

From: analiese@nwecological.com

To: Peter Gill

Subject: Comments: Birch Bay LID and Mitigation Code for Public Review (view HTML)

Hello Peter,

Thank you for the opportunity to comment on the draft code language for the Birch Bay Habitat Mitigation Fund.

I appreciate the County's efforts and believe the code is very well written. I have a few comments that may help minimize future conflicts:

- 1) 16.16.950.B
 - a. I was under the impression that the funds might be used to conduct restoration on resources other than buffers (e.g. wetlands and streams), this section of the code seems to imply that the funds will only be used for buffer restoration.
 - b. I am not sure I understand how you would accomplish "providing equal or improved buffer functions than the impacted buffer". Buffer functions are specific to the resource which the buffer is protecting (e.g. Wetland A's buffer only functions to protect Wetland A). Buffer functions are not transferable to another resource (i.e. you cannot improve buffer functions for Wetland B and say that it is equivalent to improvements to buffer functions for Wetland A).
- 2) 16.16.970.B
 - a. Do you define "tree canopy" in the HMF?
- 3) 16.16.980.A
 - a. Based on my experience, an applicant is not able to accurately say whether they have a critical area. Perhaps the first step would be for the County staff to make a site visit and determine whether it is likely the property contains a CA.

Thank you again. I look forward to hearing the next step in the HMF process!

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