

## Wendy Lane

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**From:** Kirsten Larsen  
**Sent:** Tuesday, December 4, 2018 8:16 AM  
**To:** Wendy Lane  
**Subject:** FW: SEPA 2018-326

**From:** Donn Etherington [<mailto:donn@etherington.us>]  
**Sent:** Wednesday, November 28, 2018 3:59 PM  
**To:** Kirsten Larsen <[Kirsten.Larsen@CO.CHELAN.WA.US](mailto:Kirsten.Larsen@CO.CHELAN.WA.US)>  
**Subject:** SEPA 2018-326

Via E-mail

Department of Community Development  
c/o Kirsten Larsen  
316 Washington St., Suite 301  
Wenatchee, Wash. 98801

Ms. Larsen

I am writing today to express my support for the Wheeler Ridge, LLC proposed orchard development and wildlife habitat enhancements. As a past member of the Chelan County Planning Commission for 12 years, I am very familiar with zoning and land use issues. It appears the applicant has proposed converting an old working forest, selectively logged and thinned in the late 90's, into 250 acres of producing orchard while maintaining a majority of the 640 acres for wildlife habitat and migration corridor. This appears to be a win/win/win for the entire community.

The property owner will benefit with the planting of his privately owned property, the wildlife and habitat management plan will ensure some level of preservation in the Stemilt basin for the community and the addition of additional orchard will produce jobs and import additional wealth to our valley.

As you go through your analysis of this proposal please consider the positive economic benefits and the proposed mitigation and make a determination that is in the benefit of all parties, not just a few special interests.

Thanks for allowing the public to comment on this proposed development.

Kindest,  
Donn Etherington  
P.O. Box 2094  
Wenatchee, Wash. 98807  
(509) 679-2261



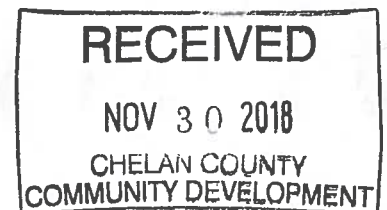
November 26, 2018

Jan Bullock  
6171 Squilchuck Rd  
Wenatchee, WA 98801  
[jandjbullock@gmail.com](mailto:jandjbullock@gmail.com)  
509-293-1320

Chelan County  
Department of Community Development

RE: Project File No.: **SEPA 2018-326**

To Whom It May Concern:



This is a response to the proposed conversion of a historical working forest in Section 17 to irrigated agriculture. Our property is below the proposed site of development. I ask you to consider my concerns regarding this proposal.

**Fire Risk:** The proposed area is in a high fire risk area. I know that owning and living on land in this vicinity comes with living with the risk of fire. I have lived with this for over 20 years. While I know it comes with the territory, increased population and development increases the risk that was not there when we decided to live here. There is one road out. In the case of wildfire or catastrophic fire, there is one road out and the traffic would only increase as we move down the canyon. Increased housing up the Squilchuck Road adds to the big picture in evacuations. We recently witnessed the horrific losses in California. Perhaps we can avoid a similar tragedy with careful county and state planning.

**Elk Habitat:** The migrating elk herds are well documented. Their habitat is wide ranging and elk aren't always aware of agriculture and corridors. Development of the habitat will disrupt the migration and health of the herd.

**Water:** Water is sacred in this environment, affecting the geology and wildlife habitat, along with existing agricultural feeds. In the last few years, we have witnessed landslide along the corridor of the Squilchuck area. Mission Ridge has experienced several slides and the two miles from my property, homes were lost due to slides and unstable slopes. While I don't understand all the geology involved, I can't help but be worried about more development and the lack of a big picture. The area proposed does not take into account the effect on the whole valley.

**More Development:** As we read about this proposal, we are also learning about proposed development of state land at Squilchuck State Park and the Mission Ridge expansion. This proposal must take into the consideration the combination of other increased development.



More development increases all the risks associated with this proposal; fire, water, wildlife habitat.

Thank-you for the consideration of my concerns. I urge the county to not look at this proposal in isolation of other development on our county, private and state lands. We truly have a great gift here and I am grateful to the access to these lands. Without careful consideration, we could easily jeopardize our lives and the incredible gift of our land.

