



## TECHNICAL MEMORANDUM

To: Barb Kincaid, AICP  
City of DuPont Director of Public Services  
Department of Community Development  
1700 Civic Drive  
DuPont, WA 98327

Date: December 10, 2024

From: Farallon Consulting, LLC dba Grette Associates  
2709 Jahn Ave NW, Suite H-5  
Gig Harbor, WA 98335

Re: Champions Centre Development (PLNG2023-002): Response to City of DuPont Peer Review Consultant Comments of April 16, 2024

This Technical Memorandum is in response to the peer review comments submitted to AHBL, Inc. from Ecological Land Services (ELS) dated April 16, 2024. As the City's Peer Reviewer for Critical Areas, ELS reviewed the Critical Areas Report, Buffer Mitigation Plan, Habitat Management Plan, and Critical Areas Submittal Narrative prepared by Grette Associates for the Champions Centre Development (PLNG2023-002).

ELS biologists reviewed the documents against the current version of the DuPont Municipal Code (DMC) and conducted a site visit in March 2024 to verify site conditions.

The following are Grette Associates' responses to ELS's comments based on their review of the Critical Areas submittals.

### **Wetland Categorization**

#### ***Water Quality Functions***

*Question D1.2* – Grette Associates agrees with this comment. The soils mapped by the NRCS at the site include DuPont Muck. Therefore, the rating was revised to reflect the answer of 'yes' for this question.

*Question D1.4* - Grette Associates agrees with this comment. The rating was revised to reflect a score of 4 points for this question.

Revising the scores as described above resulted in a total of 13 points and a rating of 'High' for Water Quality Site Potential.

#### ***Hydrologic Functions***

*Question D4.3* – Grette Associates included a figure in the revised rating form showing the approximate contributing basin. This figure confirms the contributing basin is approximately 13.3 times the size of the Bell Marsh Wetland. This confirms the score of given by Grette Associates of 3 points given in the original rating form.

### ***Habitat Functions***

*Question H1.4* – Grette Associates agrees with ELS's comment. The score for this question was revised to 3 points.

*Question H2.0* – After reviewing the calculations for land use intensity within the 1 km radius of Bell Marsh, the answers to this question were revised. Using the map submitted previously and confirmed by ELS, the acreages used in the calculations were provided on the new rating forms. These revised calculations resulted in the score for H2.1 being revised from 1 to 2. The score for H2.2 was also revised from 1 to 2. The resulting total score for H 2 was revised from 0 to 2, elevating the Rating for Landscape Potential from 'Low' to 'Moderate'.

### ***Overall Wetland Rating***

Based on the revisions summarized above, the total score for the wetland rating was revised to 22 points, which correlates to a Category II wetland. It should be noted that due to an error on the prior submitted rating form, the score for Habitat functions on the prior rating should have been 6 instead of 7 points. Therefore, the shift from Low to Moderate for Habitat Landscape Potential did not affect the Habitat Function score of 7 points or the overall wetland rating of Category II.

### ***Buffer Mitigation Plan***

The Buffer Mitigation Plan was revised to respond to the two comments provided by ELS. Table 5 was revised to correctly present the number of plants to be installed within the buffer enhancement area. Additionally, the plant tables have been added to the buffer mitigation plan drawings, as requested.

### ***Habitat Management Plan***

The Habitat Management Plan (HMP) was revised to ensure the plant quantities from the Buffer Mitigation Plan are reflected correctly in this plan. As to the discussion of the oak stand in the northwest corner of the property, as stated in the HMP this stand is more than 300 feet from the proposed project. This stand would not be affected by the project.

If you have any questions regarding these responses, please do not hesitate to contact me at (253) 442-6943, or by email at [scottm@gretteassociates.com](mailto:scottm@gretteassociates.com).

Sincerely,



Scott Maharry  
Principal Scientist  
Farallon Consulting, LLC dba Grette Associates