SEPA ENVIRONMENTAL CHECKLIST

A. Background [HELP]

1. Name of proposed project, if applicable:

Stemilt-Squilchuck Recreation Plan, referred to as "The Plan" throughout this checklist

2. Name of applicant:

Chelan County Natural Resources Department

3. Address and phone number of applicant and contact person:

Contact: Erin McKay, Senior Natural Resource Specialist

Address: 411 Washington Street, Suite 201, Wenatchee, WA 98801

Phone: 509-630-5303 Fax: 509-667-6533

4. Date checklist prepared:

April 15th, 2019

5. Agency requesting checklist:

Chelan County Natural Resources Department

6. Proposed timing or schedule (including phasing, if applicable):

This Stemilt-Squilchuck Recreation Plan is a non-project proposal intended to lay the foundations for a collaborative implementation effort to manage recreation activites based on plan recommendations. A list of recommendations has been developed as a part of the plan. generally geared towards decreasing impacts of recreation in the area. Ultimately, recommendations will be implemented by the respective landowners, management agencies, non-profits or recreationists over time as funding and opportunities become available so development of timing and implementation schedule will be ongoing. Details on the recommended implementation actions can be found in Chapter 8, the "Implementation" section of the draft plan. Environmental review, design work, documentation and any other necessary permits will be completed where and when necessary for any implementation of recommendations. A list of priority recommendations have been identified for implementation based on public supportand project readiness of actions that could be feasibly implemented within the next one to five years. Some items on this list are ongoing and all actions are intended to improve visitor experience, protect natural resources and enhance awareness of the basin and its recreation resources. It is recommended that the overall plan be updated at least every 10 years and that implementation and monitoring recommendations be updated annually to incorporate changing priorities, ownership and interest and ensure that all goals developed

are being met. Each site-specific recommendation will individually undergo environmental review prior to implementation if necessary and will comply with all local, state and federal permitting requirements. Specific recommendations that are consistent with the objectives of the 2016 Naneum Ridge to Columbia River Recreation and Access Plan will be implemented in a phased approach focusing on high priority actions first.

The draft plan was developed around recommendations that were run through several rounds of public review and revised according to the feedback recieved. The draft plan was shared with the Stemilt Partnership and agencies, and feedback was requested. The draft plan was finalized in December 2018, and the SEPA process initiated in early 2019. The draft plan will be made available to the public through SEPA review in early 2019, and an additional public comment period and County hearing will occur in late winter/early spring 2019. Adoption of the plan is expected in spring 2019.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The Stemilt-Squilchuck Recreation Plan will be evaluated and updated as necessary but no specific additions are anticipated. The plan should be updated every 10 years and implementation and monitoring plans are recommended to be updated annually or biannually in order to ensure goals are being met. Please refer to the "Implementation" section in Chapter 8 of The Plan for more details.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

The Draft Stemilt-Squilchuck Recreation Plan planning area falls within the scope of the 2016 Naneum Ridge to Columbia River Recreation and Access Plan, and the recommendations in the plan are designed to fit within and compliment those of the Naneum Plan (this Plan may be considered a supplement or addendum to the Naneum Plan). Adoption of this plan requires environmental review under the State Environmental Policy Act (SEPA). SEPA documents were prepared for the 2015 Naneum Ridge to Columbia River Recreation and Access Plan. WA Department of Natural Resources was the lead agency on the SEPA process, and submitted the SEPA checklist in September of 2014. The Naneum Plan contains suitability assessments that cover the planning area in question (pg. 47 of Naneum Plan). The recommendations in the Stemilt-Squilchuck recreation plan were designed to fit within the broader scale goals, objectives, and strategies of the Naneum Plan, and should also fit under the SEPA determination of the Naneum Plan. The SEPA documents for the Stemilt-Squilchuck Recreation Plan address the finer detail of the recommendations included in the plan.

The Plan outlines goals with recommended improvement strategies in these areas to consolidate recreational use and avoid continued spread of impacts, especially in sensitive areas such as shorelines of reservoirs and streambanks. All recommendations will individually undergo appropriate environmental review prior to implementation actions and will comply with all necessary local, state and federal permitting requirements as they occur. Please see attached Non-Project Review Form part I, 4. "Regulatory Framework and 5. "Related Documentation."

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

There are two known proposals that will require governmental approval within the planning area, but both occur on private lands and will not affect plan implementation. The proposed expansion of Mission Ridge Ski Area in Section 19 and proposed orchard development in Section 16 are both major land conversion proposals that are pending.

10. List any government approvals or permits that will be needed for your proposal, if known.

This plan will need to be formally approved by Chelan County Board of County Commissioners and adopted by Washington Department of Fish and Wildlife and Washington Department of Natural Resources.

