EXHIBIT 5.g: SWC Critical Area Report Addendum No. 3 (9/15/26)

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September 15, 2026

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

RE: Critical Area Report Addendum #3 – Pinnacle at Liberty Bay
Poulsbo Subdivision #P-06-20-25-03
SWC Job #24-158

Dear Nicole,

This report is a third Addendum to our July 14, 2025 *Pinnacle at Liberty Bay Critical Area Report.* This addendum addresses *modifications* to the site plan and the proposed buffer averaging for the plat.

The attached plan depicts the areas of proposed buffer reduction which have been reduced from those in the originally submitted plat. The original buffer averaging proposal was previously peer reviewed and approved (subject to changes which were subsequently made related to the western edge of Wetland A) by Farallon Consulting (1/8/2026). The modified plan also identifies areas of temporary stream buffer impacts and the need for new utility corridors in stream buffers which are addressed by this addendum.

Wetland A buffer averaging

In the originally submitted plan the buffer of Wetland A, a Category III wetland was to be reduced by 1,859 sf in two areas with 2,207sf of buffer added to compensate.

The new plan has reduced the buffer impact to 781sf in one area for the road grades, and added 1,018sf of buffer in a band along the east side of the wetland.

As depicted on the site plan, some minor buffer averaging is proposed along the outer portion of the buffer of Wetland A for placement of the road and the grading along its edge. The total reduced portion of the

buffer is 781sf. This will be averaged by adding 1018sf of buffer as depicted on the attached revised plan.

According to Poulsbo Municipal Code 16.20.230.E, buffer averaging can be utilized if the following criteria are met;

E. Buffer Width Averaging. The widths of buffers may be averaged if this will improve the protection of wetland functions, or if it is the only way to allow for reasonable use of a parcel. Averaging may not be used in conjunction with any of the other provisions for reductions of buffers in subsection F of this section.

Response: Due to the topography and the road width requirements, it is not feasible to get the road around this wetland without minor impacts to the buffer. The impacts are from grading to support the road.

1. Averaging to improve wetland protection may be permitted when all of the following conditions are met:

a. The wetland has significant differences in characteristics that affect its habitat functions, such as wetland with a forested component adjacent to a degraded emergent component or a "dual-rated" wetland with a Category I area adjacent to a lower-rated area.

Response: The portions of the buffer to be reduced is primarily the existing grade of an overgrown logging road and is vegetated with blackberry and crrently provides little function.

The added area of 1,018sf of buffer along the eastern edge of the buffer is more heavily vegetated and will improve wetland protection to maintain the existing functions of the wetland.

b. The buffer is increased adjacent to the higher-functioning area of habitat or more sensitive portion of the wetland and decreased adjacent to the lower-functioning or less sensitive portion.

Response: As previously noted, the reduced portion of the buffer is currently heavily overgrown with blackberry and does not contain any mature vegetation nor provide very high function. The added area of buffer is more heavily vegetated with a mix of native species and some blackberry which provide a higher function for habitat, water quality improvement and protection of the wetland from human intrusion.

The resulting averaging consists of a reduced buffer area with good native vegetation coverage and added buffer areas with good native vegetation as well. These averaged buffer will improve wetland protection to maintain existing wetland functions and would not require any additional plantings or enhancment to maintainn these fucntions.

c. The total area of buffer after averaging is equal to the area required without averaging.

Response: The total area of buffer reduced is less than the amount added, resulting in a net increase in buffer area of 237sf.

d. The buffer at its narrowest point is never less than three-quarters of the required width.

Response: The minimum buffer width is 37.5' which is 75% of the standard 50' buffer as required.

Wetland B buffer averaging

As depicted on the site plan, buffer averaging is proposed along the outer part of the buffer of Wetland B in 3 locations. The proposed averaging of the buffer of Wetland B is necessary to make efficient use of the site given the topographic constraints and grading necessitated by the City's maximum road grade of 12%. If we were permitted to create steeper roads, we could follow existing grades better and reduce the grading. But at 12%, we're chasing grades in a lot of places even with sizable walls (up to 20' in some locations). The reduced areas of buffer on the north are due to the fact that in order to utilize that narrow portion of the site and keep an access road to the lots, a minor amount of averaging will be required. The other two areas will require some grading in these areas due to the slope so averaging these will be required to allow lots on this area of the site.

The total reduced portion of the buffer is 10,833sf. This will be averaged by adding 11,060sf of buffer as depicted on the attached plan. The original plan had 11,509sf of buffer reduced, so the latest plan has reduced buffer impacts by 676sf.

According to Poulsbo Municipal Code 16.20.230.E, buffer averaging can be utilized if the following criteria are met;

E. Buffer Width Averaging. The widths of buffers may be averaged if this will improve the protection of wetland functions, or if it is the only way to allow for reasonable use of a parcel. Averaging may not be used in conjunction with any of the other provisions for reductions of buffers in subsection F of this section.

1. Averaging to improve wetland protection may be permitted when all of the following conditions are met:

a. The wetland has significant differences in characteristics that affect its habitat functions, such as wetland with a forested component adjacent to a degraded emergent component or a "dual-rated" wetland with a Category I area adjacent to a lower-rated area.

Response: The portions of the buffer to be reduced are primarily shrub dominated with no special habitat features. The added areas are more heavily vegetated and will improve wetland protection to maintain the existing functions of the wetland.

b. The buffer is increased adjacent to the higher-functioning area of habitat or more sensitive portion of the wetland and decreased adjacent to the lower-functioning or less sensitive portion.

Response: As previously noted, the added area is mature native vegetation with similar function to that to be removed through the averaging. The large width of this buffer on Wetland B as well as its slope type and separation by an old logging road between the wetland and the reduced buffer will maintain buffer functions.

