



*...a reality check of
environmental quality...*

August 22, 2017

Bill Cowin
Ketchikan Drywall Services, Inc.
1010 SE Everett Mall Way | Ste 210
Everett, WA 98208
(425) 297-9900



Kittitas Co. GDS

Subject: Vantage Bay Development Updated Biological Resource Review (Kittitas County Parcels Numbers 272933 and 622933)

In 2006, EAS, LLC was contracted by BCSCBN, Inc. to provide a biological resource review of the subject land (Attachment A). In 2017, EAS was contacted to review the current conditions and requirements relevant to the 2006 biological resource review to determine if any changes or updates have occurred since 2006. The 2017 biological resource review was performed on the project boundary (Attachment A) to evaluate potential impacts to fish and wildlife, plants, and wetlands.

The Vantage Bay Development plans to develop Parcel Numbers 272933 and 622933. EAS performed a parcel map search on the Kittitas County Assessors website (<http://www.co.kittitas.wa.us/assessor/>; Attachment B). Kittitas County reports both parcels are owned by BCSCBN, 21828 87th Ave SE, Woodinville, WA 98072. Parcel Number 622933 is 31.75 acres, and Parcel Number 272933 is 25.46 acres. Collectively, the parcels total 57.21 acres.

In conducting the biological resource review for changes or updates since 2006, EAS reviewed the following data sources:

1. Kittitas County Assessor's Office,
2. Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species,
3. National Bald Eagle Management Guidelines,
4. Washington Natural Heritage Program (WNHP),
5. WNHP 2017 Endangered, Threatened, and Sensitive Vascular Plant List,
6. WNHP 2017 Vascular Review Group 1 List,
7. WNHP 2017 Vascular Group 2 List,
8. U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory,
9. Kittitas County Shoreline Master Program,
10. Washington State Wetland Rating System for Eastern Washington

11. Priest Rapids Hydroelectric Project (P-2114) Shoreline Management Plan License Article 419, and
12. Priest Rapids Hydroelectric Project (FERC No. 2114) Wildlife Habitat Management Plan License Article 409.

Our findings are summarized below:

FISH AND WILDLIFE

Data Search and Field Reconnaissance

EAS reviewed the WDFW Priority Habitats and Species database, the Public Utility District No. 2 of Grant County, WA (GCPUD) Shoreline Master Plan, GCPUD Wildlife Habitat Management Plan, and the National Bald Eagle Management Guidelines. EAS biologist/wetland delineator John Nugent visited the site on 08/17/2017 to compare current conditions with those he had observed during 2006. The site was generally the same as before, however, some new bird perch/nest structures were noted along the river's edge.

Findings

WDFW Priority Habitat and Species

The WDFW Priority Habitat and Species (PHS) database (PHS on the Web) was accessed on July 20, 2017 (Attachment C). Shrub-steppe habitat was reported within and west of the BCSCBN, Inc. owned parcels. Approximately 1,000 ft east of the BCSCBN, Inc. owned parcels, PHS data indicated a bald eagle nest with a 660 ft buffer zone. Additionally, waterfowl concentrations and common loon were reported along the Columbia River, which are also approximately 1,000 ft east of the BCSCBN, Inc. owned parcels.

Priest Rapids Hydroelectric Project (P-2114) Shoreline Management Plan License Article 419

A review of the subject management plan (GCPUD and Alliance Consulting Group 2010), dated March 2010, documented that GCPUD designates lands as Project Facilities, Public Recreation Development, and Resources Management. Excerpts from the subject management plan relevant to lands adjacent to the Vantage Bay Development (e.g., Reaches R4 & R5, Attachment D) include the following:

“This area is used by bald eagles and many other bird species because of the extent of the vegetative community(s), considered important habitat by WDFW.”

“The airstrip area, south of I-90 is a targeted area for fish and wildlife management by the Grant PUD. Management of the area will include improvements to the biological resources, in

particular noxious weed control, riparian enhancements, perch tree protection measures, and nest boxes.”

Priest Rapids Hydroelectric Project (FERC No. 2114) Wildlife Habitat Management Plan License Article 409

A review of the subject management plan (GCPUD and GeoEngineers, Inc, 2015), dated December 22, 2015, documented the following:

- GCPUD has a site-specific wildlife habitat improvement plan for the property adjacent to Vantage Bay Development which is referred to as the “Airstrip.”
- As of the date of updated wildlife habitat management plan, GCPUD has no plans for recreational development of the Airstrip.

GCPUD communicated that the Airstrip remains an area with high potential for habitat enhancements and the following actions are planned for continued improvements at the site:

- Collaborate with WDFW regarding upland habitat enhancements at the site that may benefit upland birds such as pheasant and chukar.
- Coordinate with GCPUD Lands and Recreation staff regarding assessment for future recreational development. Ensure any future development is planned with wildlife habitat protection as an objective.

National Bald Eagle Management Guidelines

The National Bald Eagle Management Guidelines suggests a buffer of 660 ft if the project footprint of building construction includes one or two story buildings, is greater than 0.5 acres, and there is no similar activity within one mile of an eagle’s nest (USFWS 2007). The USFWS developed these National Bald Eagle Management Guidelines to advise landowners, land managers, and others who share public and private lands with bald eagles when and under what circumstances the protective provisions of the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act may apply to their activities.

Management Implications

Based on the findings above, EAS does not believe that any fish and wildlife management implications exist. The waterfowl and common loon areas were located on the mainstem of the Columbia River (~1,000 ft), and the 660 ft bald eagle buffer did not encroach upon the BCSCBN, Inc. owned parcels. WDFW reports (per their website http://wdfw.wa.gov/conservation/bald_eagle/ accessed on August 15, 2017) that the USFWS has the primary responsibility of managing bald eagles under the provisions of the federal Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act.

PLANTS

Data Search and Field Reconnaissance

EAS reviewed the Washington Natural Heritage Program (WNHP), the GCPUD Shoreline Master Plan, GCPUD Wildlife Habitat Management Plan; WHNP 2017 Endangered, Threatened, and Sensitive Vascular Plant List; WHNP 2017 Vascular Review Group 1 List, and the WHNP 2017 Vascular Group 2 List. EAS biologist/wetland delineator John Nugent visited the site on 08/17/2017 to compare current conditions with those he had observed during 2006. The site was generally the same as before; the upland areas were generally shrub-steppe with a mixture of native and non-native species.

Findings

Washington Natural Heritage Program

The WNHP has no records of rare plants or rare/high quality ecological communities near the Vantage Bay Development (Attachment E).

Priest Rapids Hydroelectric Project (P-2114) Shoreline Management Plan License Article 419

A review of the subject management plan (GCPUD and Alliance Consulting Group 2010), dated March 2010, documented that GCPUD designates lands as Project Facilities, Public Recreation Development, and Resources Management. Excerpts from the subject management plan relevant to lands adjacent to the Vantage Bay Development (e.g., Reaches R4 & R5, Attachment D) include the following:

“South of I-90 reach R4 is mostly shrub-steppe, although the pixel colors are significantly different than that seen farther upland, indicating that there may be many non-native and/or invasive species. Most of the water’s edge has a fairly well developed riparian area, albeit with a significant amount of non-native species (GCPUD data), including poplar trees along the north half of this section.

“Upland areas are undeveloped steeper shrub-steppe habitat.”

“Management of the area will include improvements to the biological resources, in particular noxious weed control, riparian enhancements, perch tree protection measures, and nest boxes.”

“Reach R5 is mostly shrub-steppe with rock outcrops. Towards the northern end the riparian area increases and includes some wetland areas, and an island (Girl Scout Island).”

Priest Rapids Hydroelectric Project (FERC No. 2114) Wildlife Habitat Management Plan License Article 409

A review of the subject management plan (GCPUD and GeoEngineers, Inc, 2015), dated December 22, 2015, documented the following:

- GCPUD has a site-specific wildlife habitat improvement plan for the property adjacent to Vantage Bay Development which is referred to as the “Airstrip.”
- GCPUD has conducted an aggressive noxious weed program to address terrestrial and wetland noxious weeds
- As of the date of updated wildlife habitat management plan, GCPUD has no plans for recreational development of the Airstrip.
- A state-identified sensitive plant species, shining flatsedge (*Cyperus bipartitus*), was identified at the Airstrip.

