



December 14, 2018

Job No. 1396-001-016

Ms. Lindsey Ozbolt  
Planning Official  
Kittitas County  
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 Public Comments**

Dear Lindsey:

Thank you for providing us with comments received during the public notice period of the Substantial Shoreline Development Permit application. By way of background, the Substantial Shoreline Development Permit application (SSDP) is associated with the Vantage Bay Planned Unit Development that was approved in November 2006 under ordinance 2006-60. One of the conditions of approval for Vantage Bay PUD is for the project to comply with the Kittitas County Shoreline Master Plan. A revised site plan illustrating the SMP jurisdiction boundary shows that portions of the Vantage Bay PUD development are located within the shoreline jurisdiction and thus requires a SSDP. The portions of the development located in SMP jurisdiction include: walking paths (TBD), community garden, pool, and barn.

The following existing documents were prepared during the original Vantage Bay PUD application and are provided with our response to comments made by the reviewing agencies:

- **Attachment 1:** Pedestrian and Subsurface Archaeological Survey for the Proposed BCSCBN, Inc Access Road System Below Vantage, Washington prepared by Tucker Orvald, M.S. Northwest Geocultural Consulting Dated July 2006;
- **Attachment 2:** Letter Report – Biological Resources Review of a Proposed Housing Development near Vantage, WA date July 19, 2006 – including correspondence from WADNR and WDFW;
- **Attachment 3:** Supplemental Biological Resource Assessments of the Vantage Bay Rezone and Preliminary Plat (Z0625) date August 19, 2006;

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The following documents were created after the Vantage Bay PUD approval ordinance was adopted:

- **Attachment 4:** Vantage Bay Development Updated Biological Resource Review (Kittitas County Parcels Numbers 272933 and 622933) dated August 22, 2017; and
- **Attachment 5:** Revised Site Plan showing all the SMP jurisdiction adjoining the Vantage Bay PUD property.

Comments are listed in the left column; applicant responses are provided in the right column. To minimize the length of this response letter, some of the public comments were reduced to provide the essence of the comment rather than the exact comment.

<p><b>Contact:</b>  <b>Dennis Wardlaw</b>  <b>Transportation Archaeologist</b></p>	<p><b>Agency:</b>  <b>Department of Archaeology &amp; Historic Preservation</b></p>
<p>Concern/Comment:</p> <ol style="list-style-type: none"> <li>1. Project area has potential to contain archaeological resources.</li> <li>2. Ground disturbing actions would destroy any archaeological resources present.</li> <li>3. Recommend a professional archaeological survey of the project area be conducted prior to ground disturbing activities.</li> </ol>	<p>Applicant Response:</p> <ol style="list-style-type: none"> <li>1. Prior to application for SSDP, the Vantage Bay Planned Unit Development application and associated SEPA review required a professional archaeological survey of the project area be conducted.</li> <li>2. A professional archaeological survey was prepared for Vantage Bay PUD in July 2006 by Tucker Orvald, M.S. at Northwest Geocultural Consulting located in Ellensburg, WA. A copy of the report is included with this response matrix. DAHP is invited to review.</li> <li>3. The survey documents 4 precontact isolates outside of the project boundary, however, the survey recommends that the discoveries do not warrant further investigation or conservation.</li> <li>4. As part of the investigation, the Confederated Tribes of the Colville Reservation, Yakima Nation, and a member of the Wanapum Longhouse at Priest Rapids were consulted.</li> <li>5. On site monitoring by an</li> </ol>

	Archaeologist is recommended during earthwork activities.
<b>Contact:</b> Paul Gonseth, P.E. Planning Engineer	<b>Agency:</b> Washington State Department of Transportation
<b>Concern/Comment:</b> <ol style="list-style-type: none"> <li>1. Agency previously provided comments on the Vantage Bay Planned Unit Development on August 8, 2006.</li> <li>2. The revised proposal will not significantly alter this project and no additional comments are provided.</li> </ol>	<b>Applicant Response:</b> <ol style="list-style-type: none"> <li>1. SEPA MDNS Transportation conditions state:           <ol style="list-style-type: none"> <li>a. Applicant shall adhere to all applicable regulations set forth in current Kittitas County Road Standards.</li> <li>b. No direct access to I-90 or within limited access boundaries of Huntzinger Road per WSDOT requirements.</li> <li>c. Access from the plat area across WSDOT property shall be prohibited.</li> <li>d. It is the developer's responsibility to dampen or deflect any I-90 traffic noise for the development.</li> <li>e. Any outdoor advertising or motorist signage for this project shall comply with state criteria.</li> <li>f. Site grading shall be designed so as not to reduce flood storage or conveyance capacity.</li> <li>g. Mail routes and mailbox locations shall be approved by the postmaster. Mailbox locations shall not create sight obstructions.</li> </ol> </li> <li>2. The proposed development will/ does comply with these SEPA conditions.</li> </ol>
<b>Contact:</b> Robert Bright Air Traffic and Airspace Officer	<b>Agency:</b> United States Army Aviation Division, Directorate of Plans,