Environmental review and permitting requirements for implementation will vary depending on each recommendation. All recommendations will individually undergo appropriate environmental review prior to implementation actions and will comply with necessary local, state and federal permitting requirements as they occur. Example permit requirements could include Forest Practice approvals, HPA approvals or local government storm water, shoreline or critical areas approval for recreation trails, roads, parking lots, camparounds or facilities.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposal "Draft Stemilt-Squilchuck Recreation Plan," is a planning effort which seeks to thoughtfully address the future of recreation in the upper Stemilt and Squilchuck basins. This area is a focal point for recreation in the Wenatchee Valley and beyond. This plan was written for, and under guidance of, the Stemilt Partnership, in collaboration with Washington Department of Fish and Wildlife and Washington Department of Natural Resources, covering an area of 17,000+. This Plan takes a comprehensive look at the existing and potential recreation opportunities in the planning area and seeks to balance these with wildlife habitat needs, agricultural infrastructure needs, and resource and community protection elements. This a nonproject proposal and The Plan is intended to serve as a guiding document to help landowners. land managers, and stakeholders implement concepts developed through previous planning efforts in a way that preserves the values held by the Stemilt Partnership and the community, as well as address future recreational growth and development in the basin in a thoughtful and collaborative manner. The intent is not to impose wholesale change in the basin and detract from the appeal of this natural landscape, but rather to focus recreation impacts to protect the values of the Stemilt Partnership and provide a strategy for growth of recreation opportunity that continues to protect these values. Additionally, this plan will require continued community participation to move toward implementation and to solve some remaining issues described in The Plan. The Stemilt-Squilchuck Recreation Plan will be included as an addendum to the 2015 Naneum Ridge to Columbia River Recreation and Access Plan. The goal is to consolidate use and avoid continued spread of impacts, especially in sensitive areas such as shorelines of reservoirs and streambanks. The Plan provides a list of goals and recommended implementation actions to achieve listed goals. Each site-specific recommendation will independently undergo an environmental review if necessary.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or

boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The planning area contains portions of Township 21N Range 19E and 20E, and Township 20N Range 20E, and spans an area of ~17,000 acres. Please see attached map. Most of the project area falls within Chelan County, with the southern-most portion occurring on state lands in Kittitas County covered under the 2015 Naneum Ridge to Columbia River Recreation and Access Plan. All of the planning area occurs within the Stemilt-Squilchuck watershed, in WRIA 40A.

The Stemilt-Squilchuck watershed is situated to the south of Wenatchee and to the north of Ellensburg in Central Washington, and drains north into the Columbia River. The upper watershed is primarily publicly owned and undeveloped, and through conservation efforts by Chelan County, Trust for Public Land, and the Stemilt Partnership, has gained recognition as the Stemilt Community Forest. The majority of the public lands comprising the area of the proposed recreation plan range from 3,000-6,000 feet above sea level and experience four distinct seasons. The planning area is bordered by the Stemilt watershed boundary to the south and east (Naneum Ridge separates the basin from the Colockum basin to the east and the Swift Creek basin to the south), by Mission Ridge Ski Area and Squilchuck Road to the west, and by Stemilt Loop Road to the north. Land ownership is a checkerboard of Washington Department of Fish and Wildlife (WDFW), Washington Department of Natural Resources (DNR), Chelan County, Washington State Parks, and private lands. For the purposes of describing the area and initiating a planning strategy, the planning area was divided into four zones that exhibit certain characteristics of recreational use and opportunity. These characteristics include use patterns, access, terrain, presence of critical wildlife habitat, and community values. For vicinity of the planning area and zones see figures 1, 3 and 4 from The Plan. The non-project proposal will apply to Washington Department of Fish and Wildlife, Washington Department of Natural Resources, and Chelan County owned lands within the Stemilt-Squilchuck planning area described above. The plan recommendations do not carry any obligation for private and federal landowners in the planning area, but collaboration with these landowners will continue throughout plan implementation. Site specific recommendations will independently undergo their own environmental review prior to implementation as necessary.

B. Environmental Elements [HELP]

- 1. Earth [help]
- a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other <u>Combination of all of the above</u>

b. What is the steepest slope on the site (approximate percent slope)?

Terrain in the planning area is varied and contains many ecosystem types across aspects and elevations. Gentle rolling forested lands in the central portion of the planning area are punctuated by high ridges, steep cliffs, talus fields and a high plateau along the southern and higher elevation portions. Slopes range from 0-90%. For more details see Non-Project Review Form, Part II, 7. "Affected Environment."

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The planning area covers over 17,000 acres with a wide variety of terrain composed of numerous soil types. This is a non-project proposal and will not implement any actions resulting in the removal or alteration of any soils within the planning area. Some specific recommendations within the plan outline suggestions for addressing soil loss issues associated with unlawful motorized use of non-green dot road systems because of lack of information and enforcement. Site-specific recommendations will independently undergo environmental review prior to implementation and will comply with all local, state and federal permitting requirements.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

The topography within the planning area varies immensely throughout the basin. There are indications of slope instability in some zones within the planning area with evidence of varying scales of landslide processes present. In addition, several zones within the planning area experience non-sanctioned motorized vehicle use, resulting in varying levels of soil loss and erosion. Site-specific recommendations that will independently undergo their own environmental review if necessary.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