GCPUD communicated that the Airstrip remains an area with high potential for habitat enhancements and the following actions are planned for continued improvements at the site:

- Continue a noxious weed monitoring and treatment program.
- Enhance and establish native shrub/steppe and bunch grass habitats on the site.
- Provide additional riparian plantings on the shore of the Columbia River and the slough to improve structural diversity and improve habitat at the site.
- Collaborate with WDFW regarding upland habitat enhancements at the site that may benefit upland birds such as pheasant and chukar.
- Investigate the removal of the airstrip pavement and restore with native species.
- Coordinate with GCPUD Lands and Recreation staff regarding assessment for future recreational development. Ensure any future development is planned with wildlife habitat protection as an objective.

WNHP 2017 Endangered, Threatened, and Sensitive Vascular Plant List; WNHP 2017 Vascular Review Group 1 List, and the WNHP 2017 Vascular Group 2 List

The sensitive state-listing status of shining flatsedge (*Cyperus bipartitus*) reported by GCPUD and GeoEngineers, Inc. (2015) was reviewed within the Washington State Department of Natural Resources, WNHP 2017 Endangered, Threatened, and Sensitive Vascular Plant List, WNHP 2017 Vascular Review Group 1 List, and the WNHP 2017 Vascular Group 2 List to assess its current state-listing status. Shining flatsedge was not included within any of the 2017 plant species lists. Thus, as of 2017, it appears the shining flatsedge was delisted and currently has no special state or federal status.

Management Implications

Based on the findings summarized above, EAS does not believe that any plant management implications exist for plant species. Based on the data review, no rare or threatened state or federal plant species are documented on BCSCBN, Inc. owned property or adjacent GCPUD property.

WETLANDS

Data Search and Field Reconnaissance

EAS reviewed the USFWS National Wetlands Inventory, Kittitas County Shoreline Master Program, GCPUD Shoreline Master Plan, and GCPUD Wildlife Habitat Management Plan. EAS biologist/wetland delineator John Nugent visited the site on 08/17/2017 to compare current conditions with those he had observed during 2006. The site was generally the same as before; the wetland area was still present.

Findings

U.S. Fish and Wildlife Service National Wetlands Inventory

The National Wetlands Inventory was accessed on July 25, 2017 and classified the wetland area near the project as Lake Wetlands (Attachment F).

Kittitas County Shoreline Master Program

The Kittitas County Shoreline Master Program (KCSMP) was updated and approved on March 7, 2016. The KCSMP regulates wetland buffers for land development (See Table 5.2-1 from the KCSMP). Per Table 5.2-1, the wetland category and intensity of use and development would determine the buffer distance for the Vantage Bay Development. The wetland buffers are measured horizontally in all directions from the regulated wetland edge as marked in the field.

In 2006, the functional analyses indicated that the adjacent wetland could qualify as a Category II or Category III wetland if site-specific surveys for special status plant species were conducted and special status plant species were present. No further delineations or rare plant evaluations were conducted in 2006 because the preliminary plat was over 120 feet from the wetlands area and did not intrude into the most conservative Kittitas County Critical Areas Ordinance prescribed wetland buffer (80 ft). In 2006, the minimum measurements between the BCSCBN, Inc. owned parcels and three wetland boundary flags measured 139.03 ft, 125.80 ft, and 153.07 ft (Attachment A).

Table 5.2-1. Wetland Buffers for Wetlands in Shoreline Jurisdiction

Wetland Category	Low Intensity Use and Development	Moderate Intensity Use and Development*	High Intensity Use and Development*
Category I	125 feet	190 feet	250 feet
Category II	100 feet	150 feet	200 feet
Category III	75 feet	110 feet	150 feet
Category IV	25 feet	40 feet	50 feet

* For the purposes of Section 5.2, high intensity use and developments include: commercial, urban, industrial, institutional, retail sales, residential (more than 1 unit/acre), conversions from non-agricultural lands to high intensity agriculture (dairies, animal feed lots, nurseries and green houses, and like uses), high intensity recreation (golf courses, ball fields, and like uses) and hobby farms. Moderate intensity use and developments include: residential (1 unit/acre or less), moderate intensity open space (parks with biking, jogging, and like uses), conversion from non-agricultural lands to moderate intensity agriculture (orchard, hay fields, and like uses), paved trails, building of logging roads, and utility corridor or right-of-way shared by several utilities and including access/maintenance roads. Low intensity use and developments include: forestry (cutting of trees only), low intensity open space (hiking, bird-watching, and like uses), unpaved trails, and utility corridor without a maintenance road and little or no vegetation management.

SEPA MITIGATED DETERMINATION OF NONSIGNIFICANCE (letter Dated August 29, 2006)

The August 29, 2006 letter concerning the Kittitas County SEPA Mitigated Determination of Nonsignificance stated in Section IIIB dictated that a minimum 80 foot buffer “shall be maintained from the wetlands”.

Priest Rapids Hydroelectric Project (P-2114) Shoreline Management Plan License Article 419

A review of the subject management plan (GCPUD and Alliance Consulting Group 2010), dated March 2010, documented that GCPUD designates lands as Project Facilities, Public Recreation Development, and Resources Management. Excerpts from the subject management plan relevant to lands adjacent to the Vantage Bay Development (e.g., Reaches R4 & R5, Attachment D) include the following:

“Most of the water’s edge has a fairly well developed riparian area, albeit with a significant amount of non-native species (GPUD data), including poplar trees along the north half of this section. Towards the southern end the riparian area increases and includes some wetland areas.

There are several slough, backwater and/or inundated areas that begin in this reach and extend into the south (R5)."

"The airstrip area, south of I-90 is a targeted area for fish and wildlife management by the Grant PUD. Management of the area will include improvements to the biological resources, in particular noxious weed control, riparian enhancements, perch tree protection measures, and nest boxes."

"Towards the northern end [Reach R5] the riparian area increases and includes some wetland areas, and an island (Girl Scout Island). There are several slough areas that begin in Reach 4."

Priest Rapids Hydroelectric Project (FERC No. 2114) Wildlife Habitat Management Plan License Article 409

A review of the subject management plan (GCPUD and GeoEngineers, Inc, 2015), dated December 22, 2015, documented the following:

- GCPUD has a site-specific wildlife habitat improvement plan for the property adjacent to Vantage Bay Development which is referred to as the "Airstrip."
- GCPUD has conducted an aggressive noxious weed program to address terrestrial and wetland noxious weeds
- As of the date of updated wildlife habitat management plan, GCPUD has no plans for recreational development of the Airstrip.
- A state-identified sensitive plant species, shining flatsedge (*Cyperus bipartitus*), was identified at the Airstrip.

GCPUD communicated that the Airstrip remains an area with high potential for habitat enhancements and the following actions are planned for continued improvements at the site:

- Continue a noxious weed monitoring and treatment program.
- Provide additional riparian plantings on the shore of the Columbia River and the slough to improve structural diversity and improve habitat at the site.
- Coordinate with GCPUD Lands and Recreation staff regarding assessment for future recreational development. Ensure any future development is planned with wildlife habitat protection as an objective.

Washington State Wetland Rating System for Eastern Washington

Washington State Wetland Rating System for Eastern Washington 2014 Update became effective January 2015.

Management Implications

Based on the finding above, the wetland area adjacent to the Vantage Bay Development would likely be rated Class III, however, this was not confirmed by EAS during 2017 because the site was not officially rated or delineated during 2017 using the Washington State Wetland Rating System for Eastern Washington 2014 Update. The presence of shining flat sedge (if present in the adjacent wetland) should not affect the wetland rating because this species no longer has a special state listing status. Per the KCSMP, which was updated on March 7, 2016, the wetland category and intensity of use and development determines the wetland buffer for the Vantage Bay Development.

LITERATURE CITED

- GCPUD (Public Utility District No. 2 of Grant County, Washington) and Alliance Consulting Group. 2010. Priest Rapids Hydroelectric Project (P-2114) Shoreline Management Plan License Article 419. Prepared for the Public Utility District No. 2 of Grant Count, Ephrata, WA.
- GCPUD and GeoEngineers, Inc. 2015. Priest Rapids Hydroelectric Project (FERC No. 2114) Wildlife Habitat Management Plan License Article 409. Prepared for the Public Utility District No. 2 of Grant Count, Ephrata, WA.
- Kittitas County SEPA DETERMINATION OF NONSIGNIFICANE. August 29, 2006. File for (Vantage Bay Rezon [Z-06-25] and Preliminary Plat [P-06-26])
- Kittitas County Shoreline Master Program. March 7, 2016. Kittitas County Shoreline Master Program Update.
- U.S. Fish and Wildlife Service. 2007. National Bald Eagle Management Guidelines. May 2007.

