

## Ann Hillier

---

**From:** Christy Carr  
**Sent:** Monday, December 11, 2017 3:07 PM  
**To:** Ann Hillier  
**Subject:** RE: Bainbridge Core 40-Miller Rd Shoulder Improvements STPUS-6705(001) NEPA/SEPA comment Response

Here are my comments. I can discuss these with the wetland biologist directly if needed. At this point, the City does not have sufficient information to approve the project.

1. The City's GIS database shows a large wetland on the west side of Miller Road and that the wetland was previously delineated and rated (with building permit 8019). The previous work may or may not be helpful to review. This wetland is referred to as Wetland A and Wetland B in the current wetland report; however, it appears that these two wetlands are actually a single unit. This should be clarified.
2. The City's GIS database shows a Type F stream associated with Wetland A East. This is also shown on the FPARS map (included as Appendix C). This should be addressed in the critical areas report. The stream is classified as a Type Ns on the west side of Miller Road. The stream is noted in the wetland mitigation report slope alternatives analysis.
3. The critical areas report should provide a narrative as to how the development standards in BIMC 16.20.130.C.15 (road expansion in FWHCAs) are met.
4. The wetland maps (Appendix B) show a wetland edge with no upland sample plot to support the delineation. Wetland A West has not upland sample plot on the north side, Wetland A East has not sample plot on the south side (and sample plot 3 appears mislabeled). The same goes for Wetland B and C. Without field verification or supporting sample plots, there is insufficient information to know the delineation is accurate. This may be clarified in the area of potential effect (AEP) letter referenced on the figures – is that available?
5. There is no wetland sample plot for Wetland B Northeast. Sample plot 10 is not noted on the figure for Wetland B&C.
6. What are the anticipated temporary construction-related impacts? These should be addressed in the wetland report and mitigation plan. It is not clear where staging and equipment access will be located (this may be in the engineering plan set, but it should be cross-referenced relative to wetland locations).
7. Rating form question D 2.3 – For Wetland A (and B), please verify that there is not a septic system located within 250 feet of the wetland. If considering the entire wetland unit (not just the area near the road and shown on the wetland maps), there are at least four homes located within 250 of the wetland, all of which may have on-site sewage systems.
8. Rating form question D 4.3 – Cannot verify without figure showing contributing basin.
9. Rating form question H 1.3 – Table 1 in wetland report lists 24 species in the wetland and upland. Given the extent of the wetland unit, are there more? Are more than 19 of the 24 listed within the wetland itself?
10. Rating form question H 1.5 – Given the location of the wetlands adjacent to the road, and association with a stream for Wetland A, it is likely that “overhanging plants extends at least 3.3 ft (1 m) over a stream (or ditch) in, or contiguous with the wetland, for at least 33 ft. (10 m). This should be verified.
11. The rating forms are incomplete without the required maps and figures. The “1 km map” needs to include habitat polygons and the contributing basin/s. Questions H 2.1, 2.2, and 2.3 on the rating form cannot be verified without this information.
12. All of the questions related to the rating forms need to be answered before the wetland category can be determined. This impacts a) whether or not SUR is required and b) the wetland mitigation ratios.
13. The mitigation plan needs to provide a narrative of how the area of impact for each wetland was determined. It isn't necessarily incorrect, it is just too difficult to tell how/why these are the numbers. It's also important to know the temporary impacts and potential indirect impacts (e.g., is there an adverse water quality impact since the road edge is getting closer to the wetlands?).

