

August 7, 2020

Mike Kaputa, SEPA Responsible Official / Natural Resources Director  
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Email: [Mike.Kaputa@CO.CHELAN.WA.US](mailto:Mike.Kaputa@CO.CHELAN.WA.US)

**Re: Chelan County, Shockey Planning Group June 19, 2020 Letter Additional Information Request Response**

Dear SEPA Responsible Official,

We hope this finds you well! Enclosed please find the requested additional information in response to the June 19, 2020 letter from Camie Anderson of the Shockey Group for the Wheeler Ridge Section 17 orchard project ("Project").

**GENERAL TOPICS**

**1. Wetland Analysis**

Please find the attached revised wetland study report dated August 6, 2020 from Lisa Palazzi, SCJ Alliance, to further clarify the wetland analysis.

**2. Fish and Wildlife Habitat Conservation Areas/Elk Migration**

Over the past two years, WDFW has consulted with our project team and the County throughout the SEPA process, including providing SEPA comments in response to the May 24, 2019 MDNS and January 24, 2020 DS threshold determinations issued by the County for the Project. Our project team held a video conference with the County and WDFW on July 30, 2020, and we provided materials in advance in the meeting to respond to the agenda. On April 6, 1998 the County approved The Highlands 205-lot Major Subdivision for Section 17, including mitigation for elk habitat per the County's August 31, 1997 MDNS. The Wenatchee Sportsmen Association appealed the MDNS and project, raising elk habitat and migration route impact issues (Case No. 98-2-00188-8). On March 30, 2001, the Chelan County Superior Court affirmed the MDNS, a copy of along with a colorized map of The Highlands project, the appeal and the final order is enclosed with this submittal.

**3. Proposed Bird Deterrent Methods**

A falconer will be contracted in the month of August to fly within the orchard area. As is the customary and established practice throughout the County (and other Eastern WA agricultural areas), reflective ribbons will be placed on the last tree in each orchard row and along roads. Inflatable dancers may be used in areas of high bird damage at a ratio of not more than 1 per 10 acres. Bird cannons may also be used at a ratio of not more than 1 per 10 acres during the time period of early August to early September.

**4. Geohazard**

Please refer to the attached technical memorandum from Aspect Consulting dated July 24, 2020.

**5. Comprehensive Roads Plan**

Please refer to the attached technical memorandum from SCJ Alliance dated August 7, 2020, which clarifies the roads plan and provides the requested additional information.

## 6. Seasonality

Please refer to the table below, which provides a summary of orchard activities between April through July for a typical season:

### Section 17 Labor Projection by Month

Month	Tie					Monthly
	Spray	Prune	Trees	Mow	Irrigate	
April	3	0				3
May	6	0	10	1	3	20
June	6	10		1	3	20
July	6	10		1	3	20
Total Employees by Task	21	20	10	3	9	

### SEPA Environmental Checklist Specific Items & Responses

1. A.10 – Chelan County Irrigation Pump Station Conditional Use Permit, if applicable  
 Chelan County Rock Pit Conditional Use Permit, if applicable  
 Chelan County Seasonal Stream Critical Area Variance, if applicable  
 Chelan County Habitat and Mitigation Plan Approval
2. A.11 – Please refer to the attached revised Figure 1, which includes the requested information.
3. A.12 – A new pump station will not be required; the existing pump station will have additional pumps installed.
4. B.1.e – None of the soil will be exported offsite.
5. B.3.a.1 – Please refer to the attached revised Figure 1.
6. B.3.b.1 - According to the EPA, on average personal water consumption is 88 gallons per day (gpd). With 24 seasonal workers onsite, the projected gpd consumption will be 2,112 gallons (24 persons x 88 GPD / person). Onsite supervision and seasonal worker hand washing and drinking water of an estimated 902 people at the peak will still be under the 5,000-gallon limit at 3 gallons per person (902 persons x 88 gpd / person =2,706 gpd). Seasonal worker toilet water will use irrigation or offsite water for the portable toilets.
7. B.3.c.2 – Pesticides will be applied to the trees. Fertilizers will be directly applied to the ground and will primarily consist of nutrient rich compost. The potential impact of residual pesticides on the ground will be limited to the 2-foot-deep "root zone" due to irrigation infiltration. There are no anticipated groundwater impacts.
8. B.5.b – The reference to section B.8.a regarding wild steelhead and gray wolf is in reference to funding, not species presence in the area. To our knowledge there is no documentation or evidence of wild steelhead or gray wolf on adjacent sections that would be impacted as a result of the Project.
9. B.5.d – To clarify, the site encompasses areas mapped as elk habitat, not elk migration. The Pacific Flyway encompasses all of Washington state and portions of adjacent states. There are no known Great Basin species documented within Section 17.

10. B.7.a – Please refer to the response to item B.7.a.3., which states: "There will be orchard spray, motor oils, gasoline, and other orchard operational chemical stored during construction and for operations. All chemical inventories will be listed, stored, and used in accordance with Washington State Department of Ecology, Washington State; Labor and Industries."
11. B.7.b.2 – Please refer to the response to item 3, Proposed Bird Deterrent Methods, in the "General Topics" above.
12. B.8.i – Please refer to item 6, Seasonality, in the "General Topics" above.
13. B.10.b – The Project may be visible from higher elevation areas in the vicinity of the site. The existing forest will be replaced with an orchard "forest" with minimal buildings as depicted on the site map (Figure 1).
14. B.11.a – In order to minimize light pollution per WDFW recommendations, all building lighting will be directed toward the ground and shielded to minimized spillover within the 2-acre development area where the housing and shop are located.

Pursuant to WAC 197-11-350(2) and Chelan County Code (CCC) 13.04.110(5), we respectfully request that the County issue a new threshold determination based upon our changed and clarified proposal.

Prior to issuing a new SEPA threshold determination, we respectfully request that, as much as possible, the County assist us with identification of impacts to the extent necessary to formulate mitigation measures per CCC 13.04.110(4).

Finally, pursuant to WAC 197-11-350(2) and CCC 13.04.110(2), we respectfully request early notice of whether a DS is likely under WAC 197-11-350 for the new threshold determination.

Thank you for your attention to and assistance with this matter. Please do not hesitate to contact us, if you have questions or need additional information.

Respectfully yours,



Ben Alworth

Wheeler Ridge, LLC

Enclosures:

1. Figure 1 – Updated Project Site Map
2. August 6, 2020 Wetland Report – Updated – SCJ Alliance
3. July 24, 2020 Geohazard Technical Memorandum – Aspect Consulting
4. August 7, 2020 Comprehensive Road Technical Memorandum – SCJ Alliance
5. August 31, 1997 MDNS for 205-lot Major Subdivision for Section 17, project map, April 20, 1998 Summons and Amended Land Use Appeal and March 30, 2020 order in Case No. 98-2-00188-8) affirming MDNS