This is a non-project proposal intended to be used as a management strategy and contains no specific actions for filling or grading. Any future site-specific actions that require grading and/or filling will independently undergo additional environmental review and design as required.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

This is a non-project proposal intended to be used as a management strategy and contains no specific implementation actions. Measures to mitigate any potential erosion will be apart of site-specific recommendation implementation areas. The Plan includes restoration strategies intended to address existing issues surrounding erosion within the planning area. Specific recommendations include suggestions for confining proposed facilities to the footprint of areas already highly affected by recreation to minimize erosion across the planning area. Areas of highly erodible soils were mapped and ranked as low suitability for recreation facilities and trails during the Naneum planning process. Future unmanaged use of the area poses the potential for additional erosion.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

This is a non-project proposal intended to be used as a management strategy and contains no specific implementation actions. Site-specific recommendations included within The Plan outline suggestions for improved road infrastructure, increased management, clear signage, bathroom facilities and designated parking areas at some trail heads. Measures to address these goals and

recommendations will be a part of site-specific recommendation implementation areas. Each site-specific action will independently undergo a separate environmental review if necessary prior to implementation.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

This is a non-project proposal and will not implement any actions that will result in any need for erosion control measures. Existing and future activities supported by The Plan may require erosion control measures during implementation. Each site-specific action will independently undergo a separate environmental review prior to implementation of any recommendations if necessary and will comply with all local, state and federal permitting requirements. Needs will be addressed and met based on each recommendation prior to implementation to ensure that erosion is reduced or eliminated. Restoration efforts will be prioritized based on public health and safety concerns, feasibly, availability of funding and overall restoration potential. Proposed restoration strategies will include working with the public and various stakeholders to assist with implementation and the redirection, restriction or management of recreational uses to prevent further or future resource damage.

2. Air [help]

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

This is a non-project proposal and will not implement any actions that will result in emissions or adverse affects to air quality. Existing and future activities supported by The Plan may alter the type and quantity of emissions in the area due to changes in motorized equipment use for both recreation and construction elements. Each site-specific action will independently undergo a separate environmental review prior to implementation of any recommendations if necessary and will comply with all local, state and federal permitting requirements. These factors will be addressed based on each recommendation prior to implementation.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

This is a non-project proposal and will not implement any actions that will result in emissions or adverse affects to air quality nor are there any off-site sources of emissions that may affect this proposal. Existing and future activity supported by this non-project proposal may alter the type and quantity of emissions in the area and these factors will be addressed based on each recommendation prior to implementation. Each site-specific action will independently undergo a separate environmental review prior to implementation of any recommendations if necessary and will comply with all local, state and federal permitting requirements.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

This is a non-project proposal and will not result in emissions or adverse affects to air quality. Any changes to air quality due to existing and future activity supported by this non-project proposal will be be addressed based on each recommendation prior to implementation. Each site-specific action will independently undergo a separate environmental review prior to implementation of any recommendations if necessary and will comply with all local, state and federal permitting requirements.

3. Water [help]

- a. Surface Water: [help]
 - 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

This is a non-project proposal and no actions affecting any surface waterbody will take place. The Stemilt-Squilchuck watershed is situated south of Wenatchee and to the north of Ellensburg in Central Washington and drains into the Columbia River. Within planning area as a whole are several perennial streams, wetlands, agricultural reservoirs and lakes including Upper Wheeler Reservoir, Black Lake, Clear Lake, Lily Lake as well as irrigation districts and infrastructure. Site-specific recommendations will independently undergo their own separate environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

This is a non-project proposal for the Draft Stemilt-Squilchuck Recreation Plan intended to provide guidance for future recreation and resource management activities within the Planning Area. Some recommendation implementations will occur near or adjacent to waters within the area. All recommendations included in the plan will independently undergo separate environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

This is a non-project proposal and no actions requiring or producing fill or dredge material will take place. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

This is a non-project proposal and no actions requiring or producing surface water withdrawals or diversions will take place. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

This is a non-project proposal and no actions will take place within a 100-year floodplain. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

This is a non-project proposal and no actions will involve any discharges of waste materials to surface waters. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

- b. Ground Water: [help]
 - 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

This is a non-project proposal and no actions will require the withdrawals of any water from any well. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

This is a non-project proposal, no actions will take place that require the discharge of any waste material. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

- c. Water runoff (including stormwater):
 - 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

This is a non-project proposal and no actions will result in any sources of runoff. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

2) Could waste materials enter ground or surface waters? If so, generally describe.

