

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.

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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.

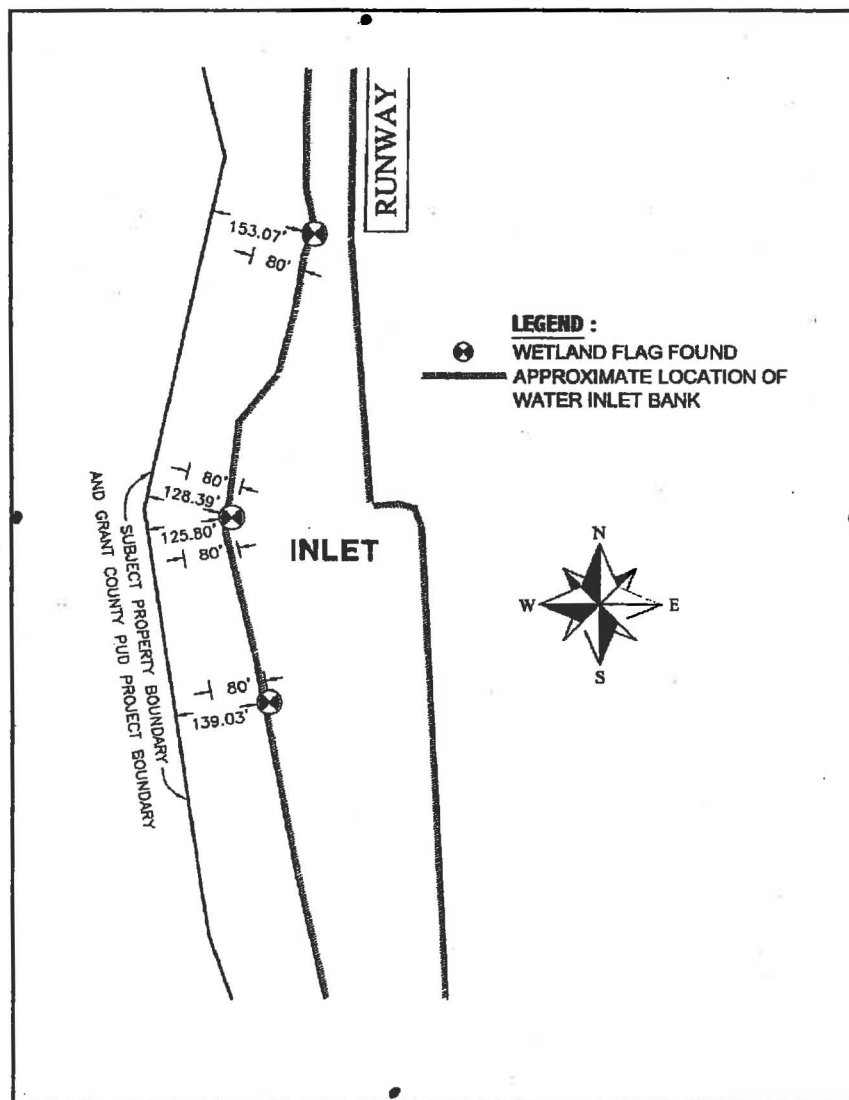


Figure 1 – Depiction of wetland points delineated as part of the Vantage Bay Rezone & Preliminary Plat.

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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 plant 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.