	<p><b>Training, Aviation, Mobilization, and Security (DPTAMS) Joint Base Lewis-McChord and Yakima Training Center</b></p>
<p><b>Concern/Comment:</b></p> <ol style="list-style-type: none"> <li>1. The proposed project is 1.5 miles from the boundary of the Yakima Training Center.</li> <li>2. The military mission on the Yakima Training Center requires a dark sky at night.</li> <li>3. Light pollution from a large project could encroach on the mission of the military.</li> <li>4. Request assurances from the applicant that the project will conform to the International Dark-Sky Association and Illuminating Engineering Society of North America recommendations for well-shielded outdoor lighting fixtures and no up light for area and street lighting.</li> </ol>	<p><b>Applicant Response:</b></p> <ol style="list-style-type: none"> <li>1. The proposed development will not employ use of area or street lighting that projects light upward.</li> <li>2. The Vantage Bay PUD will utilize downlighting where needed to the maximum extent feasible.</li> </ol>
<p><b>Contact:</b>  <b>Tristen Lamb</b>  <b>Environmental Health Supervisor</b></p>	<p><b>Agency:</b>  <b>Kittitas County Public Health Department</b></p>
<p><b>Comment/Concern:</b></p> <ol style="list-style-type: none"> <li>1. Withdrawals of groundwater on the subject property shall be subject to the rules and regulations adopted and administrated by the Washington State Department of Ecology.</li> <li>2. A Class A Water System and wastewater management system shall be developed to serve the site in conformance with local and state health regulations.</li> <li>3. There shall be a minimum of 100 feet from the OHWM for all on-site sewage treatment systems.</li> <li>4. Onsite Sewage: soil logs need to be scheduled a dug at a mutually convenient time.</li> </ol>	<p><b>Response:</b></p> <ol style="list-style-type: none"> <li>1. PLSA of Yakima is working on behalf of BCSCBN, Inc to obtain state and local approval of a Class A Water System.</li> <li>2. Kittitas County has reviewed the Water System Plan (WSP) for consistency with local codes.</li> <li>3. The Washington State Department of Health (DOH) has assigned the following project numbers for their review of the WSP: PWS ID #AD722 and DOH Project #18-0808.</li> <li>4. The DOH has issued review comments dated 10/18/2018.</li> <li>5. PLSA is currently working on response materials to the DOH</li> </ol>

<p>5. Proof of potable water must be shown prior to final plat approval.</p>	<p>review comments.</p> <p>6. The proposed Vantage Bay PUD will utilize a membrane bio reactor system (MBR) for waste water handling and treatment.</p> <p>7. The MBR will be located outside of the 100' buffer from OHWM.</p> <p>8. ESM Consulting Engineers and PLSA of Yakima will work jointly to develop the MBR appropriate for the proposed Vantage Bay PUD development.</p>
<p><b>Contact:</b>  <b>Mark Cook, Director</b></p>	<p><b>Agency:</b>  <b>Kittitas County Department of Public Works</b></p>
<p><b>Concern/Comment:</b></p> <ol style="list-style-type: none"> <li>1. Remind the applicant of Ordinance 2006-60 condition No. 13.</li> <li>2. Condition No. 13 states that the stormwater design may allow for percolation into on offsite back water slough associated with the Wanapum pool of the Columbia River. The percolation of water may affect the back-water slough's water quality. It is recommended that a base-line evaluation and then subsequent semi-annual monitoring for 3 consecutive years to document possible changes in the slough due to storm water practices for the proposed project.</li> <li>3. Public Works may be able to work with the proponent's engineer devising a stormwater scheme to minimize or negate the need for above referenced monitoring requirement during final stormwater plan submittal.</li> </ol>	<p><b>Response:</b></p> <ol style="list-style-type: none"> <li>1. The Vantage Bay PUD stormwater design and implementation will follow local and state regulations to mitigate possible environmental impacts to nearby water systems.</li> <li>2. The proponents of the Vantage Bay PUD will work closely with the Kittitas Public Works Department to develop a stormwater solution that meets applicable codes and regulations.</li> </ol>
<p><b>Contact:</b>  <b>Scott Downes</b>  <b>Area Habitat Biologist</b></p>	<p><b>Agency:</b>  <b>Washington State Department of Fish and Wildlife</b></p>