The resulting averaging consists of a reduced area with good native vegetation coverage and added areas with good native vegetation as well. These averaged buffer will maintain existing wetland functions and would not require any additional plantings or enhancment to maintain these functions.

c. The total area of buffer after averaging is equal to the area required without averaging.

Response: The total area of buffer reduced is less than the amount added, resulting in a net increase in buffer area of 227sf.

d. The buffer at its narrowest point is never less than three-quarters of the required width.

Response: The minimum buffer width is 112.5' which is 75% of the standard 150' buffer as required.

BUFFER GIVE/TAKE ANALYSIS		
	WETLAND A	WETLAND B
TOTAL GIVE	1,018 SF	11,511 SF
TOTAL TAKE	856 SF	10,895 SF
NET GIVE	162 SF	616 SF

BUFFER ADDITION ("GIVE") AREAS ARE SITED ENTIRELY OVER EXISTING, UNDISTURBED GROUND. NO CLEARING, GRADING, VEGETATION REMOVAL, OR UTILITY INSTALLATION IS PROPOSED OR PERMITTED WITHIN THESE AREAS. PROTECTIVE CRITICAL AREA FENCING WILL BE INSTALLED AT THE OUTER LIMIT OF ALL "GIVE" AREAS PRIOR TO ANY ON-SITE GRADING ACTIVITIES.

The Applicant does not propose to enhance existing or increased buffers in conjunction with proposed buffer averaging because as documented in earlier reviews, the areas proposed for buffer increase presently contain a mix of native vegetation including red alder, big leaf maple, vine maple salmonberry, Oregon grape and salal to protect wetland functions and values. As a result, no buffer enhancement plan is currently proposed.

Stream A Temporary impact

In order to get utilities through the area near Stream A, a temporary impact to 4,100sf of the buffer will be required, as well as some disturbance of the channel bottom. The disturbed area will be restored following work and all channel work will follow requirements of an HPA through WDFW.

Stream D Buffer Impact

As depicted on the plan, a small temporary impact (1,200sf) to Stream D's buffer will occur from placement of a storm water outfall. The buffer area will be restored with native vegetation and the outfall area (50sf) will be added to the buffer to maintain total buffer area. In addition, in order

to comply with City standards, a 5' utility easement on the north side of the road crossing and a 15' utility easement on the south side of the road crossing will be required. This easement is allowed under SMC 16.20.320(G)(5)[1] which states that the placement of utility corridors within designated fish and wildlife conservation areas and buffers are allowed but "shall protect the environment of fish and wildlife habitat conservation areas and their buffers" by applying the following standards, all of which are met:

a. New utility corridors or easements shall be aligned when possible to avoid cutting trees greater than twelve inches in diameter at breast height (four and one-half feet), measured on the uphill side.

There is no vegetation present in the proposed utility corridor and easements.

b. New utility corridors or easements shall be revegetated with appropriate native vegetation at pre-construction densities or greater, immediately upon completion of construction, or as soon thereafter as possible, if due to seasonal growing constraints. The utility shall ensure that such vegetation survives.

There is no vegetation present in the proposed utility corridor and easements, so no revegetation is required.

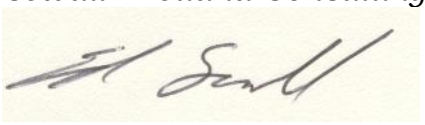
c. Any additional utility corridor or easement access for maintenance shall be provided as much as possible at specific points, rather than by parallel roads. If parallel roads are necessary, they shall be of a minimum width but no greater than fifteen feet; and shall be contiguous to the location of the utility corridor on the side away from the fish and wildlife habitat conservation area. Mitigation will be required for any additional access through restoration of vegetation in disturbed areas.

The required utility corridor and easements are parallel to the right-of-way, which will be improved, and do not require additional access within the buffer.

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 .

[1] Note: project is vested to the Critical Area Ordinance in effect as of the date of complete application (August 14, 2025), and not the 2025 amendments.

Sincerely,
Sewall Wetland Consulting, Inc.



Ed Sewall
Senior Wetlands Ecologist PWS #212

Attached: Current Site/Buffer Averaging Plan

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
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NET GIVE	162 SF	616 SF

BUFFER ADDITION ("GIVE") AREAS ARE SITED ENTIRELY OVER EXISTING, UNDISTURBED GROUND. NO CLEARING, GRADING, VEGETATION REMOVAL, OR UTILITY INSTALLATION IS PROPOSED OR PERMITTED WITHIN THESE AREAS. PROTECTIVE CRITICAL AREA FENCING WILL BE INSTALLED AT THE OUTER LIMIT OF ALL "GIVE" AREAS PRIOR TO ANY ON-SITE GRADING ACTIVITIES.

STORMWATER OUTFALL NOTE

STORMWATER FACILITY DISCHARGE OUTFALL SHALL TERMINATE ENTIRELY ABOVE THE ORDINARY HIGH WATER MARK (OHWM). FINAL OUTFALL DISSIPATION DESIGN (E.G., RIPRAP / ROCK PAD / OR PERFORATED FLOW DISPERSION TRENCH SHALL BE DETERMINED AT FINAL DESIGN. I

REVISIONS

NO.	DESCRIPTION/DATE	BY

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50085
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MONTEBANC MANAGEMENT, LLC

PINNACLE AT LIBERTY BAY PRD

BUFFER MITIGATION PLAN

CITY OF POULSBO WASHINGTON

JOB NO.:	2090-004-022
DWG. NAME:	PP-06
DESIGNED BY:	
DRAWN BY:	
CHECKED BY:	
DATE:	09/10/2026
DATE OF PRINT:	

PP-06

6 OF 35 SHEETS

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