



May 16, 2019

Job No. 1396-001-016

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Kittitas Co. CDS

Ms. Chelsea Benner
Staff Planner
Kittitas County Community Development Services
411 N Ruby St, Suite 2
Ellensburg, WA 98926

Subject: Shoreline Substantial Development Permit Associated with the Vantage Bay PUD (File SD-18-00002; Z-06-00025; & LP-06-00026)
Response to Department of Ecology Comments

Dear Ms. Benner:

Thank you for providing us with comments from Lori White, Wetland/Shoreline/Federal Permit Specialist at the Department of Ecology. In her letter dated January 2, 2019, Ms. White advised that an updated critical areas delineation be provided to Kittitas County as it pertains to the above referenced substantial shoreline development permit (SSDP) application. Furthermore, the letter cited specific requirements outlined in Kittitas County's 2016 Shoreline Master Program (SMP) for providing an updated delineation report.

BSCCBN, Inc hired Environmental Assessment Services (EAS) to conduct a field delineation based on the requirements of the SMP, and to prepare a report meeting the criteria outlined in the SMP. On April 18, 2019 staff visited the subject property and performed a site reconnaissance and delineation of the boundaries of the critical areas and waters on the site. In their delineation report, EAS concludes that the adjacent wetland is rated as a Category III wetland with a 150-foot buffer. These findings impacted the proposed Vantage Bay PUD site plan. To avoid impacts, ESM revised the site plan to remove the proposed community garden/recreation space and pool out of the 150-foot wetland buffer and outside of the required 100-foot SMP buffer. This revised site plan will also apply to the Vantage Bay PUD Final Development Plan also in review with Kittitas County.

Included with this letter are the following items for your review:

1. Wetland Delineation and Rating for a Property on Huntzinger Rd. Near Vantage, WA, prepared by Environmental Assessment Services, dated May 6, 2019;
2. Vantage Bay PUD Plan Set, prepared by ESM, revised 5/16/2019; and
3. Vantage Bay Development Updated Biological Resource Review (Kittitas County Parcels Numbers 272933 and 622933), prepared by EAS, dated August 22, 2017.

To aid review of the new information, we have provided the following comment matrix:

SMP Criteria	5.2(H) Wetland Reporting
1. Reporting requirement: if a proposed use or development is located within three hundred (300) feet of a known or suspected wetland, a wetland critical areas report is required, and shall include the following:	1. A critical areas delineation was conducted in 2006 which established that there is a wetland within 300 feet of the proposed development. EAS has prepared a wetland critical area report that is included with this letter.
a. The category and precise location of the boundary of the wetland(s)	a. EAS delineated and rated a Category III wetland on April 18, 2019. The location of the wetland boundary is illustrated on the included site plan and on page 11 of EAS' report. EAS used a high-accuracy Trimble GeoXH GPS to record features in the field.
b. All wetlands and required buffers within three hundred (300) feet of the project area shall be depicted on the site plan. Best available information should include, but not be limited to, aerial photos, soils maps, and/or topographic maps; and	b. EAS reviewed the project site and areas surrounding the site. The included report demonstrates that EAS utilized best available information for preparing their wetland delineation report.
c. An analysis of the onsite wetland(s) including the following site- and proposal-related information:	
i. Documentation of any fieldwork performed on the site, including, but not limited to, field delineation data sheets for delineations, the wetland rating forms, and baseline hydrologic data;	i. Description of fieldwork can be found under the "Methods" section starting on p. 5 of EAS' report. Furthermore, rating forms can be found in Appendix A of their report.
ii. A description of the methodologies used to conduct the wetland delineations;	ii. See response to criteria "i".
iii. The vegetative, faunal, and hydrologic characteristics of the wetland.	iii. Vegetation Evaluation can be found on p. 6, and p. 9. Faunal characteristics was not specifically addressed. However, EAS did provide a Biological Resource Review dated August 22, 2017 that can be referenced for evaluation of fauna. A copy is also enclosed with this letter. Hydrologic characteristics can be found on p 5, 7, and Appendix A.

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BCSCBN, Inc has taken care of minimizing impacts to existing critical areas on site as demonstrated in the revised site plan. Moving forward, we are looking forward to the County's review and conclusion that the proposed project satisfies the requirements outlined in the SMP, Kittitas County Code Title 17 and the conditions of approval found in Ordinance 2006-060.

If there are any questions or a need for further clarification, please feel free to contact me at (253) 838-6113 and I would be happy to discuss them with you.

Sincerely,

ESM CONSULTING ENGINEERS, LLC.

A handwritten signature in black ink, appearing to read "Matt Reider". The signature is fluid and cursive, written over a white background.

MATT REIDER
Assistant Planner