Comment/Concern:	Response:
<ol style="list-style-type: none"><li>1. The project footprint is located on shrub-steppe habitat and adjacent to waterfowl concentrations as mapped under the WDFW Priority Habitats and Species (PHS) database.</li><li>2. Development of this project will result in clearing of the shrub-steppe habitat and the proposed density of development is likely to have substantial impacts to the ability for waterfowl to use the adjacent shoreline area through increased human disturbance.</li><li>3. Construction of development will result in net loss of shrub-steppe habitat and reduce ability of waterfowl to utilize the adjacent shoreline.</li><li>4. WDFW requests if SSDP is approved that the applicant work with Kittitas County and WDFW to develop a habitat management plan that will compensate for this net loss of wildlife habitat prior to construction.</li><li>5. One option of a habitat management plan could be to reduce the development footprint with no development in the southern priority habitat areas along with habitat enhancement.</li><li>6. Another option could include securing conservation protection on compensatory land parcels and habitat enhancement on other nearby habitats that would benefit the same species as impacted by this development.</li><li>7. WDFW has concerns that the proposed development will lead to conflicts with native ungulates. These ungulates have been regularly documented moving through this general area and will look to forage</li></ol>	<ol style="list-style-type: none"><li>1. The Vantage Bay PUD and Preliminary Plat was approved under ordinance 2006-60 for 315 single family lots that covered the entire project site. The applicant has modified the PUD to be less dense and have less impact than the originally approved Preliminary Plat.</li><li>2. EAS performed a Biological Resources Review of the proposed development and prepared a letter dated 07/19/2006- included with this comment matrix.</li><li>3. EAS also conducted a functional analysis of the wetlands consistent with methodologies endorsed by Washington State Department of Ecology. A copy of there letter dated August 19, 2006 is included with this comment matrix.</li><li>4. Brett Tiller, Senior Scientist at Environmental Assessment Services (EAS) requested 1) a WDFW Priority Habitats and Species program and 2) WDNR for rare plants and/or element occurrences both on March 22, 2006.</li><li>5. National Wetland Resources and a Bald Eagle Nest were identified through those requests. Shrub-steppe habitat was not identified.</li><li>6. It is important to note that the proposed project site is generally classified as highly disturbed habitat that has had extensive agricultural and domestic livestock use for decades.</li><li>7. Washington State Parks owns surrounding land known as the</li></ol>

