



Memo

To: Lisa Klein, AICP, AHBL Inc.
Tacoma, WA

From: Kacy Hillman, PWS
Bellingham, WA

Project/File: Founder's Ridge - *Wetland and Fish and Wildlife Habitat Assessment Report and Voluntary Bat Habitat Restoration Plan*

Date: April 22, 2022

Reference: Peer Review of *Wetland and Fish and Wildlife Habitat Assessment Report and Voluntary Bat Habitat Restoration Plan*. Founder's Ridge. November 2021.

AHBL Inc. requested Stantec on March 22, 2022 to complete a peer review of the *Wetland and Fish and Wildlife Habitat Assessment Report and Voluntary Bat Habitat Restoration Plan, Founder's Ridge* (Soundview Consultants LLC, 2021) in accordance with the City of DuPont's Critical Areas Ordinance (DuPont Municipal Code, Chapter 25.105). This memo serves to provide peer review comments of the subject report.

The following are Stantec's peer review comments of the subject report that do not meet DuPont Municipal Code, Chapter 25.105:

- 1) DuPont Municipal Code 25.105.050.1 states wetlands and lakes are considered critical areas. There are existing mapped United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) features within the project area and near the project area noted below.
 - a. Within the project area:
 - i. Freshwater emergent wetland within in the narrow finger of the project area north of the existing asphalt road.
 - b. Near the project area:
 - i. Freshwater emergent wetland and riverine features that abut Old Fort Lake west of the project area;
 - ii. Freshwater emergent wetland northwest of the project area; and
 - iii. Riverine feature north of the project area (Sequalitchew Creek).
 - c. According to DuPont Municipal Code 25.105.050.1.a.i, identification of wetlands and delineation of their boundaries shall be completed according to the federal wetland delineation manual and applicable regional supplement. The subject report does not provide sufficient data to determine presence or absence of these existing mapped USFWS NWI features within or near the project area.

Reference: *Peer Review of Wetland and Fish and Wildlife Habitat Assessment Report and Voluntary Bat Habitat Restoration Plan. Founder's Ridge. November 2021.*

- 2) DuPont Municipal Code 25.105.050.1.a.ii states wetlands shall be rated according to the Washington State Department of Ecology wetland rating system. The Washington State Department of Ecology wetland rating system states wetland boundaries need to be verified by a field survey to accurately score the indicators. For those wetlands that are determined present within and near the project area by a field survey a Washington State Department of Ecology wetland rating system form should be completed for each.
 - a. Additionally, the wetland rating form provided for Old Fort Lake is insufficient according to the Washington State Department of Ecology wetland rating system guidance.
- 3) DuPont Municipal Code 25.105.050.1.b.i states buffers shall be established adjacent to designated wetland areas determined by the wetland category, as a result of the Washington State Department of Ecology wetland rating system form. As previously stated, a Washington State Department of Ecology wetland rating system form should be completed for each wetland as appropriate, and applicable buffer established for each.
- 4) DuPont Municipal Code 25.105.020.5.b states development or alteration within or adjacent to critical areas should first avoid, reduce, then compensate (ARC approach). The subject report does not provide sufficient data to determine critical areas within and adjacent to the project area that could first be avoided.
- 5) DuPont Municipal Code 25.105.050.2 states fish and wildlife habitat conservation areas are considered critical areas, such as priority habitat identified by the Washington State Department of Fish and Wildlife (WDFW). The project area includes priority habitat for the big brown bat, little brown bat, and Yuma myotis according to the WDFW, Priority Habitats and Species Map. The subject report states the big brown bat, little brown bat, and Yuma myotis are not documented in the study area as confirmed by WDFW. The subject report does not adequately document the presence or absence of priority habitat for these species within the project area.
- 6) If priority habitat exists within the project area the distribution of different vegetation communities needs to be adequately described and mapped. DuPont Municipal Code 25.105.050.2.e requires a habitat management plan for development in or adjacent to habitat for priority species and the plan should incorporate mitigation recommendations developed in consideration of WDFW habitat recommendations along with additional requirements described in that section.

Additional items of note:

- 1) The USACE National Wetland Plant List has a more recent version (Version 3.5) published in 2020 that should be referenced (in Chapter 9, References) to ensure current plant names and indicator statuses are used.

This concludes the peer review of the subject report. If you have any questions on these comments, please feel free to contact me by phone or email (below).

Reference: Peer Review of Wetland and Fish and Wildlife Habitat Assessment Report and Voluntary Bat Habitat Restoration Plan.
Founder's Ridge. November 2021.

Sincerely,

STANTEC CONSULTING SERVICES INC.

Kacy D. Hillman

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