

EXHIBIT G

Wetland Review



BGE Environmental, LLC.

Wetland Consulting and Land Use Planning

06 October 2025

Laughlin Development, LLC.
PO BOX 10607
Bainbridge Island, WA 98110

RE: Wetland Review Dauntless Dr NW, Poulsbo Tax Parcel 102601-1-044-2009

At your request, BGE completed field review and limited assessment on a known wetland area located on a 1.78-acre property on the west side of Dauntless Dr NW, see vicinity map Exhibit A. The scope of the assessment, as we understand it to be, is to determine if the subject wetland conditions regarding size, complexity, and function are the same as documented in the Olhava Master Plan. Our review included the following investigations and resources:

1. Review of *Storm Drainage Design Report*, American Engineering Corporation (AEC), 2002,
2. Review of Site Plan provided by Seabold Engineering
3. Resource data base search
 - a. Poulsbo Wetland Critical Area Map
 - b. Kitsap County GIS
 - c. DOE Water Quality Atlas
 - d. WDFW Priority Habitat and Species
 - e. National Wetland Inventory
 - f. DOE Coastal Zone Atlas
 - g. Google Earth
 - h. Bing Maps
4. Field investigation August 19, 2025.

PROJECT BACKGROUND

The subject wetland is cited (AEC) as Wetland A with a fifty-foot buffer. Wetland impact and drainage strategies for Olhava state that '*Wetland A will be preserved, undisturbed together with it's 50-foot buffer.*' According to AEC, the wetlands closed depression is incidental to the stormwater design and not meant to be utilized as a retention facility. However, the stormwater pond designed to this sub-basin will discharge to Wetland A at a release rate that meets pre-developed conditions

with the intention to 'maintain the integrity of the wetland'. The sub-basin pond (Pond 4) is multi-celled, providing detention, water quality, and sediment removal to clean up the stormwater prior to discharging. Direct stormwater discharges to wetlands are prohibited¹. To address this at the time, 'small depressions or infiltration galleries' were constructed outside and around the fifty-foot wetland buffer. The small, depressions are designed to hold the overflow from Pond 4 and allow it to infiltrate naturally into the wetland, mimicking the natural hydrologic regime. A dispersal swale level spreader was installed at the outer edge of the infiltration galleries to ensure even flow distribution around the wetland buffer. The following excerpt is taken from Section III Preservation of Natural Drainage Areas Retention /Detention Analysis Sub-Basin 8, page 26 of the AEC report:

Storm Drainage Design Report, Phase One Grading and Erosion/Sedimentation Control

Sub-Basin 8. Sub-basin 8 is 53.14 acres in size and constitutes the northeast portion of the Olhava site and drains toward the existing large closed depression containing Wetlands A. There is no outlet from this closed depression and all stormwater runoff appears to infiltrate into the site soils. When developed, the basin size will increase to 60.50 acres and include the lower sections which originally by-passed this area. However, in order to maintain the water balance in the wetlands, the release rates into the infiltration area will be the pre-developed rates from the original 53.14 acres.

Impact on Wetlands A: A closed depression analysis is not warranted for the wetlands. The infiltration area to the wetlands closed depression is incidental to the design and was not meant to be used as a retention facility. Pond 4, serving Sub-basin 8 is designed to provide detention and controlled release to this area. The pre-developed release rates from Pond 4 were calculated to match the existing flows into the closed depression in order to maintain the integrity of the wetlands. In addition, the DOE SWWM Manual does not allow direct discharge into the wetlands and requires that discharge from any control structure mimic the pre-developed conditions. The pre-developed conditions for Sub-basin 8 were surface and sub-surface flows. Therefore, providing infiltration benches, which surround the buffer area, will provide surface and sub-surface flows needed to mimic the drainage to the wetlands. Also see additional analysis in Section VII wetlands.

