

SEPA SCOPING SEPA/GMA INTEGRATED DOCUMENT AND PLANNED ACTION FOR RIVERCOURSE MASTER PLANNED RESORT

Introduction

PPR Developments LLC, is proposing to develop a Master Planned Resort. The project area is located generally between US 97 and the Columbia River, at the intersection of Sandy Shores Drive and US 97. A scoping process has been completed for the proposed project in accordance with the Washington State Environmental Policy Act (SEPA), Washington Administrative Code (WAC) 197-11 and Douglas County (County) environmental review procedures (Douglas County Code Chapter 19.04).

This project intends to integrate the subarea plan and environmental analysis to address environmental impacts and mitigation measures for the entire project area in sufficient detail as to replace environmental review on an individual or project level basis. Thus, as project applications are considered for development review, the County will evaluate the proposed project and impacts to determine if the project is consistent with the policies, development regulations and environmental analysis contained in the subarea plan. If the project is found to be consistent with the plan and determined to qualify as a "planned action", the County will apply the mitigation measures set forth in the environmental analysis section of the plan and additional project-level environmental review will be unnecessary.

Douglas County is the SEPA lead agency for this application, and the County's Responsible Official has determined that an Environmental Impact Statement (EIS) should be prepared. As part of the EIS scoping process Douglas County solicited public agency comments and established a period for public comment, including a public meeting on September 12, 2008, to discuss the proposed project and to receive citizen comments.

This document integrates the comments received and defines the environmental elements that will be addresses in the upcoming SEPA/GMA integrated document. The EIS will be prepared by SEPA consultant, AHBL Inc. under the supervision of Douglas County.

Project Description for Proposed Action

This proposal includes the creation of a integrated document including subarea plan to the Douglas County Countywide Comprehensive Plan and EIS under WAC 197-11-210 through 235, applicable development regulations and a planned action under WAC 197-11-164 and 172. The proposed master planned resort includes the following elements:

- A resort village center with amenities to include a central clubhouse and restaurant, pro shop, 100 room hotel with a gift shop, gourmet wine/grocery store, day spa, 20,000 square foot fitness center, gas station and convenience store.
- Recreational amenities consist of a 18 hole golf course, a 6 hole golf course, driving range, swimming pools, fishing pond, trails, and picnicking area.
- Up to 117 single family residences, 32 estate lots, 208 condos.
- Necessary resort/community support facilities such as water, wastewater, electrical, maintenance, administration, security facilities.

A detailed description for the proposed action is provided on the County's website at <http://www.douglascountywa.net/departments/tls/projects/rivercourse/>

No Action Alternative

SEPA requires that a No-Action Alternative be evaluated. Under this scenario the existing land use designations, goals and policies of the plan would be maintained. Development would be allowed to occur where current zoning and land use designations allow in roughly the same patterns that is observed today. This scenario will be evaluated in this EIS only in general terms, since any proposal would likely require an independent review under SEPA.

Public and Agency Scoping Process

Permit Application Submittal and SEPA Checklist

PPR Developments LLC completed draft plan documents as part of its application materials for the Comprehensive Plan/Zoning Amendments necessary for the master planned resort. PPR LLC has been performing various engineering, land use and environmental studies to support this application and anticipated EIS scoping requirements.

Public Notice

The County issued a public notice regarding the proposed project and the SEPA scoping process on August 22, 2008. The public notice is provided in Exhibit A. The public notice established a 21 day public comment period ending on September 12, 2008, and a public scoping meeting on September 12, 2008.

Public Scoping Meeting

A public scoping meeting was held 2:00 PM on September 12, 2008 at the Douglas County Public Services Building in East Wenatchee. During the public meeting, The applicant's project, the County's role, and the review process were presented; and verbal and written public testimony were solicited.

Agency Scoping

In addition to the public scoping meeting and comments on the scope of the EIS; the County also solicited written comments from the public and applicable agencies.

Public and Agency Comments

Copies of agency and public comment letters are included as Exhibit B.

Upcoming Draft EIS

AHBL will prepare a draft integrated SEPA/GMA document based on the elements contained in this Scoping Document. The public and agencies will be given the opportunity to review and comment on the DEIS. Following this comment period, AHBL will address the comments received and prepare a Final Document. The integrated document will be among the materials reviewed by the Douglas County Planning Commission and the Douglas County Board of Commissioners.

Elements to be included in the Integrated Document

The Integrated Document will address specific environmental elements requested by Douglas County, agencies and the public. Much of the information to be included in the document will be based on the completed or pending engineering, land use and environmental studies. The specific elements to be included are itemized in the following sections.

Alternatives to be evaluated in the Integrated Document

Proposed Project – PPR LLC would develop the master planned resort as requested in the application materials (CPRZ-08-01)

No Action - The existing land use designations, goals and policies of the plan would be maintained. Development would be allowed to occur where current zoning and land use designations allow in roughly the same patterns that is observed today. This scenario will be evaluated in this document only in general terms, since any proposal would likely require an independent review under SEPA.

Earth – Soils, Topography, and Erosion

Geology and Soils

- Describe regional and local geology and soil types.
- Describe how the proposed development plan is consistent with the current regulations regarding the following Critical Area Ordinance: Geologically Hazardous Areas.

- Describe planning-scale estimates of quantities and management of on-site excavation.
- Describe geologic hazards such as steep slopes and severe building soils which would impact the project. Identify where these areas are in relation to proposed development areas. Identify what impacts development will have on these areas and the geologic hazard areas on proposed development. Describe development and/or design considerations that will be utilized to mitigate impacts.

Topography

- Describe existing topographical features of concern with regards to slope stability, erosion, and runoff.

Soil Erosion

- Describe erosion potential for native soil to be disturbed as part of facility construction.
- The Development Standards shall describe soil erosion prevention measures both during construction and long-term.

Air

Air Quality

- Describe the methods for dust control during excavation and construction, for disturbed areas.
- Disclose the nature and amount of land-clearing debris that will be generated during all phases of construction and development. Identify the alternatives to burning that will be employed for solid waste management. Consider chipping the debris and using it on-site. If burning is proposed to be used as a tool, carefully detail the amount, the timing, the air quality impacts, and any applicable regulations or permits
- Include a discussion of residential yard debris and what services will be provided within the project to avoid burning debris in outdoor fires. Consider community composting, curbside pickup, community chipping, and other alternatives. If residential burning is proposed to be allowed within the development, carefully detail the amount and the air quality impacts. If residential burning will be prohibited within the development, describe the enforceable mechanism.
- Consider a prohibition on the installation of wood burning devices. If wood burning devices will not be allowed within the development, identify what enforceable measures such as ordinances or covenants will be instituted to ensure that effective restrictions remain in place for the life of the project.

Water

Runoff/absorption

- Identify the mitigation measures and design concepts that will mitigate the increase in stormwater runoff and retention for all phases of the proposed development (during construction and ongoing post construction). This shall include a preliminary engineering report detailing the feasibility of stormwater accommodation within the developed areas of the project. The report shall include an analysis of the off-site basin(s) tributary to the development.
- Identify a plan to address the operation and maintenance of private stormwater facilities.
- Analyze the impacts on Columbia River water quality, Threatened and Endangered species in regards to herbicide and pesticide use on the golf greens and fairways.
- Identify the mitigation measures and design concepts that will mitigate the effects of grading and excavation on the natural drainages located on the subject property.

