

EXHIBIT N

Public Comment

1. Lockhart

2. Float

3. The Suquamish Tribe

4. Applicant Response to Comment 1 and 2

5. Applicant Response to Comment 3



Notice of Application - Noll Pointe PRD - File No. P-09-10-25-01

From djlockhart@verizon.net <djlockhart@verizon.net>

Date Wed 11/26/2025 12:46 AM

To Edie Berghoff <eberghoff@cityofpoulsbo.com>

 3 attachments (3 MB)

Noll Pointe - PPLAT pg C1_oo extract annotated.pdf; Noll Pointe - Open Space Plan.pdf; Sandstone Ridge - Tree Protection Plan.pdf;

Re: File No. P-09-10-25-01 – Noll Pointe Planned Residential Development (PRD)

References:

Ref. (1) -Preliminary Plat Plan, Noll Pointe Planned Residential Development (as submitted with the application for the subject file)

Ref. (2) – Noll Pointe – Preliminary Plat Plan – Page C1.00 (annotated) – (attached)

Ref. (3) – Noll Pointe - Open Space Plan (attached)

Ref. (4) – Sandstone Ridge - Tree Protection Plan (attached)

Dear Ms. Berghoff,

In response to the Notice of Application for the subject PRD project, as published November 12, 2025, I submit this comment during the Public Comment Period stated in such notice.

The focus of my comments is with respect to the provisions and application of Section 18.260.070 of the Poulsbo Municipal Code (PMC) with respect to the subject PRD.

I have reviewed the referenced Preliminary Plat Plan (Ref. (1)) submitted by the applicant under the subject application. From the lot dimensions noted on that Plat Plan, it is apparent that the applicant has attempted to honor the intent of subsection A of Section 18.260.070 of the PMC. The proposed PRD is north of and adjacent to the Avondale Glen subdivision (also known as Noll Valley Park). The Avondale Glen neighborhood reflects traditional city subdivision standards with average lot sizes exceeding 8,000 square feet. Lots 41 through 51 of the proposed Noll Pointe subdivision abut the lots on the northern side of Avondale Glen and are predominantly 9,100 square feet in size, with one lot (No. 51) being very close to 10,000 square feet, whereas the majority of the lots in the PRD subdivision are in the 4,000 to 4,200 square feet range (there are a few lots smaller and a few larger than that range). By designing the size of lots 41 through 51 to have square footage comparable to the abutting lots in Avondale Glen the applicant has demonstrated a willingness to comply with the mandatory requirements of subsection A of Section 18.260.070 of the PMC, at least with respect to lot size. I do not offer here an opinion or comment as to whether the applicant has fully addressed the requirement in that subsection that the proposed PRD “shall be designed and developed so as to be consistent with the single-family residential environment at its adjacent perimeter.”

However, with respect to the mandatory requirements of subsection B of Section 18.26.070 of the PMC, the applicant has completely disregarded that the proposed PRD is subject to the screening provisions stated therein. The text of the first sentence of subsection B of Section 18.26.070 of the PMC reads: “When a PRD is proposed **adjacent** to a single-family residential zone (developed or un/underdeveloped), the **perimeter** of the PRD **shall be subject to screening provisions (this is in addition to subsection A of this section as applicable)** (emphasis added)”. While the intent of this provision of the PMC seems quite clear, my exposure to several PRD applications in Poulsbo has shown me that applicants try to find “wiggle room” in the practical application of subsection B to their projects.

Chapter 18.40 – Definitions – of the PMC begins with the sentence “Except where specifically defined herein, all words used in this code shall carry their customary meanings.” Pertinent to the comments of this email, Chapter 18.40 contains the following entries:

“Adjacent” means abutting or located directly across a street right-of-way.

Buffer. A “buffer” is a physical land separation between land uses, often either landscaped or in a natural state intended to separate potentially conflicting uses and reduce visual, noise, odors or other impacts.

“Perimeter” means the boundaries or borders of a lot, tract or parcel of land (N.B. – this entry puts into land use context the customary meaning of perimeter as being the total distance around the outside of a two-dimensional shape.)

The referenced Preliminary Plat Plan includes labels that accurately indicate the land to the north, west and south of the proposed Noll Pointe subdivision as being zoned Residential Low. To the east, and across Noll Road, the land is outside Poulsbo city limits and is zoned Rural Residential by Kitsap County. See attach Ref. (2) annotated page C1.00 of the Ref. (1) Preliminary Plat Plan. In the words of subsection B of Section 18.26.070 of the PMC, the proposed Noll Pointe PRD is “adjacent to a single-family residential zone” on three sides. Although the proposed PRD is bounded on the west by Lincoln Road, the Residential Low land on the west side of Lincoln Road still qualifies as “adjacent” because, as noted above, the PMC defines “adjacent” as “abutting or directly across a street right-of-way”.

The most appropriate way for the proposed Noll Point PRD to be compliant with subsection B of Section 18.26.070 of the PMC would be for the referenced Preliminary Plat Plan to be redesigned so that the entire perimeter of the PRD includes screening in the form of a “minimum twenty-five-foot vegetated buffer”. The required vegetation should preferably reflect retention of as many native trees as possible, consistent with the emphasis on the preservation of trees whenever and wherever possible, in line with the provisions of Chapter 18.180 of the PMC. The review authority does have the discretion to require the applicant to provide a six-foot sight-obscuring fence, as an alternative means of providing the mandatory screening. However, that discretion is guided by the requirement that the PRD comply with subsection B in a manner “deemed appropriate to provide **adequate** screening” (emphasis added). Given that the applicant proposes that the homes in the PRD will be two-story, a six-foot fence is wholly inadequate to provide effective screening. A twenty-five-foot vegetated (with native trees and additional trees planted) buffer is clearly more appropriate.

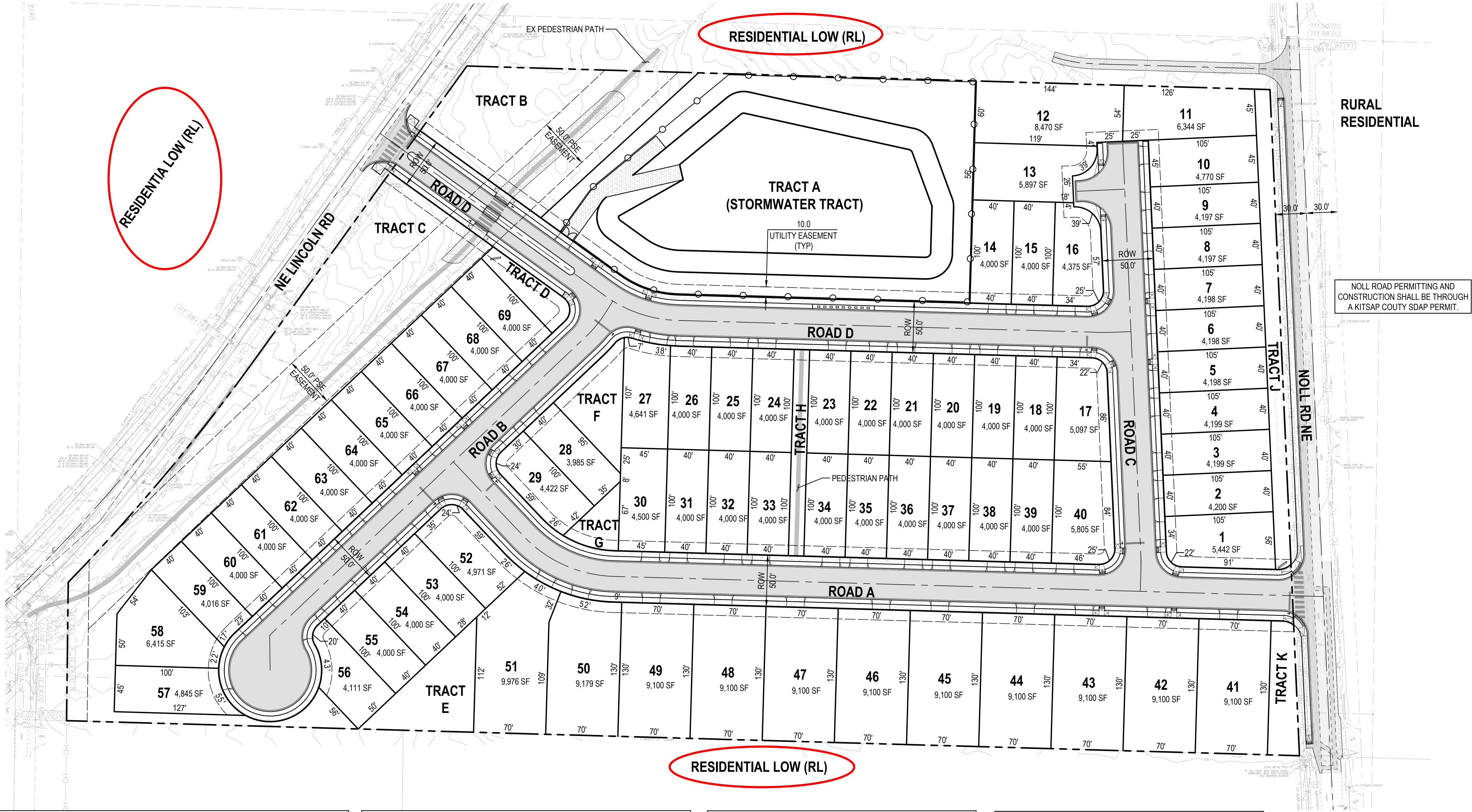
The redesign of the referenced Preliminary Plat Plan to provide vegetated buffer screening would affect the currently labeled lots 11 and 12 to the north, lots 58 through 69 to the west, lots 41 through 51 plus lots 56 and 57 to the south and lots 1 through 10 to the east. The referenced Preliminary Plat Plan and the applicant’s submitted Open Space Plan (Ref. (3)) identifies each of Tract B and Tract C on the west side of the proposed PRD as being, respectively, a “PRD Recreation Tract” or a “Tree Retention, Open Space, Recreation” tract. It is notable that PSE power lines run overhead through both Tracts B and C, thus mandating the

application of any PSE rules on the presence of plantings beneath the power lines. Perhaps a portion of Tracts B and C might retain native trees or add newly planted trees. If some parts of those tracts would be dedicated to recreation, that would imply those areas would be grass lawn rather than containing trees. To the extent that any trees preserved or added in Tracts B and C fail to satisfy the screening obligations of subsection B of Section 18.260.070 of the PMC, the redesign of the PRD should be required to address any gaps.