Estimated Area:	53.14 acres
Estimated Time of Concentration:	176.11 minutes
Estimated Peak Flows:	
Q ₂ 2-year, 24-hour:	2.23 cfs
Q ₁₀ 10-year, 24-hour:	4.64 cfs
Q ₁₀₀ 100-year, 24-hour:	9.25 cfs
Q _{7day} 100-year, 7-day:	2.73 cfs

¹ Department of Ecology's Stormwater Management Manual for Western Washington, 1992

RESOURCE SEARCH

Wetland A documentation occurs on the City of Poulsbo's Wetland Critical Area Map. There are no documented priority habitat or species to the parcel or surrounding vicinity. This includes both flora and fauna. Threatened and Endangered species potentially in the vicinity include marbled murrelet, yellow-billed cuckoo, and bull trout. No habitat is present for these species. Review of the Kitsap County Critical Areas Ordinance (*No 217-1998*) amended August 9, 1999, we presume that the wetland is Category III *because*, at a minimum, it provides a critical Aquifer recharge function². Fifty-foot buffers were standard for a Category III rating.

FIELD FINDINGS

The field review was completed under dry conditions, August 19, 2025. The approach to the interior of the closed depression is off a 2:1 slope that is heavily vegetated. Near the toe-of-slope the level spreaders are observed as angular rock berms not more than a foot in height. Once under the canopy the floor is a thick layer of fallen leaves. Dried algal mats skirt tree trunks from heights of up to four feet.

A silt fence sits on top of the constructed infiltration berm, establishing the edge of the wetland buffer of fifty-feet. The berm circles the wetland at a higher elevation to the floor of the landward closed depression. In some areas the change in elevation is over five feet. Once on the wetland side of the silt fence there is an overabundance of downed trees. The edge of Wetland A is delineated roughly fifty-feet from the silt fence. The wetlands interior is a thicket of downed trees of various stand ages. Vegetation is observed as an ecotone of hardhack in some areas. The downed logs are blanketed with dried algae. Water marks on the downed material suggests seasonal ponding up to four feet deep.

DISCUSSION

BGE completed an aerial review of the landscape from pre- to post-construction. The vicinity contours and Wetland A were taken from the drainage report and placed over a 2002 aerial, see Exhibit B. This is after the projects grading, and it shows the clearing limits roughly fifty-feet off the wetland boundary. The canopy was mostly Western red cedar. The understory and shrub complex are presumed to be typical. Note the original contours around the wetland.

By 2009 the closed depression was established around Wetland A. The infiltration berm was constructed and the level spreaders in place, see Exhibit C. The conifer trees are dead, and

² Department of Ecology's Washington State Wetland Rating System for Western Washington, 2nd Edition, 1993, or as amended.

deciduous vegetation is establishing in the buffer and closed depression. A wet weather aerial from 2012 shows that the entire closed depression is inundated in the wet season, see Exhibit D. Only a small upland island is noted on the infiltration berm along the southern side. Google Earth aerials suggest that the conifers were needle bare by 2006. Inundation to the toe-of-slope of the closed depression is observable in other years on both Kitsap County GIS and Google Earth. The closed depression, which includes Wetland A and its buffer, is observed as inundated all years, personal communication Jim Laughlin, owner. Today the closed depression is a closed canopy of deciduous trees. The wetland buffer is also a closed canopy of deciduous trees, and the wetland is seasonally inundated with a smaller percentage of scrub shrub habitat along the it's outer edge or ecotone.

CONCLUSION

Wetland A exists today. It is a distinct area of seasonal inundation, mostly void of vegetation, within the closed depression. What has changed is the habitat complexity of the wetland buffer. This is not surprising as the stormwater design utilized the buffer as an infiltration berm changing the hydrologic regime within the buffer. Conifers, regardless of the species wetland indicator status, died off quickly with the introduced hydrology. Nevertheless, the wetland buffer is forested, voluntarily re-established with species tolerant to the hydrologic regime. BGE respectfully withholds an opinion on the infiltration galleries as these benches are part of the storm water facility.