This concludes EAS's 2017 review of biological resources on and near the subject parcels.

Sincerely,



Brett Tiller
Principal Scientist
W/Attachments

Attachment A – 2006 Biological Resource Review



July 19, 2006

BCSCBN INC.
21828 87th AVE SE
Suite 200
Woodinville, WA 98072
Attn: Skip Coddington

Subject: Letter Report - Biological Resources Review of a Proposed Housing Development near Vantage, WA:

This letter serves to document an assessment of the biological resources that have been observed on or within a 1.0 mile radius of the proposed housing development near Vantage, WA. This review was performed by Environmental Assessment Services (EAS) during the spring of 2006.

Survey points of the proposed development footprint were provided by Todd Lolkus of Todd Surveyors at (509) 754-0135 to EAS during early April, 2006. EAS then converted these survey points into an Arcview™ GIS shape file and the resulting coordinates were plotted on a map that illustrated significant geographic and anthropogenic features existing on or near the proposed development area (Figure 1).

Two Washington State natural resources database requests were submitted by EAS for this development on March 22, 2006; 1) Washington Department of Fish and Wildlife (WDFW) priority habitats and species program and 2) Washington Department of Natural Resources (WDNR) for rare plants and/or element occurrences. In addition, the site was visited by B. Tiller (EAS) on 05-29-06 for an ocular assessment of the biological conditions that currently exist there. Results from both database reviews and the site visit are summarized below. Botanical surveys were not specifically conducted in the development footprint because Kittitas County does not include plants as part of their critical areas ordinance (pers. comm. with Scott Turnbull in May, 2006).

The proposed development site can be generally classified as highly disturbed habitat that has had extensive agricultural and domestic livestock use for decades. No significant natural resources (burrowing owls, ground squirrel colonies, raptor perch sites, wetlands, amphibian rearing pools, etc..) were found there during the site visit in May, 2006.



July 19, 2006

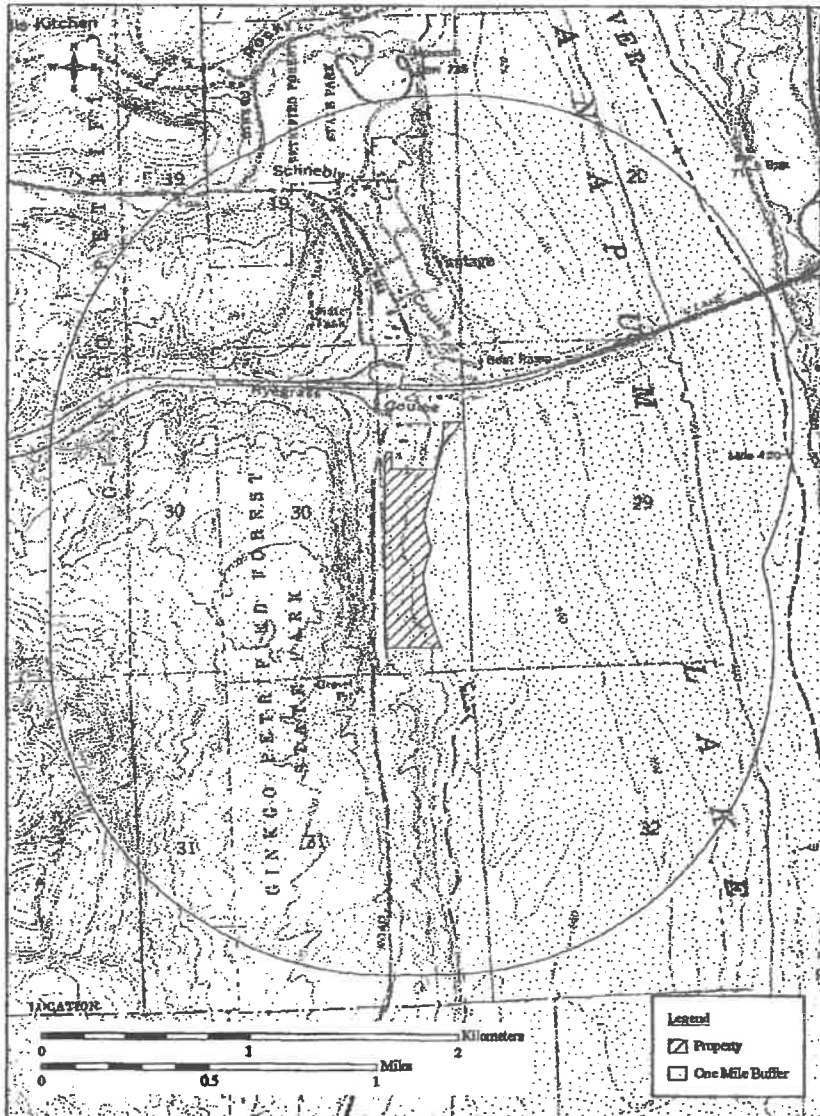


Figure 1. Depiction of proposed housing development near Vantage, WA. The figure illustrates USGS topographic features of the area, the footprint of the proposed housing development (hatched sections), the Columbia River, the existing town of Vantage, and major roadways.



July 20, 2006

Results of the WDFW database request were received by EAS on 04-21-06 and results of the WDNR database request were received by EAS on 05-05-06. No significant natural features were reported within the footprint of the development (see attachment A - letter from Wa. Dept. of Nat. Res. to Mr. Brett Tiller dated 05-01-06). There were however, three significant natural features adjacent to the proposed development footprint; 1) an active bald eagle nest, 2) a small inlet/backwater slough, and 3) areas of vegetation identified in the national wetlands inventory:

Avian Resources: An active bald eagle (*Haliaeetus leucocephalus*) nest was reported this spring approximately 1000ft to the east of the proposed housing development footprint. This nest site was first documented early in calendar year 2006, and subsequently verified by EAS and the State WDFW regional biologist (Jeff Bernetowitz [509] 457-9304). Figure 2.0 illustrates the location of this nest in context to the proposed development footprint. EAS staff consulted with WDFW in May, 2006 and provided the WDFW with a copy of Figure 2.0. WDFW staff subsequently prepared a letter to EAS to address the potential need of a site-specific Bald Eagle Site Management Plan (BESMP) for the development, consistent with State and Federal Bald & Golden Eagle Protection Guidelines. This letter was prepared on July 12, 2006 and is attached as Appendix A of this letter report. In summary, WDFW has concluded that no further actions are necessary at this time. However, if re-nesting is observed there in subsequent years, some protection measures may be necessary (see Attachment B - Letter from WDFW to B. Tiller dated July 12, 2006).

Water Resources: Adjacent to the proposed development foot-print (southern region and ~200 meters to the east) there is a relatively small back-water slough that is connected to the Wanapum pool of the Columbia River and likely provides waterfowl, amphibian, and fish habitat (see Fig.1). The slough is generally shallow (maximum depth ~6 feet) but likely contains a number of warm-water fishes during high-water periods. The slough may provide some habitat for juvenile salmonids during the rearing periods, but the lack of free-flowing water (i.e. resulting high water temperatures) and the reservoir's water-level fluctuations (potential stranding areas) limit the utility of this site as suitable juvenile salmonid habitat. Aside from possible reduction of waterfowl use caused by increased human activities near there, the slough's biological resources are not likely to be affected by the proposed development. No water from the development is expected to enter the slough as the black and grey water are to be contained [pers. comm. Skip Coddington (developer) June, 2006].

Plant Resources: WDFW priority habitats database identified a national wetlands area located east of the slough. The national wetlands area is located on adjacent property that is controlled by Grant County Public Utility District and is approximately 1000 feet away from the proposed development footprint. The national wetlands area is not likely to be affected by the proposed development.



