo Planning and Economic Development
200 NE Moe Street
Poulsbo, Washington 98370

RE: Critical Area Report Addendum #2- Pinnacle at Liberty Bay
Poulsbo Subdivision #P-06-20-25-03
SWC Job #24-158

Dear Nicole,

This report describes our response to your December 31, 2025 “*Request for Revisions*” regarding the proposed Pinnacle at Liberty Bay development. This revision specifically addresses the comments in the peer review letter dated January 8, 2026 from Farallon Consulting/Grette Associates as follows;

- *Per PMC 16.20.230, Category III wetlands with a moderate habitat score (6-7 points)³ with a proposed high impact land use are subject to a 150-foot buffer. Based on the revised habitat score, the appropriate buffer width for Wetland C is 150 feet. The Plan should be revised accordingly.*

The site plan provided in the addendum includes a 150-foot buffer for Wetland C; however, the site plan also contains a callout for a “148 feet of buffer take” adjacent to Lot 99. No further information regarding this additional buffer averaging was provided. The buffer averaging outlined in the Plan needs to be revised to address this additional buffer reduction area shown on the updated site plan.

Response: The site plan has been revised (see attached) and there is no longer any proposed impact in this area.

- *Per PMC 16.20.230, buffer averaging may be allowed if it will improve the protection of the wetland or if it is the only way to allow for reasonable use of the property. The Plan does not provide sufficient detail to support why a reduction to Wetland A's buffer is necessary and prevents reasonable use of the project site to support the proposed alignment of the road and residential park. The Plan should be revised to include additional information to demonstrate there is no feasible alternative to reposition the access road and that reducing the park area would not provide feasible recreational use. Please note that based on one of the figures provided in the plan (Attachment 1), it appears that the standard buffer is being applied to all of Wetland A, which appears to show averaging is not necessary.*

The addendum provides a sufficient explanation describing that existing topography provides constraints with respect to road design requirements and the buffer modifications proposed within the northern portion of Wetland A's buffer. However, Grette does not concur with the rationale associated with the proposed buffer modifications that would occur to the western portion of the wetland buffer. The addendum states the intent of the proposed western buffer reduction is to make the park area flat. No other information is provided to show that this is necessary. As noted previously, the Plan included a site plan showing the project adhering to the standard wetland buffer in this location which appears to show averaging is not necessary to create a suitable park area. As such, there appears to be a reasonable alternative to the site design that could be accomplished without buffer averaging and standard buffer can be applied.

Response: The site plan has been revised and now the proposed averaging in this area is all related to getting the proper grades for the roads and not the park itself.

If you have any questions in regards to this report or need additional information, please feel free to contact me at (253) 859-0515 or at esewall@sewallwc.com .

Sincerely,
Sewall Wetland Consulting, Inc.



Ed Sewall
Senior Wetlands Ecologist PWS #212

Attached: Current Site/Buffer Averaging Plan