Sincerely,

Jan Albin-Bullock





Department of Community Development  
Attention: Kirsten Larsen  
316 Washington St., Suite 301  
Wenatchee, WA 98801  
*via email* Kirsten.larsen@co.chelan.wa.us

Re: Public Comment on Project File No. SEPA 2018-326 for location Township 21N;  
Range 20EW; Section 17

To Whom It May Concern:

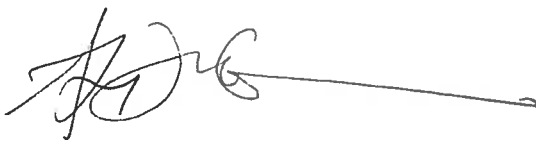
I'm writing to oppose the proposed building of irrigated orchard in what is currently forest, meadow, and wetland in Section 17.

Section 17 is a key zone of the Stemilt Basin wild space that allows animals to move from the upper meadows of the basin to the Colockum Wildlife Area. I live along the northwest border of Section 17 and spend time hiking, running, and skiing on Upper Reservoir Loop Road on the easement through Section 17. I regularly see elk using the meadows of the Section during the fall months. I see deer throughout the year in the open forest area, more frequently in the spring. Frogs populate the wetlands next to the road in the spring. I have seen both bear and cougar tracks in the Section.

Introducing structures, human and vehicle activity, and agricultural spray will destroy Section 17 as vital wildlife habitat and fragment the Stemilt Basin as a wildlife corridor. The proposed project will greatly increase human activity and introduce physical structures, both of which will displace wildlife and impede wildlife movement. The proposed 9.9 acre reservoir will disrupt wetlands. The proposed project will only mitigate this impact "where feasible," providing no assurance any mitigation will be done.

I hope that Chelan County will recognize the value of keeping Section 17 a working forest property to maintain key wildlife habitat that is important to the Stemilt Basin and Colockum Wildlife Area.

Sincerely,



Alyson Dimmitt Gnam  
6171 Squilchuck Rd.  
Wenatchee, WA 98801

RECEIVED

NOV 29 2018

CHELAN COUNTY  
COMMUNITY DEVELOPMENT



## Wendy Lane

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**From:** Kirsten Larsen  
**Sent:** Thursday, November 29, 2018 8:41 AM  
**To:** Wendy Lane  
**Subject:** FW: Comment for Section 17

**From:** Mitch Reister  
**Sent:** Thursday, November 29, 2018 4:40 AM  
**To:** Kirsten Larsen <[Kirsten.Larsen@CO.CHELAN.WA.US](mailto:Kirsten.Larsen@CO.CHELAN.WA.US)>  
**Subject:** FW: Comment for Section 17

**From:** WV TREAD Ostenson <[wvtread@gmail.com](mailto:wvtread@gmail.com)>  
**Sent:** Wednesday, November 28, 2018 10:23 PM  
**To:** Mitch Reister <[Mitch.Reister@CO.CHELAN.WA.US](mailto:Mitch.Reister@CO.CHELAN.WA.US)>  
**Subject:** Comment for Section 17

November 27, 2018

**To:** Mitch Reister, Director  
Chelan County Community Development Department  
316 Washington Street, Suite 301  
Wenatchee, Washington 98801

**From:** Board of Directors  
TREAD  
137 N Wenatchee Ave  
Wenatchee, Washington 98801

**Re:** Section 17 SEPA Comments, Wheeler Ridge, LLC Orchard Development, Chelan County

Dear Mr. Reister,

We are writing on behalf of TREAD (Trails, Recreation, Education, Advocacy, Development) It is unfortunate to read in the SEPA checklist that Wheeler Ridge has removed the recreational components from their planned action.

We helped bring to the forefront that outdoor recreation can be a economic driver in our community. Many recreational groups and the Port of Chelan County supported a comprehensive study of the Economic impacts of outdoor recreation to our community. Stemelt Squilchuck Partnership speaks to protecting Water, Wildlife, and Recreation. WDFW and State Parks both provide recreational opportunities and section 17 is a internal part of the connection for recreation in that landscape. We understood they would be providing trailheads and allowing trail building outside the orchard development on Section 17 with seasonal closures to protect wildlife.

