TECHNICAL MEMORANDUM

TO: Nikole Coleman, Planning Manager – City of Poulsbo

FROM: Chad Wallin, Grette Associates, a division of Farallon Consulting, L.L.C.

DATE: April 27, 2026

RE: PINNACLE AT LIBERTY BAY
THIRD-PARTY CRITICAL AREAS REVIEW
FARALLON PN: 3386-002.001 TASK 3

INTRODUCTION

The City of Poulsbo (City) contracted with Grette Associates (Grette), a division of Farallon Consulting, L.L.C., to assist in the review of the critical areas report addendum (Addendum 1; dated November 19, 2025)[1] that was prepared by Sewall Wetland Consulting, Inc. (SWC) in response to Grette's August 29, 2025 review.[2]

In summary of Grette's January 8, 2026 review of Addendum 1,[3] Addendum 1 addressed all but two of Grette's August 2025 comments for compliance with Chapter 16.20 of the Poulsbo Municipal Code (PMC). Grette recommended that the two outstanding comments from the August 2025 review be addressed prior to the City's acceptance of the submitted materials.

SWC provided the City a revised critical areas report addendum (Addendum 2; dated April 6, 2026)[4] in response to Grette's January 2026 review. Provided below is a summary of Grette's review comments followed by Grette's response upon review of Addendum 2. Please note that this review is limited to evaluating SWC's response to Grette's wetland

[1] Sewall Wetland Consulting, Inc. Critical Areas Report Addendum – Pinnacle at Liberty Bay. Addressed to the City of Poulsbo Planning and Economic Development. November 19, 2025.
[2] Grette Associates. 2025. Pinnacle at Liberty Bay: Third-Party Review. Prepared for the City of Poulsbo. Technical Memorandum. August 29, 2025.
[3] Grette Associates. 2026. Pinnacle at Liberty Bay: Third-Party Review. Prepared for the City of Poulsbo. Technical Memorandum. January 8, 2026..
[4] Sewall Wetland Consulting, Inc. Critical Areas Report Addendum #2 – Pinnacle at Liberty Bay. Addressed to the City of Poulsbo Planning and Economic Development. April 6, 2026.

comments with respect to compliance with Section 200 (Wetlands) of Chapter 16.20 of the PMC. Those comments Grette provided in the August 2025 review that are associated with Section 300 (Fish and Wildlife Habitat Conservation Areas) of Chapter 16.20 of the PMC will be addressed under a sperate review.

August 2025 Comment - Per PMC 16.20.230, Category III wetlands with a moderate habitat score (6-7 points)[5] 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.

> *January 2026 Review Response - The site plan provided in the addendum (Addendum 1) includes a 150-foot buffer for Wetland C; however, the site plan also contains a callout for a "148 square 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.*

Addendum 2 states that the site plan has been revised and that there are no longer any proposed impacts to this area. The site plan provided in Addendum 2 has been revised and no longer shows the 148 square feet of buffer take adjacent to Lot 95 (previously labeled as Lot 99).

This site plan also includes revised quantifications of the other three buffer take areas associated with Wetland B compared to what was shown in the site plan provided in Addendum 1. More specifically, the buffer take areas totaling 3,724 square feet and 2,530 square feet shown on Addendum 1's site plan were increased to 4,181 square feet and 2,734 square feet, respectively. See attached for comparison. The third area of buffer take (5,107 square feet) shown on Addendum 1's site plan next to Lot 56 (previously labeled as Lot 58) was decreased to 4,607 square feet.