The Sandstone Ridge housing development recently approved by the review authority offers an exemplary approach by a PRD to honor both the letter and spirit of subsection B of Section 18.260.070 of the PMC (see attached Ref. (4) page from the Tree Protection Plan submitted as part of the Sandstone Ridge PRD application). The tree retention spaces in the Sandstone Ridge plan completely surround the subdivision (except for street openings). The Sandstone Ridge applicant has incorporated a community amenity of a walking trail that runs through the tree retention areas and thus encircles the neighborhood. The Sandstone Ridge PRD is only a half mile south of the proposed Noll Pointe PRD, which makes comparison of the two most apt. The Noll Pointe applicant might want to consider the Sandstone Ridge example when redesigning the Noll Pointe layout.

Respectfully,

Dana J. Lockhart



LEGEND

- PROPOSED PROPERTY LINE
- PROPERTY LINE
- EASEMENT ②
- CENTERLINE

RURAL
RESIDENTIAL

NOLL ROAD PERMITTING AND
CONSTRUCTION SHALL BE THROUGH
A KITSAP COUNTY SDAP PERMIT.

RESIDENTIAL LOW (RL)

RESIDENTIAL LOW (RL)

TRACT SUMMARY TABLE

TRACT	AREA (SF)	% OF TOTAL	USE
A	75,613	11.48	STORMWATER POND
B	21,867	3.32	PRD RECREATION TRACT
C	48,530	7.37	PRD RECREATION TRACT
D	2,476	0.38	OPEN SPACE, PLAT MONUMENT
E	6,262	0.95	TREE RETENTION, OPEN SPACE
F	4,482	0.68	PRD RECREATION TRACT
G	1,953	0.30	PRD RECREATION TRACT
H	3,000	0.46	UTILITY EASEMENT, OPEN SPACE
J	7,004	1.06	OPEN SPACE, PLAT MONUMENT
K	3,417	0.52	OPEN SPACE

PRD RECREATION TRACT EXPANDED DESCRIPTION

TRACT	USE	TYPE OF RECREATION USE
B & H	NATURE TRAIL THROUGH TREE RETENTION AREA	GROUP 1 PASSIVE
C	NATURE TRAIL THROUGH TREE RETENTION AREA	GROUP 1 PASSIVE
F	PARK WITH PLAY TOY, SLIDES, AND PICNIC AREA	GROUP 1 ACTIVE
G	BENCHES	GROUP 2 PASSIVE

PRD LOT CALCULATIONS TABLE

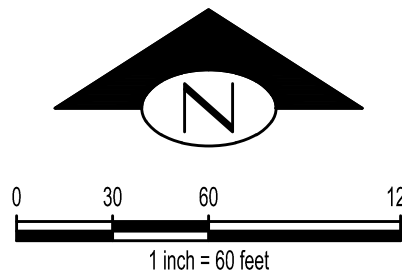
PMC SECTION 18.260		
CODE REFERENCE	ALLOWED	PROVIDED
MINIMUM LOT SIZE	3,750 SF	3,985 SF
MINIMUM AVERAGE LOT SIZE	3,750 SF	5,141 SF
MAX GROSS DENSITY (5 UNITS PER GROSS ACRE)	76 LOTS	69 LOTS
MINIMUM NET DENSITY (4 UNITS PER NET ACRE)	42 LOTS	69 LOTS

PROPERTY INFORMATION SUMMARY TABLE

TOTAL SITE AREA	15.12 AC / 658,627 SF	
ZONING	RES LOW (RL)	
TYPICAL LOT SIZE	4,000 SF	
SMALLEST LOT SIZE	3,985 SF	
AVERAGE LOT SIZE	5,141 SF	
LARGEST LOT SIZE	9,976 SF	
DEVELOPMENT SUMMARY TABLE		
	REQUIRED	PROVIDED
OPEN SPACE (MIN 15%)	98,794 SF	98,996 SF
FRONT SETBACK	20 / 25 FT	20 / 25 FT
SIDE SETBACK	5 FT	5 FT
REAR SETBACK	10 FT	10 FT
MAX BLDG HEIGHT	35 FT	35 FT

NOTES:

- SEE SHEET C1.10 FOR PRELIMINARY STRIPING, SIGNAGE, AND PROPOSED ON-STREET PARKING STALLS.
- PROPOSED UTILITY EASEMENT FOR WATER, SEWER, STORMWATER, AND FRANCHISE UTILITIES SHALL ALL BE 10' (TYP) UNLESS OTHERWISE NOTED.



Z:\2400001-2409999\2400760 Lincoln Road PRD\CAD\Design\PRD\PLAT\PR-PP-C1.00-PLAN.dwg
RosaG
Oct 23, 2025 - 12:04pm

1	09/2025	RAG	EKC	JSF	INITIAL PRELIMINARY PLAT SUBMITTAL
NO.	DATE	BY	CHD.	APPR.	REVISION

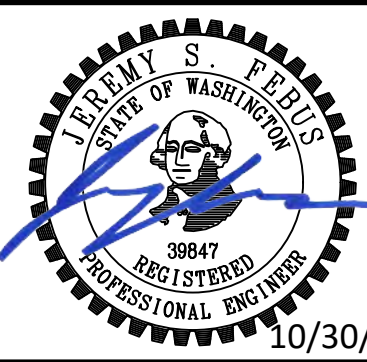
DRAWN BY RAG	DESIGNED BY EKC
CHECKED BY EKC	APPROVED BY JSF
DATE SEPTEMBER 12, 2025	
JOB No.:	2400760

CALL TWO BUSINESS
DAYS BEFORE YOU DIG
1-800-424-5555

SCALE:
AS NOTED



1601 5th Avenue, Suite 1600
Seattle, WA 98101
206.622.5822
www.kpff.com



NOLL POINTE PLANNED RESIDENTIAL DEVELOPMENT
POULSBORO, WASHINGTON

PRELIMINARY PLAT PLAN

SHEET

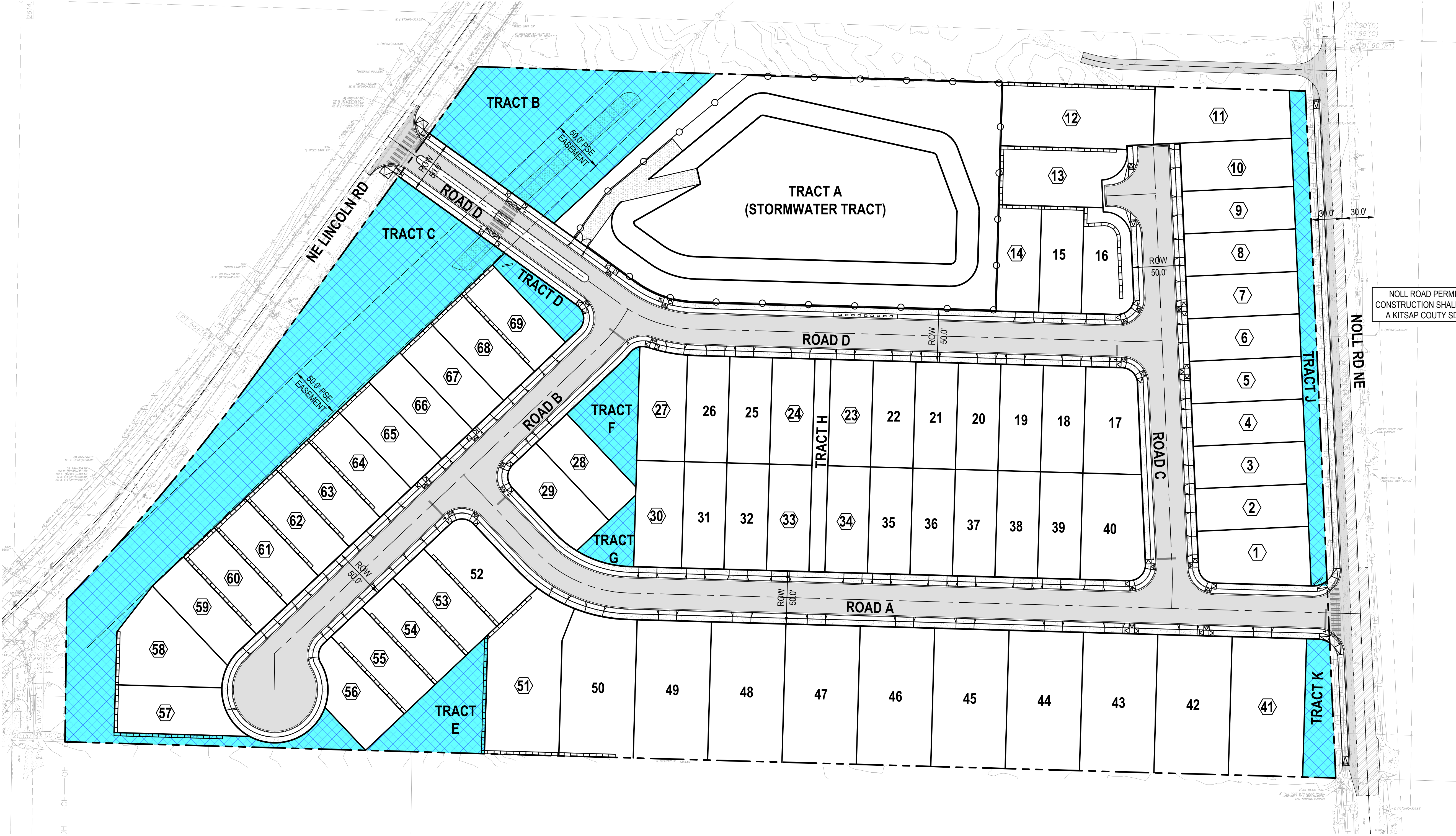
C1.00

NOTES:

- ① OPEN SPACE IDENTIFIED IN THE TRACT OPEN SPACE SUMMARY TABLE IS HIGHLIGHTED IN BLUE/CYAN ON THIS PLAN.

