



August 18, 2023

Judy Surber, planning manager
City of Port Townsend
250 Madison Street, Suite 3
Port Townsend, WA 98368

HA addendum for LUP23-024 (NWMC Repairs and Protection)

Dear Ms. Surber,

Part of the project proposal which involved “the removal of 13 linear feet of armor rock from the intertidal area surrounding the stormwater culvert along the southwest end of the site” is now no longer being proposed. In light of this information, this addendum to the original Habitat Assessment (HA) (dated September 17, 2021) has been prepared to clarify if the revised project will alter the findings and conclusions contained in the original HA and if the revised project will still meet no net loss criteria under the City’s Shoreline Master Program (SMP).

Leaving the 13 linear feet of armor rock around the stormwater culvert as it exists now is not anticipated to adversely affect Fish & Wildlife Habitat Conservation Areas (FWHCAs) that are present at the site and within the 0.25-mile action area. These FWHCA’s include eelgrass, Washington Department of Fish and Wildlife (WDFW) State Priority Habitat & Species (PHS) (see Table 1 for a summary), and federally listed species and critical habitat (see Table 2 for a summary).

Table 1. WDFW PHS query results

Species or Habitat	Priority Area/Occurrence Type	Action Area	Project Footprint
Waterfowl concentrations-Port Townsend Shoreline	Regular concentration: Brant & Harlequin feeding areas	Y	Y
Estuarine and Marine Wetland	Aquatic habitat	Y	N
Pacific Sand Lance	Breeding area (~0.5 mi away)	N	N
Waterfowl concentrations-Hudson Point, Port Townsend	Regular concentration: waterfowl wintering & migration areas	Y	N
Purple martin (<i>Progne subis</i>)	Breeding area	Y	N

Table 2. National Marine Fisheries Service (NMFS) and U.S. Fish & Wildlife Service (USFWS) Designated Critical Habitat

NMFS/USFWS Critical Habitat	Action Area	Project Footprint
Bocaccio Rockfish (Puget Sound-Georgia Basin DPS) (NMFS, 2014)	Y	Y
Yelloweye Rockfish (Puget Sound-Georgia Basin DPS) (NMFS, 2014)	Y	N
Marine Critical Habitat for Puget Sound Chinook Salmon (NMFS, 2005)	Y	Y
Freshwater Critical Habitat for Puget Sound Chinook Salmon (NMFS, 2005)	N	N
Puget Sound Steelhead (NMFS, 2016)	N	N
Marine Critical Habitat for Hood Canal Summer-run Chum Salmon (NMFS, 2005)	Y	Y
Freshwater Critical Habitat for Hood Canal Summer-run Chum Salmon (NMFS, 2005)	N	N
Southern Resident Killer Whale-Inland Critical Habitat (NMFS, 2006)	Y	N
Bull Trout (USFWS, 2010)	N	N
Marbled Murrelet (USFWS, 2016)	N	N
Leatherback Sea Turtle (NMFS, 2012)	N	N
Green Sturgeon (NMFS, 2009)	N	N
Southern Eulachon (NMFS, 2011)	N	N
Humpback Whale (NMFS, 2021)	N	N

As noted in the original HA, no eelgrass or macroalgae was found within the area of the proposed project, and since heavy equipment will access the site from the upland side of the project area and a barge will not be needed, adverse effects to eelgrass or any other submerged aquatic vegetation that may be present offshore are not anticipated.

The main effects that are anticipated to be associated with removal of the culvert’s rock armor are possible turbidity during construction and disturbance of benthic communities, and if it is left in place, interruption of sediment transport. Excluding removal of the culvert’s rock armor from the proposal will minimize the amount of work that would occur in the upper intertidal zone, and, therefore, prevent the disturbance of more sediment that could cause additional short-term, localized turbidity in the water column which could affect juvenile bocaccio rockfish, Puget Sound Chinook salmon, or Hood Canal summer-run chum that may be present (the effects of turbidity are described in the HA). Excluding the area around the rock armor from the proposed work area will also avoid further disturbance, crushing, or smothering of benthic meiofauna in the upper intertidal zone due to the use of heavy equipment in the work corridor on the beach.

According to the Washington Department of Ecology’s Coastal Atlas Map, the project area is within an “artificial pocket beach” with “accretion shoreforms” (i.e. areas of sediment deposition) to either side; it is also part of a larger “left to right” drift cell which is moving sediment in a northerly direction, around the point towards Fort Worden State Park. The project site is northeast (i.e. downdrift) of documented forage fish (sand lance) spawning habitat so leaving the culvert’s rock armor in place would not adversely affect this habitat. The culvert’s rock armor is also right next to, and downdrift of, a concrete boat ramp which extends further waterward than the rock armor and is, therefore, more likely to disrupt sediment transport than the rock armor.

Furthermore, the proposed project has been entered into the Puget Sound Nearshore Conservation Calculator as part of the federal permit review process which quantifies impacts to habitat from proposed actions such as construction/expansion, repair/replacement, and mitigation. The Nearshore Conservation Calculator has since been revised by CGS to exclude the removal of the culvert's rock armor and it still shows a surplus of credits. This surplus indicates that there is a net benefit from the proposed project (due to the proposed beach nourishment and native plantings) and no further mitigation is required.

To summarize, leaving the culvert's rock armor in place instead of removing it as additional mitigation for the proposed shoreline repair project is not anticipated to result in adverse effects to FWHCAs and the project would not require additional/alternative mitigation to ensure there is no net loss of habitat or ecological function. The installation of native plantings and beach nourishment as proposed are expected to provide a net benefit to the nearshore environment, as evidenced by the Nearshore Conservation Calculator that has been prepared for federal approval. Therefore, the conclusions and determinations of effect in the original HA are still valid.

Please feel free to reach out with any additional questions.

Thank you,

A handwritten signature in black ink that reads "Kimberly McClurg". The signature is written in a cursive, flowing style.

Kimberly McClurg, marine biologist
Marine Surveys & Assessments