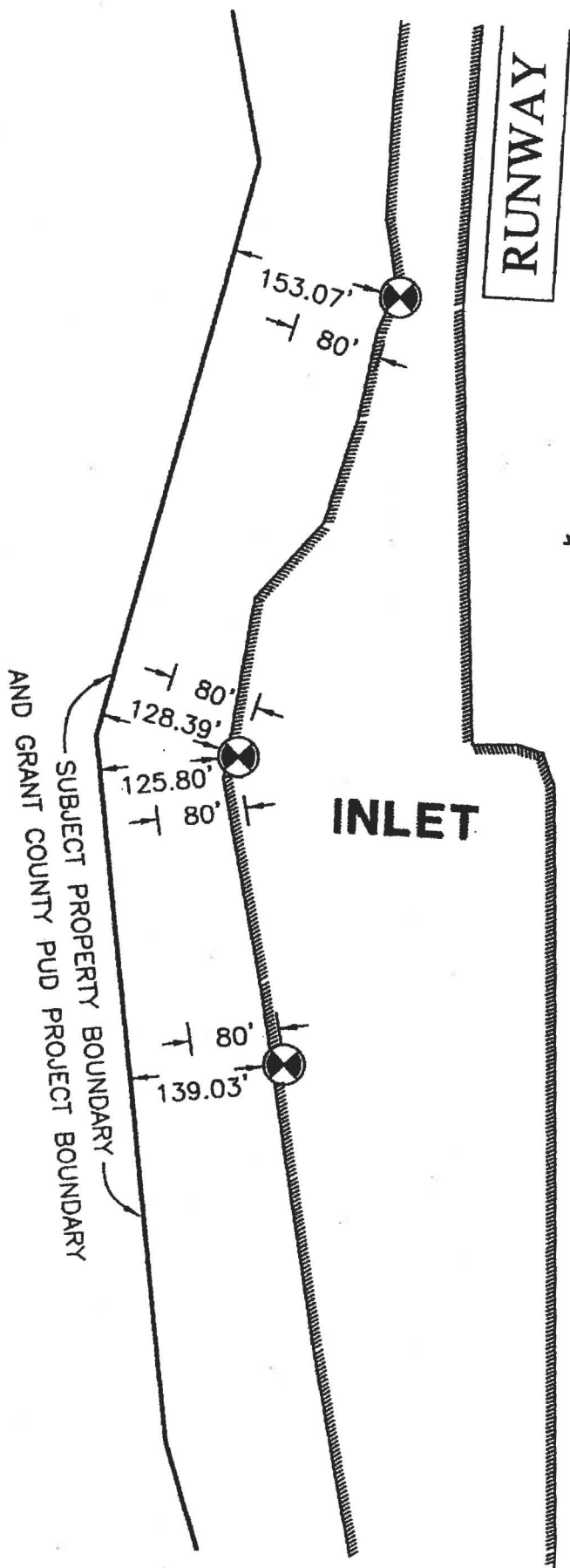
This adjacent wetlands area was established or greatly enhanced by a previous property owner a number of years ago. As such, the mouth of the slough is not conducive for boat access due to a shallow underwater bar there and use of this slough by other members of the public is not expected to be affected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

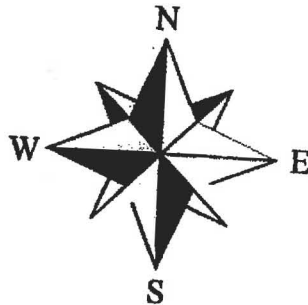
I hope these efforts and findings satisfactorily address the Ecology's Shoreland/Environmental Assistance comments that were provided to Joanna Valencia. Please do not hesitate to contact me with any questions or additional concerns.

Sincerely,

Brett Tiller
Sr. Scientist



LEGEND :
 WETLAND FLAG FOUND
 APPROXIMATE LOCATION OF WATER INLET BANK



BCSCBN Inc. Vantage Development Project - Cost Proposal II

Item	Northwest Geocultural Consulting Cultural Resource Inventory 2006	Quantity	Unit	Unit Price*	Amount
	Cost Proposal for Survey Restricted to Roads Right of Way				
1	Subtask 1: Subsurface Survey				
	MS Archaeologist	40	Hr	\$80	\$3200
	Archaeological Lead Technician	40	Hr	\$40	\$1600
	Archaeological Field Technician	40	Hr	\$35	\$1400
	Archaeological Field Technician	40	Hr	\$35	\$1400
	Subtask Total				\$7,600
2	Subtask 2: Monitoring				
	MS Archaeologist	8	Hr	\$80	\$ 640
	Archaeological Technician	80	Hr	\$35	\$2800
	Subtask Total				\$3440
3	Subtask 3: Report				
	MS Archaeologist	32	Hr	\$80	\$2560
	GIS Analyst	16	Hr	\$50	\$800
	Subtask Total				\$3360
4	Travel Expenses & Equipment 4:				
	Mileage to Survey Location	300	miles	\$0.45	\$ 130
	Mileage to Monitoring Location	600	miles	\$0.45	\$ 270
	Bobcat Power-Auger Rental	1	4days	\$1000	\$1000
	Subtask Total				\$1405
Not to Exceed Total Cost:					\$15,805

*including benefits and indirect costs