The Chelan County Community Development Department and others that live, work, and PLAY here should take note that of the 640 acres on Section 17, less than 40% is proposed for development. Based on the information provided, it appears Wheeler Ridge did everything possible to appease environmental stakeholder groups, resource agencies, and County staff but did not safeguard public access to 390 acres of forest lands for public enjoyment and the recreational economy of our community.

Sincerely,

Board of Directors for Wenatchee Valley TREAD





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5455 E. High Street, Suite 111, Phoenix, AZ 85054

Phone: 480-814-8016

Fax: 480-814-8017

November 28, 2018

Department of Community Development  
ATTN: Kirsten Larsen  
316 Washington St.  
Wenatchee, WA 98801

Dear Chelan County Community Development Department,

Sprouts Farmers Market is a proud partner of Washington's cherry growers, the state that leads the nation in sweet cherry production. Cherries are among the top produce items we carry each summer in our 315 stores across 19 states, including Washington, and are a huge driver to our retail success.

Washington State is a well-known leader in agribusiness, as agriculture is a \$10.6 billion-dollar industry for the state based on USDA figures, as well as a job creator across many areas (e.g., manufacturing, operations, retail, food services, distribution, etc.). We believe the cherry industry is successful because of its growers' ability to deliver high-quality fruit to retailers year after year.

If the Wheeler Ridge LLC proposal is approved by the Department, we believe there will be strong consumer demand for late-harvest cherries, and assuming the cherries continue to meet our high quality standards, we intend to purchase such cherries to offer in our retail stores.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Chad Miller".

Chad Miller  
Vice President, Produce Procurement  
Sprouts Farmers Market





# Washington State Tree Fruit Association

105 S. 18<sup>th</sup> Street, Suite 116 - Yakima, WA 98901 - 509-452-8555

November 27, 2018

Mr. Mitch Reister  
Community Development Director  
Chelan County Community Development Department  
316 Washington St., Suite 301  
Wenatchee, WA 98801

Dear Mr. Reister:

Thank you for the opportunity to provide this letter for the record illustrating our support for Wheeler Ridge, LLC to convert a portion of a historical working forest to an irrigated orchard in Section 17. WSTFA represents the growers, packers, and marketers of apples, pears, cherries and other tree fruits in Washington State. The proposed project is in an area designated by the Natural Resources Conservation Service as "Farmland of Statewide Importance" to meet the Nation's short- and long-range need for food and fiber. We want to continue to encourage agricultural development in areas that maximize private investment success and provide a sustainable cash flow to surrounding communities. Wheeler Ridge, LLC has invested financial and staff resources into this project and we believe that the required permits should be approved to continue the late season cherry production. Higher elevation growing sites are needed to achieve the extended harvest season.

The applicant's staff submitted a robust SEPA report with several, thorough studies ranging from elk, to wetlands, to slope stability beyond what is typical for orchard development. We commend Wheeler Ridge, LLC for working with the environmental groups and the Chelan County Natural Resources Department to address all possible concerns. However, it is unclear why a private landowner should be required to provide habitat for a species that is hunted for recreation.

Based on the information provided in the SEPA checklist, the approval of this project will contribute millions of dollars to the local economy and within the state of Washington in the immediate short-term to develop the property. Long-term operations/harvest of fruit is estimated to contribute \$10 million dollars annually to local and state economies.

Thank you for allowing us to express our support for the approval of this application.

Sincerely,

Ranie L. Haas  
Director of Regulatory and Industry Affairs  
Washington State Tree Fruit Association



November 27, 2018

To: Mitch Reister, Director  
Chelan County Community Development Department  
316 Washington Street, Suite 301  
Wenatchee, Washington 98801

From: Travis Hornby, President  
Evergreen Mountain Bike Alliance  
25 N. Wenatchee Ave., Suite 109  
Wenatchee, Washington 98801

Re: Section 17 SEPA Comments, Wheeler Ridge, LLC Orchard Development, Chelan County

Dear Mr. Reister,

We are writing on behalf of Evergreen Mountain Bike Alliance Central Chapter in response to your solicitation for comments to the SEPA checklist submitted by Wheeler Ridge to convert 250 acres of a historical working forest to irrigated orchards. Our Organizations focus on Trails Recreation Advocacy Education Development in Wenatchee Valley in collaboration with an array of stakeholder groups, including private landowners.

