APPENDIX 12
AGENCY PUBLIC COMMENT LETTERS
NOTICE OF ADDITIONAL INFORMATION
October 27, 2014

APPLICANT(S): Big River Development
PROJECT: CPRZ-07-02A
Parcel Number(s): multiple
LOCATION: Spanish Castle MPR

Dear Mr. Johnston:

Douglas County has completed the comment period for your application. Land Services and agencies with jurisdiction have completed their reviews and have the following comments:

- As I mentioned in an earlier meeting; prior to going to planning commission hearing, Evergreen Vineyards LLC will have to either sign the application or provide a letter stating that they approve of their property being part of this application.
- The recreation plan must be more clearly and affirmatively defined. The intent of the Master Planned Resort is for a self-contained resort. A recreation plan must clearly document how that plan supports the MPR and generates the ‘draw’ to bring people for residential and transient stays. The MPR application must clearly commit to implementing that plan.
- This amendment proposes to eliminate traditional phasing. As we have discussed in previous meetings; in order to eliminate phasing, a threshold plan for different land uses will need to be in place. The threshold plan will need to be balanced among all of the land use categories (SFR, MFR, Recreation, Commercial). I would suggest a number of thresholds (more that just 1 or 2) in order to ensure that all aspects of the resort are supporting each other.
- Since the feedlot no longer exists, I would suggest significantly reducing or possibly eliminating this discussion.
- In all of your Figures, I believe the northern boundary is incorrect. I believe APN 20220410001 is not supposed to be part of the MPR boundary. See enclosed map.
- In your Design Development Manual you list Irrigated Agriculture District. I could not locate that on the Land Use Map.
- You will need to swap out the Appendix 12 Public Comment Letters with the comments from this 60 day public comment. I have enclosed them with this letter.
- Section 10 of the Master Plan should be titled Final Supplemental Environmental Impact Statement.
- WA Dept of Archaeology & Historic Preservation has provided comment regarding cultural resources. I also received a call from the Colville Tribes Historic Preservation Office (I have not yet received any written comment). They have expressed concerns that while cultural reports have been completed not all of the property has actually been surveyed and that some of the surveys are outdated or insufficient. DAHP is also requesting a cohesive document to manage cultural resources. I have reviewed the documents provided to me by Ty Morrison on October 17th. That report concludes that it was only an assessment and that a survey is highly recommended. At this point, I can see two options; First perform the
surveys on all the property not already surveyed or insufficiently surveyed and establish a management document for cultural resources. Second, create the management document for cultural resources which includes a requirement to perform a survey in those lacking areas prior to making development application. Then those management recommendations would be included in the SEIS mitigation conditions and possibly the design development manual. In the interest of getting this amendment reviewed and approved, I suggest the second option.

Three written comments were received during the 60 day review period. Comments from WA Dept of Archaeology & Historic Preservation and Douglas County Transportation will need to be addressed.

Consistent with the requirements of Title 14, DCC, your application has been placed on hold until the above noted materials/plans have been submitted. Once the above information is submitted to our office, planning staff can continue processing the application.

Timing of this application with the county comprehensive amendment cycle.
In order to keep this project on this year's comprehensive plan cycle we have to take it to the planning commission no later than February. Looking at the calendar this means we must have everything wrapped up by January 16th. This means I need to have these changes be to me in time to allow for review and for you to make additional edits if they are necessary. I would suggest early December. Even then it might be tight, depending on the nature of the edits. If this does not make the February PC agenda it will have to be bumped to the 2015 cycle which would wrap up sometime early 2016.

Please give me a call if you have any questions at (509) 884-7173.

Sincerely,

Curtis Lillquist, AICP
Principal Planner – Development Services

Encl
ALL DRAWINGS SHOW THIS PROPERTY WITH THE APP BOUNDARY

GLOBAL AG PROPERTIES USA LLC

APN 20220410001
DOUGLAS COUNTY
TRANSPORTATION & LAND SERVICES
140 19TH STREET NW, SUITE A • EAST WENATCHEE, WA 98802
PHONE: 509/884-7173 • FAX: 509/886-3954
www.douglascountywa.net

To:       Curtis Liliquist
CC:       Doug Bramlette, PE PLS, Todd Wilson
From:     Jennifer Lange, PE
Date:     October 21, 2014
Re:       Spanish Castle Master Planned Resort Sub-Area Plan amendment – Transportation

Comments regarding the Sub-Area plan amendment are noted below:

Introduction, page i:
  Paragraph 1 – typos
  Paragraph 2 – references improvements to Spanish Castle Road, plus 2-other existing
  County Roads. Identify these roads. Spanish Castle Road and the extension of Spanish
  Castle Road are and will be improved and maintained as a county road.

Page iii:  Refers to construction commencing in the summer of 2013. Confirm.

Page 6-4 & 6-7 (Fig. 6-4) conflicting trail width specified.

Page 6-5 to be modified to accurately depict County right-of-way (existing or proposed-
relocated) for the extension of Spanish Castle road beyond the BNSFRR crossing.

Page 8-2:  Paragraph 5. Vulcan Siding road was subject to an application for vacation
Order issued October 14, 2014.