This is a non-project proposal and no actions will take place that could result in waste materials entering the ground or surface waters. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

This is a non-project proposal, no actions will take place that alter or affect drainage patterns in the area. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

This is a non-project proposal and will not result in surface, ground or runoff water impacts. Any future site-specific actions based on recommendations derived from The Plan will individually undergo separate environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation .Agricultural water storage infrastructure is the primary built environment that currently shapes the landscape. Originating in the mid-1800s, when settlers began to move into the Stemilt basin and develop orchards, a complex system of reservoirs and pipelines provides a reliable source of water for irrigation. Multiple irrigation districts maintain and control this infrastructure, including Upper Stemilt Irrigation District and Wenatchee Heights Reclamation District. A major consideration throughout the planning process was the potential effects of recreation on irrigation district infrastructure, and the Districts were involved in the development of recommendations throughout the process. The high-use recreation sites in the planning area tend to occur near reservoirs or water sources. Improvements to these sites would result in more formalized access and hardened sites, with the main objectives being to reduce spread of impacts and improve user safety and experience. An ongoing effort to prioritize hard closures of non-green dot roads to protect wildlife habitat connectivity and sensitive aquatic resources is included in The Plan, and the Stemilt Partnership Roads Committee provides an advisory panel of a variety of stakeholders who can help assess prioritized hard closures and potential access needs.

4. Plants [help]

 a. Check the types of vegetation found on the s 	ite:
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xdeciduous tree: alder, maple, aspen, other
xevergreen tree: fir, cedar, pine, other
xshrubs
xgrass
xpasture
xcrop or grain
x Orchards, vineyards or other permanent crops.
x wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
xwater plants: water lily, eelgrass, milfoil, other
other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

This is a non-project proposal and no actions will take place that remove or alter vegetation. Site-

specific restoration objectives or reccomendations may include vegetation removal or revegetation activites. In addition, many areas within the recreation planning area are commercial forest, orchard and residential development occurs on the fringes of the planning area, and the Mission Ridge Ski Area borders the planning area to the southwest. Planned development expansions, including a new Mission Ridge Ski Area lodging and lift expansion within the planning area, and proposed orchard development in the northwest section of the planning area will alter the character of these portions of the area by greatly increasing the percentage of built/hardened area. These development activities are outside the scope of this planning process, but may affect some of the recommendations included therein. Landowners of the private lands where these developments are proposed participated in the planning process and are willing to continue involvement in implementation of plan recommendations alongside potential developments. Any site-specific reccommendations will undergo their own environemental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation.

c. List threatened and endangered species known to be on or near the site.

None that are known of.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

This is a non-project proposal and any site-specific reccommendations will independently undergo a separate environemental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation. Restoration reccommendations outline the use of native species and the management/ elimination of weeds and invasive species within the larger plan.

e. List all noxious weeds and invasive species known to be on or near the site.

Musk thistle

5. Animals [help]

a. <u>List</u> any birds and <u>other</u> animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, songbirds, other: mammals: deer, bear, elk, beaver, other: fish: bass, salmon, trout, herring, shellfish, other

The diverse habitat within the planning area supports many priority species such as spotted owl, white headed woodpecker, elk, mule deer, western toad, west-slope cutthroat, rainbow trout, eastern brook trout, black bear, bobcat, and mountain lion. The over 17,000 acre planning area is home to a wide variety of song birds and birds of prey. Habitat connectivity in the contiguous forestland provides migration corridors for elk and mule deer from high elevation summer range to winter range lower in the watershed. See chapter 5, "Wildlife Considerations" in The Plan.

b. List any threatened and endangered species known to be on or near the site.

Priority species present in the planning area include Elk, spotted and flammulated owl, white-headed and pileated woodpecker, mule deer, western toad, west-slope cutthroat, rainbow trout, eastern brook trout, black bear, bobcat, and mountain lion (Stemilt Vision Document, 2008). Endangered or threatened species potentially present in the planning area include Northern spotted owl (*Strix occidentalis*) and grey wolf (*Canis lupus*).

c. Is the site part of a migration route? If so, explain.

This is a non-project proposal and will implement no actions. However, within the larger recreation planning area the contiguous upland forests of the upper Stemilt basin provide critical seasonal habitat for a portion of the Colockum elk herd during the spring and summer. Most of the planning area falls under the designated Priority Habitat and Species polygon for critical elk calving habitat. Elk collar data collected between 2013 and 2017 shows bull elk use in the planning area as being widespread throughout the spring and summer, and concentrated in the south-eastern portion during the rut, indicating that cow elk are also present in this portion during mating season. The planning area is also used as a migration corridor for mule deer in the area. Continuous considerations have been made to protect and maintain critical areas and habitat within the planning area.

d. Proposed measures to preserve or enhance wildlife, if any:

This is a non-project proposal. Any site-specific recommendations will undergo their own environmental review as necessary prior to implementation and will comply with all local, state and federal permitting requirements specific to each recommendation. Wildlife is one of the three pillars of the Stemilt-Squilchuck Community Vision, and holds enormous importance in the forested landscape of the upper Stemilt and Squilchuck watersheds. Within the larger recreation planning area, understanding the potential impacts of recreation on seasonal elk use in the basin was of great importance to many stakeholders in the planning process, including the Wenatchee Sportsman Association- a long-standing local group oriented around the preservation of elk habitat and protection of local elk populations. WDFW provided a team of wildlife specialists to assess potential impacts on elk habitat and populations and develop recommendations for limiting these impacts in the context of recreation management. Washington Department of Fish and Wildlife provided technical assistance and critical evaluation of impacts of recreation proposals on this landscape throughout the planning process. Providing this critical component of the planning process, WDFW formed a Stemilt planning group composed of land managers, district biologists, habitat biologists and enforcement staff that reviewed the Preferred Recreation Concept Alternatives and made recommendations to Chelan County and the planning group.

