

March 25, 2025

Jenny Murphy  
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**Compliance with Mitigation Plan Requirements**

Sims Way Stormwater Facility

Port of Port Townsend

CITY OF PORT TOWNSEND  
DSD

Dear Jenny Murphy,

The Port of Port Townsend proposes to construct the Sims Way Stormwater Facility project located in Port Townsend, Jefferson County. Critical Areas have been identified on the site, requiring that a Site Mitigation Plan be prepared per PTMC 19.05.060(D)(6) and SMP DR-6.3.4. The impacted critical areas identified are wetlands regulated by the Clean Water Act, which requires the preparation of a Compensatory Mitigation Plan according to the USACE, EPA, and Ecology interagency guidance in *Wetland Mitigation in Washington State*. This memorandum outlines how the state and federal Compensatory Mitigation Plan meets the requirements of PTMC 19.05.060(D)(6) and SMP DR-6.3.4.

PTMC 19.05.060(D)(6)

- a. An additional report is provided in response to critical areas being identified on-site.
- b. The Compensatory Mitigation Plan:
  - i. Details the quantity and quality of mitigation the project will provide to restore temporary impacts and compensate for permanent impacts through revegetation.
  - ii. Specifies grading, earthwork, and planting plans to restore the functions and values of the impacted critical areas and buffers.
  - iii. Proposes Goals, Objectives, Performance Standards, Success Standards, Monitoring, Maintenance, and Contingency Plans to ensure the existing wetland characteristics, functions, and values are retained or improved on-site.
- c. The Compensatory Mitigation Plan includes measures to protect vegetation, including:
  - i. Restoring and mitigating impacts to previously undisturbed natural vegetation by planting in-kind native species.
  - ii. Clearing noxious weeds and replanting with native species.

SMP DR-6.3.4.

Widener & Associates qualified wetland and habitat professionals, as described in PTMC 19.05.020, prepared a Shoreline Use Evaluation and Compensatory Mitigation Plan to evaluate impacts and propose mitigation for shoreline ecological functions. They include:

- a. An inventory of existing conditions in the shoreline jurisdiction.
- b. Discussion of project impacts and the functions and values that would be affected.
- c. Application of federal and state mitigation ratio recommendations.
- d. Adoption of federal and state habitat recommendations regarding planting.

- e. Discussion of mitigation sequencing to avoid impacts to sensitive areas and a proposal to restore a currently maintained portion of wetland buffer.
- f. Specifies grading, earthwork, and planting plans to restore the functions and values of the impacted critical areas and buffers.
- g. Proposes Goals, Objectives, Performance Standards, Success Standards, Monitoring, Maintenance, and Contingency Plans to ensure the existing wetland characteristics, functions, and values are retained or improved on-site.
- h. Proposes 2:1 and 3:1 ratios to mitigate permanent wetland impacts to ensure that at least an equivalency of functions and values is provided to offset the loss.
- i. Proposes best management practices during construction and long-term management actions, including monitoring and maintenance.
- j. Proposes contingency actions if mitigation does not meet performance standards.
- k. Provides additional information regarding the quality and characteristics of the selected compensatory mitigation site.

The Port of Port Townsend, based on the best professional judgment of Widener & Associates, believes this memorandum adequately outlines how the Compensatory Mitigation Plan for the Sims Way Stormwater Facility, prepared by qualified professionals, meets the requirements of PTMC 19.05.060(D)(6) and SMP DR-6.3.4. Should you have any questions regarding this memorandum, please contact Ross Widener at (425) 332-3961 or [ross@widener-enviro.com](mailto:ross@widener-enviro.com).

Sincerely,



Ross Widener  
Widener & Associates