Ground water movement/quantity/quality

- Detail the amount of irrigation water necessary to adequately serve all components of the development that require irrigation. Provide documentation that sufficient water rights have been obtained to meet the anticipated irrigation water demand. This analysis shall take into account that the Twin W short plat lots have rights to use irrigation water.
- Analyze what impacts this amount of groundwater withdrawal for irrigation will have on existing groundwater supplies in the vicinity.
- Analyze and identify the impact on groundwater by fertilizer nitrates and onsite sewage systems. Identify measures necessary to mitigate these impacts.
- Analyze and disclose the amount of domestic water necessary to serve the project at full build out. Document the water rights that have been obtained and any planned transfers to meet this anticipated water demand.

Plants and animals

- Identify the design concepts for landscaping and screening requirements to increase compatibility between different intensities of land uses, screen undesirable views of surrounding properties, and provide a visual separation and physical buffer between varying intensities of abutting land uses.
- Identify plans for long-term maintenance of the open space/conservation areas.
- Describe how the proposed development plan is consistent with the current regulations regarding the following Critical Area Ordinance: Wetlands, Fish and Wildlife Habitat Areas.

- Develop protection measures for all identified wetlands within the project area.
- Identify the potential for increased wildlife/human conflicts.
- The subject property is important for regular large concentrations of mule deer and water fowl. The property is also important for wintering bald eagles. Surveys shall be conducted and management plans developed for both game species and diversity species that take into account migration corridors, sensitive habitats and fragmentation of both habitat and population.

Environmental Health

Noise

- Identify the design and operational considerations for mitigation of noise from the construction of future phases on development within built out phases.

Land and shoreline use

Relationship to existing land use plans and to estimated population

- Identify how the proposed development is consistent with the Douglas County Countywide Comprehensive Plan.
- Identify how the project is consistent with the requirement that a MPR must have a primary focus on visitor accommodations. How will the project be phased to ensure that the focus of the master planned resort is maintained primarily for transient accommodations and on-site recreational amenities throughout the life of the development.

Housing

- Identify the housing demand that will be generated by employees of the development and what mitigation measures will be taken to mitigate this demand.
- Describe the various types and amounts of housing, including a breakdown by tenure for all aspects (i.e. permanent, transient, timeshare, employee, etc.) of the proposed development. Identify a projected population range at various times of the year for use in projected utility and facility impacts.
- Identify how the project will meet the requirements to have a primary focus on visitor accommodation at each phase of development and at final buildout.

Historic and cultural preservation

- Perform an archaeological survey of the areas of the property that have not been surveyed to determine the extent of archaeological/cultural resources on the property. This survey shall be incorporated with the previous surveys to comprehensively describe what cultural resources

are on the site and describe what actions will be taken for the protection, avoidance and mitigation of damage to cultural resources.

Agricultural crops

- Identify the potential impacts of the proposed project on surrounding agricultural lands and agricultural operations. Impacts to be reviewed include but are not limited to: agricultural hours of operation, odor, noise, dust, etc.
- Identify what measures are proposed to mitigate the potential impacts listed above and minimize complaints pertaining to agricultural lands and operations, e.g. buffers, disclosure statements, operational considerations, etc.
- Describe how the subject property does or does not meet the criteria for long term commercial agriculture land as defined in the Douglas County Countywide Comprehensive Plan.
- Describe how the land is better suited and has more long-term importance for the master planned resort than commercial agricultural production. What are the impacts to the local/regional agricultural economy of removing the subject property from production permanently.

Transportation

Transportation systems

- Identify the road standards for all transportation facilities associated with the proposal that are supported by the traffic study. Proposed road standards shall include cross sections and standards for construction to support anticipated traffic generation as well as a geotechnical analysis to determine adequate structural road sections and the ability of existing transportation facilities to withstand anticipated construction activities.
- Describe how the road standards support service and delivery vehicle access. This service vehicle discussion shall include:
 - Vehicle turning paths shall be sufficient to accommodate the largest vehicles anticipated, at a minimum a single unit truck.
 - Service vehicle access points shall have turning paths sufficient to allow service vehicles to enter and exit the site without encroaching upon opposing lanes or curbed areas.
 - External and internal roads shall have sufficient separation for large vehicles to be queued on entry or exit without blocking access to parking spaces or internal roadways.
- Describe how the road standards meet the requirements for emergency vehicle access to all proposed areas and structures.
- Describe the participation by and use of existing road alignments, including Orchard Place and Vinyard Drive. The application materials show use of these alignments to access portions of the project while during the scoping process, it was conveyed that the applicant did not have an interest or control of these facilities.
- Provide a plan to address the operation and maintenance of private transportation facilities.

- An integral component of the overall traffic study relates to basic site planning principles. An integrated on-site roadway system should deliver vehicles from the external roadway system in a manner easily understood by typical drivers and that maximized efficiency, accommodates anticipated traffic patterns and ensures public safety.

Vehicular traffic

- A traffic study shall be prepared that analyzes the traffic associated with the proposal including, but not limited to:
 - Transportation mitigation shall incorporate project phasing as appropriate.
 - Emergency access:
 - Two emergency access points are identified, both of which are located on the riverside portion of the proposal, north of US 97, east of the main access.
 - Evaluation of Orchard Place/Edgewater Drive as an alternate emergency access and/or alternatives west of the main entrance off of US 97.
 - Emergency access provisions for the portion of the development located south of US 97.
 - Appendix D of the International Fire Code, which addresses emergency access provisions.
 - Emergency access provisions shall be evaluated based upon needs as identified by the Fire Marshall.
 - Emergency access provisions shall be evaluated based upon what measures are acceptable to the Washington State Department of Transportation.
 - The effect of the development on the intersection of the internal roads with US 97
 - The effect of the cart and pedestrian tunnel on US 97.

Parking

- Identify the parking standards that will be used to mitigate parking demands for all forms of land use proposed in the development. The parking standards shall include template parking dimensions.
- The design standards shall include a section on off-street parking and loading designs.

Movement/circulation of people or goods

- The overall site plans must consider pedestrian, bus, bicycle and disabled access facilities.
- The importance of good road network circulation for the health, welfare and safety of the public cannot be over emphasized. The road alignment shall be provided to foster the long-range transportation objectives of the County. This includes continuity of pedestrian and other trail systems related to the proposed road network.

- To facilitate the best possible road and pedestrian network circulation, the layout of roads shall provide for the continuation of roads in adjoining subdivisions or adjoining undeveloped property.
- The transportation chapter shall discuss the following components:
 - The inclusion of permanent cul-de-sacs is strongly discouraged as they inhibit road and pedestrian network circulation and are inconsistent with the county comprehensive plan.
 - How the road alignment fosters the long-range transportation objectives of the County including continuity of pedestrian and other trail systems with the road network.
 - Access of lots by internal road systems only.
- The transportation chapter shall have a pedestrian component that integrates pedestrian connections between public transportation and site buildings and shall be designed to reduce the use of motor vehicles for trips within the development.

Traffic hazards

- Identify the intersection improvements necessary to mitigate the impacts of the proposal on US 97.

Public services and utilities

Fire

- Identify what the maximum fire flow will be for the most limiting structure proposed in the development.
- Describe the impact of the proposed development on fire protection and emergency medical service level of service in the area at all phases of development and at final buildout. Identify if the proposed development will reduce the fire and EMS level of service below adopted minimum. Identify what District upgrades (station upgrades, additional equipment, personnel) will be necessary to increase level of service above adopted minimum.

Police

- Describe the impact of the proposed development on police protection and emergency service in the area at each phase of development and at final buildout. Describe development design standards and Douglas County Sheriff Department measures necessary to mitigate impact of the proposal. Identified impacts include but are not limited to response time, deputy coverage.

Schools

- Describe the estimated number of school age children residing year round in the proposed development and the measures necessary to mitigate impacts on the Orondo, Eastmont and Chelan School Districts.

