

April 14, 2021

Tom White 3945 Lytle Road NE Bainbridge Island, WA 98110

RE: April 2021 Updates to Lytle Road CAR and Mitigation Plan

Dear Tom,

This letter has been written to address changes made to the *Lytle Road CAR and Mitigation Plan* for your property on Lytle Road, Kitsap County Tax Parcel No. 4164-006-001-0208, in Bainbridge Island Washington. Updates were made to the report following the *Notice of Incomplete Application* from the City of Bainbridge Island (COBI), dated April 5, 2021. The following concerns and revisions (as applicable) were requested by the COBI:

- Note that Figure 3 in the critical areas report appears to contain some formatting issues.
  - Specific formatting issues were not provided by COBI, so the aerial imagery was removed from Figures 3 and 4. If any specific formatting issues can be provided, the figures will be updated as needed.
  - All applicable figures were updated with the proposed 20-foot front yard setback and the reserve drainfield was removed from the subject property and shown exclusively on the property to the north. A 5-foot building and impervious setback were added to the buffer edge to provide space between the residence and buffer areas.
  - The removal of an onsite reserve drainfield allowed the buffer mitigation area to be expanded and impacts to be reduced by 522 square feet. The mitigation area was expanded from 2,744 square feet to 3,266 square feet and plant quantities were updated in the mitigation plan. Overall impacts to the buffer were reduced from 3,020 square feet to 2,498 square feet. These figures are updated throughout the report.
- In the discussion of mitigation sequencing and the RUE review criteria, please clarify: is the driveway sited to minimize impacts (i.e. could it be proposed farther away from the wetland edge)? Can the front setback be further reduced to minimize impacts (e.g. 5' or 10')? Are there any specific measures proposed to minimize impacts, such as permeable paving, LID foundation design, metal or non-leaching roof, etc?
  - The driveway cannot be moved any further from the wetland edge but will utilize pervious pavement to reduce runoff onsite.
  - The front yard setback cannot be reduced further than 20 feet because the proposed drainfield is within this area. Reducing the front yard setback beyond 20 feet (up to 10 feet or 5 feet) would require placing the primary drainfield, which is the

greatest source of pollutants from the development, closer to the wetland boundary and buffer. Reducing the front yard setback and thus placing the drainfield closer to the wetland and stream would not be recommended. This information has been updated within the RUE criteria (Page 5) and Mitigation Sequencing (Page 8) sections of the report.

- The project will use metal roofing for the home, pervious pavement for the driveway, and minimizes on-ground disturbance by proposing a small footprint with cantilevers on the west and east sides of the house.
- Please relate the goals and objectives of the mitigation plan to the functions and values of the original critical area. The mitigation plan goal is to "improve buffer functions"—but what buffer functions, specifically?
  - o As requested, the "Goals, Objectives, and Performance Standards" (Page 13) section of the Mitigation Plan was updated to provide clarity.
  - An additional section, "Existing Buffer Functions", was inserted into the Mitigation Plan on Page 10 and the "Structures and Functions Sought" (Page 10) section was edited to provide clarity regarding the mitigation goals.
- Monitoring is required for a minimum of 7 years, in accordance with BIMC 16.20.180.G. Please adjust.
  - The monitoring period of 5 years was corrected to 7 years throughout the report.
    The Performance Standards (Page 14) were also updated for a 7-year monitoring period.

It was also noted in the notice from the COBI that the site plan and other materials refer to a Category III wetland. The wetland onsite is a Category II wetland; any applicable materials should be updated with the Category II designation.

The updated report is attached separately as a PDF. If there are any questions or changes required to the updated report, please contact me at (360) 674-7186 (ext. 1205) or by email at <a href="mailto:keelin@ecoland.com">keelin@ecoland.com</a>.

Sincerely,

Keelin Lacey Biologist

Attachment (1): Lytle Road CAR and Mitigation Plan – Revised April 14, 2021

Keelin (Jacuf