14. The mitigation plan has some weird math on page 5. If the impacts are 130 sf, the 1.5:1 mitigation requirement is 195 sf. The requirement is stated to be 270 sf. The proposed mitigation is listed with two different numbers – 1050 sf and 1065 sf. All of these factors may change based on comment 12 and 13, but the math needs to be right.
15. I think the proposed wetland mitigation area may already be wetland. This area was recently cleared and grubbed of yellow flag iris. The wetland mitigation area should be confirmed in the field and this invasive species issue should be addressed (in terms of maintenance and adaptive management).
16. In general, the mitigation concept of providing connectivity between wetland areas is good; however, there is no assessment to demonstrate it is sufficient (e.g., credit-debit method). Existing site conditions of proposed mitigation area should be better described in the mitigation plan.
17. The mitigation plan references US Army Corps of Engineers mitigation ratios for Western Washington for Category III wetlands (1.5:1). This does not make sense.
18. The number of proposed emergent plants (80) is insufficient based on 30" spacing over a 1050 sf area (see Sound Native Plants plant calculator).
19. The City (Public Works) should review the performance standards. They are largely unachievable, overly complicated and will be very difficult (time consuming, costly) to monitor. Monitoring reports are not required for all seven years of monitoring. An invasive species cover threshold should be included (it is alluded to in contingencies, but it should be a performance standard). The monitoring plan requires performance and maintenance sureties. Is this standard practice for Public Works? How will vegetation in the wetland buffer be monitored? Are there impacts to the buffer? Is the buffer being enhanced with new planting? Why would you monitor it?
20. Would WDFW require an HPA for the stream crossing? What are WSDOT and US Army Corps of Engineer requirements? The City should actively coordinate with these other agencies to ensure a streamlined permitting process and consistent mitigation requirements.
21. Thirty-five trees are proposed for removal. While not all of these are included within wetland areas, this is an environmental impact that should be addressed. The slope alternatives was done to minimize wetland impacts, I presume in terms of impact area, but there is not alternatives analysis for avoiding tree removal. Obviously, it is difficult to achieve tree retention objectives with linear project features, but it at least warrants a critical review.
22. Not wetland related, but aprons on driveway approaches are favorable for multi-modal facility users. Gravel from existing driveways will be spread into the bike lane/shoulder, likely pushing bicyclists into the travel lane and negating the safety gained by the added road width.

---

**From:** Ann Hillier

**Sent:** Monday, December 11, 2017 11:51 AM

**To:** Christy Carr <ccarr@bainbridgewa.gov>

**Subject:** RE: Bainbridge Core 40-Miller Rd Shoulder Improvements STPUS-6705(001) NEPA/SEPA comment Response

Sorry about that. I think they are in Appendix D of this version.

[file:///C:/Users/ahillier/Downloads/16168%20Mitigation%20Report%20Binder1%20\(4\).pdf](file:///C:/Users/ahillier/Downloads/16168%20Mitigation%20Report%20Binder1%20(4).pdf) Let me know if the link doesn't work...

---

**From:** Christy Carr

**Sent:** Monday, December 11, 2017 11:44 AM

**To:** Ann Hillier <ahillier@bainbridgewa.gov>

**Subject:** RE: Bainbridge Core 40-Miller Rd Shoulder Improvements STPUS-6705(001) NEPA/SEPA comment Response

I don't see any appendices – just placeholders. ??

---

**From:** Ann Hillier

**Sent:** Friday, December 08, 2017 9:13 AM

**To:** Christy Carr <[ccarr@bainbridgewa.gov](mailto:ccarr@bainbridgewa.gov)>

**Subject:** FW: Bainbridge Core 40-Miller Rd Shoulder Improvements STPUS-6705(001) NEPA/SEPA comment Response

Thank you, Christy! This is the report, along with responses to questions at the beginning. -Annie

---

**From:** Patrick Skillings [<mailto:pskillings@skillings.com>]

**Sent:** Thursday, December 7, 2017 1:56 PM

**To:** [KelseyS@wsdot.wa.gov](mailto:KelseyS@wsdot.wa.gov); Chris Munter <[cmunter@bainbridgewa.gov](mailto:cmunter@bainbridgewa.gov)>; Ann Hillier <[ahillier@bainbridgewa.gov](mailto:ahillier@bainbridgewa.gov)>

**Cc:** Tim Horton <[thorton@skillings.com](mailto:thorton@skillings.com)>; Gerry Smith <[gsmith@skillings.com](mailto:gsmith@skillings.com)>

**Subject:** Bainbridge Core 40-Miller Rd Shoulder Improvements STPUS-6705(001) NEPA/SEPA comment Response

Chris, Stacie, and Annie,

Please find our response to comments on the Wetland report/ mitigation report for the Core-40 Miller Road Shoulder Improvement Project. If any questions arise, please let me know.

Thank you,  
Respectfully,

Patrick

**Skillings Connolly, Inc.**

Patrick Skillings, PMP  
Vice President

Office : (360) 491-3399  
VoiceMail: (360) 455-3166  
Fax : (360) 491-3857

5016 Lacey Boulevard S.E.  
Lacey, WA 98503

[www.skillings.com](http://www.skillings.com)