It is unfortunate to read in the SEPA checklist that Wheeler Ridge has removed the recreational components from their planned action. Stemelt Squilchuck Partnership speaks to Water, Wildlife and Recreation. WDFW and State Parks both provide recreational opportunities and section 17 is internal in connection for recreation. We understood they would be providing trailheads and allowing trail building outside the orchard development on Section 17 with seasonal closures to protect wildlife.

We understand the primary objective of Wheeler Ridge is to grow food; it is unfortunate they feel providing the community with recreational opportunities will impact their ability to grow food. We are concerned other landowners in the valley will follow suit and disengage with Organizations like ours because they fear environmental restrictions, unfavorable political conversations, and a fear of being subjected to uncharacteristic government process.

The Chelan County Community Development Department and others that live, work, and PLAY here should take note that of the 640 acres on Section 17, less than 40% is proposed for development. Based on the information provided, it appears Wheeler Ridge did everything possible to appease environmental stakeholder groups, resource agencies, and County staff but did not safeguard public access to 390 acres of forest lands for public enjoyment and the recreational economy of our community.



Sincerely,

Travis Hornby

President

Evergreen Mountain Bike Alliance

Central Chapter

Cc: Chelan County Commissioners

Chelan County Natural Resource Department

Washington State Parks

Washington State Department of Fish and Wildlife





# Van Well Nursery

Helping Growers Grow

P.O. BOX 1339

• WENATCHEE, WA 98807 •

PHONE (509) 886-8189

FAX (509) 886-0294

E-mail: [vanwell@vanwell.net](mailto:vanwell@vanwell.net)

November 21, 2018

Chelan County Community Development Dept.  
316 Washington Street No. 301  
Wenatchee WA 98801

TO WHOM IT MAY CONCERN:

Thank you for the opportunity to provide this letter to illustrate Van Well Nursery, Inc.'s support for Wheeler Ridge, LLC to convert a portion of a historical working forest to a 250-acre irrigated orchard in Section 17.

Based on the information provided in the SEPA checklist, Wheeler Ridge, LLC will contribute **millions of dollars** to the local economy and within the State of Washington in the immediate short-term for the initial development. Long-term operations/fruit harvest is estimated to contribute **\$10 million-dollars annually** to local and state economies with investments in labor, materials, and equipment — **\$10 million dollars annually!**

The initial investment and the ongoing revenue created by this development will require local equipment, materials, and contracting resources that will directly benefit Chelan County's economy. As a local supplier/contractor, we support this project because it provides financial growth for our business and our employees for years to come.

The bedrock of our local economy remains agriculture. The apples, cherries and pears grown here bring money in from outside the county — money that can then be spent and circulated locally. As traditional orchard spaces are removed for development, the county must allow new ground to be established for fruit production. This enables small, family-run businesses like ours (and hundreds of others) to create jobs, pay taxes and actively participate in the community.

Thank you for your time and consideration.

Sincerely,



Peter J. Van Well  
President Van Well Nursery, Inc.



PROPAGATORS AND DISTRIBUTORS OF

GALE GALA®  
GALA

SCARLET SPUR II  
RED DELICIOUS

AUVIL EARLY  
FUJI



Department of Community Development  
ATTN: Kirsten Larsen  
316 Washington St.  
Wenatchee, WA 98801

November 26, 2018

Dear Chelan County Community Development Department,

My name is Nick Moless and I am a proud supporter of Washington State grown cherries. Washington State is important to us because it leads the nation in sweet cherry production. Cherries are among the top produce items we carry in our 470+ stores across the country each summer, and a huge driver to our retail success. I am writing to fully support Wheeler Ridge LLC and their proposal to convert a portion of their historical working forest to an irrigated orchard for late-harvest cherries.