Parks or other recreational facilities

- Identify to what level the recreational/commercial amenities will be utilized by people other than those who own a interest in the proposed development.

Water/stormwater

- Perform an engineering study to identify the necessary infrastructure improvements to serve each phase and full buildout with domestic water service. This analysis shall review the ability of the system to provide maximum fire flow for the most limiting structure in the development.
- Provide engineering documentation on the feasibility and preliminary plan to provide irrigation water to all components of the project that require irrigation water.
- Provide a plan to address the operation and maintenance of the many stormwater facilities required for the project.

Sewer/solid waste

- Identify all of the proposed methods (septic, community septic, central treatment facility) of wastewater treatment for the various areas of development within the project. For each method of treatment and each area of proposed development provide a preliminary engineering analysis detailing the suitability of each area for septic treatment feasibility of treatment in that area and the cumulative impacts of the proposed amount of wastewater. Impacts shall include, but are not limited to, effects on ground and surface water and impacts on soil stability related to potential water/soil movement across the topography.
- Provide a solid waste plan that identifies the long term management of waste from the following sources: residential, commercial, and biosolids from the wastewater treatment facility (if proposed).

Other governmental services or utilities

- Identify what development is proposed to be located in close proximity to the Douglas County PUD transmission lines. Identify the potential conflicts between the proposed development and the transmission lines. Identify what measures are proposed to mitigate those conflicts.
- Identify what development is proposed to be located in close proximity to the Chelan County PUD Transmission lines. Identify the potential conflicts between the proposed development and the transmission corridors. Identify what mitigation measures are proposed to mitigate those conflicts.
- Analyze the impacts the project at each phase and at full buildout will have on the existing transmission, substation and distribution facilities serving the area. Identify the measures necessary to mitigate the impacts.

Fiscal Impacts

- Identify what impacts the proposed development will have on: assessed value, tax levy collection for special districts, and estimated sales tax revenues on construction.
- Identify what fiscal impacts will be generated by the service districts in order to provide service to the project, such as: costs to update service plans, process annexation. Identify what measures proposed to mitigate those costs.

EXHIBIT A



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

Name of Applicant: Jack Davis, PPR, LLC

Date of Application: February 28, 2008

Date of Letter of Completeness Issued: August 5, 2008

Date Notice of Application Issued: August 22, 2008

Application Number: CPRZ-08-01

Description of Proposal PPR Developments LLC has filed an application for a Master Planned Resort. The proposal includes the creation of a subarea plan to the Douglas County Countywide Comprehensive Plan, applicable development regulations and a planned action under WAC 197-11-164 and 172. The subject property is located within the Commercial Agriculture 10 and Rural Resource 5 zoning districts and may more particularly be described as Twin W, within a portion of Sections 1 and 12, Township 26 N, Range 21 E. W.M. and Sections 6, 7, and 8, Township 26 N, Range 22 E. W.M. in Douglas County, Washington. The proposed project includes the following elements:

- A resort village center with amenities to include a central clubhouse and restaurant, pro shop, 100 room hotel with a gift shop, gourmet wine/grocery store, day spa, 20,000 square foot fitness center, gas station and convenience store.
- Recreational amenities consist of a 18 hole golf course, a 6 hole golf course, driving range, swimming pools, fishing pond, trails, and picnicking area.
- Up to 117 single family residences, 32 estate lots, 208 condos.
- Necessary resort/community support facilities such as water, wastewater, electrical, maintenance, administration, security facilities.

Other required permits not included in the application, to the extent known by the department:
Unknown

Threshold Environmental Determination: In review of this application, the Douglas County Transportation and Land Services Department has determined that this proposal will have a probable significant adverse impact on the environment and is issuing a combined Notice of Application/Determination of Significance and request for comments on the scope of the EIS and application comments with a 21-day comment period. An environmental impact statement (EIS) in conjunction with a subarea plan for the purpose of establishing a planned action will be prepared as required by RCW 43.21.031. The main topic areas the Lead Agency has identified for discussion in the EIS are:

- (1) Natural environment
 - (a) Earth
 - (b) Air
 - (c) Water
 - (d) Plants and animals
 - (e) Energy and natural resources
- (2) Built environment
 - (a) Environmental health
 - (b) Land and shoreline use
 - (c) Transportation

(d) Public services and utilities

Public/Agency Comment Period: A public scoping meeting will be held on Friday, September 12, 2008 beginning at 2:00 PM for the purpose of soliciting public and agency comment on what issues should be addressed in the environmental impact statement. This scoping session will be held at:

Hearing Room
Douglas County Public Services Building
140 19th Street NW
East Wenatchee Washington

Written comments regarding the project and/or potential impacts are also being accepted and these should be addressed to

SEPA Responsible Official
Douglas Co. Trans & Land Services
140 19th Street NW, Suite A
East Wenatchee WA 98802

Comments must be submitted by 5:00 PM on September 12, 2008 for issues to be considered for inclusion in the environmental analysis. Additional opportunities to comment on the environmental review shall be provided upon completion of the draft EIS.

Comments on the application after the comment period noted above may be addressed to:

Douglas County Regional Planning Commission
c/o Curtis Lillquist, AICP, Senior Planner
Douglas County Transportation & Land Services
140 19th Ste NW Suite A
East Wenatchee WA 98802

Written comment on the Draft EIS will be accepted during the SEPA comment period following it's issuance. Written comment on the subarea plan and the planned action will be accepted during the GMA 60 day review period, up to, and including the public hearing. Public testimony will also be accepted pertaining to the subarea plan and planned action during the public hearing. Requests to be notified of future events can be filed in writing with the SEPA Responsible Official at the address above. A public hearing date has not yet been determined. Any interested person/party has the right to comment on the proposal, request a copy of the decision and appeal the decision subject to the requirements outlined in Title 14 of the Douglas County Code.

More Information: Complete information, including all environmental documents and copies of the proposal may be reviewed during normal business hours at the office of Douglas County Transportation and Land Services, 140 19th Street NW Suite A, East Wenatchee Washington. Additionally, the above materials are available on the Douglas County Internet web site at www.DouglasCountyWA.net under the heading of "Current Projects" then "Rivercourse Master Planned Resort". Interested persons may contact Curtis Lillquist, Senior Planner at (509) 884-7173 for further information about this project

EXHIBIT B

Schwantes, Inc.

SEPA Responsible Official
Douglas County
Transportation & Land Services
140-19th Street NW Suite A
East Wenatchee, WA 98802

Re: Application Number: CPRZ-08-01

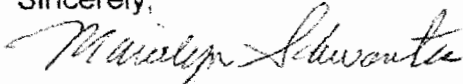
We are in receipt of the "Notice of Application", submitted by Jack Davis, PPR, LLC for development of a "Resort Village Center", at the Twin W Orchard.

We are the owners of the Rancho Manzanas Subdivision, Lot 4, which is the property adjoining the Edgewater Orchard, down river from the Twin W Orchard. Our orchard consists of approximately 50 acres.

Because of our location and it's proximity to Lake Entiat Estates, a residential subdivision and the amount of homes now being constructed in the area, we feel the "Master Planned Resort" that is being proposed, will be a very positive addition to the area. Through the twenty-five years that we have owned our property, there have been countless times, that a resort as planned would have been utilized and enjoyed by ourselves and guests. The Columbia River is a place to be enjoyed by the public and the guest amenities and accommodations in our area are few to non-existent.

We certainly do not feel that this development will have a negative impact on our environment and can only hope that everyone will see the positive economic as well as cultural value this development will bring to the area.

