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March 11, 2022

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

RE: City Heights Zone 3 Water Main Extension
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 Zone 3 Water Main Extension of City Heights project, as detailed on the BlueLine City Heights sheet CA-02 (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.*" An excerpt from Appendix B has been attached to this letter for reference.

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

2.1 Crystal Creek Crossing (Sheet CA-02)

The proposed water main extension to the City Heights Phase 2 project is required to cross Crystal Creek, a Type 3 stream under the vested Code with an associated 50' buffer. Under current Code the stream would be considered a Type F water as a result of known fish use. An associated Category III wetland known as Wetland G is located along the edges of the stream and is found immediately west of the proposed crossing.

The water main extension will come from the south from SR903 in the area of the existing power line crossing and along the eastern edge of an existing 30' public utility easement. An existing gravel road used by off-road vehicles etc. passes through the creek in this area. Creek bed disturbance is high in this area due to the passage of vehicles through the actual stream bed. The area is heavily disturbed with the creek banks consisting of old coal mine tailings and debris.

The project will be to extend a water line from the maintenance road through the Crystal Creek stream bed. The line will be trenched through the stream bed ideally when the creek bed is dry. However, although this

creek will go dry it is not always dry in the summer, so the crossing would occur in the low flow time of year and as conditioned by the HPA for the crossing. If water is present, this would entail a temporary diversion of the water from the creek around the 215sf of stream bed/wetland impact. The line would also temporarily impact 2,292sf of stream buffer. There would also be a permanent impact to the stream buffer of 611sf, which is proposed to be mitigated using buffer averaging with an equal area of buffer added just east of the proposed impact area.

The boring of the creek is not possible due to the slopes and topography of the creek, an open trench is the only viable option. Impacts to critical areas are addressed in Cle Elum Municipal Code chapter 18.01.070:

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 water to the project.

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: Minimizing the impacts has been accomplished by using the narrowest disturbance path for the water line to be trenched through the creek. This will be done in the dry season when flows are at their lowest or ideally, when the streambed is dry. Temporary impacts to the stream channel consist of 215sf of stream bed, as well as 2,292sf of stream buffer. All of these areas will be returned to natural grade and restored with native vegetation to include ponderosa pine, serviceberry, snowberry and nootka rose. Most of this area has little if any vegetation at this time. The creek bed will be restored to its original configuration with a WDFW approved gravel/cobble mix. There will also be some minor buffer averaging associated with the end of the maintenance road of 611sf of stream buffer, to be mitigated with an addition of 615sf of stream buffer next to the impact area.

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

Response: Temporary impacts associated with this crossing will all be restored as described above.

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, the minor permanent buffer impact will be averaged at a 1:1 ratio by adding an equal amount of buffer along the easter side of the buffer crossing and near the associated impact.

f. Monitoring the impact and taking appropriate corrective measures.

Response: Monitoring of the restoration plantings and stream bed will be provided as required by Code.

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

Response: The boundary of Crystal Creek (OHWM) was flagged in June of 2020 and surveyed and put on the plan as shown on sheet CA-02.

2.2 Wetland E Crossing

As shown on Sheet CA-02 of the Blueline City Heights Zone 3 Water Main Extension plan sheet, the maintenance road will extend from the Crystal Creek crossing previously described, north of Wetland G and its associated 50' buffer and then curving around to cross Wetland E in a narrow portion of the wetland and based upon existing topography.

Wetland E is a Category III wetland that has a 50' buffer based upon the previously approved Critical Areas Report described on Page 1 of this report.

As with the Crystal Creek crossing, efforts have been made to limit impacts to the wetland and its associated buffer to the greatest extent practicable. Permanent impacts to the wetland itself have been eliminated by eliminating the maintenance road across the wetland. Temporary impacts from the proposed construction work to place the waterline will include 327sf of wetland impact.

Temporary impact to the buffer of Wetland E will include 5,328sf of buffer for the maintenance roads and stormwater outfalls. This will impact 3,110sf of buffer which will be mitigated on a 1:1 ration through buffer averaging adding 3,417sf of buffer to the wetland buffer on the east.

Impacts to critical areas are addressed in Cle Elum Municipal Code chapter 18.01.070:

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: Temporary disturbance of critical areas will be mitigated in an as-built Restoration 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 and still be able to provide water to the project.

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: Avoidance of the impact has been accomplished by eliminating the maintenance road crossing and using the narrowest temporary impact footprint through the wetland and its associated buffer.

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

Response: The proposed permanent impact of 3,110sf of buffer for the proposed eastern and western road terminus will be mitigated by averaging the buffer adding 3,417sf of buffer along the eastern side of the wetland in the vicinity of each impact.

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 buffer near the crossing and associated impact.

f. Monitoring the impact and taking appropriate corrective measures.

Response: Since this is just averaging, no monitoring is anticipated. If any temporary impacts require restoration plantings these may require monitoring depending on the amount of impact.

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

Response: The boundary of Wetland E was confirmed in June of 2020 to be the same as the original 2009 delineation and that edge is shown on Sheet CA-02.

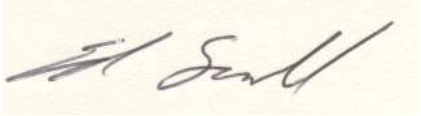
Permits Required

•An HPA will be required for the proposed crossing of Crystal Creek.

•Temporary impacts to the bed of Crystal Creek and Wetland E will occur. As a result, a US Army Corps 404 Permit would be required.

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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