July 19, 2006

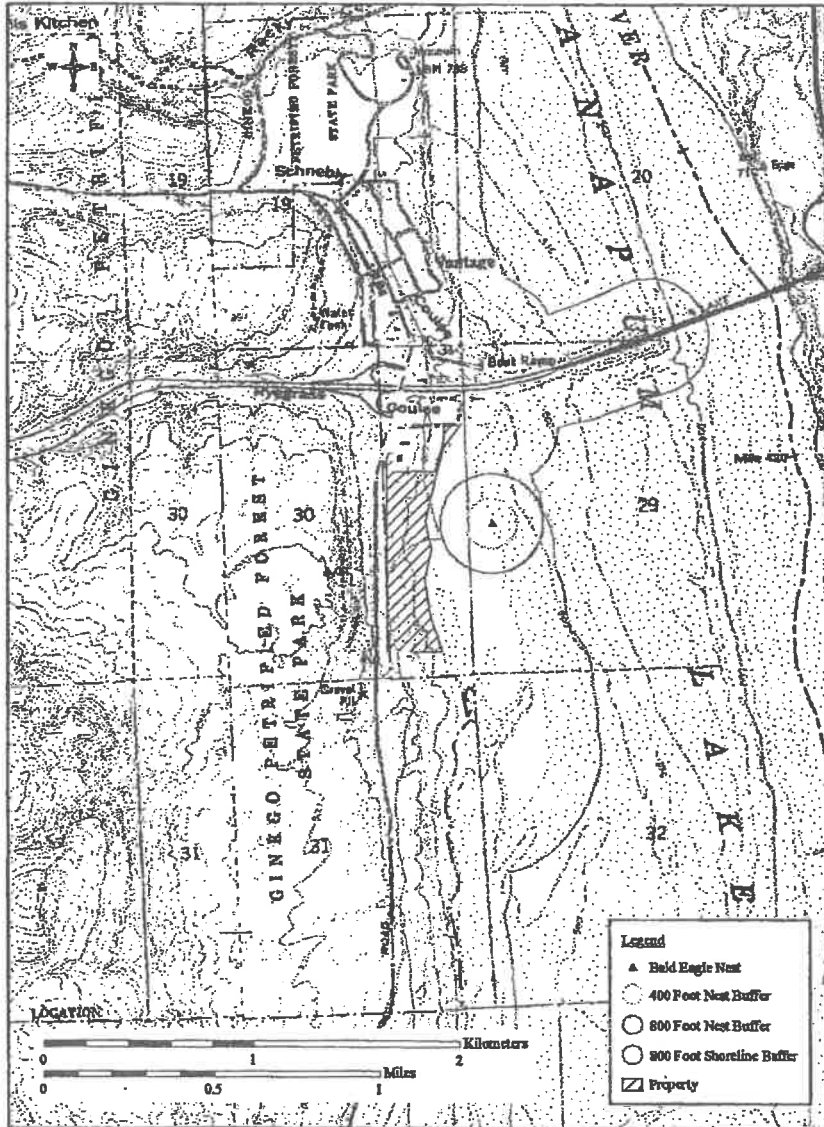


Figure 2. Bald Eagle Nest Site, 400 ft. nest buffer, 800 ft. nest buffer, and 800 ft. shoreline buffer in proximity to the proposed housing development near Vantage, WA.



July 19, 2006

This concludes EAS's initial biological resource review of the proposed housing development near Vantage, WA.

Please do not hesitate to call me at the number listed below with any questions regarding this request.

Sincerely,

Brett Tiller
Sr. Scientist

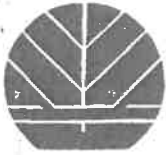
See attachments



EAS ENVIRONMENTAL ASSESSMENT SERVICES

July 19, 2006

Attachment A
Washington Dept. of Natural Resources Database Review Letter



May 1, 2006

Brett Tiller
Environmental Assessment Services
PO Box 265
Richland WA 99352

**SUBJECT: Proposed Housing Development near Vantage, Kittitas County
(T17N R23E S29-32)**

We've searched the Natural Heritage Information System for information on significant natural features in your project area. Currently, we have no records for rare plants or high quality native ecosystems within one mile of your project area.

The information provided by the Washington Natural Heritage Program is based solely on existing information in the database. In the absence of field inventories, we cannot state whether or not a given site contains high quality ecosystems or rare plant species; there may be significant natural features in your study area of which we are not aware.

The Washington Natural Heritage Program is responsible for information on the state's rare plants as well as high quality ecosystems. For information on animal species of concern, please contact Priority Habitats and Species, Washington Department of Fish and Wildlife, 600 Capitol Way N, Olympia WA 98501-1091, or by phone (360) 902-2543.

Please visit our internet website at <http://www.dnr.wa.gov/nhp> for more information. Lists of rare plants and their status, rare plant fact sheets, as well as rare plant survey guidelines are available for download from the site. Please feel free to call me at (360) 902-1697 if you have any questions, or by e-mail at sandra.moody@wadnr.gov.

Sincerely,

Sandy Swope Moody, Environmental Review and Grants Coordinator
Washington Natural Heritage Program

Asset Management & Protection Division, PO Box 47014, Olympia WA 98504-7014
FAX 360-902-1789



EAS ENVIRONMENTAL ASSESSMENT SERVICES

July 19, 2006

Attachment B
Washington Dept. of Fish and Wildlife Bald Eagle Nest Site Assessment Letter



STATE OF WASHINGTON

DEPARTMENT OF FISH AND WILDLIFE

1701 S 24th Avenue • Yakima, Washington 98902-5720 • (509) 575-2740 FAX (509) 575-2474

July 12, 2006

Brett Tiller
Environmental Assessment Services
350 Hills Street, Suite 151
Richland, WA 99354

Dear Brett:

I am writing concerning the proposed development in Kittitas County on parcels 17-23-30000-0001, 17-23-30000-0003, and 17-23-30010-0006. As you know, there had been a bald eagle nest on the side of the Columbia River about 800 feet from the proposed development. I first became aware of the nest in early March and confirmed a bald eagle incubating on March 14th. The eagle territory was name Vantage #1703. I went to the site on June 13th and found the nest tree had blown over. This was not surprising as the tree was a dying hybrid poplar. In reviewing the above parcels, I determined there was no need for a bald eagle plan or restrictions on the development to protect bald eagles. The properties are distant enough from any potential nest trees that timing restrictions on construction will not be needed. There also aren't any potential eagle perch or nest trees on the above parcels.

I am uncertain if eagles will return to the area for nesting in the future. The only trees in the area are relatively small with tight branching that wouldn't typically be good nest trees. If the eagles do return, the only concern would be human disturbance around the nest. The best course of action if eagles do return would be to try to educate the new homeowners and work with Grant County PUD (owner of land with potential nest trees) to limit disturbance directly around the nest during critical periods. WDFW would undertake that responsibility.

Sincerely,

Jeff Bernatowicz

District Wildlife Biologist
Washington Department of Fish and Wildlife

August 19, 2006

BCSCBN INC.
21828 87th AVE SE
Suite 200
Woodinville, WA 98072
Attn: Skip Coddington

Subject: - Supplemental Biological Resource Assessments of a the Vantage Bay Rezone and Preliminary Plat (Z0625):

This letter was prepared to address the Department of Ecology's (Ecology) 07-31-06 comments concerning Shorelands/Environmental Assistance near the Vantage Bay Rezone Project (Z0625).

Two main issues were identified on page 6 and 7 in the letter; 1) that no wildlife use survey had been performed and 2) potential impacts to adjacent wetlands was not adequately addressed.

A five page biological resource review letter report was sent to BCSCBN Inc. and Todd Lolkus Land Surveying LLC, by Environmental Assessment Services (EAS) on 07-19-06. This report, along with appendices showing the Washington Department of Fish and Wildlife's (WDFW) Bald Eagle Nest Site Management strategy and the State Department of Natural Resources' database review, was not provided to Ecology prior to their review. Mr. Brett Tiller (EAS) subsequently provided this letter report (w/o figures or attachments) electronically to Catherine Reed for review on 08-08-06.

Comments provided on page 6 of Ecology's letter to Mrs. Valencia (Kittitas Co. Planner) also noted that any development within 200 feet of the OHWM or the floodway (whichever is more landward) needs to be in compliance with Kittitas Co. Shoreline Master Plan (KCSMP) and buffers should be imposed through the Kittitas Co. Critical Areas Ordinance that are large enough to protect wetland functions from degradation. Ecology recommended that a functional analysis of the wetland area be completed and provided for public review and comment before the County approves the rezone.