LEGEND

- PROPOSED PROPERTY LINE
PROPERTY LINE
EASEMENT (GRADING AND UTILITY)
CENTERLINE
LOT WITH DIRECT VISIBILITY TO OPEN SPACE
OPEN SPACE ①



TRACT SUMMARY TABLE

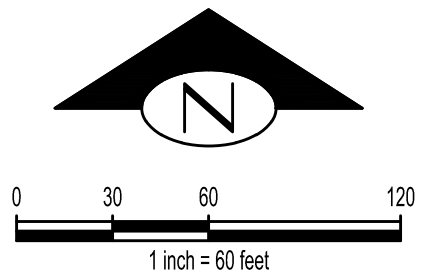
TRACT	TOTAL AREA (SF)	UNEMCUMBERED AREA (SF)	USE
A	75,613	0	STORMWATER POND
B	21,867	21,867	TREE RETENTION, OPEN SPACE, RECREATION
C	48,530	48,530	TREE RETENTION, OPEN SPACE, RECREATION
D	2,476	2,476	OPEN SPACE
E	6,262	6,262	TREE RETENTION, OPEN SPACE
F	4,482	4,482	RECREATION, OPEN SPACE
G	1,953	1,953	RECREATION, OPEN SPACE
H	3,000	3,000	UTILITY EASEMENT, OPEN SPACE
J	7,009	7,009	OPEN SPACE
K	3,417	3,417	OPEN SPACE

PRD OPEN SPACE CALCULATIONS TABLE

PMC SECTION 18.260

CODE REFERENCE	ALLOWED/ REQUIRED	PROVIDED
TOTAL SITE AREA	---	15.12 AC
ROW AREA	---	2.97 AC
UNENCUMBERED OPEN SPACE ¹	2.27 AC	2.27 AC

¹ 15% OPEN SPACE IS REQUIRED FOR AVERAGE LOT SIZE OF BETWEEN 4,500 SF AND 5,499 SF



Z:\2400001-2409999\2400760 Lincoln Road PRD\CD00\Design\PRD\AT\JP-PP-C1.10-OSP.dwg
Sep 10, 2025 - 11:38am RossG

1	09/2025	RAG	EKC	JSF	INITIAL PRELIMINARY PLAT SUBMITTAL
NO.	DATE	BY	CHD.	APPR.	REVISION

DRAWN BY RAG	DESIGNED BY EKC
CHECKED BY EKC	APPROVED BY JSF
DATE SEPTEMBER 12, 2025	
JOB No.: 2400760	

CALL TWO BUSINESS DAYS BEFORE YOU DIG
1-800-424-5555

SCALE:
AS NOTED

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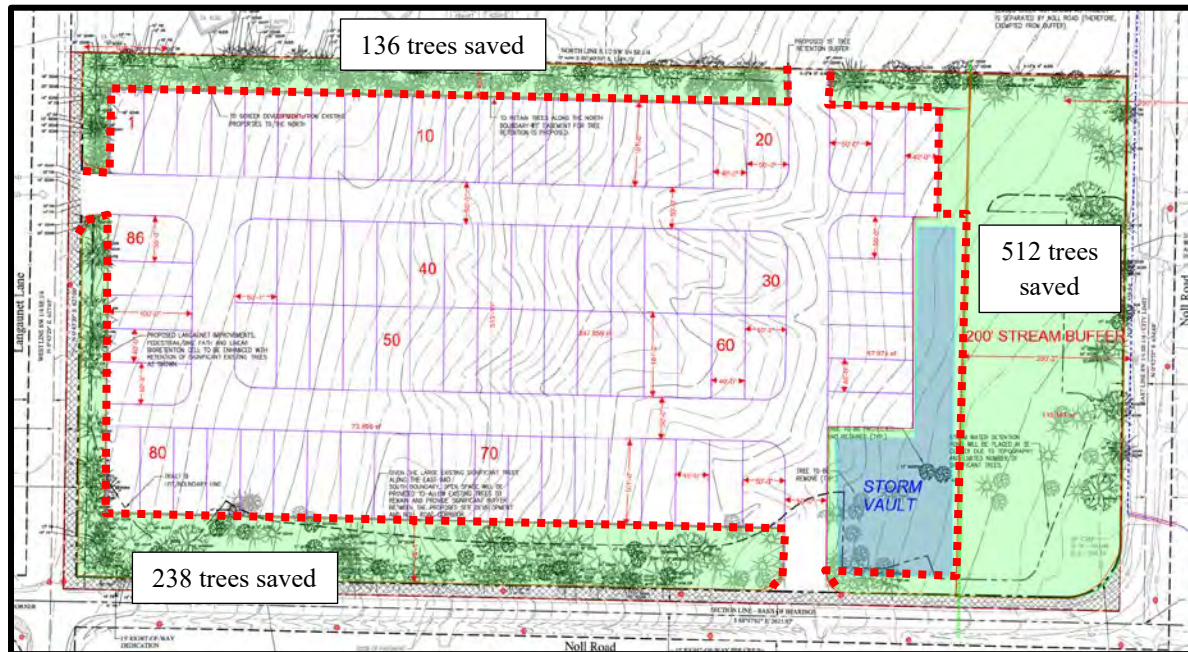
NOLL POINTE PLANNED RESIDENTIAL DEVELOPMENT
POULSBORO, WASHINGTON

OPEN SPACE PLAN

SHEET

C1.10

Attachment 2. Sandstone Ridge Site Plan



..... Tree Protection Fence Location

**Exhibit N2**

PUBLIC COMMENT - NOTICE OF APPLICATION NOLL POINTE RESIDENTIAL DEVELOPMENT

From Jeff & Jan Float <jj@jefloat.com>**Date** Mon 12/1/2025 9:38 AM**To** Edie Berghoff <eberghoff@cityofpoulsbo.com>

3 attachments (9 MB)

Washington Forestry Consultants Tree Protection Plan 7.17.25.pdf; Noll Pointe Landscape Plan.pdf; City of Poulsbo SEPA Environmental Checklist(1).pdf;

JEFF & JAN FLOAT
2776 NE Noll Valley Loop | Poulsbo, WA
98370
916.217.7149 | jj@jefloat.com | 916.202.0123

PLANNING & ECONOMIC DEVELOPMENT DEPARTMENT**Attention: EDIE BERGHOFF**

Hearing Examiner

Senior Planner City of Poulsbo

200 NE Moe Street

Poulsbo, WA 98370

MS. BERGHOFF:

The interests of the City of Poulsbo, when well understood, must coincide with moral obligations. Among these is the importance of cultivating peace and leadership combined with the ethics to do what is right for the citizens and neighbors you serve. After all, we provide the property-tax basis for the City's livelihood. As such, provisions and compromise are mandatory for rendering such justice. Being a directly impacted homeowner on Noll Valley Loop, it appears the letter provided by us to Monarch Homes dated March 5, 2025, in conjunction with the Community Outreach meeting on the Noll Pointe development with our recommendations, questions, and concerns have fallen on blind eyes and deaf ears.

Turning your attention to the Washington Forestry Consultants, Inc. Tree Protection Plan attachment, the statistics provided are indeed appalling and unacceptable to our neighborhood. To wit, Noll Valley Loop contiguously borders the southern boundary line of the proposed Noll Pointe subdivision. The planned elimination of 1,786 trees out of a total of 1,991 perfectly healthy ones is an ecological disaster no matter how you justify it. The dreadful part of this plan is the 40% shortfall of the Monarch Homes planned tree retention (205 trees) vs. the number of retained trees *required* by City of Poulsbo (498). The most egregious part of the Tree Protection Plan is the Forestry Consultant's response in *requiring only half* of that shortfall (293) with replacement trees (147). Coming from any governing body such as the City of Poulsbo a

requirement means an official demand to follow a rule or law. This perpetuates a negative political attitude of “rules for thee, but not for me.” Most certainly, if a common resident of Poulsbo didn’t follow a required rule of the City or State, there would be fines to pay and consequences for our actions. In this case, it is literally a *half-assed* response to the violation with no consequences.

Please turn your attention to the SEPA Environmental Checklist attachment, Page 7, Line Item b. Noise 2) and 3). Talk about incomplete, vague and ambiguous answers from Geoff Sherwin with Entitle Fund Five LLC. The average daily noise exposure levels of heavy construction equipment operation is between 85 and 110 decibels (dB). High-powered chainsaws register between 100 and over 125dB. What you may not realize is the average person perceives a change in sound level of 10 dB as a doubling the sound’s loudness. So 70 to 80 dB is two times as loud, 70 to 90db is four times as loud, 70 to 100 dB is eight times as loud, etc. A chart of the various noise levels in dB from heavy equipment used in homebuilding construction is provided for your reference.

The developer/home builders are keenly aware that home construction sounds originating from temporary construction sites as a result of their activity are exempt from the allowable maximum environmental noise levels from 7 am to 10 pm. With the *rule* being 55dB to 70dB for us ordinary citizens, the no-rules rule for construction companies is ripe for abuse. Mr. Sherwin’s less-than-honest answers to the SEPA survey displays an attitude of “we don’t have to be quiet, and there’s nothing you can do about it.” One must only ask yourself: How would feel with bulldozers and chainsaws whipping up 100+ dB of noise 50 feet from your bedroom every morning at 7:00?

