Sewall Wetland Consulting, Inc.
PO Box 880
Fall City, WA 98024
Phone: 253-859-0515

March 8, 2022

Sean Northrop
City Heights Holdings LLC
405 NW Gilman Blvd,
Suite 102
Issaquah, Washington 98027

RE: City Heights Phase 2 Plat & Interim Montgomery Access Impacts Analysis
SWC Job #A9-121

Dear Sean,

This report is a description of the critical areas as well as proposed impacts associated with the City Heights Phase 2 Plat & well as the Montgomery Interim Access as detailed on the BlueLine City Heights sheets CA-01 & CA-03 (see attached).

This report is an update to portions of the Sewall Wetland Consulting, Inc. October 26, 2009 "*City Heights – City of Cle Elum – Wetlands and Wildlife Habitat Report*". This report was reviewed and approved as part of the EIS process at that time. In the approved City Heights Annexation and Development Agreement (see attached), the buffers and classifications of the wetlands and streams were vested at that time.

City Heights is an approved Planned Mixed Use development that is approved to be built out in phases. City Ordinance 1353 (Planned Action Ordinance- November 8, 2011) and the November 2011 City Heights Annexation and Development Agreement (DA) include parameters for vesting, development standards, and project options and obligations among other things. The DA vests the project to code in effect as of November 8, 2011. Per DA Appendix B, Critical Areas (Title 18).1 "*The critical area designations and delineations set forth in the EIS shall be deemed the final determination of the identification, designation, and extent of critical areas and boundaries for purposes of applying and implementing the provisions of city the City's critical area ordinance(s) set forth in Title 18 of CEMC.*"

1.0 METHODOLOGY

Ed Sewall of Sewall Wetland Consulting, Inc. inspected the site and areas within 200' of the site in June and July of 2009, as well as June of 2020. The wetlands on the site were confirmed based upon the 2009 delineations using methodology described in the ***Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0)*** (USACOE September 2008) as required by the US Army Corps of Engineers starting in June of 2009. This is the methodology currently recognized by City of Cle Elum for wetland determinations and delineations. The site was also reviewed using methodology described in Soil colors were identified using the 1990 Edited and Revised Edition of the ***Munsell Soil Color Charts*** (Kollmorgen Instruments Corp. 1990.

2.0 PROPOSED IMPACTS AND ASSOCIATED RESTORATION & BUFFER AVERAGING

2.3 Summit View Road Connection

As depicted on Sheet CA-01 of the Blueline City Heights Plan Set, the proposed road will be widened over the existing road, which currently bisects the buffer. However, the new road surface will widen to the west impacting this already bisected buffer with 4,896sf of permanent buffer impact. Again, this is non-functional buffer as it currently is located across an existing roadway and is separated from the wetland by the roadway.

There is no way to connect this road to the existing Summit Road without passing through some critical area buffer. This area of the proposed crossing is an existing gravel road through the woods to access the power line so impacts to buffer function are very small. This impact is proposed to be mitigated through buffer averaging by adding 4,920sf of buffer in a forested portion on the east side of Wetland C. In addition, 1,899sf of buffer area will be temporarily impacted by grading for the roadway on the west side of the road. This area will be restored with native trees and shrubs.

The following general performance standards shall apply to activities permitted with in critical areas or critical area buffers. Additional standards may be necessary based on site specific considerations or proposed development impacts.

A. General Performance Standards.

1. Areas of new permanent disturbance and all areas of temporary disturbance shall be mitigated and/or restored pursuant to a mitigation and restoration plan based off of Wetland Mitigation in Washington State, Part 1: Agency Policies and Guidance (Version 1, Publication #06-06-011a, March 2006, or as amended) and Wetland Mitigation in Washington State, Part 2: Developing Mitigation Plans (Version 1, Publication #06-06-011b, March 2006, or as amended).

Response: The 1,899sf of temporary disturbance of critical area buffer of Wetland C will be mitigated in an as-built Restoration Plan as needed. Currently this is a disturbed area with little vegetation.