The initial biological resources review letter report prepared by EAS on 07-19-06 included a review of the State's priority habitats and species database. In that review, two wetland areas were identified as part of the national wetlands inventory, however, those areas were several hundred meters from the Vantage Bay development footprint and as such, were not likely to be adversely affected by the Vantage Bay development. However, subsequent to Ecology's submission of the Vantage Bay Rezone Preliminary Plat comments, EAS attained updated National Wetlands Inventory data that identified an additional wetland area within 200 feet of the development footprint.

August 19, 2006

In response to this new finding, EAS conducted a functional analyses of the wetland consistent with methodologies endorsed by the Washington State Dept. of Ecology. Additionally, approximately 200 meters (600 feet) of the western-most boundary of the wetland area was delineated to assess distances nearest to the boundaries of the development's footprint. Three flagged wetland boundary points were then surveyed by Todd Lolkus Land Surveying, LLC and a depiction of the distances between the wetlands and property boundary is shown in Figure 1 below.

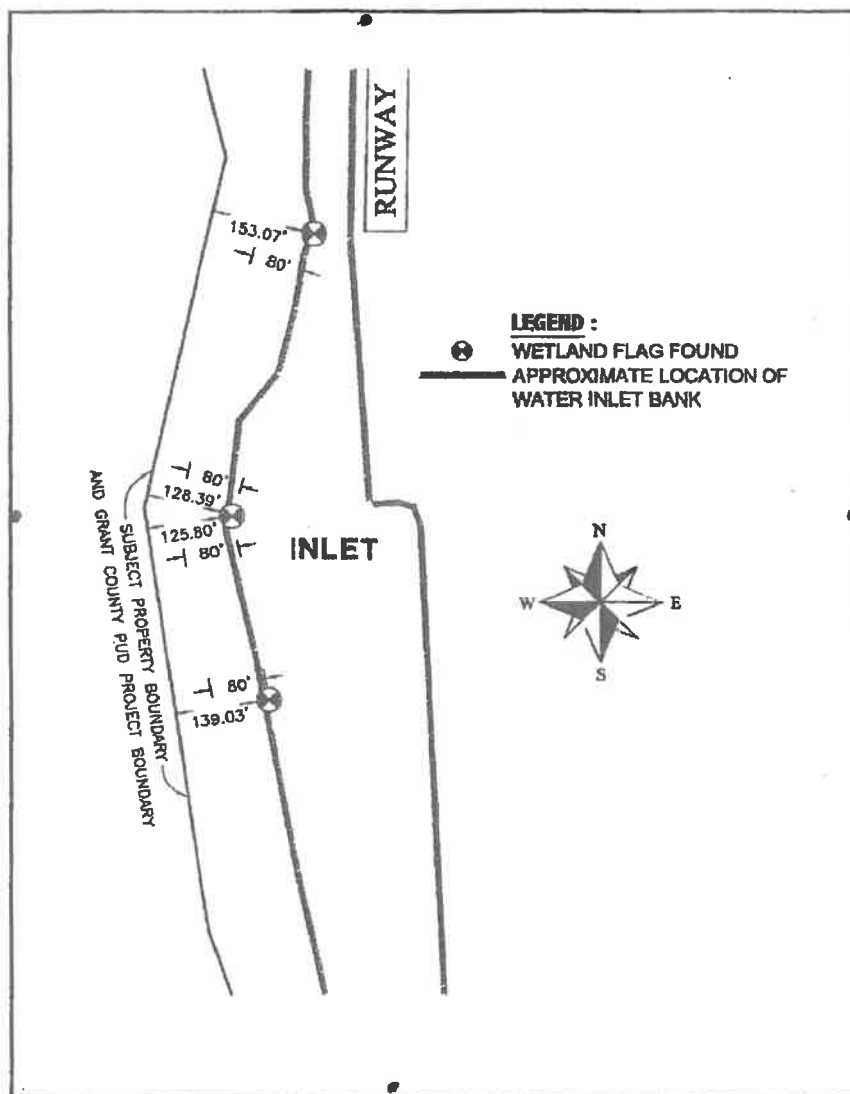


Figure 1 – Depiction of wetland points delineated as part of the Vantage Bay Rezone & Preliminary Plat.

August 19, 2006

The functional analysis indicated that the adjacent wetland qualified as a Category 2 with the possibility of being a Category 3 (the highest wetlands resource value) if site-specific surveys for special status species of plants were conducted. The Kittitas County Critical Areas Ordinance was then used to identify and administer the most protective buffer around this wetland (80ft., see Fig. 1). No further delineations or rare plan evaluations were conducted because the Preliminary Plat is over 120 feet from the wetlands area and do not intrude into the prescribed wetland buffer. The developer will provide signs at major access points indicating that the area contains sensitive wetland habitats.

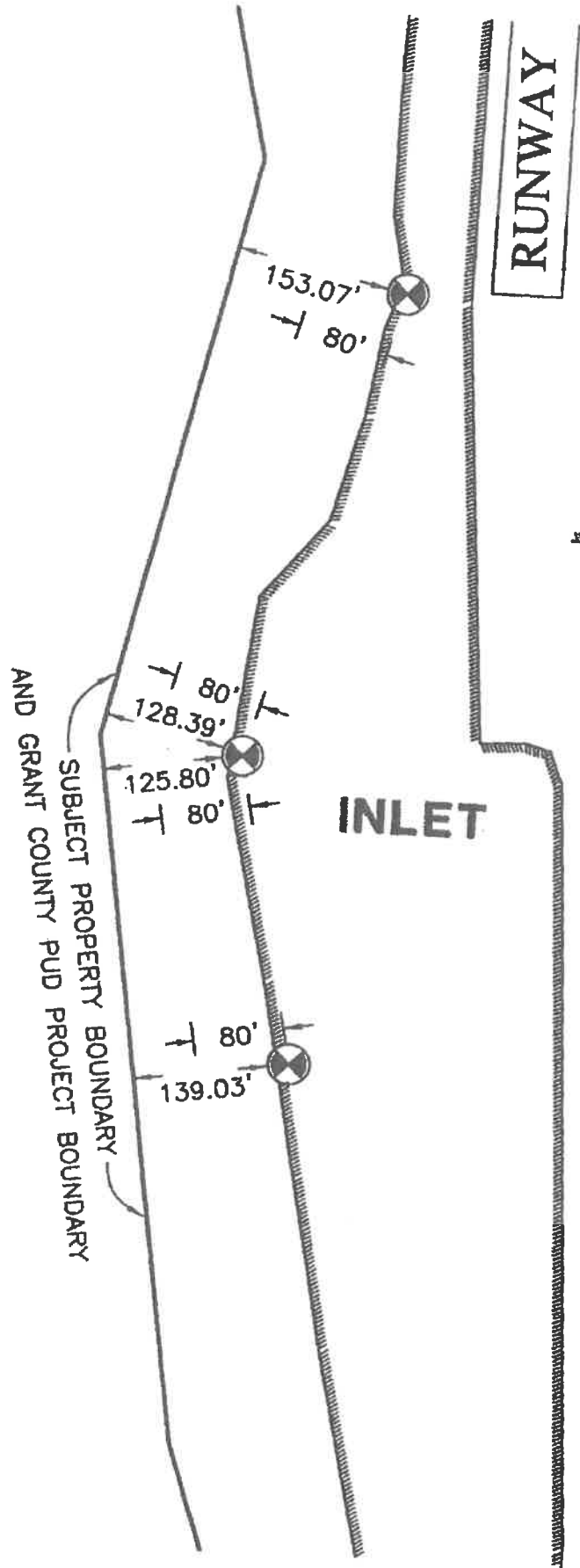
This adjacent wetlands area was established or greatly enhanced by a previous property owner a number of years ago. As such, the mouth of the slough is not conducive for boat access due to a shallow underwater bar there and use of this slough by other members of the public is not expected to be affected by this project.



The project's storm water management design will likely allow percolation of the water into the slough. As a result, water temperatures in the slough may be affected; i.e. cooler temperatures in the summer and warmer temperatures during the winter. This is typically not thought to be an adverse effect because water temperatures in the Columbia River are already un-naturally high during the summers due to impoundment and temperatures in backwater areas often exceed upper lethal temperature thresholds for many native aquatic biota (such as salmon) in the Pacific Northwest. EAS recommends a baseline evaluation and subsequent semi-annual monitoring of water quality (temp, DO, conductance) and of the benthic community (macroinvertebrate community structure) for a period of three years to document possible changes in the slough due to storm water practices at the Vantage Bay Rezone and Preliminary Plat.