Sincerely,



Schwantes, Inc. by
Marilyn Schwantes
Secretary of Corporation

IN WASHINGTON

44 Orchard Drive
Orondo, WA 98843
Phone: (509) 784-1944
Fax: (509) 784-2775

IN ALASKA

2209 Eureka Street
Anchorage, AK 99503
Phone: (907) 277-1776
Fax: (907) 272-6650

SEP 11 2008

Douglas County TLS



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

September 10, 2008

SEPA Responsible Official
Douglas County Transportation & Land Services
140 19th St. NW, Suite A
East Wenatchee, WA 98802

Dear SEPA Official:

Thank you for the opportunity to comment on the scope of the Environmental Impact Statement for Rivercourse Master Planned Resort, proposed by PPR Developments LLC. We have reviewed the documents and have the following comments.

Water Resources

Ecology has identified six water rights for the proposed place of use, two of which are subject to instream flows and one provisioned as a Family Farm Permit. Only one of these rights indicates multiple domestic as its purpose. The purpose of all six rights is for irrigation and therefore do not cover the proposed purpose of this project. Changing the purpose of use for these water rights to the proposed use is subject to approval from the Department of Ecology pursuant to Sections 90.03.380 RCW and 90.44.100 RCW.

Change applications must be filed with Ecology or with the Conservancy Board. Additionally, when changing the season of use from irrigation season to year-round continuous use on the Columbia River, the new out of season use would be subject to winter in-stream flows. If an interruptible water right is the sole domestic supply for a project, there may be issues approving a water right change and/or the Water System Plan due to the unreliable nature of the water right.

Chapter 173-150 WAC provides for the protection of existing rights against impairment, i.e. interruption or interference in the availability of water, or contamination caused by withdrawal of ground water by a junior water right holder.

If you have any questions concerning the Water Resources comments, please contact Candis Graff at (509) 454-4264.



Water Quality

A septic system for a development of this magnitude is likely not the appropriate method for wastewater treatment and disposal. A properly designed and operated biological system will be needed to protect local ground and surface water.

If you have any questions concerning this comment, please contact Richard Frye at (509) 575-2821.

Project Greater-Than 1 Acre with Potential to Discharge Off-Site

An NPDES Construction Stormwater General Permit from the Washington State Department of Ecology is required if there is a potential for stormwater discharge from a construction site with more than one acre of disturbed ground. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit is a minimum of a 38 day process and may take up to 60 days if the original SEPA does not disclose all proposed activities.

The permit requires that Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) is prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water (this includes storm drains) by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading or construction.

More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/> . Please submit an application or contact Lynda Jamison at the Dept. of Ecology, (509) 575-2434, with questions about this permit.

Air Quality

This project needs to demonstrate that it can be constructed and operated without causing or contributing to non-attainment of air quality standards. The level of analysis should be commensurate with the potential for impacts from the project.

The EIS should:

- evaluate existing air quality in the project vicinity
- describe meteorological factors affecting air quality (noting seasonal variations)
- inventory project-related emission sources
- model and disclose the predicted impacts to the public's breathing air
- propose enforceable mitigation measures, and
- analyze these components for the construction, build out, and operation phases of the project

DUST

There is a need to carefully plan for and constantly monitor dust prevention and control activities throughout all phases of the project. Ecology suggests the proponents develop a Fugitive Dust Control Plan (FDCP) for the entire project area from start to finish, for the life of the project and beyond. The FDCP should be comprehensive and include measures for idle areas as well as active areas. Plans should be reviewed by all project managers who will be expected to implement them, and the resources to implement the plans should be required and secured. The FDCP should include, at a minimum, the following components.

- Identification of project-related fugitive dust sources, assignment of dust control methods to each, and identification of who will be responsible for carrying out the measures during various phases of the project.
- A commitment to secure and train personnel to implement the FDCP, and clear assignment of responsibility for compliance during all phases of the project.
- A commitment and the ability to cease activity during windy conditions when best efforts are insufficient to control the dust.
- A clear explanation of how the dust control measures will effectuate compliance with applicable provisions of WAC 173-400-040.

OUTDOOR BURNING

Ecology would like to encourage a smoke free project. This would include grinding of all land clearing debris instead of burning the material. Please contact Ecology's Air Quality Program for help with this. The EIS should contain an inventory of the organic solid waste that will be generated by the project and how it will be utilized and/or disposed of.

If outdoor burning is to occur, the EIS should contain a complete emissions inventory of the intended outdoor burning for the life of the project. These emissions should be included in the air quality modeling analysis for this project and should analyze PM2.5 impacts from land clearing burning during construction.

Construction-phase analysis and mitigation: Disclose the nature and amount of land-clearing debris that will be generated during all phases of construction and development. Identify the alternatives to burning that will be employed for solid waste management. Consider chipping the debris and using it on-site. If burning will be used as a tool, carefully detail the amount, the timing, the air quality impacts, and any applicable regulations or permits. Only natural unprocessed vegetation can be burned in an outdoor fire in Washington State. Burning all other material is prohibited – this includes construction debris.

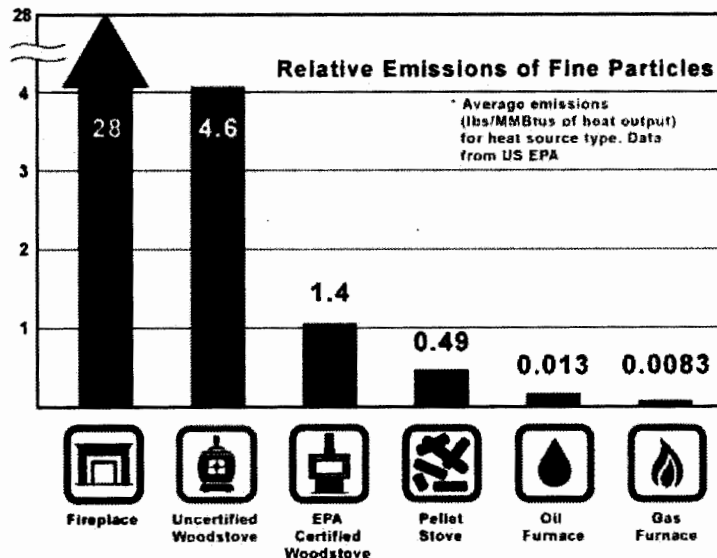
Operation-phase analysis and mitigation: Include discussion of residential yard debris and what services will be provided within the project to avoid burning the debris in

outdoor fires. Consider community composting, curbside pick-up, community chipping, and other alternatives. If residential burning will be allowed within the development, carefully detail the amount and the air quality impacts. If residential burning will be prohibited within the development, describe the enforceable mechanism.

HOME HEATING

Home heating impacts should be included in the air quality modeling analysis for this project. With the large size of this proposal, the installation and use of wood burning devices for home heating could have significant air quality impacts as well as negative human health impacts for residents.

Wood burning devices emit many thousands of times as much harmful fine particle pollution as gas appliances for equivalent heat output as illustrated by the attached graphic.



The documented health effects of fine particle pollution include asthma, cancer, and other serious medical conditions.

In this region more than 40% of wintertime fine particle pollution comes from woodstoves and fireplaces, and the climate is particularly susceptible to stagnant air condition which exacerbate the build up and effects of fine particle pollution. As a result, reducing wood smoke pollution is a high priority.

Consider bringing natural gas to the site early in the development phase. Consider using propane if natural gas is not available. Consider a SEPA mitigation requirement that prohibits the installation of wood burning devices. If wood burning devices will not be allowed within the development, the project proponent should put forth enforceable measures such as ordinances and covenants to ensure that effective restrictions remain in place for the life of the project.

AIR QUALITY SUMMARY

All potentially significant impacts on ambient air quality must be thoroughly analyzed and fully disclosed in the draft EIS. In order to determine which impacts are potentially significant, the appropriate level of analysis must be conducted and displayed. The analysis should be supported by emissions inventory and ambient impact modeling. The EIS should present credible and enforceable mitigation measures.