<p>upon vegetation such as lawns, gardens and commercial plantings, including the proposed vineyard.</p> <ol style="list-style-type: none"><li>8. WDFW states that the applicant should accept that unfenced areas will be grazed upon and, when it occurs, should not seek animal damage permits from WDFW.</li><li>9. Scott Downes has stated that WDFW would be more than happy to provide the applicant with guidance on the habitat management plan and fencing.</li></ol>	<p>GINKGO PETRIFIED FOREST / WANAPUM RECREATION AREA. This area is designated as low impact recreational use that serves as protected wildlife habitat.</p> <ol style="list-style-type: none"><li>8. Grant County owns the land between the shoreline of Columbia River and the project boundary of the Vantage Bay PUD. This area is protected as documented in the Grant County PUD Wildlife Habitat Management Plan (FERC License Article 409).</li><li>9. The airstrip property is being managed for wildlife habitat.</li><li>10. Further, the SSDP application is compliant with conditions of approval for Ordinance 2006-60 which approved the Vantage Bay PUD back in 2006. All development will be outside of the mandatory 100-foot buffer from OHWM or the 100-year flood plain, whichever is greater.</li><li>11. Pedestrian trails will be provided to shoreline areas except for on Grant County PUD property. Signage will be used to identify protected areas and keep people from impacting the priority habitat.</li><li>12. Local and State agencies have reviewed the higher density project and as a result have requested mitigated conditions of approval. The SSDP application is one of the compliance items under the conditions of approval. Appropriate mitigation is being employed for the proposed development.</li></ol>
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<p><b>Contact:</b>  <b>Gwen Clear</b>  <b>Environmental Review Coordinator</b>  <b>Central Regional Office</b></p>	<p><b>Agency:</b>  <b>Washington State Department of Ecology</b></p>
<p><b>Comment/Concern:</b>  <b>SHORELANDS/ENVIRONMENTAL ASSISTANCE</b></p> <ol style="list-style-type: none"> <li>1. The Department of Ecology (Ecology) was unable to review the wetland delineation and rating associated with this Planned Unit Development, as it was previously approved.</li> <li>2. Ecology requires new delineations after 5 years.</li> <li>3. Ecology would be happy to review any supplement documents related to this project and provide technical assistance to the County.</li> </ol> <p><b>WATER RESOURCES</b></p> <ol style="list-style-type: none"> <li>4. Ecology recommends that the County coordinate with the Washington State Department of Health on the requirements of a Group A water system.</li> </ol> <p><b>WATER QUALITY</b></p> <ol style="list-style-type: none"> <li>5. Ecology requests more details about the currently planned project. The project proposes a wastewater treatment facility for sanitary and industrial wastewater. The proposal states treated wastewater will be used for site landscaping purposes.</li> <li>6. The proposed project will require the submittal of a State Reclaimed Wastewater Discharge Application that will require compliance with WAC Chapter 173-219 and 173-240.</li> <li>7. The project will require the NPDES Construction Stormwater General Permit and Stormwater Pollution Prevention Plan.</li> </ol> <p><b>SEPA</b></p> <ol style="list-style-type: none"> <li>8. Ecology recommends that Kittitas</li> </ol>	<p><b>Response:</b></p> <ol style="list-style-type: none"> <li>1. Included with this comment matrix is the Vantage Bay Development Updated Biological Resource Review dated 8/22/2017 and prepared by EAS.</li> <li>2. Kittitas County Ordinance 2006-60 condition of approval states that a minimum 80-foot buffer shall be maintained from the wetlands- the proposed SSDP application demonstrates this.</li> <li>3. PLSA of Yakima is BCSSNC, Inc Water System Engineer and has submitted the Water System Plan (WSP) for a Group A Water System to the Department of Health for review. As part of the WSP, Kittitas County had to review for consistency with local codes.</li> <li>4. The waste water system plans are in conceptual planning stages. Appropriate state and local permit applications will be applied for once plans are ready for submittal.</li> <li>5. All applicable state and local health codes will be complied with.</li> <li>6. A Construction Stormwater General Permit application will include a SWPPP after the Planned Unit Development Final Development Plan approval by Kittitas County.</li> <li>7. A Revised MDNS is not advisable. The SSDP application is a compliance action with the</li> </ol>