Washington State is a well-known leader in agribusiness, as ag is a \$10.6 billion-dollar industry for the state as well as a job creator across many areas (i.e. manufacturing, operations, retail, food services, distribution, etc.). The cherry industry is successful because of its growers' ability to deliver high-quality fruit to retail year after year. It's a huge crop for export and also in high demand among U.S. consumers.

The Wheeler Ridge LLC proposal is great for supermarkets across the U.S. because we will be able to fill consumer demand for cherries longer than ever before because of the region's ability to extend harvest and cherry season. This will also fuel your local and state economy, with an estimated \$10 million coming to Chelan County and Washington State through the orchard development and harvest process.

Thank you for your time and consideration.

Sincerely,

Nick Moless  
Global Senior Category Buyer – Produce  
Whole Foods Market  
831-750-7343



Department of Community Development  
ATTN: Kirsten Larsen  
316 Washington St.  
Wenatchee, WA 98801

November 26, 2018

Dear Chelan County Community Development Department,

My name is Bradley Hansman and I am a proud supporter of Washington State grown cherries. Washington State is important to us because it leads the nation in sweet cherry production. Cherries are among the top produce items we carry in our 577 stores across 7 states each summer, and a huge driver to our retail success. I am writing to fully support Wheeler Ridge LLC and their proposal to convert a portion of their historical working forest to an irrigated orchard for late-harvest cherries.

Washington State is a well-known leader in agribusiness, as ag is a \$10.6 billion-dollar industry for the state as well as a job creator across many areas (i.e. manufacturing, operations, retail, food services, distribution, etc.). The cherry industry is successful because of its growers' ability to deliver high-quality fruit to retail year after year. It's a huge crop for export and also in high demand among U.S. consumers.

The Wheeler Ridge LLC proposal is great for supermarkets across the U.S. because we will be able to fill consumer demand for cherries longer than ever before because of the region's ability to extend harvest and cherry season. This will also fuel your local and state economy, with an estimated \$10 million coming to Chelan County and Washington State through the orchard development and harvest process.

Thank you for your time and consideration.

Sincerely,

Bradley Hansman  
Category Manager (Apples, Pears & Stone fruit)  
[bradleyhansman@segrocers.com](mailto:bradleyhansman@segrocers.com)  
904-370-5606



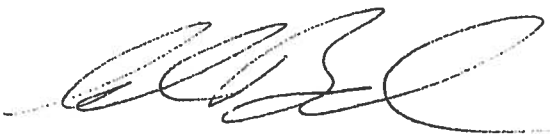
November 19, 2018

Chelan County Community Development Department,

Thank you for the opportunity to provide this letter to illustrate our support for Wheeler Ridge, LLC to convert a portion of a historical working forest to a 250 acre irrigated orchard in Section 17. Based on the information provided in the SEPA checklist, Wheeler Ridge, LLC will contribute **\$10 million-dollars** to the local economy and within the state of Washington in the immediate short-term for the initial development. Long-term operations / fruit harvest is estimated to contribute **\$10 million-dollars annually** to local and state economies with investments in labor, materials, and equipment - **\$10 million dollars annually!**

The initial investment and the ongoing revenue created by this development will require local equipment, materials, and contracting resources that will benefit our local economy. As a local supplier / contractor we support this project because it provides financial growth for our business and our employees for years to come.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Brizendine', with a stylized, flowing script.

Adam Brizendine

General Manager

Selland Construction, Inc.

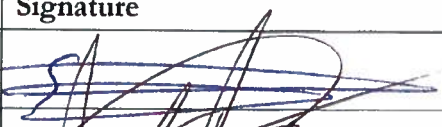
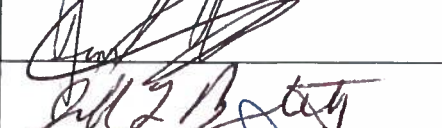



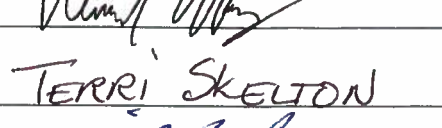

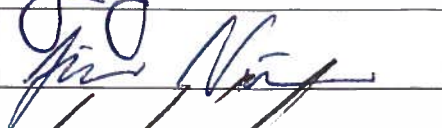
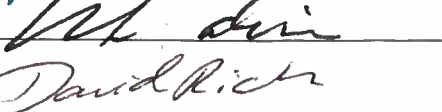