Line Item 10, Aesthetics b. Mr. Sherwin’s answer completely sidestepped and avoided the question “What views in the immediate vicinity will be altered?” You can’t convince anyone in the world that the massacre from the removal of 1,786 trees with a height of 50’ to 100’ over 15 acres won’t alter the views from the 100 homes and families immediately adjacent to the proposed development. Talk about a purposeful omission and a blatant lie.

Turning your attention to the Noll Pointe Landscape Plan attachment, why is there a landscape buffer planned for the perimeter of the development and all internal streets and sidewalks but nothing between the two subdivisions? Given the planned placement of a 50’ to 60’ setback of the homes from the rear lot line on the 11 lots in question, certainly 5’ to 8’ of a treescape buffer is not out of the ordinary in the course of residential development.

Our proposal to you and the City of Poulsbo is a pretty simple one: REQUIRE and ENFORCE the retention of available healthy trees and plant replacements to reach the 146 number of trees short of the City’s requirement. Place those trees along the southern border of the Noll Pointe lots that adjoin the 12 lots of the Knoll Valley Loop homes already in place. Those trees also serve as sound barriers. The investment to do so is a drop in the bucket relative to the overall cost of the project and will return a substantial dividend of goodwill between neighboring communities. This will competently mitigate some of the above complex burdens on the immediate and surrounding community at large.

Ms. Berghoff, we didn't invite this direct conflict into our backyard. In effect, Monarch Homes, Washington Forestry Consultants, Entitle Fund Five LLC, the landowners from the Colacurcio family, KPFF Consulting Engineers and the City of Poulsbo are causing a violent intrusion of an ecological calamity upon a long-time existing community and our legal right to the quiet enjoyment of private property. In any event, if the City of Poulsbo chooses to approve the Tree Cutting and Clearing Permit tied to the report produced from the WA Forestry Consultants and do nothing about this matter at hand, one can only question the moral turpitude of the powers that be within the City of Poulsbo Planning & Economic Development Department and it's open complicity in choosing to do business with a landowner from a large scale criminal enterprise guilty of racketeering and conspiracy. We can't imagine you not being aware of this fact, but just in case you aren't:

https://en.wikipedia.org/wiki/Colacurcio_Organization .

Respectfully submitted,

JEFF & JAN FLOAT

WASHINGTON FORESTRY CONSULTANTS, INC.

FORESTRY AND VEGETATION MANAGEMENT SPECIALISTS



W F C I

O: 360/943-1723

C: 360/561-4407

9136 Yelm Hwy SE
Olympia, WA 98513

- Preliminary Tree Protection Plan-

NOLL POINTE

NE Lincoln Road & Noll Road NE
Poulsbo, Washington

Prepared for: ~~JKM Holdings, LLC~~ Entitle Fund Five, LLC

Prepared by: Washington Forestry Consultants, Inc.

Date of Report: July 17, 2025

Introduction

The project proponent is planning to construct a new 69-lot single-family home plat on one parcel totaling 15.05-acres between NE Lincoln Road and Noll Road NE in Poulsbo, WA. The proponent has retained WFCI to:

- Evaluate all significant (≥ 6 inches diameter) trees on the site pursuant to the requirements of Chapter 18.180 of Poulsbo Municipal Code.
- *• Make recommendations for tree removal and retention.
- *• Complete the required minimum stocking and tree replacement calculations.

Methodology

The significant (6-inches DBH and larger) trees on the parcel were inventoried using standard forestry sampling methodology. Twelve variable area plots were installed on a systematic grid across the parcel. The plot locations are marked in the field with pink flagging. Data from the counts of significant trees were entered into SuperAce[®], a forest inventory software program that projected the total number of significant trees of the project.

* This plot data will be used to determine the 25% tree retention requirement. Sampling was designed to and achieved a 95% confidence level for the projection of the population of significant trees. The evaluation used methodology developed by the International Society of Arboriculture and Matheny and Clark (1998)¹.

¹ Nelda Metheny and James R. Clark. (1994). A Photographic Guide to the Evaluation of Hazard Trees in Urban Areas (2nd Edition). International Society of Arboriculture, Champaign, IL.

Table 1. Summary of Trees in Cover Type I.

Species	DBH Range (in.)	# of Healthy Trees	# of Unhealthy Trees	Total # of Trees
Bigleaf Maple	9 – 15	247	0	247
Douglas-fir	6 – 38	1,367	222	1,589
Red Alder	9 – 15	67	418	485
Western Redcedar	14 – 30	157	0	157
Western Hemlock	18 – 22	59	0	59
Western White Pine	16 – 28	94	0	94
Summary	6 – 38	1,991	640	2,631

Potential Tree Retention

The site plan shows tree retention in three tree tracts totaling 1.55-acres. A total of 205 significant trees are projected to be growing in the tracts. Trees will require protection in groups to reduce the chances of windthrow after development.

The boundaries of the tree tracts will need to be staked to confirm the number of save trees and assess their retention potential.

Impacts to Off-Site Trees

Trees on the parcels to the north will be exposed to additional winds after the site is cleared. Property lines need staking to properly inventory the edge trees.

Discussion

There are 1,991 healthy significant-sized trees currently growing in the project area. The City of Poulsbo requires 25% significant trees to be retained.

The following is a summary of the proposed tree retention:

Total Trees on Site:	2,631 Trees
Number of Unhealthy Trees:	<u>640 Trees</u>
Number of Healthy Trees:	1,991 Trees

* <u>Required Tree Retention</u> (25% of 1,991 trees):	<u>498 Significant Trees</u>
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Planned Tree Retention:	205 Significant Trees
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* <u>Shortfall of Tree Retention Requirement:</u>	<u>293 Trees</u>
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* <u>Required Replacement Trees:</u>	<u>147 Trees</u>
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The proposed site plan is retaining 205 healthy trees in three save tree areas on the site. One hundred and forty-seven 2"-caliper replacement trees are required since the planned tree retention is 293 trees under the 25% retention requirement.

Tree Protection Measures

Trees to be saved should be protected during site grading and construction with high visibility NGPA fencing on driven posts (see Attachment #4) located at the edge of the critical root zone. This zone is described as a distance of 5 feet outside of the dripline of the save tree unless otherwise specified by WFCI. The fences should be installed after logging and pruning, but prior to the start of land clearing.

There should be no root disturbing activity within the critical root zone of save trees. This includes irrigation line installation, rototilling, equipment operation, trenching, cuts or fills. If roots are encountered outside of the established root protection zone, they should be cut cleanly with a saw and covered immediately with moist soil. If grading or fill soils must impact tree, then the tree should be re-evaluated by WFCI to determine if the tree can be saved. Mitigation to save the tree can then be prescribed, or tree removal may be necessary.

Pruning

Tree pruning may be required where trails, sidewalks, access roads, or other improvements occur near saved trees. Crown raising should be done to a height of 8' over sidewalks, and 15' over driveways or streets to allow vehicles to pass without damaging branches. All new buildings should have at least 10 feet of clearance to tree branches. Pruning should be completed prior to construction to avoid tree damage by construction contractors cutting or breaking branches for clearance.

All pruning on save trees should be completed according to the ANSI A300 (2001) standards for proper pruning, and be completed by, or supervised by an International Society of Arboriculture Certified Arborist®.

Conclusions

Timeline for Activity

1. The approved tree protection plan map should be included in the construction drawings for bid and construction of the project.
2. Contact WFCI to attend pre-job conference and discuss tree protection issues with logging and clearing contractor. WFCI can verify all trees to be saved and/or removed are adequately marked for retention.
3. Complete logging and removal of any hazard trees within reach of homes or other targets within the project and outside of the project area.
4. Complete all necessary pruning to provide at least 8' of ground clearance near sidewalks and trails, and 15' above all driveways or access roads.
5. Complete land clearing. Do not excavate stumps within 10' of trees to be saved. These should be individually evaluated by WFCI to determine method of removal.

6. Remove any invasive species within tree protection areas. No equipment should enter the tree protection areas.
7.  Install tree protection fences along the perimeter landscape and around all interior trees to be saved. The fences should be located at the edge of grading. Maintain fences throughout construction.
8. Complete grading and construction of the project.

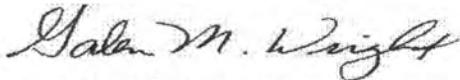
Summary

There are 1,991 healthy significant trees on the subject parcel. At least 498 significant trees are required to be retained to meet the 25% tree retention requirement. Two hundred and five trees in three tree tracts are planned to be retained. This is 293 trees short of the required minimum. At least 147 replacement trees are required to replace the number of trees short of the minimum requirement. The tracts should be staked to confirm the number and conditions of the trees within the tracts.

Please give us a call if you have any questions.