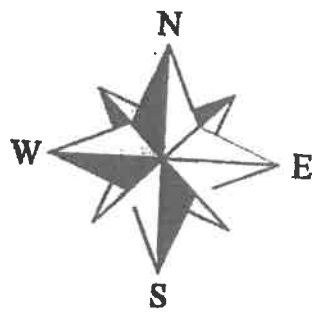
I hope these efforts and findings satisfactorily address the Ecology's Shoreland/Environmental Assistance comments that were provided to Joanna Valencia. Please do not hesitate to contact me with any questions or additional concerns.

Sincerely,

Brett Tiller
Sr. Scientist

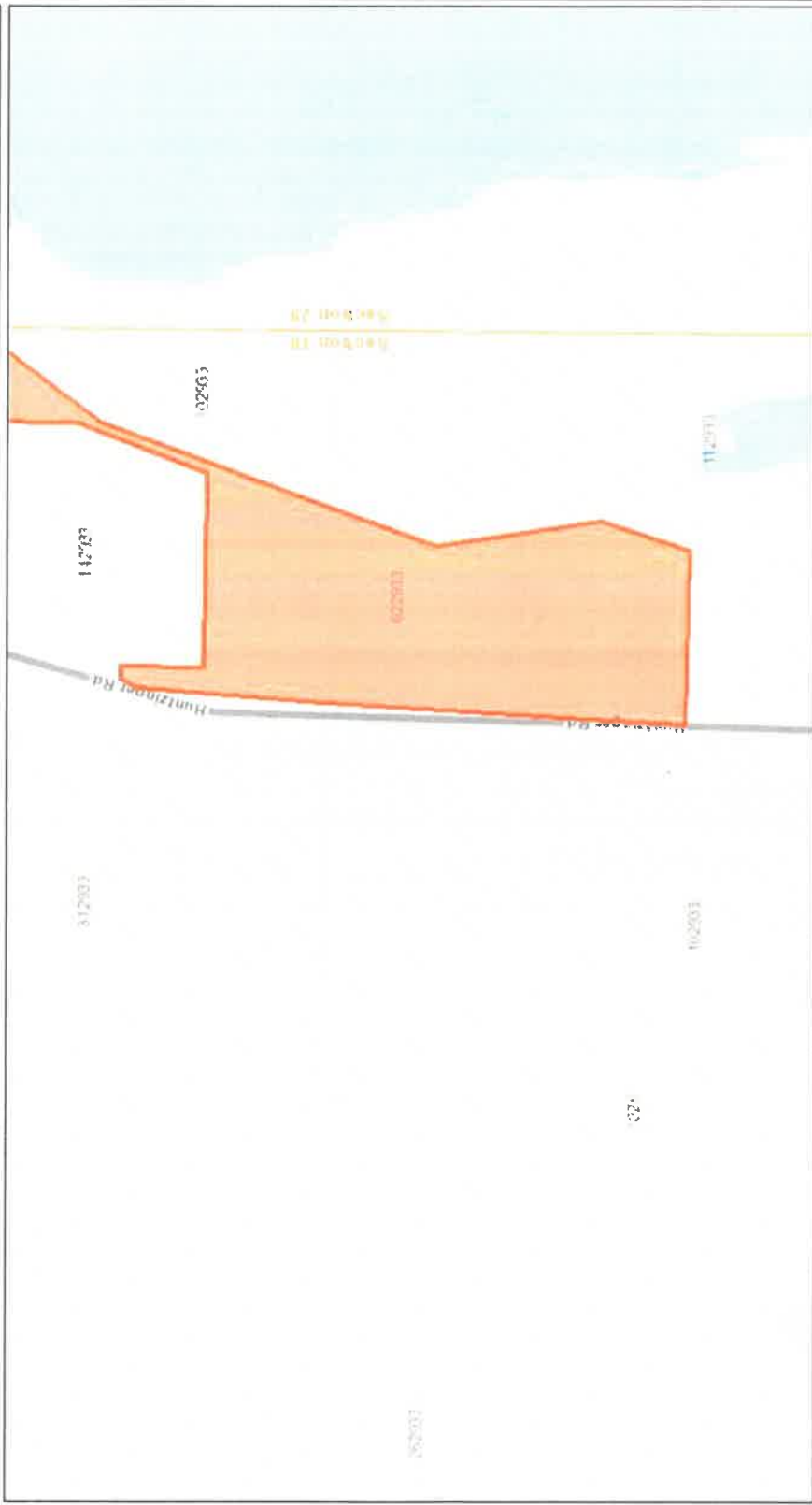


LEGEND :
 WETLAND FLAG FOUND
 APPROXIMATE LOCATION OF WATER INLET BANK



Attachment B – Kittitas County Parcel Maps

Vantage Bay Development Project

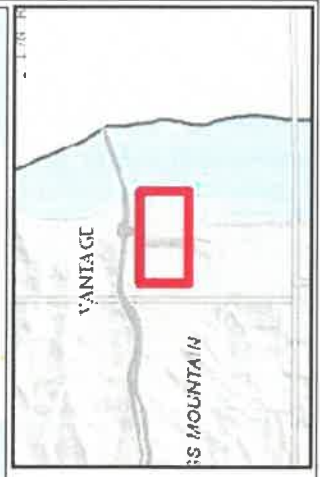


Date: 7/17/2017

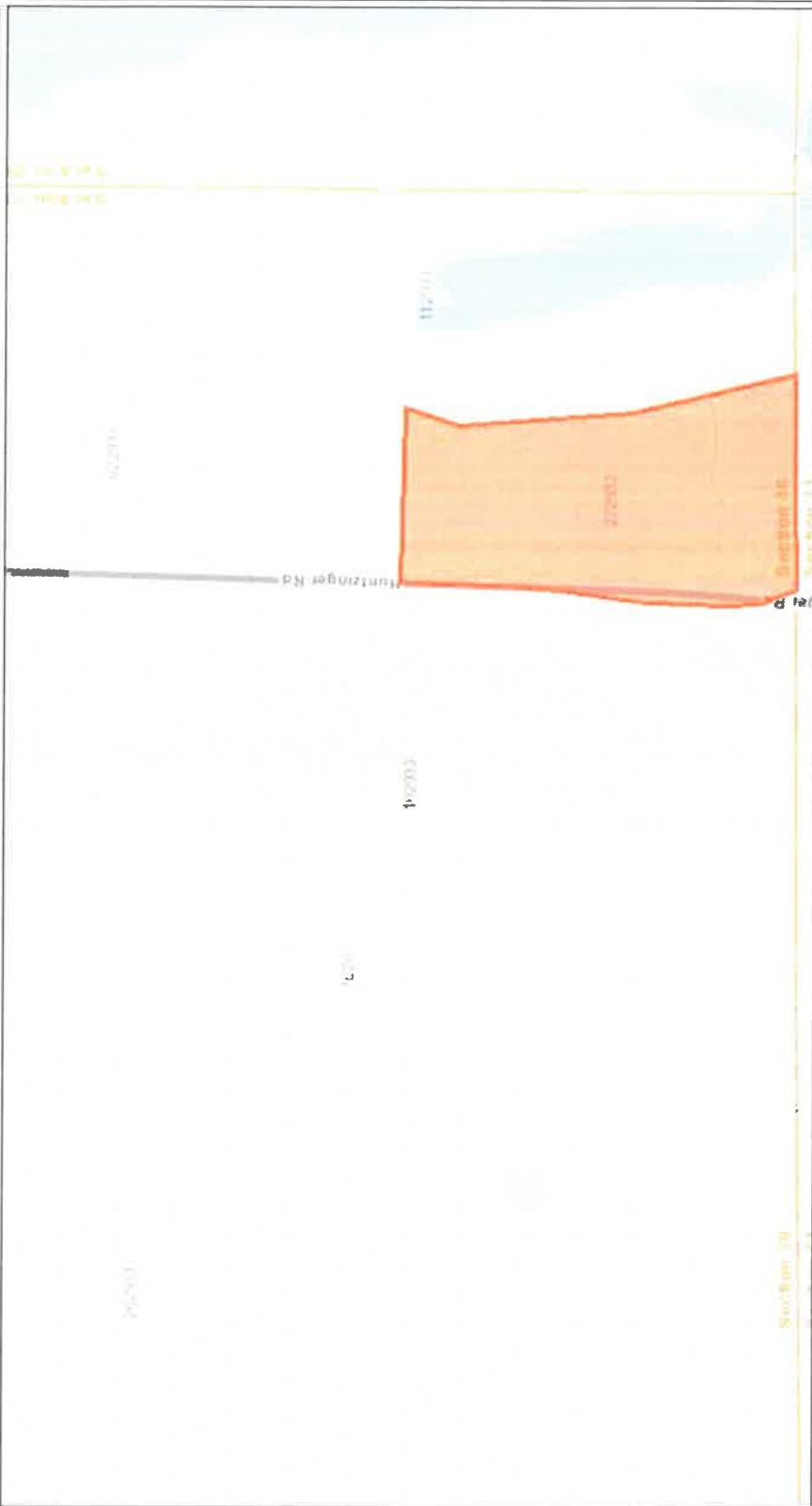
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1 inch = 752 feet
 Relative Scale 1:9,028