Specific considerations were made and reflected in the recommendations provided to ensure appropriate planning for low impact recreation, including:

- Limit recreational trail development in Zone 3, to avoid drawing more human
 Presence and wildlife disruption to the area with the highest concentration of elk use in the basin.
- Limit new motorized route development to areas where re-routes or alternative routes are needed to reduce impacts associated with existing routes or uses.
- Prioritize enforcement of existing non-green dot road closures with gates or barriers to manage for large areas of contiguous high-quality wildlife habitat.
- Consider seasonal closures of new trails and routes to protect elk during calving season, as per WDFW recommendations (likely May-June).

- Consider locating new non-motorized trails within the 'impact buffer' of an existing motorized route. Non-motorized recreation creates disturbance impacts to ungulates and other wildlife, but to a lesser degree than motorized recreation.
- Keeping impacts of non-motorized recreation within the same footprint of established motorized recreation routes would avoid spreading impact out across the landscape. This concept could apply to the creation of the North-South nonmotorized trail concept outlined in the Naneum Plan.
- Maintain a buffer between recreation sites/development and lakes/streams, to avoid impacts to sensitive aquatic species.

e. List any invasive animal species known to be on or near the site.

There are none known.

6. Energy and Natural Resources [help]

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

This is a non-project proposal, not applicable.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

This is a non-project proposal, not applicable.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

This is a non-project proposal, not applicable.

7. Environmental Health [help]

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.
 - 1) Describe any known or possible contamination at the site from present or past uses.

This is a non-project proposal, not applicable.

 Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

This is a non-project proposal, not applicable.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

This is a non-project proposal, not applicable.

4) Describe special emergency services that might be required.

This is a non-project proposal, not applicable.

5) Proposed measures to reduce or control environmental health hazards, if any:

This is a non-project proposal, not applicable.

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

This is a non-project proposal which outlines recommendations for managing current and future recreation uses within the planning area and no noise that exists in the area will affect this proposal. The upper Stemilt and Squilchuck basins are a focal point for recreation in the Wenatchee Valley and beyond. Current and future use of the area is compiled of mixed types of recreation including both motorized and non-motorized uses which produces traffic noise. There is also some commercial timber harvest that takes place in the area resulting in noise associated with equipment.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

This is a non-project proposal and no noise will be created as a result. Site-specific proposals for tails, facilities and road management will be individually analyzed through separate environmental review/SEPA analysis and will comply with all local, state and federal permitting requirements and laws.

3) Proposed measures to reduce or control noise impacts, if any:

This is a non-project proposal and no noise will be created as a result. Specific recommendations outlined within the plan include the reduction, management and redirection of motorized vehicle use which if implemented would have an effect on types and levels of noise within the planning area. Each recommendation within the plan will independently undergo environmental review if necessary prior to implementation. Each recommendation is geared towards managing the types of recreational opportunity within the area while protecting wildlife, water and natural resources.

8. Land and Shoreline Use [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The majority of the planning area is publicly owned and undeveloped and is used by a wide range of recreationists for a variety of motorized and non-motorized activities. This is a non-project proposal and will not affect any current land uses. The goal of the overall recreation planning project is an integrated recreation plan that accomplishes the twin goals of conservation and enhanced recreation opportunity, while also protecting the values of the local community through outreach and a collaborative planning process. Some recommendations for managing recreation outlined in the plan will restrict, redirect or manage recreation activities. Specific recommendations within the Recreation Plan will independently environmental review prior to implementation and will comply with all local, state and federal permitting requirements as necessary.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The project area is made up primarily of working forest land. Some active orchards exist on the outer edge of the project boundary. Since this proposal is a non-project action, no lands will be converted for other uses. Specific recommendations within The Plan will independently undergo their own environmental review prior to implementation and will comply with all local, state and federal permitting requirements as necessary.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

This is a non-project proposal and will not affect or be affected by any surrounding farm or forest land and their normal business operations. Specific recommendations within the Recreation Plan will independently undergo separate environmental review prior to implementation and will comply with all local, state and federal permitting requirements as necessary.

c. Describe any structures on the site.

The planning area is largely undeveloped. There is dispersed irrigation infrastructure and a number of dispersed campsites throughout the planning area. None of the campsites currently have any built structures or facilities. There are recommendations outlined in the Plan suggesting the installation of metal fire rings and pit toilets to reduce wildfire risk and risk to public health and safety. However, this is a non-project proposal and any recommendations will independently undergo their own environmental review prior to implementation as necessary and will comply with all local, state and federal permitting requirements as needed.

d. Will any structures be demolished? If so, what?

