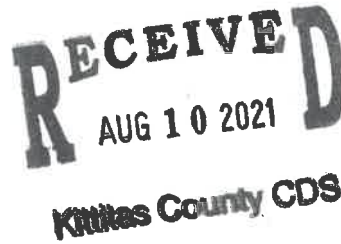


March 18, 2020

Mr. Forrest Huisman
New Suncadia LLC
770 Suncadia Trail
Cle Elum, WA 98922



RE: Suncadia Phase 3 Division 17 – Wetland Buffer Review
R.A.I. Project #2003-028-027

Per your request, Raedeke Associates, Inc. has prepared this document to evaluate the proposed buffers for critical areas under the Kittitas County (2017) code. This report specifically addresses critical areas (wetlands and streams) associated with the proposed Phase 3 Division 17 development on the Suncadia resort property.

This report provides a summary of our findings and is intended to be used for project planning purposes in the vicinity of Wetland 39 previously identified and delineated on the site.

PROPERTY LOCATION

The Phase 3, Division 17 project area is located west of the intersection of Tumble Creek Drive and Easton Ridge Trail as depicted on drawings received from ESM on October 6, 2020.

METHODOLOGY

We reviewed the wetland boundaries per the guidelines of the U. S. Army Corps of Engineers (COE) Wetlands Delineation Manual (Environmental Laboratory 1987), as updated for this area by the regional supplement to the COE wetland delineation manual for the Western Mountains, Valleys, and Coast Region (COE 2010). The COE wetlands manual is required by state law (WAC 173-22-035, as revised) for all local jurisdictions.

Surveyors from ESM re-established key points along the boundary of Wetland 39 to facilitate our review and verification of the wetland edges in the vicinity of the project site. On December 10, 2020, Raedeke Associates, Inc staff visited the project area to evaluate the previously delineated sensitive area boundaries and to collect data to evaluate the sensitive areas and buffer requirements under the current Kittitas County code and regulatory guidelines.

EXISTING CONDITIONS

Previously wetlands and streams were identified on or within the immediate vicinity of the subject property. Wetland 39, located north and south of the Phase 3, Division 17 development site, is fully described in the Environmental Impact Statement (Raedeke Associates 1997) for the Suncadia Resort.

On December 10, 2020, Raedeke Associates, Inc staff visited the project area to evaluate the previously delineated sensitive area boundaries and to collect data to evaluate the sensitive areas under the current Kittitas County code and regulatory guidelines.

It was determined that wetland and stream boundaries had not changed from the original delineations.

Wetland 39 was determined to receive 18 points under the Washington State Wetland Rating System for Eastern Washington (Hruby 2014) and thus would be considered to be a Category III wetland. Standard buffer width for Category III wetlands ranges from 20 to 80 feet, depending on the intensity of proposed adjoining land uses and other factors (Kittitas County 2017). In addition to the buffer requirement, a building setback line equal to the side yard setback requirement of the applicable zoning district is required from the edge of any wetland buffer.

REGULATORY CONSIDERATIONS

Kittitas County regulates impacts to wetlands and streams through Title 17A, Critical Areas, of the Kittitas County (2017) Code. The County requires that development activities result in no net loss of wetland function or values and has established specific compensatory mitigation ratios for unavoidable impacts to wetlands regulated by the County.

Buffer widths are predicated on the following criteria, as determined by the Director of Planning;

1. The overall intensity of the proposed use;
2. The presence of threatened, endangered, or sensitive species;
3. The site's susceptibility to severe erosion;
4. The use of a buffer enhancement plan by the applicant which uses native vegetation or other measures which will enhance the functions and values of the wetland or buffer.

Buffer widths shall be the least restrictive width necessary to meet the criteria listed above (Kittitas County Code 17A.04.025).

PROPOSED DEVELOPMENT

The proposed Phase 3, Division 17 development would generally provide a buffer of greater than 80 feet to Wetland 39 (attached Figure) from the development to the south and greater than 20 feet from the proposed development to the north. The closest point between the development and the wetland would be approximately 25 feet from the north edge of the wetland south of the proposed Southern Star Lane. The wetland edge would be greater than 25 feet from the edge of any proposed structure.

A proposed trail parallel to Tumble Creek Drive would be with 80 feet of the eastern edge of the wetland, however, it appears that the trail would be at least 50 feet from the wetland edge.

With regard to the buffer width criteria expressed in the Kittitas County (2017) code:

1. Residential development at the proposed density is generally considered to be a high intensity land use;
2. the Washington Department of Fish and Wildlife Priority Habitat and Species list (2021) does not identify any endangered, threatened, or sensitive species on the project site. Northern Spotted Owls are known to occur in the township, but are not known to occur on the site;
3. the areas nearest to Wetland 39 consists of gently sloping (less than 10% slope) so is not expected to be susceptible to severe erosion;
4. the closest encroachment into the buffer would occur downslope from the wetland and thus no surface water runoff from the street would be discharged to the wetland or its buffer; and
5. No buffer enhancement is proposed as the area between the development and the critical areas is currently vegetated. Areas temporarily disturbed during construction should be revegetated with native plant species.

CONCLUSIONS

The proposal will provide buffers that are wider than the minimum required by the code and in most instances are wider than 80 feet. There are no known threatened, endangered, or sensitive species in the project vicinity; the site is relatively flat and not susceptible to severe erosion; and the retained buffer is largely comprised of native vegetation that serves to protect the critical areas.

During construction, best management practices should be implemented to ensure that the retained buffer is adequately protected from unintended intrusion and appropriate erosion and sediment control measures should be implemented between the development and the critical areas.

Development of the Phase 3, Division 17 plat as depicted likely will not result in significant adverse impacts to the nearby critical areas.

LIMITATIONS

We have prepared this report for the exclusive use of New Suncadia LLC and their consultants. No other person or agency may rely upon the information, analysis, or conclusions contained herein without permission from New Suncadia LLC.

The determination of ecological system classifications, functions, values, and boundaries is an inexact science, and different individuals and agencies may reach different conclusions. With regard to wetlands, the final determination of their boundaries for regulatory purposes is the responsibility of the various agencies that regulate development activities in wetlands. We cannot guarantee the outcome of such agency determinations. Therefore, the conclusions of this report should be reviewed by the appropriate regulatory agencies prior to any detailed site planning or construction activities.

We warrant that the work performed conforms to standards generally accepted in our field, and has been prepared substantially in accordance with then-current technical guidelines and criteria. The conclusions of this report represent the results of our analysis of the information provided by the project proponent and their consultants, together with information gathered in the course of the study. No other warranty, expressed or implied, is made.

If you have any questions or comments, or wish to discuss this issue further, please contact me at (206) 525-8122 or at cwright@raedeke.com.

Respectfully submitted,

RAEDEKE ASSOCIATES, INC.



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