Vantage Bay Development Project

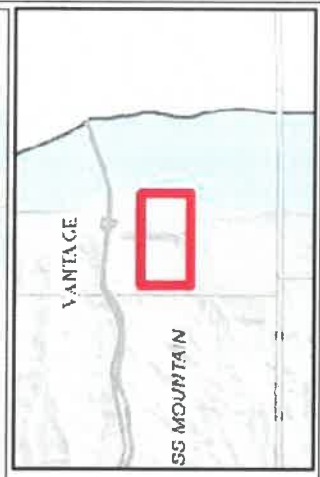


Date: 7/17/2017

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1 inch = 752 feet
 Relative Scale 1:9,028



Attachment C – WDFW Priority Habitat and Species Report



WASHINGTON DEPARTMENT OF FISH AND WILDLIFE PRIORITY HABITATS AND SPECIES REPORT

SOURCE DATASET: PHSPlusPublic
REPORT DATE: 07/20/2017 5:22

Query ID: P170720172231

Common Name	Site Name	Priority Area	Accuracy	Federal Status	Sensitive Data	Source Entry
Scientific Name	Source Dataset	Occurrence Type		State Status	Resolution	Geometry Type
Notes	Source Record	More Information (URL)		PHS Listing Status		
	Source Date	Mgmt Recommendations				
Shrub-stepps	YAKIMA TRAINING CENTER PHSREGION 920175	Terrestrial Habitat N/A	1/4 mile (Quarter)	N/A N/A	N AS MAPPED	WA Dept. of Fish and Wildlife Polygons
		N/A		PHS LISTED		

DISCLAIMER: This report includes information that the Washington Department of Fish and Wildlife (WDFW) maintains in a central computer database. It is not an attempt to provide you with an official agency response as to the impacts of your project on fish and wildlife. This information only documents the location of fish and wildlife resources to the best of our knowledge. It is not a complete inventory and it is important to note that fish and wildlife resources may occur in areas not currently known to WDFW biologists, or in areas for which comprehensive surveys have not been conducted. Site specific surveys are frequently necessary to rule out the presence of priority resources. Locations of fish and wildlife resources are subject to variation caused by disturbance, changes in season and weather, and other factors. WDFW does not recommend using reports more than six months old.

07/20/2017 5:22

WDFW Test Map



July 20, 2017

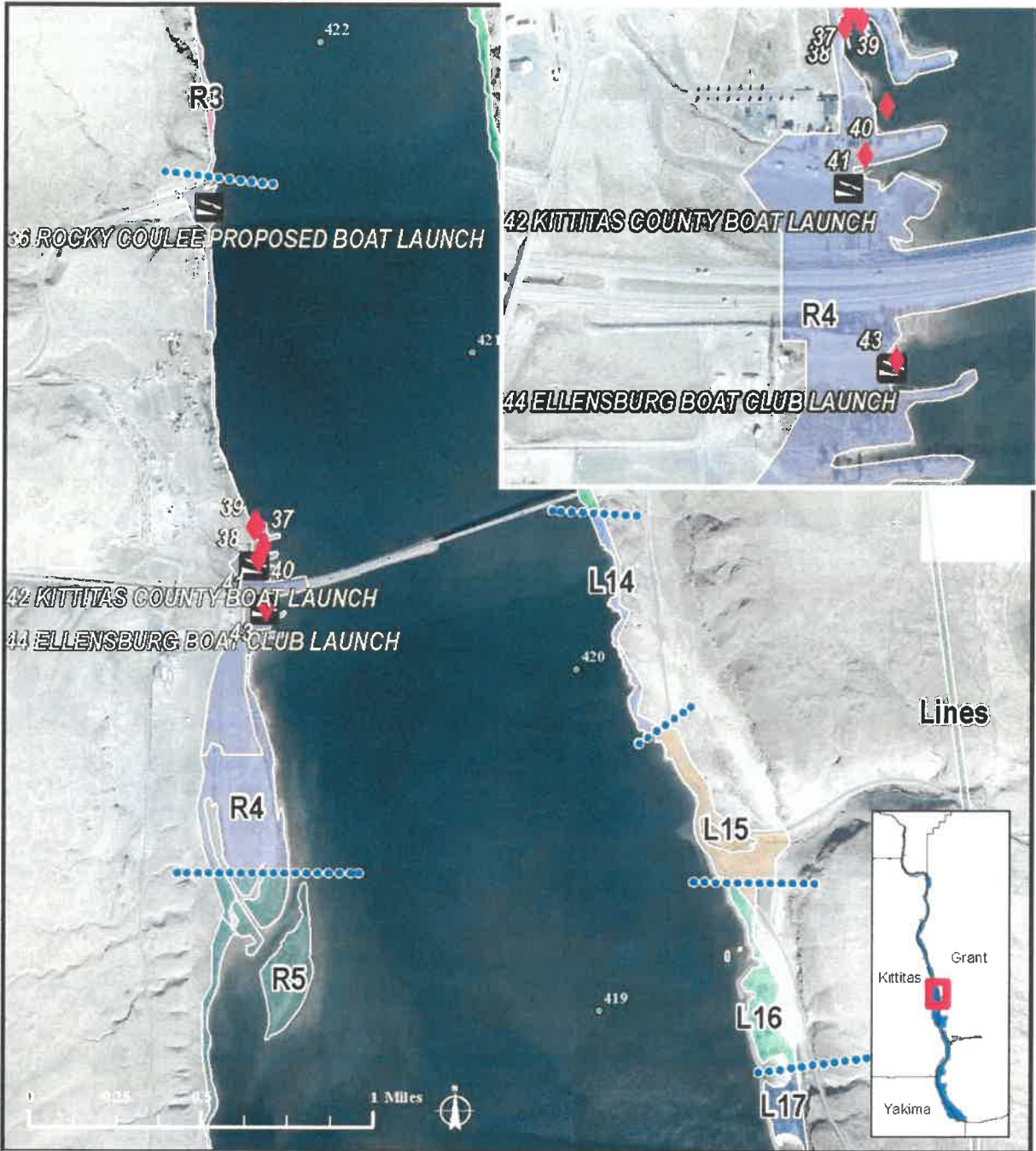
- PHS Report Clip Area **POLY**
- AS MAPPED
- SECTION
- QTR-TWP
- TOWNSHIP

1:19,842



Sources: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Attachment D – Public Utility District No. 2 of Grant County, WA Shoreline Management Plan
Reach R4 & R5 Map**



**Grant County PUD
Reach Analysis &
Characterization**

Public Utility District #2 Grant County, WA
FERC Project #2114

- REACH AREA - COLOR VARIES BY REACH
- Bouy Concentration Area
- Reach Breaks
- USGS River Miles
- Buoy
- Dock
- Pier
- Boat Launch

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This map/data was created and for your informational, planning reference and guidance only. Grant PUD makes no warranty, express or implied, related to the accuracy or content of these materials.