Respectfully submitted,

Washington Forestry Consultants



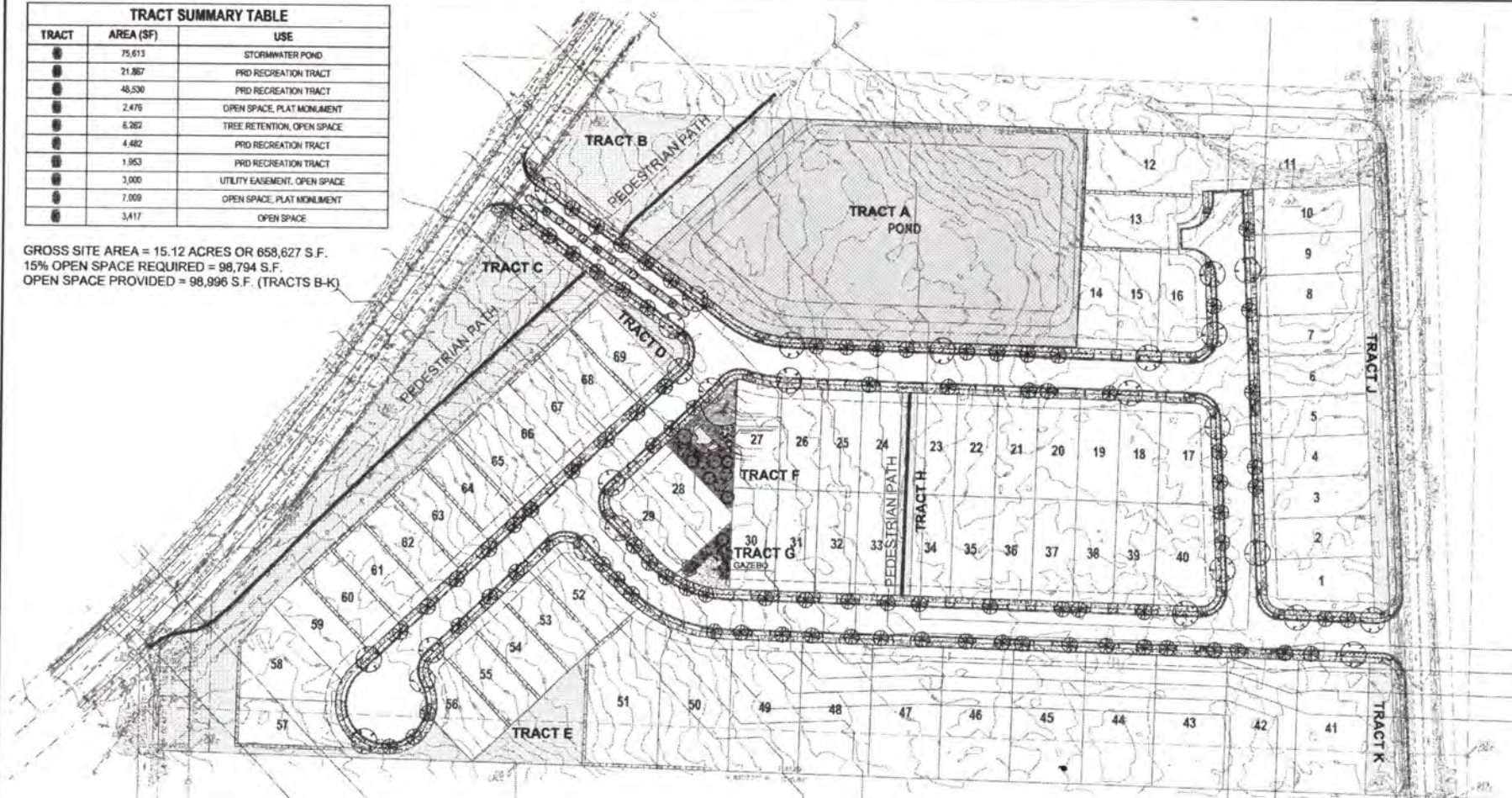
Galen M. Wright, ACF, ASCA
ISA Bd. Certified Master Arborist PN-129BU
Certified Forester No. 44
ISA Tree Risk Assessor Qualified (2014-24)
ASCA Tree and Plant Appraisal Qualified



Joshua Sharpes
Professional Forester
ISA Certified Arborist
Urban Forest Professional, PN-5939AM
ISA Tree Risk Assessor Qualified

TRACT SUMMARY TABLE		
TRACT	AREA (SF)	USE
1	75,613	STORMWATER POND
2	21,867	PRD RECREATION TRACT
3	48,530	PRD RECREATION TRACT
4	2,476	OPEN SPACE, PLAT MONUMENT
5	6,262	TREE RETENTION, OPEN SPACE
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7	1,953	PRD RECREATION TRACT
8	3,000	UTILITY EASEMENT, OPEN SPACE
9	7,009	OPEN SPACE, PLAT MONUMENT
10	3,417	OPEN SPACE

GROSS SITE AREA = 15.12 ACRES OR 658,627 S.F.
 15% OPEN SPACE REQUIRED = 98,794 S.F.
 OPEN SPACE PROVIDED = 98,996 S.F. (TRACTS B-K)



PLANT LIST			
SYMBOL	QTY	DESCRIPTION	SIZE
TREES			
1	5	Prunella virginiana Douglas Fir	5' Ht. Min. Compass Plant
2	8	Fraxinus sylvatica 'Virens' Purple Lanceol. Columbine Purple Noddy	1 1/2" Cal. Min. Well-formed
3	7	Pinus strobus Shore Pine	5' Ht. Min. Compass Plant
4	3	Quercus laevis 'Virens' Sentry Columbine Prunella Sentry Oak	1 1/2" Cal. Min. Well-formed
5	39	Acer grandidentatum Rocky Mountain Elm Maple	1 1/2" Cal. Min. Well-formed
6	20	Cercis canadensis 'Forest Pansy' Eastern Redbud	1 1/2" Cal. Min. Well-formed
7	4	Acer pennsylvanicum Amur Maple Tree	1 1/2" Cal. Min. Well-formed

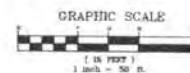
SHRUBS			
1	14	Rubus perfoliatus Raspberry	5' Gal. Min.
2	10	Vaccinium x Bush Blueberry	5' Gal. Min.
3	8	Ribes sanguineum Flowering Currant	3' Gal. Min.
4	10	Vaccinium x Dwarf Blueberry	3' Gal. Min.
5		Fragaria chiloensis Crested Strawberry	1 Gal. Min. @ 2 1/2" OC Triangular Spacing

Hydroseed for Typical Lawn Areas			
Material	Quantity	Rate	% by Weight
Topsoil	1000	1000	40%
Seed	1000	1000	25%
Compost	1000	1000	20%
Water	1000	1000	15%
Stabilizer	1000	1000	7%
1 lb. per 1,000 SF or 43.87 lbs per acre			

Preliminary Landscape & Park Plan
 Development of a Preliminary Landscape and park plan and notes for the project based on the provided site plan. The plan shall show symbols for trees and site furnishings and a legend with the symbols and descriptions of elements. 15% Open Space will be shown for the development. We will incorporate the required elements into the design in collaboration with the City of Portland, OR.

NOTE:
 1. Street Trees must be from the approved street use list of SMALL TREES with the City of Portland. Any substitutions shall be approved by the Landscape Architect.
 2. All Street Trees in Planting Maps shall have Plant Barrier per detail on sheet L3.
 3. Street trees shall be approved from different and different per detail on sheet L3.

LANDSCAPE PLAN



Noll Pointe
 500 Noll Rd NE
 Portland, WA
 253.490.8067

REVISIONS

AGENCY REVIEW
 DATE: August 21, 2025



PROJECT NO: 20075
 FILE NAME: 25075.LA
 DRAWN BY: KLB
 CHECKED BY: CKB
 PLOT SCALE: 1:1
 DRAWING SCALE: 1:50

DRAWING CONTENTS

LANDSCAPE PLAN

DRAWING NO:

L1

1 OF 3

DATE: 08/21/2025



Know what's below.
 Call before you dig.



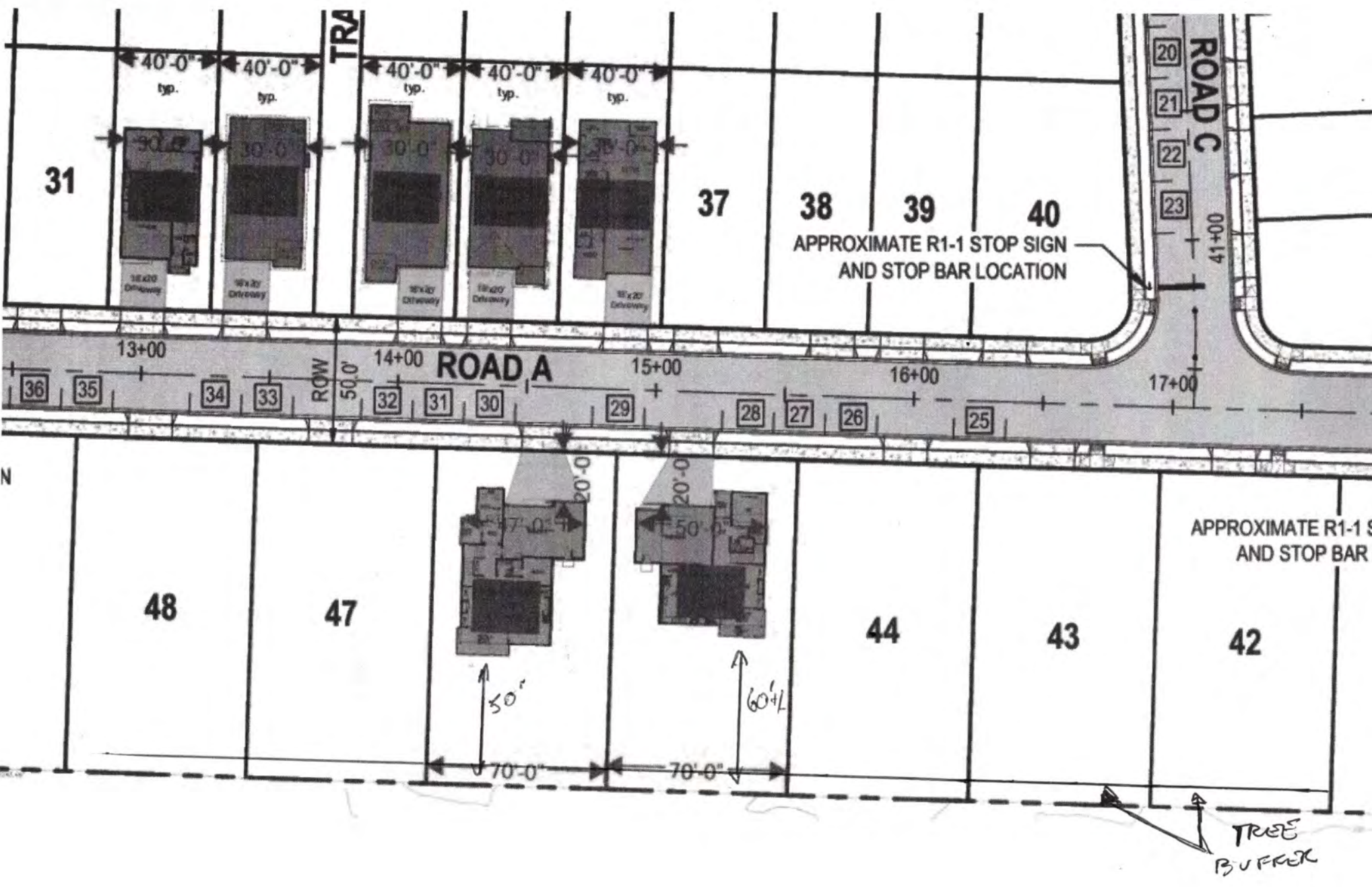
06-23-05

A circular professional seal for John D. Kieffer, a Professional Land Surveyor in the State of Washington. The seal features a portrait of a man in the center, surrounded by the text "JOHN D. KIEFFER", "STATE OF WASHINGTON", and "PROFESSIONAL LAND SURVEYOR". The number "14567" is at the bottom.