Based on Grette's calculations, the total take area of Wetland B's buffer is 11,702 square feet, and the total buffer give area is 12,930 square feet, which meets the requirement of the total area of buffer after averaging is equal to the buffer area without averaging as defined in PMC 16.20.230(E). As described in Grette's January 2026 review, Addendum 1 provided a

[5] Per Ecology's guidance (https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/rating-systems), a habitat score of 5 points is considered to provide low habitat functions. The buffer tables defined in PMC 16.20.230 have not been updated to reflect this change. As such, this review is based on Ecology's guidance.

sufficient summary to describe details regarding existing slope constraints and how those conditions require buffer averaging for the project to meet other design requirements. Addendum 2 does not provide any explanation for why these increases are necessary compared to what is provided in Addendum 1. Comparing the Addendum 1 and Addendum 2 site plans, it appears there were design changes that occurred in response to buffer width changes associated with Stream C. The Addendum 1 site plan assigns Stream C a 75-foot buffer, whereas the Addendum 2 site plan shows a 150-foot stream buffer. Given this information, the change in stream buffer width appears to explain why quantifications changed to the three buffer take areas associated with Wetland B.

August 2025 Comment - 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.

> *January 2026 Review Response - 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 allow for the park area to be 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 the standard buffer could be applied.*

Addendum 2 states that the site plan has been revised to show the proposed averaging in this area is all related to getting the proper grades for the roads and not the park itself. The buffer take area along the western portion of Wetland A's buffer has been reduced from 966

square feet to 460 square feet which appears to be what is necessary to support the construction of the road. For example, the revised buffer take area is limited to an area parallel to Road D and is linear in shape. As such, the 460 square feet of buffer take appears to be related to establishing the appropriate grades to construct the road.

Based on Grette's calculations, the total take area of Wetland A's buffer is 1,232 square feet and the total buffer give area is 1,581 square feet, which meets the requirement of the total area of buffer after averaging is equal to the buffer area without averaging as defined in PMC 16.20.230(E).

In closing, Addendum 2 has addressed the two comments from Grette's January 2026 review; however, prior to the City's acceptance, Grette recommends that the City verify with SWC that the reasoning for the changes to the buffer take areas associated with Wetland B are in response to the updated lot configuration to address Stream C's buffer changing from 75 feet to 150 feet. Once this is verified, Grette recommends the City accept Addendum 2.

If you have any questions regarding this memorandum, please contact me at (253) 573-9300, or by email at chadw@gretteassociates.com.

Grette Associates, a division of Farallon Consulting L.L.C.

Regards,

Chad Wallin, PWS
Associate Biologist

ATTACHMENT A
SITE PLANS

PINNICALE AT LIBERTY BAY
Third-Party Critical Area Review
Farallon PN: 3386-002.001 Task 3

A PORTION OF THE SE 1/4 OF SECTION 23, TWP. 26 N., RGE. 1 E.,WM

n

SCALE: 1" = 80'

80 40 0 80 160

BUFFER GIVE/TAKE ANALYSIS

	WETLAND A	WETLAND B	STREAM C
TOTAL GIVE	2,119 SF	11,571 SF	7,246 SF
TOTAL TAKE	1,941 SF	11,509 SF	7,196 SF
NET GIVE	178 SF	62 SF	50 SF

REVISIONS

NO.	DESCRIPTION/DATE	BY

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Project Management

MONTEBANC MANAGEMENT, LLC

PINNACLE AT LIBERTY BAY SUBDIVISION

BUFFER MITIGATION PLAN

CITY OF POULSBO

WASHINGTON

JOB NO.: 2090-004-022
DWG. NAME: PP-06
DESIGNED BY:
DRAWN BY:
CHECKED BY:
DATE: 11/26/2025
DATE OF PRINT:

PP-06

6 OF 32 SHEETS

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A PORTION OF THE SE 1/4 OF SECTION 23, TWP. 26 N., RGE. 1 E.,WM

SCALE: 1" = 80'

80 40 0 80 160

BUFFER GIVE/TAKE ANALYSIS

	WETLAND A	WETLAND B
TOTAL GIVE	1,581 SF	12,930 SF
TOTAL TAKE	1,309 SF	11,702 SF
NET GIVE	272 SF	1,228 SF

REVISIONS

NO.	DESCRIPTION/DATE	BY

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PINNACLE AT LIBERTY BAY SUBDIVISION
BUFFER MITIGATION PLAN

CITY OF POULSBO WASHINGTON

JOB NO.:	2090-004-022
DWG. NAME:	PP-06
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DATE:	04/03/2026
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PP-06

6 OF 33 SHEETS

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