This is a non-project proposal, not applicable.

e. What is the current zoning classification of the site?

The planning area is largely classified as commercial forest. There are some areas on the boundary of the planning area zoned as rural residential and commercial agriculture.

f. What is the current comprehensive plan designation of the site?

This is a non-project proposal, not applicable.

g. If applicable, what is the current shoreline master program designation of the site?

A portion of the Recreation Planning Area in Chelan County contains aras designated as Conservancy and Fish Bearing Streams.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

The Recreation Planning area contains areas classified as critical areas by Chelan County.

- Wetland and wetland buffers
- Riparian areas
- Fish habitat
- Elka calving areas
- Elk late summer forage areas
- Big horn sheep habitat
- Mule deer habitat
- Cliffs and buffs
- High quality and rare plant communities
- Shrub-steppe habitat
- Sensitive, threatened and endangered species habitat
- Soils with high erosion potential
- Poorly drained soils
- Steep slopes
- Areas with high potential for landslides
- Special geologic features
- i. Approximately how many people would reside or work in the completed project?

This is a non-project proposal, not applicable.

i. Approximately how many people would the completed project displace?

This is a non-project proposal, not applicable.

k. Proposed measures to avoid or reduce displacement impacts, if any:

This is a non-project proposal, not applicable.

L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

This is a non-project proposal and will not implement any actions. Site specific recommendations will independently undergo separate environemental review. The proposed plan will meet the requirements and regulations of all applicable local, state and federal laws. For more information refer to the attached SEPA Non-Project Review Form, Part I, numbers 1.a. "Background," 1.d. "Planning Process and schedule/Timeline," 2.c. "Legal Mandates," 4.a. "Regulatory Framework," and 6 "Public Involvement".

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

This is a non-project proposal and will not implement any recommendations or actions. Site-specific recommendations will independently undergo separate environmental review prior to implementation. Some recommendations outlined within The Plan propose managing, redirecting or restricting zones for motorized and non-motorized recreation geared towards the long term protection of natural resources and agriculture. When implemented, these recommendations will ensure that recreation infrastructure and facilities minimize impact to resources and adjacent properties. These changes will potentially reduce public usage and improve conditions for local agricultural use.

9. Housing [help]

 a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

This is a non-project proposal, not applicable.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

This is a non-project proposal, not applicable.

c. Proposed measures to reduce or control housing impacts, if any:

This is a non-project proposal, not applicable.

10. Aesthetics [help]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

This is a non-project proposal, not applicable.

b. What views in the immediate vicinity would be altered or obstructed?

This is a non-project proposal, not applicable.

b. Proposed measures to reduce or control aesthetic impacts, if any:

This is a non-project proposal, not applicable.

11. Light and Glare [help]

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

This is a non-project proposal, not applicable.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

This is a non-project proposal, not applicable.

c. What existing off-site sources of light or glare may affect your proposal?

This is a non-project proposal, not applicable.

d. Proposed measures to reduce or control light and glare impacts, if any:

This is a non-project proposal, not applicable.

12. Recreation [help]

a. What designated and informal recreational opportunities are in the immediate vicinity?

The forested landscape of the upper Stemilt-Squilchuck basin lends itself to a variety of activities including hiking, mountain biking, horseback riding, fishing, hunting and wildlife viewing, skiing and snowshoeing, snowmobiling, and ATV use. Use patterns vary spatially and seasonally in the basin, ranging from summer high use in the lower reaches, to winter motorized recreation in some of the upper reaches, and to relatively little use overall in other areas. Access points and dispersed camping areas in the basin are generally not developed, and in some cases are heavily impacted by illegal off-road driving, litter, and erosion to roads and parking areas. While the local community has expressed interest in developing non-motorized summer and winter recreation opportunities, including hiking, mountain biking, horseback riding, and backcountry skiing and snowshoeing, very few non-motorized trails currently exist in the basin. Squilchuck State Park has a newly developed mountain bike trail system that does not currently extend into the Stemilt Basin. The goal of the recreation planning project is an integrated recreation plan that accomplishes the twin goals of conservation and enhanced recreation opportunity, while also

protecting the values of the local community through outreach and a collaborative planning process. For more information see the attached Non-Project SEPA form, Part II, Section 7, "Affected Environement."

b. Would the proposed project displace any existing recreational uses? If so, describe.

The vision statement of the "Draft Stemilt-Squilchuck Restoration Plan" states: "Establish sustainable recreation opportunities in the Stemilt-Squilchuck Basin through a community based planning process that embraces community values, protection of water and wildlife resources, and collaboration with all stakeholders." This is a non-project proposal which will not implement any recommendations. However, all recommendations within The Plan are directly associated with the collaborative management of recreation within the Planning area. Each site-specific recommendation will alter current recreation uses and use boundaries. Each site-specific recommendation will independently undergo a separate environmental review if necessary. Implementing the projects within this proposal will provide the mechanisms necessary for sustainable recreation opportunities to continue to develop in this area. The proposed recreation plan will serve to direct recreation use to trails and facilities that are designed to accommodate specific use types.

