Ann Hillier

From:	Christy Carr
Sent:	Wednesday, December 13, 2017 10:27 AM
То:	Ann Hillier
Subject:	Fort Ward Lots 5&6 Wetland review

Here are my comments:

- 1. Although I have been to the site many times, we should probably take a site visit to confirm the wetland boundary. We can take a look at the City-owned properties to see if there is any viable mitigation opportunities in case we need a Plan B (if culvert replacement doesn't work).
- 2. The rating form is the same one for the lots to the south and is fine.
- 3. I will defer to Peter on the culvert and what the City needs to verify its feasibility. I would think some sort of hydrologic assessment of existing and future water levels is necessary to ensure that the replaced culvert is not going to adversely impact existing homes. Also, clear construction limits need to be set around the work area and it is likely that some type of replanting will be needed or invasive species will either return or invade.
- 4. Where is the stormwater from the driveway (pollutant generating surface) going? Peter should weigh in on the stormwater section of the wetland report I don't necessarily agree that existing conditions are impervious, although I'm not sure how much it matters from a wetland standpoint.
- 5. Objective 1 of the mitigation plan should be clarified as to where it applies just the existing native vegetation, just the proposed planted area, or both? It should be both.
- 6. The mitigation plan should include a performance standard and contingency action/s for the culvert replacement component.
- The plant quantities do not seem adequate per Sound Native Plants plant calculator (<u>http://soundnativeplants.com/nursery/plant-quantity-calculator/</u>). Plant spacing noted in plant list is not accurately reflected on planting plan.
- 8. Plant species are not located to minimize off-site impacts of development. If minimizing light and noise is the goal, this should be reflected in the plant type and location nearest to where these impacts will occur (driveway, deck).
- 9. The mitigation plan for the lots to the south include split rail fence. The fencing should be coordinated with this proposal.
- 10. Did the applicant provide a narrative as to how the RUE criteria are met? Specifically, these two criteria may not be met by the proposal:
 - There is no reasonable alternative to the proposal;
 - The proposed impact to the critical area is the minimum necessary to allow reasonable use of the property;

The lot coverage for each parcel is below 1200 square feet (1198), but a separate driveway and a deck is proposed for each house. A shared driveway should be considered (both from a wetland and stormwater impact perspective) and whether or not decks are "the minimum necessary to allow reasonable use of the property." Decks are not a primary appurtenance. It also appears that the configuration of the house on Lot 6 could be revised to put the garage in the front, thereby reducing the area of the driveway and turnaround (as is proposed for Lot 6).



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