The scope of air quality analysis should be commensurate with the project's potential impacts. If impacts will be prevented through enforceable mitigation, the air quality analysis can be scaled back appropriately.

Ancillary and/or off-site components impacting air quality that are not analyzed at this stage will need to undergo separate SEPA review at a later time and this can cause problems and delays for contractors. Consider analyzing related components early. Examples include asphalt and concrete batching and associated sand and gravel mining activities.

If you have any questions concerning the Air Quality comments, please contact Jared Mathey at (509) 454-7845.

Sincerely,



Gwen Clear
Environmental Review Coordinator
Central Regional Office
(509) 575-20121422



Public Utility District No. 1 of Douglas County

1151 Valley Mall Parkway • East Wenatchee, Washington 98802-4497 • 509/884-7191 • FAX 509/884-0553 • www.douglaspud.org

September 2, 2008

RECEIVED

SEP - 3 2008

Douglas County TLS

SEPA Responsible Official
Douglas County Transportation and Land Services
140 19th St NW, Suite A
East Wenatchee, WA 98802

**RE: Response to “River Course Master Planned Resort EIS Scoping Comment Period”
dated August 22, 2008**

Dear SEPA Responsible Official:

Please accept these comments related to the PPR LLC’s Application for a Master Planned Resort. Douglas PUD has reviewed the Notice of Application, including the Description of Proposal and Conceptual Land Use Plan map and has questions related to the potential adverse impact that this development could have on Douglas PUD’s electric system and its customers-owners.

As currently existing, the electrical system serving the planned resort area would be unable to effectively provide the increased electrical load. System upgrades and a re-routing of power lines would be needed. This would include relocating existing overhead power lines in the middle of the proposed golf course to the outer boundary area. This has been previously discussed with PPR LLC.

In consideration of where this development is proposed and the size and scope of its plans, Douglas PUD requests that the SEPA Responsible Official consider the following questions during the Environmental Impact Statement process:

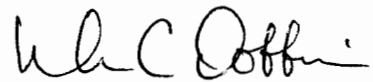
- Are the existing transmission, substation and distribution facilities sufficient to accommodate the increased load resulting from the proposed development?
- If existing facilities are inadequate to accommodate a development of this size and the development creates an undue burden on the electric system, how should the developer be required to mitigate for these impacts?

- Is the developer prepared to pay for the relocation of electrical lines to eliminate conflicts with the development?

We believe these questions raise issues that should be considered in the environmental analysis. Thank you for the opportunity to comment.

If you have any questions, please contact me at 509-881-2220.

Sincerely,

A handwritten signature in black ink, appearing to read "W.C. Dobbins". The signature is written in a cursive style with a large initial "W" and "C".

William C. Dobbins
General Manager



State of Washington

Department of Fish and Wildlife

Mailing Address: 1550 Alder St. NW, Ephrata, WA 98823

September 8, 2008

SEPA Response Official
Douglas Co. Trans & Land Services
140 19th Street NW, Suite A
East Wenatchee, WA 98802

SUBJECT: Rivercourse Master Planned Resort EIS Scoping Comments, Township 26 North, Range 21 & 22 East, Douglas County

Dear Mr. Lillquist

The Washington Department of Fish and Wildlife (WDFW) understands the applicant, PPR Developments LLC, is proposing a ~500 acre Master Planned Resort located generally east of the intersection of US Hwy 97 and Sun Cove Road in Douglas County. WDFW offers the following comments at this time. More comments are likely to follow as this project continues further in the planning process.

The area proposed for development is adjacent to the Wenatchee River, which is identified on WDFW's Priority Habitat and Species (PHS) maps as an area that is important to wintering bald eagles and regular large concentration (RLC) of water fowl in the winter (Sept. – March). The project's Environmental Impact Statement (EIS) should identify and analyze potential impacts of the proposed resort, including potential increased recreational uses of the river, on wintering bald eagles and waterfowl that utilize the area. The southeastern portion of the planned resort is identified on WDFW's PHS maps as providing habitat for RLCs of mule deer (200-300 individuals). The EIS should identify potential impacts to this population. Development of the master planned resort at this location will most likely create a scenario that is ripe for increased wildlife/human conflicts. This is a foreseeable situation the developers are creating, and they need to take full responsibility for addressing these conflicts by being required to waive all claims to the state for nuisance wildlife.

Aerial photographs of the area intended for development show intact blocks of remnant shrub-steppe habitat that are likely utilized by animal species that depend upon shrub-steppe for one or more of their life history stages. The project EIS should address impacts to these species due to loss of these remnant habitats blocks, as well as mitigation strategies proposed to compensate for this loss.

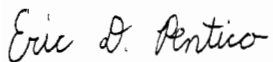
Finally, the Wenatchee River, which is currently on the Washington State Department of Ecology's 303(d) list for numerous contaminants, contains several species that are currently

Mr. Lillquist
September 8, 2008
Page 2 of 2

threatened or endangered including bull trout, Upper Columbia spring chinook and Upper Columbia Steelhead. The application narrative states that the project site varies between 300 and 500 feet from the Columbia River with the exception of 6 parcels that have shoreline access, and the project overview map indicates the majority of the area closest to the Columbia River will be dedicated to active recreation (i.e. golf course). The project EIS should examine potential risks and project impacts to Columbia River water quality and T&E species in regards to herbicide and pesticide use on established golf greens and fairways.

If you have any questions, please contact me at (509) 754-4624 ext. 15.

Sincerely,



Eric D. Pentico
Habitat Program



STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

September 11, 2008

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

In future correspondence please refer to:

Log: 091108-03-DO

Property: Rivercourse Master Planned Development Resort EIS Scoping Comment Period

Re: Archaeology – More Information Requested

Dear Mr. Lillquist:

We have reviewed the materials forwarded to our office for the proposed project referenced above. The area has the potential for archaeological resources. A portion of the project area has been surveyed for cultural resources. This portion contained previously recorded cultural resources and several other resources have been recorded within 3 miles of the project area. We recommend the Environmental Impact Statement (EIS) include a section on cultural resources and that a professional archaeologist survey the remainder of the project area.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment on this project. Should you have any questions, please feel free to contact me at (360) 586-3088 or Gretchen.Kaehler@dahp.wa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Gretchen Kaehler".

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

CC. Johnson Meninick, Yakama Tribe
Camille Pleasants, Confederated Tribes of the Colville

Curtis Lillquist (x408)

From: hassenfam@comcast.net
Sent: Monday, September 08, 2008 9:26 AM
To: Curtis Lillquist (x408)
Subject: Questions and comments for Developers of the Rivercourse project

Hi Curtis

It was a pleasure talking with you last week and here are my questions/comments for the developers of the Rivercourse project for the upcoming meetings.

1. Does the project have enough water supply and could it possibly restrict or take away water capacity from residents along Orchard and Vineyard Drives?
2. What kind of Water drainage systems are being proposed? Knowing full well that Wenatchee gets only 9 inches of rainfall during the year and the summer months getting little rain, is the system going to be a retention system or detention system? Will Sprinkler systems keep water the retention/detention system full of water? **I know from personal experience of commercial developments that Retention systems are generally undesirable due to standing water that attract pests, insects and rodents. This is especially significant to residents along Vineyard Drive where one of the proposed stormwater systems is being shown on the drawings. A Detention system with a dry basin or underground vaults are much better systems to handle water runoff and I would recommend this system or something comparable.**
3. What kind of road improvements will the project make for residents along Vineyard and Orchard Drive? Due to significantly more auto traffic along these roads, will sidewalks be installed or other such measures to maintain the safety of foot and bicycle traffic? Any bicycle lanes or paths being proposed along Vineyard/Orchard Drives?