See accompanying Non-Project Review Form for detail on how specific recommendations will affect types of recreation use in the planning area.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

This is a non-project proposal which will not implement any recommendations. Each site-specific recommendation will independently undergo a separate environmental review if necessary. Implementing the recommendations within this non-project proposal will provide a mechanism for sustainable recreation oppertunites to develop in the planning area. The proposed recreation plan will serve to direct recreation use to trails and facilities that are designed to accommodate specific use types and designed to minimize environmental damage and increase user safety and satisfaction. This collaborative plan will increase the potential for long term recreational activity to occur in the area while preserving wildlife, water and other natural recources. Dispersed roads and trails in the area that are currently causing environemental damage will be repaired, resotred, redirected or eliminated reducing adverse environemental impacts. Facilities will be put inplace to aid in managing access, and public use safety and health.

13. Historic and cultural preservation [help]

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

There are old cabin and lookout sites located in the planning area, but exact locations are not know. The DAHP database contains historic sites near Lily Lake, specifically a refuse dump from an old settler site.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

There are places or objects recorded in the DAHP database within the planning area. Culturalresources reviews have been recently completed by WDFW archeologic staff for unrelated projects within the planning area, such as a green dot road reroute, meadow restoration, commercial thinning, and gate placement. No archeologic or historic materials were located during these reviews. Site specific cultural resource reviews will be completed at the project level if ground disturbance will occur upon implementation of individual recommendations.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

This is a non-project proposal. As site-specifc projects are proposed and implemented, tribal and DAHP consultations in accordance with regulation policies and procedures will be completed and any necessary requirements pursuant to local, state and federal law will be completed.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

This is a non-project proposal and will not change or reduce any protection of areas of historic, archaeological, scientific or cultural importance. All implementations will be in compliance with local, state and federal laws associated with cultural/historical resource protection in the planning area.

14. Transportation [help]

a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

There are six major undeveloped access points to the project area. A majority of the planning area is characterized by rough roads, difficult access, and little in the way of developed recreation resource. Several unimproved red dot and green dot roads run through the planning area and a variety of private, State, County and Forest Service owned road systems. This is a non-project proposal and will not affect any accesses or facilities. Recommendations within The Plan outline specific actions for improving access and facilities and redirecting, decommissioning or managing roads and trails in the planning area. Each site-specific recommendations will independently undergo separate environmental review if necessary prior to implementation.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The planning area is largerly undeveloped and is not serviced by any public transportation. Link Transit runs to Mission Ridge in the winter, the Malage area. The nearest transit stop is located approximately which is approximately 5 or more miles away.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

This is a non-project proposal and no parking spaces will be removed or provided as a result. There are recommendations outlined within the Recreation Plan that suggest improvements to road systems, road signage and parking facilities. Each sit-specific recommnedations will individually undergo environmental review prior to implemndation.

d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

This is a non-project proposal and no specific work actions are proposed. Specific recommendations within the recreation plan outline improvements, management and/or redirection of road and trail systems as well as clear signage throughout. Many of the roads within the planning area are technically closed to motorized traffic but are still used illegally. Some of the roads have easements for irrigation facility maintenance but some could be closed or decommissioned. A roads analysis will be an important component to future management of these roads for resource protection and recreation enhancement. The roads within the project area are currently heavily used by vehicles in the spring, summer and fall with heavy snowmobile use in the winter. For example, areas within zone 1 are visibly affected by illegal off-roading and trash dumping. Little enforcement of green dot road regulations prompted recommendations which outline ways to increase compliance to reduce erosion to roads and parking areas. The goal of the recreation planning project is an integrated recreation plan that accomplishes the twin goals of conservation and enhanced recreation opportunity, while also protecting the values of the local community through outreach and a collaborative planning process.

e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

This is a non-project proposal. Vehicular trips will be assessed when SEPA review is needed at the time of specific project proposals. The type and use of traffic in the area is expected to change as recommendations are implemented. This area experiences four distinct season and various recreationist visit the area throughout the year. Some specific information associated with current use:

Zone 1:

 Traffic counters installed in 2007 at Green Dot road entrance points into the upper basin show vehicle use increases in the late spring and fall, May being the peak month with 3,073 counts on the Upper Basin Loop Road in May 2007 (Stemilt Vision Document, 2008).

Zone 3:

The 2007 traffic counter found the highest use of Schaller Road was in October (892 counts), likely due to hunting traffic.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No.

h. Proposed measures to reduce or control transportation impacts, if any:

Monitoring and adaptive management of each recommendation action will help to assure recreational areas are sustainable. Extensive road system and parking planning with wide stakeholder group for this plan should prevent most transportation issues across the landscape. Site-specific planning and environmental review will take place prior to implementation for each recommendation.

15. Public Services [help]

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

Implementation of recommendations may require future public service need or increase. However, this is a non-project proposal and future site-specific recommendations will independently undergo their own environmental review if necessary prior to implementation and will comply with all local, state and federal permitting requirements.

b. Proposed measures to reduce or control direct impacts on public services, if any.