2. Mitigation plans shall include a discussion of mitigation alternatives (sequencing) as they relate to:

a. Avoiding the impact altogether by not taking a certain action or parts of an action;

Response: Avoiding this impact is not possible and still be able to connect through the road system for the existing project. There is no way to connect o Summit road without some impact due to the continuous critical area along its existing alignment. The proposed connection is a minimal impact and avoids more sensitive portions of the buffer.

b. Minimizing impacts by limiting the degree or magnitude of the actions and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts;

Response: The road has been placed in a location where existing buffer conditions are already degraded and where buffer impacts will be minimal where still allowing connection to the existing Summit View Road. All impacts are west of the existing road and although a buffer

impact, are in areas already bisected from the wetland by the existing road and are of low function.

c. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;

Response: Not applicable.

d. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;

Response: Not Applicable

e. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and/or

Response: As previously described, buffer impacts will be averaged at a 1:1 ratio by adding an 4,920sf of buffer along the east edge of the buffer of Wetland C.

f. Monitoring the impact and taking appropriate corrective measures.

Response: Since this is just averaging, no monitoring is anticipated. Any disturbance of vegetated buffer for the utility line will be assessed after installation and an as-built restoration plan provided.

3. All boundaries of critical areas or any associated buffers shall be delineated prior to development activity on site.

Response: The boundary of Wetland C was confirmed in June of 2020 to be the same as the original 2009 delineation and that edge is shown on Sheet CA-01.

2.4 Summit View/Montgomery Interim Access

As depicted on Sheet CA-03, Summit View Road will connect to North Montgomery Avenue. This will require crossing Stream E, a Type 4 stream (now considered a Type N water). This stream is a small (12" wide) intermittent stream that only carries snow melt in the early spring and is dry the remainder of the year. The stream currently passes

through a 18" culvert in the area of the proposed road crossing. The culvert goes under an old roadbed that is generally abandoned. The proposal is to place a larger 48" arch pipe culvert over the old culvert in the same length. There will be no stream impacts from this work. This culvert will be placed to insure in the future that the stream will flow through this area with adequate room, if the existing 18" culvert were to fail. There is no place else to make this access connection and avoid the stream due to the steep topography in this area. Although there is no work in the stream itself, the proposed roadbed will pass over the existing abandoned roadbed, and disturb 1,669sf of existing vegetated buffer. This is proposed to be averaged by adding 1,913sf of buffer to the western buffer along the stream upslope of the crossing.

The following general performance standards shall apply to activities permitted with in critical areas or critical area buffers. Additional standards may be necessary based on site specific considerations or proposed development impacts.

A. General Performance Standards.

1. Areas of new permanent disturbance and all areas of temporary disturbance shall be mitigated and/or restored pursuant to a mitigation and restoration plan based off of Wetland Mitigation in Washington State, Part 1: Agency Policies and Guidance (Version 1, Publication #06-06-011a, March 2006, or as amended) and Wetland Mitigation in Washington State, Part 2: Developing Mitigation Plans (Version 1, Publication #06-06-011b, March 2006, or as amended).

Response: Any temporary disturbance of critical areas will be mitigated in an as-built Restoration Plan if needed.

2. Mitigation plans shall include a discussion of mitigation alternatives (sequencing) as they relate to:

a. Avoiding the impact altogether by not taking a certain action or parts of an action;

Response: Avoiding this impact is not possible and still be able to provide access to Montgomery Avenue due to the topography of the area.

b. Minimizing impacts by limiting the degree or magnitude of the actions and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts;

Response: There is no stream impact proposed or work within the channel itself, the proposed culvert is being placed over an existing culvert and in the same location and length as the existing culvert. The proposed roadbed will pass over the existing abandoned roadbed and disturb 1,669sf of existing vegetated buffer. This is proposed to be averaged by adding 1,913sf of buffer to the western buffer along the stream upslope of the crossing.

c. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;

Response: As previously mentioned, the buffer impacts are over an abandoned re-vegetated roadbed, and will be averaged. The stream crossing will be accomplished with a WDFW approved culvert.

d. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;

Response: Not Applicable

e. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and/or

Response: As previously described, buffer impacts will be averaged at a 1:1 ratio by adding an equal amount of buffer along the western side of the stream crossing and near the associated impact.

f. Monitoring the impact and taking appropriate corrective measures.