Transportation Plan, page 20:  Refers to Vulcan Siding Road, which was subject to an
application for vacation Order issued October 14, 2014.
October 13, 2014

Mr. Curtis Lillquist
Transportation and Land Use Services
140 19th Street NW
East Wenatchee, WA 98802

In future correspondence please refer to:
Log: 052107-26-DO
Property: Spanish Castle Master Planned Resort Amendments CPRZ-07-02A
Re: Archaeology-Additional survey requested, Request cultural resources information be removed from the County website

Dear Mr. Lillquist:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer. The project area contains multiple archaeological sites and resources which are protected under state laws. Permit from DAHP will be required for some areas of development under RCW 27.53. Some of the additional areas of development have not been surveyed by a professional archaeologist. The surveys for some area are outdated and insufficient for this project. It is usual for DAHP to request updated surveys when the original surveys are over 5 years old. The updated survey(s) should include:

- Current maps of the projects are including the 200 additional acres
- Summary of previous surveys
- Current project description including amount and depth of ground disturbance proposed. Also a description of the currently proposed phases for the project.

This project appears to have changed developers/owners/plan more than once. The new survey should document these changes and produce a cohesive document that can be used to manage already identified cultural resources, provide for identification of such resources during construction and identify for the proponent when a permit from DAHP will be required.

Also, documentation from Douglas County stated that the cultural resources information was not posted on the County website. Portions of a cultural resources survey/assessment and portions of a cultural resources review co-mingled out of order are posted on the Douglas County website. Please be aware that the location of archaeological sites is exempt from public disclosure under RCW 42.56.300 to prevent looting and depredation. These documents should be removed from the website as soon as possible.
Thank you for the opportunity to review. Please feel free to contact me if you have any questions.

Sincerely,

[Signature]

Gretchen Kaehler
Local Governments Archaeologist
(360) 586-3088
gretchen.kaehler@dahp.wa.gov

cc. Guy Moura, THPO, Confederated Tribes of the Colville
    Johnson Meninick, Cultural Resources, Yakama Nation
    Kate Valdez, THPO, Yakama Nation
October 2, 2014

Curtis Lillquist  
Douglas County Transportation & Land Services  
140 19th St. NW, Suite A  
East Wenatchee, WA 98802

Re: CPRZ-07-02A

Dear Mr. Lillquist:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for Spanish Castle Master Planned Resort amendment, proposed by Big River Development. We have reviewed the documents and have the following comments.

**WATER RESOURCES**

According records in the Central Regional Office the property probably has associated water rights. If the property has valid water rights, the proponent should consider submitting a change application to Ecology or the Douglas County Conservancy Board to change the purpose of use from irrigation to domestic/municipal as needed. The conservancy board will process the application quicker than Ecology. Another option to expedite permit processing through Ecology is cost reimbursement. Please contact Ecology if you have questions about changing valid existing irrigation water rights to domestic.

If you have any questions or would like to respond to these Water Resources comments, please contact Jacquelyn Metcalf at (509) 457-7148.

**TOXICS CLEAN-UP**

Based upon the historical agricultural use of this land, there is a possibility the soil contains residual concentrations of pesticides. Ecology recommends that the soils be sampled and analyzed for lead and arsenic, and for organochlorine pesticides. If these contaminants are found at concentrations above the Model Toxics Control Act cleanup levels Ecology recommends that potential buyers be notified of their occurrence.
If you have any questions or would like to respond to these Toxics Clean-up comments, please contact Jeff Newschwander at (509) 454-7842.

**WATER QUALITY**

Revision to include the additional acreage is required to the existing Construction Stormwater General Permit and Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan).

If you have any questions or would like to respond to this Water Quality comment, please contact Mark Peterschmidt at (509) 454-7843.

Sincerely,

Gwen Clear  
Environmental Review Coordinator  
Central Regional Office  
(509) 575-2012

3419
October 31, 2014

Curtis Lillquist, Senior Planner
Douglas County Transportation and Land Services
140 19th Street NW, Suite A
East Wenatchee, WA 98802

Re: Application for a Major Amendment to the Spanish Castle Master Planned Resort (SCMPR)

Dear Mr. Lillquist,

The Public Utility District No. 2 of Grant County (Grant PUD) appreciates the opportunity to comment on the proposed amendment. Please accept the Grant PUD’s comments as follows:

1. Grant PUD requests that all references of “waterfront resort” be changed to “water view resort”. Property owned by Grant PUD separates the SCMPR development from the physical river shoreline and serves as a part of the visual amenity. Grant PUD shoreline management plan (SMP) currently prohibits/restricts any shoreline development except the area where the Apricot Orchards boat launch is located.

2. The SCMPR refers to adjacent property owned by Grant PUD as “open space”. It is Grant PUD’s opinion that the term “open space” should be changed to “property owned by Grant PUD” or similar term. Grant PUD SMP lists the river shoreline area under the land use classification of Resources Management. Even though, it may serve similar functions as open space (conservation and protection of fish, wildlife, scenic, historic and cultural resources), it is not part of the resort and should not use same term as open space required by the Zoning Ordinance.

3. The proposed amendment states in its introduction that the property borders State Route 28 and is accessed from the highway by Spanish Castle Road, which is to be improved and paved through the site not only to access the resort but also to maintain public access to an existing boat launch on the river. Section 8.4 states that the road improvements will extend from the SR 28 intersection to no closer than 200 feet from the ordinary high water mark of the Columbia River at the boundary of the Grant PUD property. It appears that some clarification may be need as to what is proposed and where. Any proposed improvement on Grant PUD property will require review and approval by Grant PUD in advance.

If you have any questions, please contact me at 509-754-5088, ext. 4114.
Sincerely,

[Signature]

Igor Shaporda
Lands Specialist
Grant PUD
PO Box 878
Ephrata, WA 98823
ishapor@gcpud.org

Cc: Shannon Lowry, Lands and Recreation Resources Manager
    Sheryl Dotson, Property Services Supervisor
    Jerri Mickle, Parks and Recreation Supervisor