I, JOHN D. KIEFFER REGISTERED AS A LAND SURVEYOR BY THE STATE OF WASHINGTON, CERTIFY THAT THIS PLAT IS BASED ON AN ACTUAL SURVEY OF THE LAND DESCRIBED HEREIN, CONDUCTED BY ME OR UNDER MY SUPERVISION, DURING THE PERIOD OF DEC. 1903 THROUGH 1904, THAT THE DISTANCE, COURSES, AND ANGLES ARE SHOWN THEREON CORRECTLY, AND THAT MONUMENTS OTHER THAN THOSE MONUMENTS APPROVED FOR SETTING AT A LATER DATE HAVE BEEN SET AND NOT CORNERS STAKED ON THE GROUND AS DEPICTED ON THE PLAT.

- ⑤ FOUND SECTION CORNER MONUMENT.
- ⊕ CALCULATED POSITION OF SECTION CORNER MONUMENT.
- FD. 5/8" REBAR @ CAP "EMERSON 17665" PER KITSAP CO. SHORT SUBDIVISION 6509
- ① SET 2" IRON PIPE FILLED W/ CONCRETE 4 BRASS DISK IN ADJUTANT CASE IN CENTERLINE OF ROAD
- SET CONCRETE FILLED 2" IRON PIPE W/ NAIL & L.S. SHOWER "JFK 16601"

FILED FOR RECORD AT THE REQUEST OF City of Paul
ON Aug 14 AT 7:05 PM
MINUTES PAST 12 PM AND RECORDED IN VOLUME 176
PLATS, PAGES 176-180 RECORDS OF KITSAP COUNTY, WASH.
Karen Flynn
KITSAP COUNTY AUDITOR
ATTEST: Jana M
DEPUTY





SEPA ENVIRONMENTAL CHECKLIST

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

A. BACKGROUND

Name of proposed project, if applicable:
Noll Pointe Planned Residential Development

Date Prepared:

08/18/25

Name of Applicant:

Entitle Fund Five, LLC

Address:

612 Harrison Street, Suite 100
Sumner WA 98390

Phone Number:

253.312.5780

Contact:

Geoff Sherwin

Agency Requesting Checklist:

City of Poulsbo Planning and Economic Development Department

Proposed timing or schedule (including phasing, if applicable)

Construction is anticipated to begin in 2028

Do you have any plans for future additions, expansions, or further activity related to or connected with this proposal? If yes, explain.

No plans for future additions are currently known.

List any environmental information you know about that has been prepared, directly related to this proposal.

Critical Area Report

Tree Survey

Preliminary Storm Drainage Report

Geotechnical Report

Do you know whether applications are pending for governmental approvals or other proposals directly affecting the property covered by your proposal? If yes, explain.

No pending applications are currently known.

List any government approvals or permits that will be needed for your proposal, if known.

Preliminary Plat Approval (Poulsbo), Planned Residential Development Approval (Poulsbo), Grading and Construction Plan Approval (Poulsbo), NPDES Permit (Washington DOE), Final Plat Approval (Poulsbo), Site Development Activity Permit Approval (Kitsap County)

Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

The project proposes to construct 69 single family lots with associated roadways, utilities, and open space on an approximately 15 acre site. Storm water will be managed using a storm water detention pond and water quality vault. Roadways will provide primary access to the development via Lincoln Road, with a secondary access from Noll Road NE. Provided open space includes active recreation, passive recreation, and vegetated open space.

1) Describe any known or possible contamination at the site from present or past uses. There is no known contamination at the site from current or past uses.			
2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. There are no known existing hazardous chemicals or hazardous conditions that might impact the design and development of this project.			
3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project. No toxic or hazardous chemicals are anticipated to be a part of this project throughout its life cycle.			
4) Describe special emergency services that might be required. No special emergency services are anticipated beyond what would normally be required and provided for a residential development.			
5) Proposed measures to reduce or control environmental health hazards, if any. None.			
b. Noise			
1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? No known noise in the area is anticipated to impact the project.			
2) What types of levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. Temporary construction noise is expected but will only occur during designated work hours. Following project completion, noise from the development will be that of a typical residential community.	90-110 DECIBELS		
3) Proposed measures to reduce or control noise impacts, if any. The project will meet all City and County requirements regarding construction. Construction will occur only during designated hours, and construction equipment will be properly maintained.			
8. Land and Shoreline Use			
a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. Currently the site is undeveloped forested land. Adjacent properties appear to be large lot rural residential (to the north and east) and single family residential (to the south and west). The proposal does not affect the current land uses.			

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any. None.			
9. Housing			
a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. Approximately 69 housing units will be provided that are anticipated to be middle income.			
b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. None.			
c. Proposed measures to reduce or control housing impacts, if any. None are proposed.			
10. Aesthetics			
a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? The tallest height of any of the project's proposed structures is 35 feet. The principal building materials proposed for the project is wood.			
* b. What views in the immediate vicinity would be altered or obstructed? No views in the immediate vicinity are anticipated to be significantly obstructed.			
c. Proposed measures to reduce or control aesthetic impacts, if any. None.			
11. Light and Glare			
a. What type of light or glare will the proposal produce? What time of day would it mainly occur? New street lights and lights from homes will be produced by this project. New light will be produced mostly in the evenings.			
b. Could light or glare from the finished project be a safety hazard or interfere with views? The light from the finished project is not anticipated to be a safety hazard or to interfere with views.			
c. What existing off-site sources of light or glare may affect your proposal? Existing off-site sources of light or glare are not anticipated to affect the proposal.			

TABLE IV. Average Daily Noise Exposure Levels (8-Hour TWA) of Heavy Equipment Operators and Associated Laborers in dBA (Adapted from Legris and Poulin⁽¹¹⁾)

Operator or Task	Mean TWA	SD	Range
Heavy-duty bulldozer	99	5	91-107
Vibrating road roller	97	4	91-104
Light-duty bulldozer	96	2	93-101
Asphalt road roller	95	4	85-103
Wheel loader	94	4	87-100
Asphalt spreader	91	3	87-97
Light-duty grader	89	1	88-91
Power shovel	88	3	80-93
Laborers	90	6	78-107
Crawler crane >35 ton			
Noninsulated cab	97	2	93-101
Crawler crane <35 ton			
Noninsulated cab	94	3	90-98
Insulated cab	84	3	80-89
Rubber tired crane >35 ton			
Noninsulated cab	84	5	78-90
Insulated cab	74	9	59-87
Rubber tired crane <35 ton			
Insulated cab	81	4	77-87
Truck-mounted crane	79	2	76-83
Tower crane	74	2	70-76

Equipment	Decibels	Equipment	Decibels
Pneumatic chip hammer	103-113	Earth Tamper	90-96
Jackhammer	102-111	Crane	90-96
Concrete joint cutter	99-102	Hammer	87-95
Portable saw	88-102	Earthmover	87-94
Stud welder	101	Front-end loader	86-94
Bulldozer	93-96	Backhoe	84-93

RE: [External] Noll Pointe Planned Residential Development & Preliminary Plat - Technical Review 2

From Rod Malcom <rmalcom@suquamish.nsn.us>

Date Wed 5/13/2026 4:09 PM

To Edie Berghoff <eberghoff@cityofpoulsbo.com>

Good afternoon, Edie:

The following comments are addressed to the:

1. Noll Pointe Planned Residential Development Preliminary Plat Poulsbo, WA Drainage Report February 2026 | Preliminary Plat Report; and
2. Wetland and Stream Determination Report - Noll Road NE Revision #1: October 29, 2025.

It is unclear if a sufficient portion of the project site was checked to determine if there is a stream – whether defined or undefined – extended into the project site.

-
Drainage Report

The drainage report contained a very comprehensive description of downstream waters. There was a level of detail typically absent from most drainage reports.

As the nearby stream appears to be seasonal, it would be helpful if the anticipated change in the mean annual volume of water running off the site pre and post-development was determined. This would give an indication of potential alterations in the volume of precipitation that might no longer infiltrate on site and support to interflow and shallow groundwater reaching the stream channel.

-
Wetland and Stream Determination Report

This report contains references to the presence of fish in the stream to the northwest of the proposed project. For example, page 2 states:

"The closest mapped feature is cutthroat trout (Oncorhynchus clarki) occurrence in a stream approximately 365 feet to the northwest of the parcel. No wetlands, streams, or priority habitats are mapped within 300 feet of the property."

Page 2 states:

"Washington Department of Fish and Wildlife (WDFW) SalmonScape Interactive Mapping System: SalmonScape shows a stream originating in the center of the property. The closest fish habitat is mapped downstream of the site, approximately 0.1 miles to the northwest. No other wetlands or streams are mapped within 300 feet of the site."

Given the document presence of fish so close to the project site, states on page 6:

"No flowing water, scoured areas, sorted streambed material, or other evidence of a stream were documented in the 2009 Wiltermood report, or observed during the December 2024 or March 2025 site visits."