<p>County issue a Revised MDNS to include the currently proposed development of the Vantage Bay PUD.</p> <p>9. Ecology states the following as additional development not described and reviewed within the 2006 MDNS:</p> <ul style="list-style-type: none"> <li>a. A 40-unit boutique hotel</li> <li>b. Restaurant</li> <li>c. Winery</li> <li>d. 16 Acres of vineyard</li> <li>e. Community garden</li> <li>f. Pool</li> <li>g. Clubhouse</li> <li>h. Barn</li> <li>i. Pedestrian walking trails throughout the Planned Unit Development</li> </ul>	<p>conditions of approval from the original MDNS associated with the Vantage Bay PUD. The listed development is not in addition to the original planned unit development but rather a modification and decrease in proposed density.</p> <p>8. The Vantage Bay PUD and Preliminary Plat was approved under ordinance 2006-60 for 315 single family lots that covered the entire project site. The applicant has modified the PUD to be less dense and have less impact than the originally approved Preliminary Plat.</p>
<p><b>Contact:</b>  <b>Sheryl Dotson</b>  <b>Property Services Supervisor</b></p>	<p><b>Agency:</b>  <b>Grant County Public Utility District</b></p>
<p><b>Comment/Concern:</b></p> <ul style="list-style-type: none"> <li>1. Regarding the applicant's reference to a future park on Grant PUD shoreline properties: a recent update to the Priest Rapids Recreation Resource Management Plan concludes that additional recreation facilities and/or amenities are not warranted at this time within the Wanapum Recreation Area. Annual surveys have shown that there are enough recreation opportunities currently available.</li> <li>2. The Airstrip property is being managed for wildlife habitat, as outlined in Grant PUD's Wildlife Habitat Management Plan (FERC License Article 409), as a fall and winter waterfowl concentration area with quality riparian habitat.</li> <li>3. Waterfowl hunting occur regularly in</li> </ul>	<p><b>Response:</b></p> <ul style="list-style-type: none"> <li>1. Vantage Bay PUD does not rely on a future park on the Grant PUD property to accommodate the development. Proponents of Vantage Bay PUD would welcome the opportunity to coordinate with Grant PUD on a joint-venture to develop the property as onsite recreation available to the general public; however, at this time pedestrian trails systems will remain solely on the Vantage Bay PUD project property.</li> <li>2. Vantage Bay PUD will provide an easement over the proposed internal roads to provide access to Grant PUD property, however, cooperation between Grant PUD and the HOA will be required so</li> </ul>

<p>the fall and winter months at this site.</p> <ol style="list-style-type: none"> <li>4. Grant PUD welcomes the applicant providing an easement from Huntzinger Road for public access to the lands and waters of the [Grant PUD] property however appropriate amenities, such as hiking/walking trails, are not included on the conceptual plan drawings for comment.</li> <li>5. Grant PUD's FERC license requires "non-project use permits" for any third-party use and occupancy of the Grant PUD property. These uses must demonstrate a public benefit and non-exclusive in nature.</li> <li>6. Grant PUD recommends installation of fencing between their property and Vantage Bay PUD to prevent trespassing, minimize ground disturbances and vegetation damage. Public access point should be built into the fence system to provide access to the shoreline.</li> </ol>	<p>that public access does not degrade the developments of private property.</p> <ol style="list-style-type: none"> <li>3. If Vantage Bay PUD seeks use of the Grant PUD property, then a non-project use permit application will be applied for with Grant PUD.</li> <li>4. Vantage Bay PUD will provide a way to delineate property boundaries in order to prevent trespassing and environmental degradation.</li> </ol>
<p><b>Contact:</b>  <b>William (Bill) Cantral</b>  <b>Chief of Police</b></p>	<p><b>Agency:</b>  <b>United States Army</b>  <b>Yakima Training Center, Directorate</b>  <b>Emergency Services</b></p>
<p><b>Comment/Concern:</b></p> <ol style="list-style-type: none"> <li>1. Residential development outside the northeast corner of the Yakima Training Center creates some potential security concerns such as trespassing, illegal dumping, vandalism, etc.</li> <li>2. The northeast training area of the Yakima Training Center has an uncontrolled perimeter and frequent military training, which involves maneuver training and use of artillery simulation training aids.</li> <li>3. Residents of this proposed</li> </ol>	<p><b>Response:</b></p> <ol style="list-style-type: none"> <li>1. Potential security concerns noted.</li> <li>2. The development's HOA and or the winery and hotel will notify residents and guests of the simulation training and maneuvers.</li> <li>3. Additionally, Vantage Bay PUD will have signage, fencing, or a combination of both denoting property boundaries to prevent trespassing.</li> </ol>

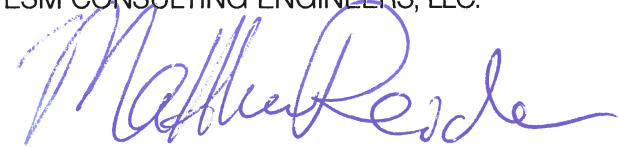
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development would encounter military traffic on Huntzinger Road and noise associated with simulated explosions.	
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If there are any questions or a need for further clarification, please feel free to contact me at (253) 838-6113 and I would be happy to discuss them with you.

Sincerely,

ESM CONSULTING ENGINEERS, LLC.



MATT REIDER  
Assistant Planner

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