This is a non-project proposal but the larger Recreation Plan is intended to provide guidance and recommendations for manageing recreation within the planning area. Providing designated recreation use areas and more enforcement and management is intended to reduce the current and future need for public services.

16. Utilities [help]

a.	Circle utilities currently available at the site:
	electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,
	other

c. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

This is a non-project proposal. Recommendations included within The Plan outline suggestions for improved roads/trails and road management, shower and toilet facilities, signage and campsite development. Each recommendation will undergo design, permitting and environmental review requirements prior to implementation as necessary.

C. Signature [HELP]

The above answ	ers are true	and complete to t	the best of my knowle	edge. I understand that the
lead agency is re	elying on ther	m to make its dec	cision.	
Signature:	(ny		

Name of signee ____Erin McKay

Position and Agency/Organization Senior Natural Resource Specialist

Date Submitted: April 19, 2019

D. Supplemental sheet for nonproject actions [HELP]

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

**NOTE TO THE READER: Attached to this Environmental Checklist is a Non-Project Review Form (NPRF) prepared by Chelan County Natural Resources Department for this proposal. This form contains supplemental information that goes into more detail about the elements of the environement and provides more background information about The Plan that is the subject of this non-project proposal.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The "Draft Stemilt-Squilchuck Recreation Plan" is intended to provide management strategies to improve conditions within the Recreation Planning Area and should not result in any increases in adverse impacts to the resources listed above. The Plan includes a list of goals and recommendations geared towards road and trail restoration, redirection, development, maintenance and management as well as directing recreation use to appropriate areas within the planning area. All recommendations were developed in order to promote and maintain sustainable recreation within the planning area to reduce adverse impacts to natural resources and wildlife. For more information refer to NPRF Part I, 1-3.

Proposed measures to avoid or reduce such increases are:

See NPRF, Part II.8. "Key Issue Assessment."

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Effects on plants, animals, fish, and aquatic life habitats were addressed during the biological suitability assessment portion of the Naneum planning process. The biological suitability assessment identified areas with particular sensitive habitats and, to the degree possible, conceptual trail and facility locations avoid these areas and project proposals to address site

specific field conditions with site-specific management strategies strive to minimize recreation disturbance in such areas. Additionally, wildlife impact evaluation by WDFW completed during this planning process assessed likely affects on elk use in the planning area and recommendations were built around the results of this evaluation. An overall goal of the plan is to reduce impacts in areas of contiguous quality habitat and sensitive areas, while increasing recreational opportunity in areas that are suitable for such activity.

Restoration work will reduce existing impacts to all listed resources. Activities in the Recreation Planning Area will be managed consistently with the proposed recreation plan and with agency management plans. Management activities proposed will undergo site-specific environmental review in compliance with the state environmental policy act when required.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

See NPRF, Part II.8. "Key Issue Assessment."

3. How would the proposal be likely to deplete energy or natural resources?

This proposal will not result in the depletion of energy or natural resources.

Proposed measures to protect or conserve energy and natural resources are:

No applicable.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

This is a non-project proposal intended to be used as the framework for the management of recreation in the planning area and will not reduce protection of environmentally sensitive or governmentally protected areas within the Recreation Planning Area. Site specific projects within the planning area will be coordinated with other land management agencies, landowners and stakeholders to ensure that each recommendation is implemented in compliance with all local, state and federal regulations and permitting requirements. The Plan's goals are geared towards reducing overall impacts to critical or environmentally sensitive areas while promoting sustainable recreation use, development and growth.

Proposed measures to protect such resources or to avoid or reduce impacts are:

This is a non-project proposal intended as a framework for managing recreation and resource protection within the planning area. All recommendations will independently undergo separate environmental review and will be in compliance with all local, state and federal regulations and permitting requirements. Each site-specific project will be subject to compliance with conservation requirement, cultural resource protection, public use policies and management strategies for priority habitats and species.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

This is a non-project proposal what will not change any land or shoreline uses. The Plan does include recommendations for managing use and access for shoreline recreations such as fishing in the area. These recommendations are intended to decrease degradation of shorelines and natural resources when implemented. Each recommendation will independently undergo environmental review prior to implementation and will comply with all local, state and federal permitting requirements and regulations.

Proposed measures to avoid or reduce shoreline and land use impacts are:

Chelan County Natural Resources will consult with local governments and interested stakeholders concerning specific shoreline protection measures during project design and permit review at the time projects are proposed to be implemented for this plan.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Very little increase of demands on transportation or public services is anticipated. There are recommendations for increased enforcement of roads, but any site-specific recommendations will independently undergo separate environmental review and will be a collaborative effort between landowners and stakeholders.

Proposed measures to reduce or respond to such demand(s) are:

None at this time.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The likelihood of any such conflicts is low given the extensive public, agency and stakeholder collaboration in the planning process as documented in The Plan. Consultation with all stakeholders and agencies will continue during the planning and design of each future project, including site-specific SEPA review when required.