Followed by this statement of page 7:

“Additionally, WRI assessed the off-site area where Kitsap County maps a culvert under NE Lincoln Road, approximately 185 feet north of the subject property. No flowing or standing water, sorted stream bed material, or defined channel were observed adjacent to the right-of-way.”

The locations of streams are often incorrectly mapped and, at times, there can be more stream crossings of a road than shown on a map. A field visit that looks for evidence of a stream in the location shown on a map, can overlook the presence of a stream or a road crossing in another location. It should be clarified if the site visits mentioned in the report traversed the property looking for evidence of a stream or only looked at the location shown on maps. It should be clarified if during the site visit if only the location of the mapped stream/culvert was looked at.

The Wild Fish Conservancy apparently surveyed the stream in 2019 and shows deviations from the mapped location as well as the stream extending into the property (Fig 1). The narrative part of their map includes the following:

“Structure Notes:

This is a 1.6ft. ABS pipe crossing NE Lincoln Rd. The channel upstream is not well defined. The channel downstream may be Type F (need more data). There is a 0.33ft. overflow pipe at the site also. Road fill is 8.0ft.

Additional Notes:

The survey was conducted in the road right-of-way during a lower than normal flow year. The channel downstream meets Type F physicals, however, more data is needed. The riparian corridor downstream is composed of big-leaf maple, salmonberry, and nettle.”

The WFC survey indicates there was a channel upstream of the culvert crossing on NE Lincoln Rd, with the channel downstream being clearly defined. This differs from the “Wetland and Stream Determination” which states:

“... Kitsap County maps a culvert under NE Lincoln Road, approximately 185 feet north of the subject property. No flowing or standing water, sorted stream bed material, or defined channel were observed adjacent to the right-of-way.”

Additionally, the “Wetland and Stream Determination” report gives emphasis to a lack of defined channel. In 2026, there have been updates to water typing. Though in the past, off-channel habitats of Type F streams could be categorized as Type F, field assessments often fixated upon a need for a defined channel. Updates to the WACs have expanded the definition to include nonchannelized streams. Also, areas of undefined channel that are fish passable are often used by juvenile fish to move between areas of defined channel.

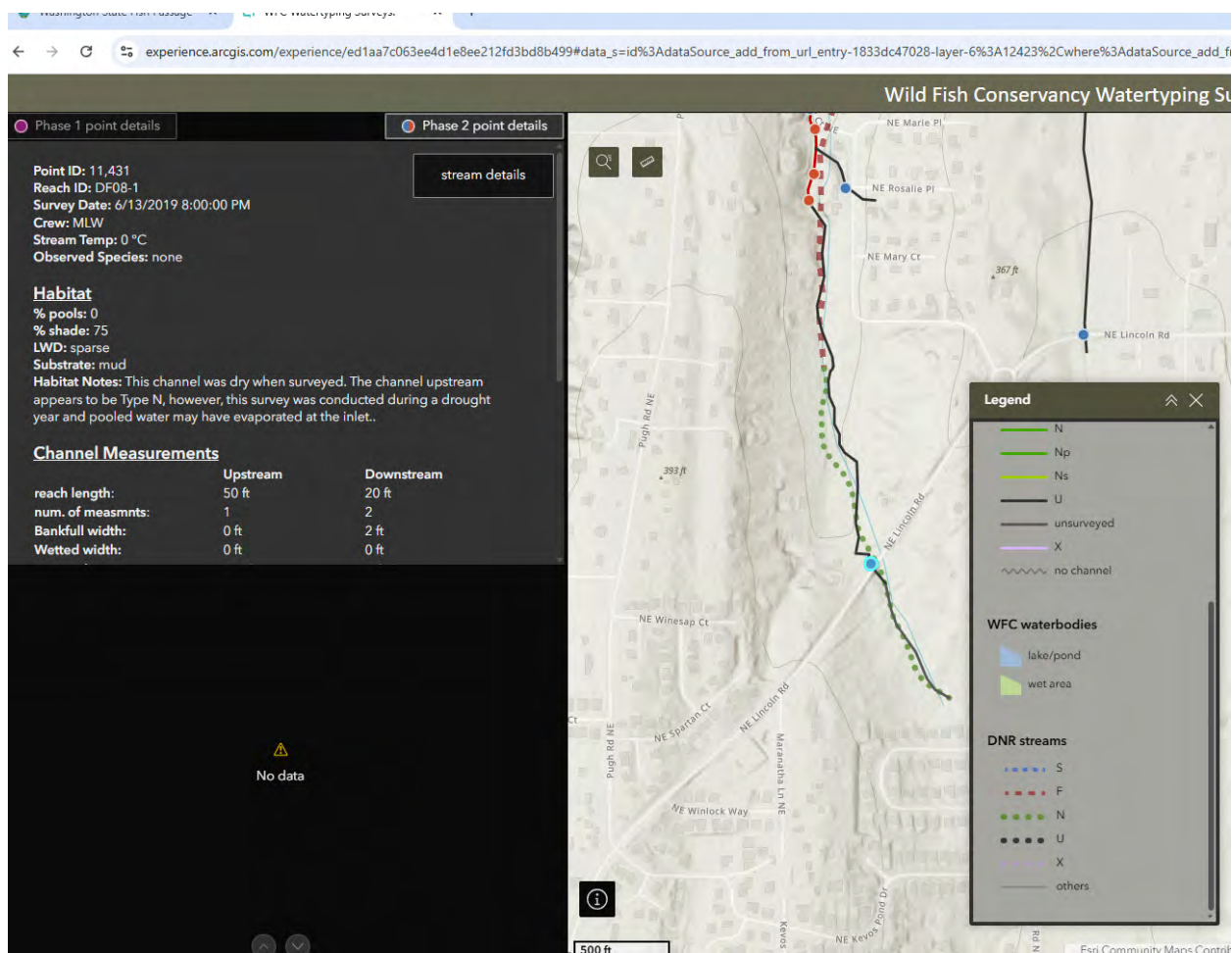


Fig 1. WFC map

Thank you.

Rod

Roderick Malcom
Biologist/Ecologist
Fisheries Department



P.O. Box 498 (mailing)
18490 Suquamish Way
Suquamish, WA 98392
Phone: (360) 394-8449

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immediately notify the sender electronically, return the email to the above email address and delete it from your files. Thank you.

From: City of Poulsbo PED Department <planninginfo-cityofpoulsbo.com@shared1.ccsend.com>

Sent: Wednesday, April 29, 2026 3:50 PM

To: Rod Malcom <rmalcom@suquamish.nsn.us>

Subject: [External] Noll Pointe Planned Residential Development & Preliminary Plat - Technical Review 2



City of Poulsbo Technical Review Notice

Technical Review Committee,

Please find the project documents for the Noll Pointe Planned Residential Development & Preliminary Plat [here](#). Please provide review by May 13, 2026.

If there is an issue with the link, you can go to <https://ci-poulsbo-wa.smartgovcommunity.com/Public/Home> (-> gf8qfm6ab.cc.rs6.net) > Applications> and search for permit # P-09-10-25-01

Please let me know if you have problems accessing the electronic application.

Edie Berghoff | Senior Planner | eberghoff@cityofpoulsbo.com

Tech Review (due May 13, 2026)

City of Poulsbo | Planning and Economic Development Department 200 NE Moe Street |
Poulsbo, WA 98370 US

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Noll Pointe PPlat Response to public comments:

Float Leg er 12/1/2025

1. Concerns over the tree retention plan and the removal of the trees and the possible short fall.
 - a. The applicant has requested the project forester to conduct a more thorough tree inventory for the proposed tree retention areas. The tree retention and landscape plans will be revised based upon the results of the tree inventory.
2. Concerns over the noise levels during construction of the project and the individual single-family residences.
 - a. The project will comply will all local rules and regulations for construction hours and noise during the construction of the project, in accordance with Poulsbo Municipal Code 15.32.
3. Concerns over the “Views in the vicinity will be altered” from the SEPA checklist.
 - a. The intent of the SPEA question is in regard to the immediate vicinity of the project. They are correct in the fact, that the view of the project from the neighboring properties will change as it will become a single-family development. The statement in the SEPA checklist is in regard to the project not obscuring or significantly impacting views of substantial geographic features such as mountains, lakes, or other landmarks.
4. Concerns over the perimeter landscape buffer planned for the project, in relation to the common boundary line between the project and the abu4 ng homes of the Noll Valley Loop single-family development.
 - a. The City code for Planned residential Developments Section 18.260.070 provides options. Per Section 18.260.070(A), the project has matched the square footage and widths of the lots adjacent to the Noll Valley Loop plat.
 - b. Per Section 18.260.070(B), there is an option to either provide a 25 foot vegetated buffer or a six-foot site obscuring fence. The applicant has chosen to utilize the 6 foot site obscuring fence. The applicant has concerns not only for the residences that will reside in the proposed project but those that abut the southern boundary of the project. It is our experience that a 25 foot vegetative buffer with existing trees can be susceptible to wind throw as the remaining trees will now be exposed to winds they have not previously been exposed to. With that, they can very easily be blown over on to fences and residences. We value the safety of our customers and neighbors and have chosen the fencing option as allowed by code.

1. Concerns over the perimeter landscape buffer planned for the project, in relation to the common boundary line between the project and the adjoining homes of the Noll Valley Loop single-family development.
 - a. The City code for Planned residential Developments Section 18.260.070 provides options. Per Section 18.260.070(A), the project has matched the square footage and widths of the lots adjacent to the Noll Valley Loop plat.
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May 26, 2026

Edie Berghoff
Senior Planner
City of Poulsbo
200 NE Moe Street
Poulsbo WA, 98370

RE: Noll Pointe Planned Residential Development & Preliminary Plat Comment Response

Wetland Resources, Inc. (WRI) has reviewed the emailed comments dated May 13, 2026, from the Suquamish Tribe fisheries department, regarding the *Wetland and Stream Determination Report* for the Noll Pointe Planned Residential Development and Preliminary Plat project. The comments from the Suquamish Tribe are below in italics, with responses following in normal text.