Thanks,

Rick Hassen
Vice President
Hassen Properties
425-269-5213



PUBLIC HEALTH
ALWAYS WORKING FOR A SAFER AND
HEALTHIER COMMUNITY

Chelan-Douglas Health District

200 Valley Mall Parkway, East Wenatchee, WA 98802

Personal Health: 509/886-6400 • FAX 886-6478

Environmental Health: 509/886-6450 • FAX 886-6449

Maternal Child Health: 509/886/6400 • FAX 886-6436

Memorandum

To: SEPA Responsible Official, Douglas County TLS
From: Allen Hunter
Date: September 11, 2008
Re: Rivercourse Master Planned Resort

Topic areas that should be included in the draft EIS are:

- The availability of water and Water Rights adequate to the entire development.
- Impact on ground water by Nitrates in fertilizers used in the golf course, and from onsite sewer systems.

RECEIVED

SEP 12 2008

Douglas County **TLS**

SEPA Responsible official
Douglas County Trans and Land Services
140 19th Street NW, Suite A
East Wenatchee, WA 98802

RE: Rivercourse Master Planned resort

We have the following concerns

- 1) Development impact on waterfront.
- 2) Impact of resort, guest, and staff on surrounding properties with regards to fire and police resources not addressed
- 3) The resort, RV park, and spa seem more than the "golf course and attendant facilities" expressed in the covenant.

Sincerely,



Matthew and Sarah Lonergan

11807 Holmes point drive NE

Kirkland WA, 98034

Please put us on the mailing list. We hope to be in Wenatchee full time in 2 years.




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

LAND USE COMMENT SHEET

DATE: September 3, 2008

TO: Curtis Lillquist

FROM:  Don S. Heffner, Building Official

DESCRIPTION
OF PROJECT: Rivercourse Master Planned Resort

NAME OF APPLICANT: Jack Davis, PPR, LLC

APPLICATION NUMBER: CPRZ-08-01

Nothing to comment on at this time. Will review information and plans when submitted.



Confederated Tribes and Bands of the Yakama Nation
Established by the Treaty of June 9, 1855

Post Office Box 151
Toppenish Washington 98948

RECEIVED

SEP 17 2008

Douglas County TLS

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

September 12, 2008

Subject: Rivercourse Master Planned Resort EIS Scoping Comment Period

Dear Mr. Lillquist,

Thank you for contacting the Yakama Nation Cultural Resource Program regarding the above referenced project. This project falls within the ceded lands of the Yakama Nation, defined as the usual and accustomed areas and places utilized by the ancestors of the Yakama People for the gathering of foods, medicines, and ceremonial purposes. These legal rights are outlined in the Treaty of 1855 between the Yakama Nation and the United States government. Just as in the past, these lands and their resources continue to fulfill a central role in the culture of members of the Yakama Nation in the present, and will continue to do so in the future.

The proposed project entails the development of a Master Planned Resort located north on both sides of US Hwy 97 in the Twin W area, within a portion of Sections 1 and 12, Township 26 N., Range 21 E.; and Sections 6, 7 and 8, Township 26 N., Range 22 E.

We have reviewed the project documentation and have concerns regarding the proposal. Our concerns are focused on the development taking place in an area (on ridges and drainages leading to the Columbia River) which we view as having a high potential for cultural/archaeological sites. In terms of past and present Native American cultures of the region, the Columbia River is among the most extensively utilized areas of the interior Northwest. The Columbia was, and still is, a place of permanent homesites, a place to secure traditional foods and medicines, a place of gathering and trade, and a place of religious practice and spiritual renewal. The ridges, canyons and creeks leading to the Columbia River were heavily utilized as major thoroughfares.

A review of the Washington State Department of Archaeology and Historic Preservation (DAHP) cultural site database indicates the rich cultural history of the area, with several sites associated with both Native American and historic Euro-American land use being found in the vicinity of the proposed development.

Given these conditions, the size of the development and the extensive land alteration the project will bring, we recommend that the subject property be at minimum professionally surveyed for cultural/archaeological resources. Further, based on the findings of the survey, additional cultural

resources protective measures may be necessary during any type of ground disturbing activities relating to the proposed development.

Please contact me at 1-509-865-5121 ext. 4737, or CRP archaeologist Dave Woody at ext. 4760, if you have any questions regarding that which is written above.

Sincerely,



Johnson Meninick, Program Manager
Cultural Resources Program

CC: Gretchen Kaehler, Assistant State Archaeologist, Washington State Department of Archaeology and Historic Preservation (DAHP)

Kate Valdez, Yakama Nation Tribal Historic Preservation Officer (THPO)



PUBLIC HEALTH
ALWAYS WORKING FOR A SAFER AND
HEALTHIER COMMUNITY

Chelan-Douglas Health District

200 Valley Mall Parkway, East Wenatchee, WA 98802

Personal Health: 509/886-6400 • FAX 886-6478

Environmental Health: 509/886-6450 • FAX 886-6449

Maternal Child Health: 509/886/6400 • FAX 886-6436

Memorandum

To: SEPA Responsible Official, Douglas County TLS
From: Allen Hunter
Date: September 11, 2008
Re: Rivercourse Master Planned Resort

Topic areas that should be included in the draft EIS are:

- The availability of water and Water Rights adequate to the entire development.
- Impact on ground water by Nitrates in fertilizers used in the golf course, and from onsite sewer systems.

**DOUGLAS COUNTY
TRANSPORTATION AND LAND SERVICES**

Memo

To: Curtis Lillquist
CC: Doug Bramlette
From: Jennifer Lange
Date: September 12, 2008
Re: Rivercourse Master Planned Resort

Transportation – (Traffic Impact Analysis):

A traffic impact analysis shall be prepared in accordance with Douglas County Code 20.30, Traffic Impact Analysis. The TIS shall be included for review and acceptance by Douglas County.

1. Transportation mitigation including phasing as appropriate.
2. Emergency access:
 - a. Two emergency access points are identified, both of which are located on the riverside portion of the proposal, north of US 97, east of the main access.
 - b. Evaluation of Orchard Place/ Edgewater Drive as an alternate emergency access and or alternates west of the main entrance off of US 97.
 - c. Emergency access provisions for the portion of the development located south of US 97.
 - d. Appendix D of the International Fire Code, which addresses emergency access provisions.
 - e. Emergency access provisions shall be evaluated based upon needs as identified by the Fire Marshall.
 - f. Emergency access provisions shall be evaluated based upon what measures are acceptable to the Washington State Department of Transportation.
3. Development of Road Standards shall be completed in accordance with Douglas County Code 12.52 and include determination of adequate road cross sections to support anticipated traffic generation as well as a geotechnical analysis to determine adequate structural road sections and the ability of existing transportation facilities to withstand anticipated construction activities.
4. Agreements shall be in place to address the long term operation and maintenance of the private transportation facilities. It shall be clearly noted that Douglas County will not maintain the private transportation facilities.
5. Provide clarification within the EIS document regarding the participation by and use of existing road alignments, including Orchard Place and Vinyard Drive. The application material show use of these alignments to access portions of the planned

development, while at the scoping meeting, it was conveyed that the applicant did not have an interest or control of these facilities.