Response: Since this is just averaging, no monitoring is anticipated.

3. All boundaries of critical areas or any associated buffers shall be delineated prior to development activity on site.

Response: The boundary of Stream E (OHWM) was confirmed unchanged in June of 2020 and surveyed and put on the plan as shown on sheet CA-03.

2.5 Pond B7-b outfall impacts

Pond B7-b is a pond that will discharge treated and detained stormwater from Phase 2 of the City Heights project to the buffer of Stream C (see sheet CA-01). This will impact 200sf of of the buffer of Stream C for the construction of the energy dissipater outfall, as well as 729sf of temporary impact for the construction of the outfall.

The impacts to 200sf buffer will be mitigated by using an existing surplus of 897sf of buffer averaged in Phase I of this project to compensate for this impact.

A. General Performance Standards.

1. Areas of new permanent disturbance and all areas of temporary disturbance shall be mitigated and/or restored pursuant to a mitigation and restoration plan based off of Wetland Mitigation in Washington State, Part 1: Agency Policies and Guidance (Version 1, Publication #06-06-011a, March 2006, or as amended) and Wetland Mitigation in Washington State, Part 2: Developing Mitigation Plans (Version 1, Publication #06-06-011b, March 2006, or as amended).

Response: Impacts to the buffer will be mitigated through buffer averaging as shown on the plan.

2. Mitigation plans shall include a discussion of mitigation alternatives (sequencing) as they relate to:

a. Avoiding the impact altogether by not taking a certain action or parts of an action;

Response: Avoiding this impact is not possible as the topography of the site and natural release point requires this be the outfall location for the storm water system.

b. Minimizing impacts by limiting the degree or magnitude of the actions and its implementation, by using appropriate technology, or by taking affirmative steps to avoid or reduce impacts;

Response: The location of the pond is outside the buffer of the stream. However, the outfall must be in the buffer to discharge and disperse into the stream correctly.

c. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;

Response: No restoration or rehabilitation of this area is possible. Buffer impacts to 200sf buffer will be mitigated by using an existing surplus of 897sf of buffer averaged in Phase I of this project to compensate for this impact. The stream dispersion will also be reviewed under the WDFW HPA application.

d. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action;

Response: Not Applicable

e. Compensating for the impact by replacing, enhancing, or providing substitute resources or environments; and/or

Response: As previously described, buffer impacts will be averaged at a 1:1 ratio.

f. Monitoring the impact and taking appropriate corrective measures.

Response: Since this is just averaging, no monitoring is anticipated.

3. All boundaries of critical areas or any associated buffers shall be delineated prior to development activity on site.

Response: The boundary of Stream C (OHWM) was confirmed unchanged in June of 2020 and surveyed and put on the plan as shown on sheet CA-01.

Permits Required

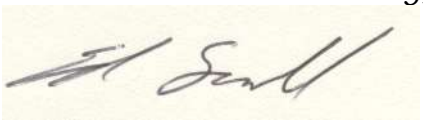
•An HPA may be required the stormwater outfall to Stream C as well as the placement of the 48" arch pipe culvert over Stream E.

•There is no work proposed within wetlands or filling of stream channel so no US Army Corps 404 Permit would be required. There is no reason to have a "jurisdictional determination" conducted for this project. That is generally done by the Corps when a project is trying to determine if the proposed impacts to wetlands or waters is connected to navigable waters, and thus jurisdictional.

•A 401 Water Quality Certification would also not be needed form WADOW as there is no Corp permit required, and the thresholds for a requiring 401 water quality permit are not met.

If you have any questions in regards to this report or need additional information, please feel free to contact me at (253) 859-0515 or at esewall@sewallwc.com .

Sincerely,
Sewall Wetland Consulting, Inc.



Ed Sewall
Senior Wetlands Ecologist PWS #212

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