Comment Letter Concern #1

The locations of streams are often incorrectly mapped and, at times, there can be more stream crossings of a road than shown on a map. A field visit that looks for evidence of a stream in the location shown on a map, can overlook the presence of a stream or a road crossing in another location. It should be clarified if the site visits mentioned in the report traversed the property looking for evidence of a stream or only looked at the location shown on maps. It should be clarified if during the site visit if only the location of the mapped stream/culvert was looked at.

During the December 2024 site visit, the entire property was traversed to assess site conditions and identify any wetlands or FWHCAs that may not be mapped by other sources. Due to the identification of an onsite stream and wetland by online resources, extra attention was given to areas with mapped features and to topographical depressions. Additionally, WRI staff walked the ROW of Lincoln Road adjacent to the parcel to review downslope areas abutting the parcel and to identify any culverts that might convey water into or out of the site. Due to differing conclusions from previous studies and online resources, WRI returned to the site in March 2025 towards the end of the wet season. The second evaluation of the site confirmed the initial conclusions from the December 2024 investigation.

Comment Letter Concern #2

The Wild Fish Conservancy apparently surveyed the stream in 2019 and shows deviations from the mapped location as well as the stream extending into the property (Fig 1). The narrative part of the map includes the following.

‘Structure Notes:

This is a 1.6ft. ABS pipe crossing NE Lincoln Rd. The channel upstream is not well defined. The channel downstream may be Type F (need more data). There is a 0.33ft. overflow pipe at the site also. Road fill is 8.0ft.

Additional Notes:

The survey was conducted in the road right-of-way during a lower than normal flow year. The channel downstream meets Type F physicals, however, more data is needed. The riparian corridor downstream is composed of big-leaf maple, salmonberry, and nettle.’

The WFC survey indicates there was a channel upstream of the culvert crossing on NE Lincoln Rd, with the channel downstream being clearly defined. This differs from the “Wetland and Stream Determination” which states:

‘...Kitsap County maps a culvert under NE Lincoln Road, approximately 185 feet north of the subject property. No flowing or standing water, sorted stream bed material, or defined channel were observed adjacent to the right-of-way.’

Additionally, the ‘Wetland and Stream Determination’ report gives emphasis to a lack of defined channel. In 2026, there have been updates to water typing. Though in the past, off-channel habitats of Type F streams could be categorized as Type F, field assessments often fixated upon a need for a defined channel. Updates to the WACs have expanded the definition to include nonchannelized streams. Also, areas of undefined channel that are fish passable are often used by juvenile fish to move between areas of defined channel.

Due to lack of access, areas offsite and outside of publicly accessible areas (rights-of-way) were not evaluated. Additionally, PMC 16.20.150.K.2 states that when a legally established, preexisting use (such as a paved road) interrupts a buffer, the buffer will end at the edge of pavement, adjacent to the critical area. As WRI did not locate any streams or wetlands extending onto the property, the RMZ/buffer of any offsite streams or wetlands would terminate at NE Lincoln Road or Noll Road NE and would not extend onsite.

Onsite areas upstream of the culvert (as well as the rest of the site) were assessed for any evidence of streams or wetlands. The WFC survey states that the channel upstream of the culvert (the segment that is mapped on the subject parcel) was not well defined and appears to be a Type N, but that the survey was conducted during a drought year, which indicates that the survey was not conclusive. WRI visited the site twice during the wet season, with the March 2025 site visit occurring when precipitation levels were considered normal. During the site visits, no evidence of flowing or standing water were observed anywhere on the parcel or in the ROW of NE Lincoln Road adjacent to the parcel. As such, there is no flow path or stream, channelized or nonchannelized, connecting the site to off-site streams or wetlands.

Photographs were taken during the March 2025 site visit at the lowest points on the site to show existing conditions in the area most likely to exhibit stream or wetland conditions. These photos were included in the report, and copies are enclosed with this letter. A map showing the photo points, data points, and two-foot contours is also enclosed with this response. Photo Point One

shows the lowest area of the site and it contains a dense upland plant community. Photo Point Two is within the lower elevations of the property and shows a layer of intact leaf litter. If the site contained flowing or ponded water, even periodically, an even layer of leaves on the ground and dense upland plants would not be present.

WRI has concluded that there are no wetlands, streams, or FWHCAs onsite. No flow path or other aquatic connection is present between the project site and the offsite stream.

Please feel free to contact us at 425-337-3174 or emily@wetlandresources.com if you have any questions.

Sincerely,
Wetland Resources, Inc.

A handwritten signature in cursive script that reads "Emily Prosser".

Emily Prosser
Associate Ecologist/Wildlife Biologist

Attachments: Site Map and Photographs

SITE PHOTOS
JKM HOLDINGS - NOLL ROAD NE

PORTION OF SECTION 13, TOWNSHIP 26N, RANGE 01E, W.M.



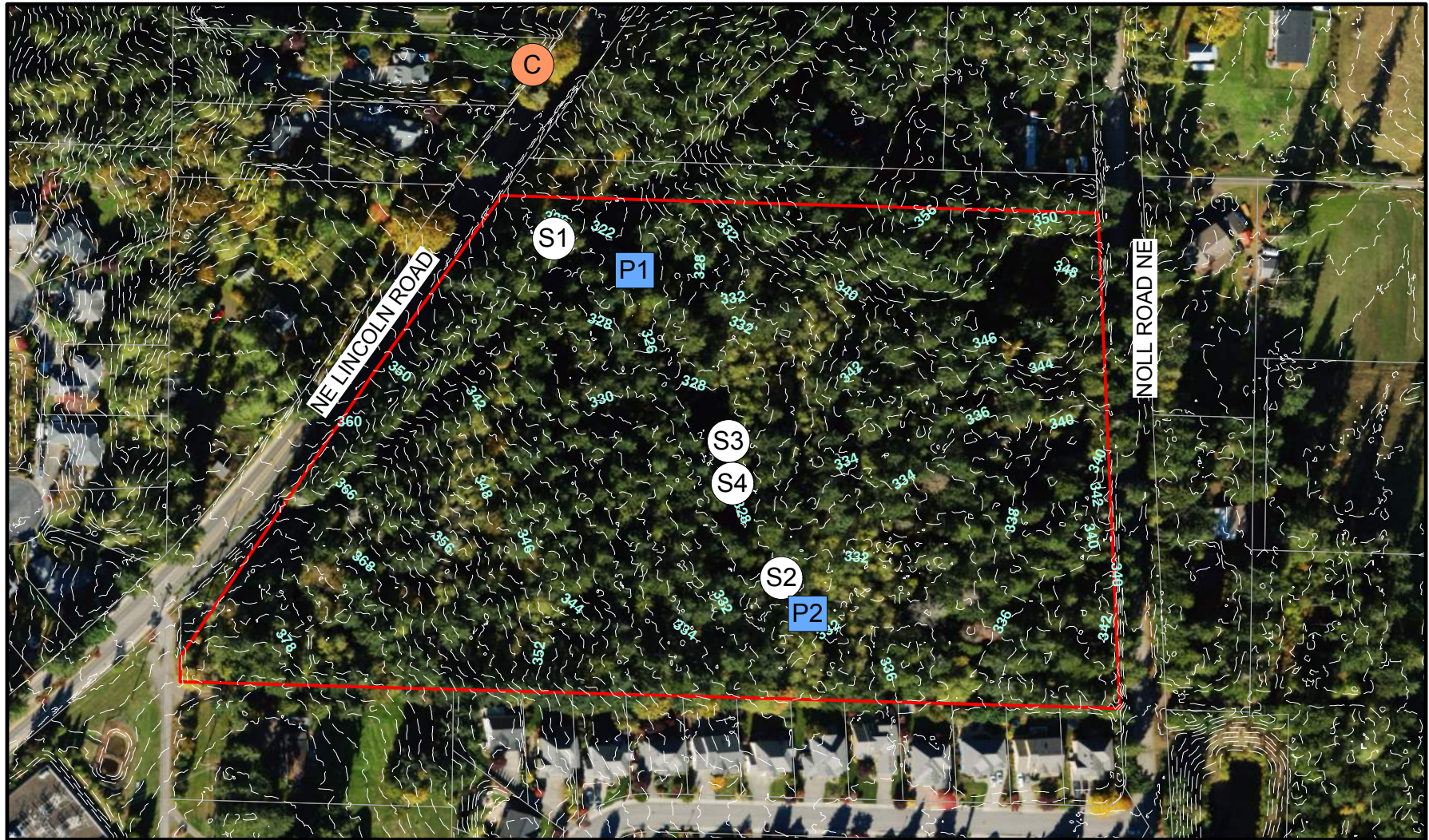
PHOTO POINT 1: LOOKING TOWARDS THE LOWEST POINT OF THE SITE, SHOWING A DENSE UPLAND PLANT COMMUNITY.



PHOTO POINT 2: LOCATED WITHIN THE LOWER ELEVATIONS OF THE PROPERTY, SHOWING A LAYER OF INTACT LEAF LITTER.

SITE MAP
JKM HOLDINGS - NOLL ROAD NE

PORTION OF SECTION 13, TOWNSHIP 26N, RANGE 01E, W.M.



LEGEND

- S# DATA POINTS
- P# PHOTO POINTS
- C CULVERT



Scale 1" = 200'



Wetland Resources, Inc.
Delineation / Mitigation / Restoration / Habitat Creation / Permit Assistance
9505 19th Avenue S.E. Suite 106 Everett, Washington 98208
Phone: (425) 337-3174
Fax: (425) 337-3045
Email: mailbox@wetlandresources.com

Site Map
JKM HOLDINGS - NOLL ROAD NE
Poulsbo, WA

JKM Holdings, LLC Attn: Geoffrey P. Sherwin PO Box 188 Puyallup, WA 98371	Sheet 1/1 WRI #: 24334 Drawn by: EP Date: 05/26/26
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