6. Provisions to address impacts of construction activities on existing service routes shall be addressed.
7. To facilitate efficient emergency response affecting public health and safety, an addressing plan shall be assigned by the Douglas County Geographic Information System Coordinator.
8. The importance of good road network circulation for the health, welfare and safety of the public cannot be overemphasized. Poor circulation adds unnecessary miles to pedestrian and trail systems, school bus routes, mail delivery and other service deliveries, utility services and most importantly, emergency services such as police and fire. Through good road network circulation, the public will have better emergency access and police and fire safety will be enhanced.
9. The road alignment shall be provided to foster the long-range transportation objectives of the County. This includes continuity of pedestrian and other trail systems related to the proposed road network. The inclusion of permanent cul-de-sacs is strongly discouraged as they inhibit road and pedestrian network circulation and are not consistent with the County Comprehensive Plan.
10. To facilitate the best possible road and pedestrian network circulation, that the layout of roads are to provide for the continuation of roads in adjoining subdivisions, then the roads shall be constructed prior to final plat approval. When adjoining property is not subdivided, the County Engineer shall determine whether roads in the proposed plat are to provide access to such unplatted property. Reserve easement strips may be required to prevent unauthorized access until such time as the connecting roads are constructed. Where the roads are to remain private, the above still applies except a separate tract or easement will be shown on the final plat map and they will not be dedicated to the public.
11. Unless otherwise approved, all lots within major subdivisions shall be accessed by means of an internal road network. This network may be public or private but not a mixture of both. Access easements or multi-dwelling driveways in lieu of public or private roads shall not be permitted.
12. An integral part of an overall traffic study relates to basic site planning principles. An integrated on-site roadway system should deliver vehicles from the external roadway system in a manner easily understood by typical drivers and that maximizes efficiency, accommodates anticipated traffic patterns and ensures public safety.
13. The overall site plans must consider pedestrians, bus, bicycle, and disabled access facilities.

14. Pedestrian connections between public transportation facilities and site buildings shall be integrated into the overall project design. Pedestrian facilities shall be designed to reduce the motor vehicle use for trips within the development and between nearby developments.
15. Appropriate public transportation facilities, such as passenger shelters, ride sharing areas and bus staging areas shall be accommodated adjacent to service drive and entrance areas; at key locations along circulation drives; and at major pedestrian focal points along the external roadway system as determined the County and LINK Transit. Will LINK Transit provide service within a private development?
16. Access for disabled persons shall be provided in accordance with federal, state and local requirements.
17. Service and delivery vehicles require separate criteria for movement to and from the site:
 - Vehicle turning paths shall be sufficient to accommodate the largest vehicles anticipated, a minimum single unit truck (SU).
 - Service vehicle access points shall have turning paths sufficient to allow service vehicles to enter and exit the site without encroaching upon opposing lanes or curbed areas.
 - External and internal roads shall have sufficient separation for large vehicles to be queued on entry or exit without blocking access to parking spaces or internal roadways.

Stormwater

1. A preliminary stormwater plan and report shall be provided in accordance with Douglas County Code 20.40. The Stormwater Management Manual for Eastern Washington is the applicable design guidance document.
2. The stormwater analysis shall include an analysis of the off-site basin(s) tributary to the development.
3. Detailed stormwater design plans and reports shall be completed with each phase of development. Stormwater plans and reports are subject to review and acceptance by Douglas County.
4. The applicant is responsible for acquisition of all necessary permits including the Department of Ecology Construction Stormwater Permit.
5. Measures proposed to address erosion and sediment control throughout the phases of the project.
6. Measures proposed to address dust control throughout the phases of the project.



Washington State
Department of Transportation
Paula J. Hammond, P.E.
Secretary of Transportation

North Central Region
Office of Region Administrator
P.O. Box 98
Wenatchee, WA 98807-0098

509-667-3000
Fax 509-667-2940
TTY: 1-800-833-6388
www.wsdot.wa.gov

September 12, 2008

Douglas County Transportation
and Land Services
140 19th St. NW
East Wenatchee WA 98802

Attention: Curtis Lilliquist, Senior Planner

Re: River Course Resort CPRZ 08-01, US 97, MP 225.65 Lt., Twin W Orchards

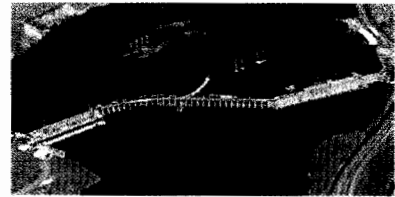
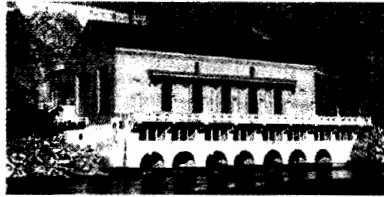
Thank you for the opportunity to review and comment on the above referenced project EIS scoping. WSDOT requests the following.

- Update the existing Access Connection Permit including review for safety improvements. Evaluate for project impacts and design standards including warrants for right and left turn lanes. Illumination is a design standard with turn lanes. Additional right of way may be necessary to accommodate improvements. Coordinate the scope of the study with Douglas County and WSDOT.
- The emergency access options 1 and 2 located east of the primary access should be included in the traffic analysis and will be considered by WSDOT in cooperation with Douglas County.
- Address interconnectivity options with properties west of the development in cooperation with Douglas County.
- The Cart and pedestrian tunnel should be included in the traffic analysis and will be considered by WSDOT in cooperation with Douglas County.
- Well head protection zones are prohibited within the State right of way.
- A Reimbursable Agreement between the Developer and WSDOT will be necessary for State time to review design plans and field inspection.

Please don't hesitate to contact our office if there are questions or need for additional information.

Sincerely,

Cynthia McGlothorn
Transportation Planner
509-667-2910



PUBLIC UTILITY DISTRICT NO. 1 of CHELAN COUNTY

P.O. Box 1231, Wenatchee, WA 98807-1231 • 327 N. Wenatchee Ave., Wenatchee, WA 98801

(509) 663-8121 • Toll free 1-888-663-8121 • www.chelanpud.org

September 9, 2008

RECEIVED

SEP 11 2008

Douglas County TLS

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

**Subject: Application #: CPRZ-08-01, Jack Davis, PPR, LLC
Proposal for Master Planned Resort at Twin W
Orondo, WA 98843**

The majority of the subject land and proposed improvements will lie inland and upland of the District's Hydroelectric Project Boundary (Exhibit G flowage easement elevation line). However, three areas of the planned resort extend into the District's flowage easement area and to the Columbia River.

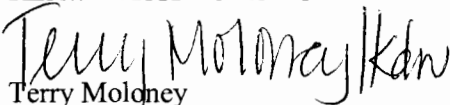
Based on information provided, the area "above" the District's flowage easement area will not likely affect the District's flowage easement rights. Therefore, the District does not object to the upper area being developed. However, the District may have significant concerns about any future proposed development of the 3 areas which extend into the District's flowage easement area or into the Columbia River. Therefore, the District needs to know more information and reserves a right to review and approve any future proposals to use these 3 areas for access to the river or for future waterfront improvements which might impact the District's hydroelectric project or its operation.

This proposed development will require electricity provided by "Douglas" County PUD. There, Chelan County PUD does not have any comments pertaining to such future electrical needs, services or infrastructure. However, Chelan County PUD has a high voltage transmission line which runs through parts of this development, mostly southerly of SR 97 and along the southerly portion of the proposed development. Therefore, plans for land improvements and structures in this area need to take into consider the high voltage and electrical safety codes pertaining to necessary distances from this source of danger. Please see and pass along to the developer the attached "Engineering/Operations Guideline No. 2 for Use of Transmission Line Right-of-Way".

Please call me at 661 4839 if you have any questions.

Sincerely,

REAL ESTATE SERVICES


Terry Moloney

Real Estate Specialist

Enclosures

FLOWAGE EASEMENT RESTRICTIONS:

In the 1950s, land owners along the Columbia River above Rocky Reach Dam granted rights to Chelan County Public Utility District (“the District”) to raise water levels of the Columbia River and water levels over and water tables under their properties to specified elevations defined within Warranty Easements, and to damage their property as a result.