Attachment E – Washington Natural Heritage Program Consultation

Behr Turner

From: DNR RE Natural Heritage Program <Natural_Heritage_Program@dnr.wa.gov>
Sent: Wednesday, July 19, 2017 12:07 PM
To: Behr Turner
Subject: RE: Rare Plant Species and Rare/High Quality Ecological Communities Information Request

July 19, 2017

Behr Turner
Environmental Assessment Svcs, LLC
350 Hills St., Suite 112
Richland, WA 99354

SUBJECT: Development near Vantage, WA (T17N R23E S30, 31)

We've searched the Natural Heritage Information System for information on significant natural features in your project area. Currently, we have no records for rare plants or rare/high quality ecological communities in the vicinity of your project.

The information provided by the Washington Natural Heritage Program is based solely on existing information in the database. In the absence of field inventories, we cannot state whether or not a given site contains high quality ecosystems or rare plant species; there may be significant natural features in your study area of which we are not aware.

The Washington Natural Heritage Program is responsible for information on the state's rare plants as well as high quality ecosystems. For information on animal species of concern, please contact Priority Habitats and Species, Washington Department of Fish and Wildlife, 600 Capitol Way N, Olympia WA 98501-1091, or by phone (360) 902-2543.

For more information on the Natural Heritage Program, please visit our website at <http://www.dnr.wa.gov/natural-heritage-program>. Lists of rare plants and their status, rare plant fact sheets, as well as rare plant survey guidelines are available for download from the site. Please feel free to call the Natural Heritage Program at (360) 902-1667 if you have any questions, or by e-mail at natural_heritage_program@dnr.wa.gov.

Sincerely,

Jasa Holt
Washington Natural Heritage Program
Washington State Dept. of Natural Resources (DNR)
(360) 902-1642
jasa.holt@dnr.wa.gov
<http://www.dnr.wa.gov/natural-heritage-program>

From: Behr Turner [mailto:behr.turner@easbio.com]
Sent: Tuesday, July 18, 2017 4:11 PM
To: DNR RE Natural Heritage Program <Natural_Heritage_Program@dnr.wa.gov>
Cc: Brett Tiller <brett.tiller@easbio.com>; Alishia Montoya <alishia.montoya@easbio.com>
Subject: Rare Plant Species and Rare/High Quality Ecological Communities Information Request

Dear Natural Heritage Center,

Please see attached Information Order Form regarding potential rare plants and rare/high quality ecological communities within a potential develop area. The Township, Range, Sections and a map were provided in the attached order form.

If you have any questions, please contact at your earliest convenience.

Thank you,

Behr Turner | Sr. Scientist

Environmental Assessment Services, LLC
8(a) Alaska Native Corporation/Owned Small Disadvantaged Business
Primary NAICS 541620
350 Hills St., Suite 112
Richland, WA 99354
Phone | 509.375.4212 ext. 29
Cell | 509.895.1423
behr.turner@easbio.com

www.easbio.com

EAS ENVIRONMENTAL
ASSESSMENT
SERVICES



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INFORMATION ORDER FORM
WASHINGTON NATURAL HERITAGE PROGRAM
(complete all fields)

Contact Information:

Name: Behr Turner
Title: Senior Scientist
Organization: Environmental Assessment Services, LLC
Address: 350 Hills Street Suite 112
City: Richland State: WA Zip: 99354
Phone: 509-895-1423 Fax: 509-392-8269
Email: behr.turner@easbio.com Date of Request: July 18, 2017

Please identify your organization:

- | | | |
|---|--|--|
| <input type="checkbox"/> Government Agency | <input type="checkbox"/> Native American Tribe | <input type="checkbox"/> Landowner of the project area |
| <input checked="" type="checkbox"/> Private Consultant acting on behalf of landowner or manager | <input type="checkbox"/> University Researcher | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Non-profit organization acting on behalf of landowner or manager | | |

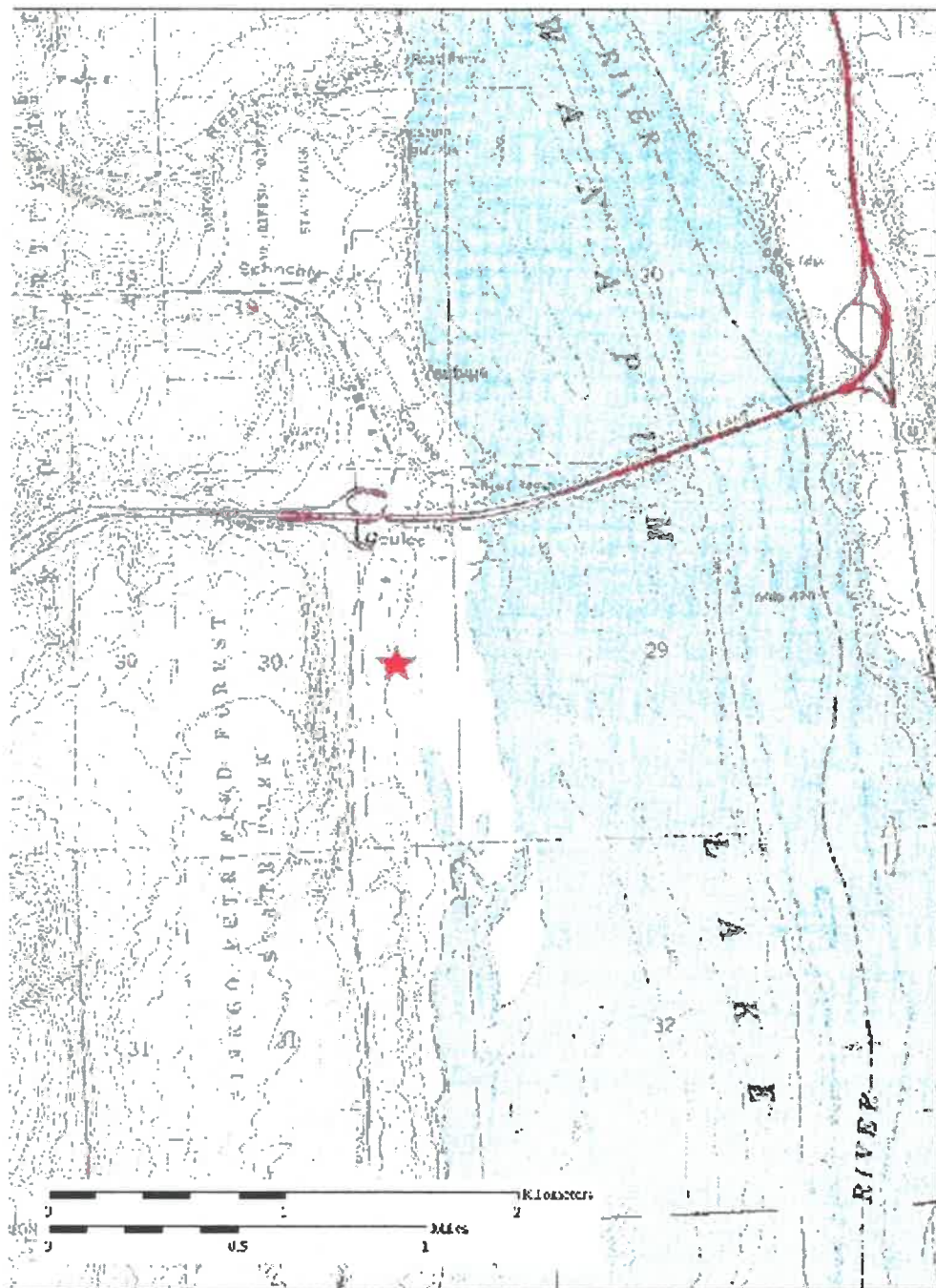
Project description and your intended use of Natural Heritage information:

A private developer is planning to develop an area near Vantage, WA

Project location and extent: Include county name and an accurate legal description (Township, Range (E/W), Sections), and attach a map illustrating the project area.

The actual development fingerprint will be located on the peninsula shown mostly in Section 30 (Eastern Half) and 31 (Northeastern ¼ of Section 31), Township 17 North, Range 23 East of Kittitas County, WA.

Project area map (please include).



Attachment F - U.S. Fish and Wildlife Service National Wetlands Inventory



U.S. Fish and Wildlife Service

National Wetlands Inventory

Vantage Bay



July 25, 2017

Wetlands

-  Estuarine and Marine Deepwater
-  Estuarine and Marine Wetland
-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond
-  Lake
-  Other
-  Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NW Mapper