November 15, 2018

Chelan County Community Development Department,

Thank you for the opportunity to provide this letter to illustrate our support for Wheeler Ridge, LLC to convert a portion of a historical working forest to a 250 acre irrigated orchard. Based on the information provided in the SEPA checklist, Wheeler Ridge, LLC will contribute **\$10 million-dollars** to the local economy and within the state of Washington in the immediate short-term. Long-term operations / fruit harvest is estimated to contribute **\$10 million-dollars annually** to local and state economies with investments in labor, materials, and equipment - **\$10 million dollars annually!**

The initial investment and the ongoing revenue created by this development will require local equipment and supply resources that will benefit our local economy. As a local supplier we support this project because it provides financial growth for our business and our employees for years to come.

Company	Contact Name	Signature
Valley Tractor	Emile Carraway sales	
NC Machinery	Forest Finch manager	
Consolidated Supply	Jeff Burchett	Jeff Burchett
G.S. Long	Bob Schwartz	
Stew	Jon Jansick	
Wilson	Bill Johnson	Bill Johnson
NAPA	Steve Workland	
Jerrys Auto Supply	Margaret Melendrez	
NORTHWEST Bearing	Terri Skelton	TERRI SKELTON
Fastenal	Mika Gingerich	
Jeremy Jones <sup>Les Schwab</sup>	Jeremy Jones	
Romaine Electric	Derik A.	
Burrows tractor	Will Adams	
Singster motors	David Rich	David Rich




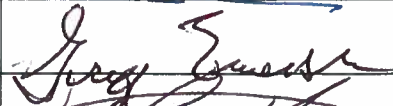

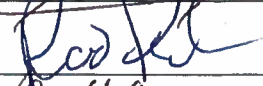
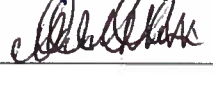
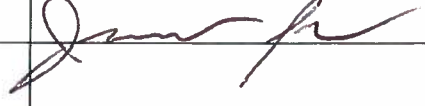


November 15, 2018

Chelan County Community Development Department,

Thank you for the opportunity to provide this letter to illustrate our support for Wheeler Ridge, LLC to convert a portion of a historical working forest to a 250 acre irrigated orchard in Section 17. Based on the information provided in the SEPA checklist, Wheeler Ridge, LLC will contribute **\$10 million-dollars** to the local economy and within the state of Washington in the immediate short-term. Long-term operations / fruit harvest is estimated to contribute **\$10 million-dollars annually** to local and state economies with investments in labor, materials, and equipment - **\$10 million dollars annually!**

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Company	Contact Name	Signature
Stan's Menards Mart	Kyle Nelson / Anthony P... ANTHONY P...	
Standard Paint & Flooring	Randy Stuber	
NORTHWEST WHOLESALE	JOHN ELAM	
Ferguson Enterprises	Greg Emerson	
Master Fleet Service	Adam Russell	
Cascade Auto Center	Rod Tulver	
<del>Alaska</del> Honda	Deanna	
Doghouse Motorsports	Kathy Marcan	
Central Washington Equipment	Justin Pell	

SEPA 2018-326



## Wendy Lane

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**From:** Kirsten Larsen  
**Sent:** Monday, December 10, 2018 1:38 PM  
**To:** Wendy Lane  
**Subject:** FW: SEPA2018-326-Proposed Project: Wheeler Ridge

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**From:** John Olson [<mailto:johnrolson@outlook.com>]  
**Sent:** Wednesday, November 14, 2018 4:35 PM  
**To:** Kirsten Larsen <[Kirsten.Larsen@CO.CHELAN.WA.US](mailto:Kirsten.Larsen@CO.CHELAN.WA.US)>  
**Subject:** SEPA2018-326-Proposed Project: Wheeler Ridge

TO WHOM IT MAY CONCERN:

The Notice of Environmental Review for the above-cited project was in the legal notice section of today's Wenatchee World making it available for public comment. It's difficult to make comment without access to the full public file and without driving 2-3 hours round trip to Wenatchee to review the record.