Sincerely,



Robbyn Myers, M.S., SPWS



Exhibits A-D

BGE25_240 DAUNTLESS TMWDTR.100625.jki

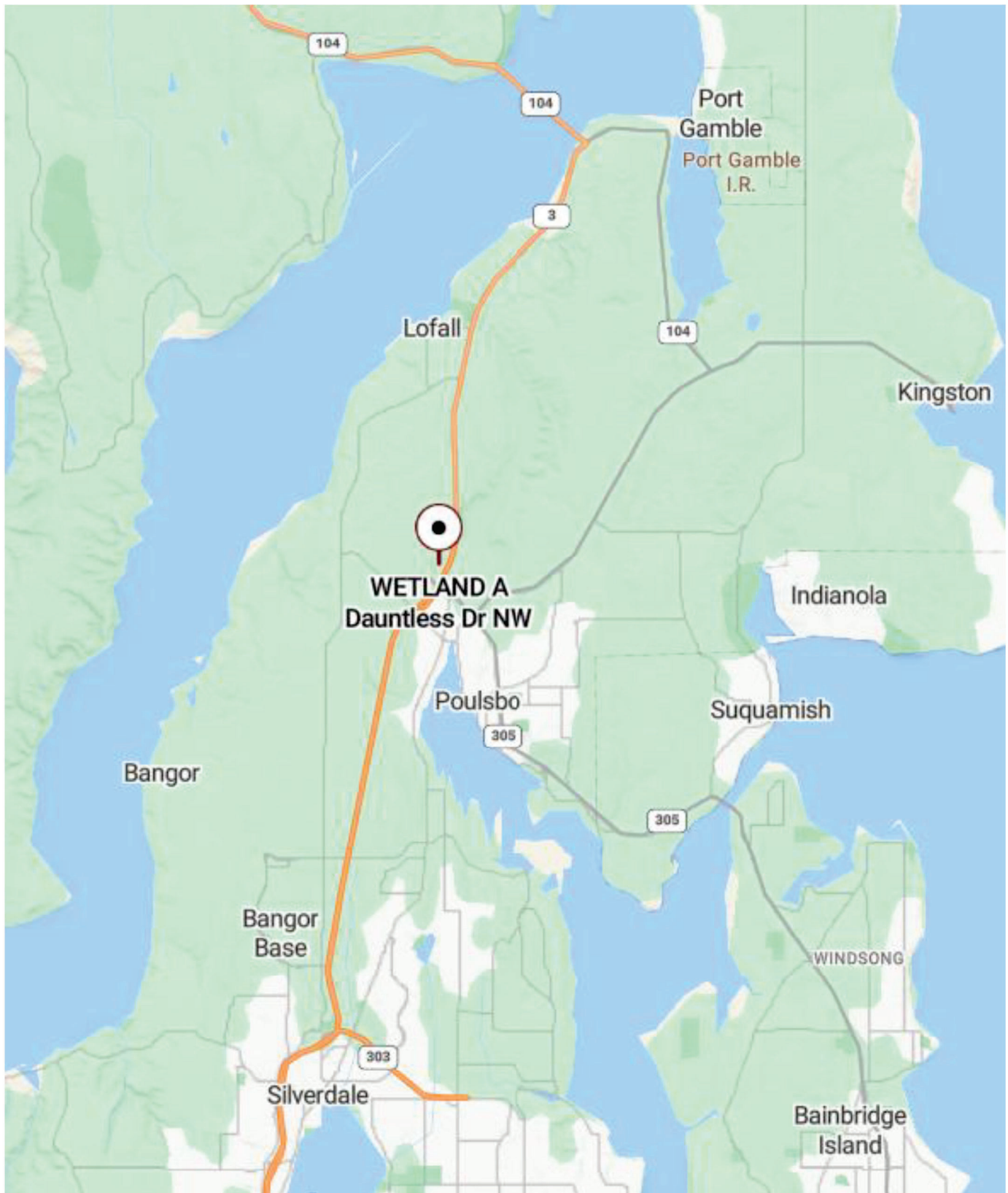


EXHIBIT A: VICINITY MAP

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LAUGHLIN DEVELOPMENT LLC
DAUNTLESS DR NW
102601-1-044-2009