During the last 15 years, some owners entered into Supplemental Easements (and some signed Amended Supplemental Easements) with the District which convey additional rights to the District including a right to raise and maintain daily water levels of the Columbia River at a slightly higher level than the river has been maintained. Within these easements the District gave its consent to landowners to build down to elevations defined within these newer easements.

The newer easements convey to the District perpetual rights to permanently raise the water level of the Columbia River and the water level over and water table under properties, as each property and elevation is defined within each easement, and to damage each property as a result. Both the 1950s easements and the newer easements significantly restrict uses of land described within the easements.

In addition, the Federal Energy Regulatory Commission, as Licensor of Hydroelectric Projects (dams & reservoirs) prohibits any residential structures, or any portion(s) thereof, riverward of the newest easement’s contour *elevation* line and prohibits any artificial alterations of contour elevation lines, shorelines or lands within easement areas whether through reclamation, filling, excavation or the like. Moreover, any proposed land use(s), improvement(s), alteration(s) and/or change(s) in vegetation or soil, including contour of the land, below the newest easement’s contour *elevation* line may only be made with the District’s prior written approval. The District’s written approval is required in addition to the requirement that property owners obtain all necessary permits, approvals and/or other authorizations from any local, city, county, state, federal and/or other agency, department or authority having jurisdiction over the property and/or the proposed use.

The restrictions do not necessarily prohibit property owners from installing and maintaining a permitted dock or irrigation pump riverward of the contour *elevation* line. However, these activities are conditioned upon the initial and continued approval of the District. Property owners must also obtain all necessary rights and/or permits from those local, state and federal agencies or departments having jurisdiction over a proposed dock or pump.

Because it is important that each landowner understands the restrictions on their property (or property that they may acquire) the District requests that all new subdivision maps clearly indicate and label the original Warranty Easement contour elevation line (the District’s Exhibit K map line), and if granted, the Supplemental Easement or Amended Supplemental Easement’s contour *elevation* Line (the District’s Exhibit G map line). In addition, the District requests that all subdivision maps clearly indicate that riverfront property is subject to the provisions of the District’s original Warranty Easement, any newer easement if it has been granted, and the Federal Energy Regulatory Commission’s limitations on uses within easement areas. This disclosure of pertinent information will help to ensure that future purchasers will understand limitations on new parcels. District Real Estate staff are available to assist in providing more information.

In addition to prohibiting residential dwellings (including deck or roof supports) or wells or septic systems riverward of the newest easement’s contour *elevation* line, the District highly recommends that property owners construct septic systems, crawl spaces, basements or in-ground pools “higher” in elevation than the District’s Hydroelectric Project Boundary/easement contour *elevation* line. This is recommended because any such subsurface structures are likely to be damaged by underground seepage from the river during temporary or permanent high river-water conditions or events. (Empty or less-than-full pools can float out of the ground during high ground-water conditions. *Relief valves can be installed during construction to prevent this.*)

The Federal Energy Regulatory Commission and the District require the preservation and/or enhancement of the scenic, recreational and environmental qualities of the river and shoreline and conformance with the Department of Ecology, the Army Corps of Engineers, the Department of Fish and Wildlife, the County and any other governing agencies’ requirements.

Engineering/Operations Guideline No. 2 Guidelines for Use of Transmission Line Right-of-Way



Purpose: The following is an outline of Chelan County PUD's (District) conditions and guidelines for the use of land with transmission line easements.

Introduction: Rights usually reserved to the landowner include the right to cultivate, occupy, and use the land for any purpose that does not conflict with the District's use of its easement. In order to avoid potential conflicts, it is the District's policy to review all proposed uses within the transmission line right-of-way easement. In such reviews, considerations include:

- Safety of the public
- Safety of District Employees
- Restrictions covered in the easement
- Access to facilities for maintenance, operations, and upgrades
- Protection of the transmission line structures and overhead conductor
- Road or street crossings

General Guidelines:

All landowners must adhere to any and all of the Transmission Use Guidelines listed below.

- Structures (any man-made assembly), Equipment and Storage: Under limited circumstances, a structure, piece of equipment or storage may be allowed, with prior written approval from an authorized District Representative – if they meet the following criteria:
 1. Is temporary and is easily and immediately movable at owner's expense.
 2. Does not restrict complete access and maintenance of line or right of way, or future use by the District.
 3. Does not adversely affect the safety of property owners, District personnel or the general public.
 4. Does not exceed any minimum clearances identified in the latest version of the National Electric Safety Code.

Structures, equipment and storage include, but are not limited to, the following: buildings, sheds, storage facilities, trailers, billboards, signs, street or area lights, hunting stands, recreational facilities, dumpsters, satellite signal-receiver systems, items within storage facilities, garbage, trash, uprooted stumps, boulders, rubble, flammable material, building material, and junk or inoperable vehicles. Permanent or non-movable buildings, swimming pools, mobile homes and airstrips are not allowed within District rights-of-way.

- Trees, shrubs, bushes, hedges, low-growing evergreens, flowers, grasses, low-growing shrubs or gardens planted within right-of-way must not exceed a maximum height of 12 feet at maturity, and may not interfere with the District's access and/or maintenance requirements.

Approved By: _____

Chad Rissman
Chief Distribution Engineer

Randall B. Kono

Randall B. Kono
Distribution Engineer

Engineering/Operations Guideline No. 2 Guidelines for Use of Transmission Line Right-of-Way



- Any equipment located or operated under the transmission line conductors must conform to the State of Washington Administrative Code (WAC), and care must be exercised when operating cranes and other equipment in close proximity to the conductors. The following table identifies the minimum distance to be maintained from the energized line given the operating voltage. (WAC 296-155-525, WAC 296-24-960, WAC 296-24-24019)

Nominal Voltage	Minimum Required Clearance (feet)
0 to 50,000 V	10
115,000 V	13
230,000 V	17

- Grading or excavation on transmission line right of way will not be allowed without prior written approval from an authorized District representative. Access by two-wheel drive vehicle to the District's facilities must be maintained at all times. Any grading that allows water to pond or to cause erosion around any pole, tower or anchor is prohibited. Grading or excavation within 50 feet of any District structure or 15 feet of an anchor will not be allowed unless authorized by the District. Beyond 50 or 15 feet, the excavation should be a minimum slope of 2:1. The District may allow a reduction in these specified distances after a soil and erosion investigation is performed by a licensed professional engineer at the property owners expense.
- No blasting shall occur within 300 feet of any PUD transmission line without first giving the PUD reasonable notice thereof in writing.
- The District is naturally concerned about the possibility of excessive amounts of dust or other contaminating particles being generated through the process of crushing rock, stockpiling materials, spraying, etc. Dust and other particulates can cause contamination to the insulators thereby causing electrical failure. Every effort should be undertaken to control the dust problem, including frequent sprinklings and/or other dust/particulate abatement measures. The project owner will assume all liability, including lost revenue, for any damage to the District's transmission line facilities. Additional maintenance including insulator washing will be at the property owners expense.
- No burning activities are allowed in rights-of-way.
- Fences must be installed at least 10 feet away from poles or towers and can not exceed 8 feet in height. Fences may not be attached to the District's poles or towers. If the District's ability to travel up and down the right of way is impeded, the property owner must install a 12-foot gate(s). Special grounding maybe required to protect against step and touch potentials.

Approved By: _____
Chad Rissman
Chief Distribution Engineer

Randall B. Kono

Randall B. Kono
Distribution Engineer