But, based on the location, size (640 acres), and intensity of activity for this project, the siting seems most inappropriate. The current use as a working forest, however, seems very appropriate considering the adjacent Squilchuck State Park, the nearby Mission Ridge Recreation Area, and the surrounding Wenatchee National Forest.

I would appreciate any public files that you can share and would look forward to the staff report when it is available. Thanking you in advance.

John R. Olson  
P.O. Box 2404  
324 E. Okanogan Ave.  
Chelan, WA 98816  
[johnrolson@outlook.com](mailto:johnrolson@outlook.com)  
253-209-1248

Sent from Mail for Windows 10



Chelan County Department of Community Development  
316 Washington St., Suite 301  
Wenatchee, WA 98801

November 26, 2018

Attention: Kirsten Larsen (kirsten.larsen@co.chelan.wa.us)

I support the orchard development by Wheeler Ridge of land located in Section 17 of the Stemilt Basin. (**Project File No.:** SEPA 2018-326; **Project Location:** Township 21N; Range 20EW; Section 17; and identified by Assessor's Parcel Number: 21-20-17-000-000).

The proposed development seems to be a good balance of agricultural development on private land, which is crucial to our local economy, and the natural values of the site, including forest cover, wildlife habitat and movements, and recreation.

My education (Ph.D., University of Washington) and expertise (retired Forest Service research wildlife biologist of 25 years) is in forest and wildlife management. I have recreated in this area for the past 24 years. I have worked with Wheeler Ridge as a paid consultant on this project in the past. So, I am well acquainted with the proposed project and its potential impacts. For this letter, however, I have not been paid by Wheeler Ridge to endorse the project.

Much criticism of the project has been on the basis of lost wildlife habitat, particularly elk habitat and other impacts on the local elk population. Below is my professional assessment of the wildlife habitat and the mitigation options for Section 17.

#### Wildlife Habitat

About 400 acres of the southeastern portion of Section 17 is considered a Class II Fish and Wildlife Habitat Area based on the presence of elk calving/breeding habitat, as mapped by the WA Dept. Fish and Wildlife Priority Habitats and Species (PHS) database (consulted online 10/8/17). Orchard development would occur in part of this area. The remainder of Section 17 not mapped as PHS elk habitat may be elk or deer winter range; but, elk and deer winter range maps as described in section 11.78.060 3F of the County Code are no longer available at the County offices (per the planner at the Community Planning office, 10/9/17). Anyway, it is unlikely that the unmapped portion of Section 17 is winter habitat because it is steep forest on a northwestern aspect that accumulates much winter snow.

No migration corridors are mapped for this area in the PHS database, nor are they mapped in any other available published source. Moreover, there are no published studies, (e.g. radio telemetry studies - the "Musser" study, WDFW 2014 telemetry study<sup>1</sup>) that identify specific seasonal uses by elk or deer (e.g. calving, migration), nor the locations of these uses, for Section 17 or the greater Stemilt Basin.

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<sup>1</sup> reference [http://wdfw.wa.gov/conservation/elk/colockum/jan0713\\_colockum\\_elk\\_presentation.pdf](http://wdfw.wa.gov/conservation/elk/colockum/jan0713_colockum_elk_presentation.pdf)



The ~400 acres of mapped elk habitat in Section 17 is the very northern edge of a contiguous block of about 7000 acres of mapped PHS elk habitat in the Stemilt Basin, and contiguous with the large (about 192,000 acres) PHS habitat block of the greater Colockum elk herd. Elk calving area is mapped in a large portion of the Stemilt and Colockum herd ranges, thus is not limited by orchard development of section 17.

As such, elk habitat converted to orchard in Section 17 represents about 3% of the mapped Stemilt elk habitat and 0.12% of the greater Colockum herd habitat. Being on the very edge of the area's elk habitat, the loss of 235 acres of habitat in Section 17 would not fragment the remaining habitat. Moreover, three adjacent sections are public lands managed by the WA DNR or WDFW (east and south) or Washington State Parks (west), so there would be no future loss of adjacent habitat to create a cumulative fragmentation effect.