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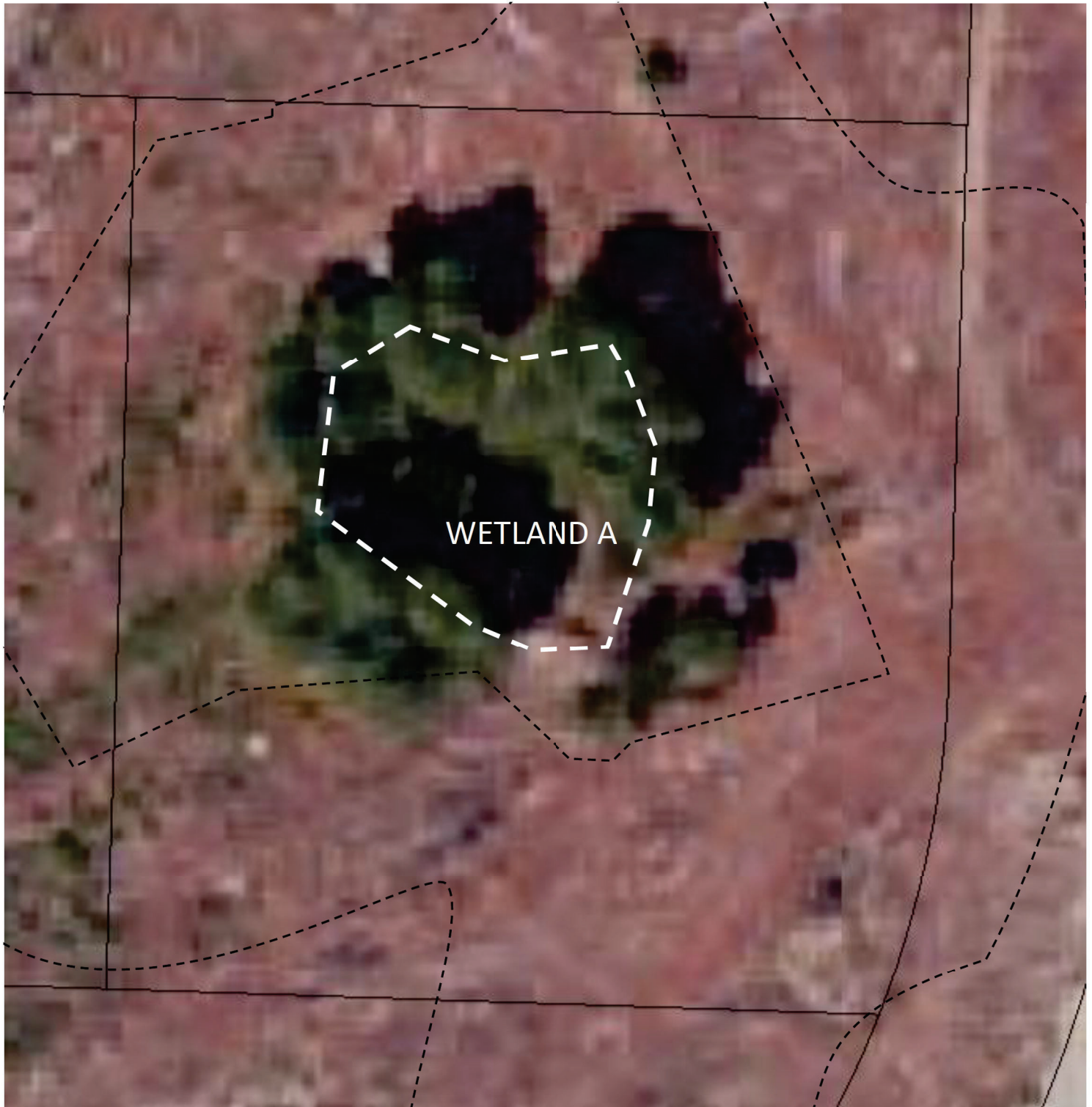


EXHIBIT B: WETLAND A PRE-CONSTRUCTION TOPOGRAPHY
OLHAVA MASTER PLAN FIGURE 3 EXISTING SUB-BASINS

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EXHIBIT C: OBSERVED CONDITIONS OF CLOSED DEPRESSION

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EXHIBIT D: OBSERVED CONDITIONS DURING THE WET SEASON

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