Other elk habitat mapping efforts, such as the Stemilt Vision Document, show elk habitat in Section 17; but, that model has not been verified and has been deemed unreliable for current County forest planning efforts (County consultant W. Gaines, WA Conservation Science Institute, personal communication 11/13/18).

In sum, orchard development in section 17 would have a negligible effect on elk habitat in the Stemilt basin and for the larger Colockum herd. Few elk in the main Colockum herd use the Stemilt Basin for winter or summer range, so orchard development in Section 17 will have an insignificant impact on the general Colockum herd.

### **Habitat Management and Mitigation**

The proposed development will attempt to mitigate the impact of converting forest to orchard:

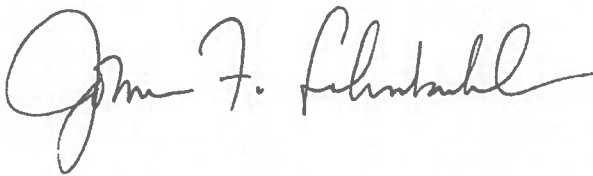
- The project has provided for several movement corridors for wildlife in north-south and east-west directions.
- Preservation of elk and other wildlife habitat in the northeastern and northwestern corners of the section, which is contiguous with public land (WA Dept. Fish and Wildlife, State Parks), and in riparian areas throughout Section 17.
- No development of about a 240-acre block of forested hill slope in the northwestern portion of the section. A community forest restoration and fuel reduction thinning is planned for the near future, and that likely will increase forage resources as a result of thinning the canopy.
- Approved deer/elk orchard fencing around both orchard blocks that avoids cul-de-sacs and other obstacles.



- Habitat improvement projects, like water developments and planting forage species or screening vegetation in the corridor, will be considered in a collaborative effort with stakeholders.
- Disturbance by recreationalists at critical times of the year (e.g. elk calving season) will be managed.
- Improvement of the County road and increased seasonal traffic through Section 16 to Section 17, will have some disturbance impact on wildlife use of the north quarter of Section 16 (owned by WDFW). Since that is a County road open to the public, I am not sure how Wheeler Ridge might manage that impact.

In sum, I think the proposed project in Section 17 does a good job of balancing the agricultural and wildlife values of the site by attempting to mitigate the impacts of converting some forest to orchard. The section and its development is at the edge of the interface of private and public lands in the Stemilt Basin, and likely will be the last orchard development in that southern part of the Basin. There is, however, some current and planned development of Section 21 further to the south in the "donut hole" of surrounding public lands. About 200 acres is owned by Wheeler Ridge and could be developed, as mentioned in this Section 17 proposal. To the extent possible, that development should be forestalled by land exchanges or other means to maintain the integrity of habitat across the wider public-lands landscape in the upper Stemilt Basin.

Sincerely,

A handwritten signature in black ink, appearing to read "John F. Lehmkuhl". The signature is fluid and cursive, with the first name "John" being the most prominent part.

John F. Lehmkuhl, Ph.D.  
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December 3, 2018

Chelan County Department of Community Development  
316 Washington St Ste 301  
Wenatchee, WA 98801

Chelan County Department of Community Development,

Thank you for the opportunity to provide this letter to illustrate our support for Wheeler Ridge, LLC to convert a portion of a historical working forest to a 250-acre irrigated orchard in Section 17. Based on the information provided in the SEPA checklist, Wheeler Ridge, LLC Will contribute **\$10 million-dollars** to the local economy and within the state of Washington in the immediate short-term for the initial development. Long-term operations/fruit harvest is estimated to contribute **\$10 million-dollars** annually to local and state economies with the investments in labor, materials, and equipment -- **\$10 million dollars annually!**

The initial investment and the ongoing revenue created by this development will require local equipment, materials, and contracting resources that will benefit our local economy. As a local contractor, we support this project because it provides financial growth for our business and our employees for years to come.

Sincerely,



Norman S. Winters  
President, Plumbco, Inc

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DEC 12 2018

CHELAN COUNTY  
COMMUNITY DEVELOPMENT