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Memorandum to file, Mark Hoppen, SEPA Responsible

Official

September 18, 2013



CITY OF BLACK DIAMOND

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MEMORANDUM

Date: September 18, 2013

To: File PLN11-0001

From: Mark Hoppen, SEPA Responsible Official

Re: Condition #89/SEPA Mitigation Measure #9 of The Villages MPD Phase 1A Preliminary Plat

Condition #89/SEPA Mitigation Measure #9 is as follows:

"89. Prior to any clearing or grading of Parcels 34B, 27C, 1L or the area between 1L and 27C, the Applicant shall prepare and have approved an analysis by a qualified expert assessing whether any wildlife corridor connections between wetlands S, T, D4 and E1 have any significant environmental benefit and identify any measures to connect those wetlands that are reasonably feasible. The Applicant's analysis shall be subject to peer review the City's MDRT team. The SEPA Responsible Official shall be responsible for approving the connectivity analysis and is authorized to impose reasonable mitigation measures to the extent necessary to prevent probable significant adverse environmental impacts."

Pursuant to the Hearing Examiner's preliminary plat condition of approval #89/SEPA Mitigation Measure No. 9 on The Villages MPD Phase 1A Preliminary Plat, the Master Developer submitted a letter regarding the wildlife corridor connections analysis on June 19, 2013. Next, the MDRT responded with comments on the document on July 15, 2013. The MDRT wetland consultant, Perteet, determined that, the first criterion of Condition #89 had been met and that habitat connections between wetlands S, T, D4 and E1 do not have significant environmental benefit compared to others defined by King County and under the City Sensitive Areas Ordinances Best Available Science (BAS).

The Master Developer provided a resubmittal package on August 14, 2013. The MDRT reviewed the resubmittal and the MDRT wetland consultant, Perteet, determined that,

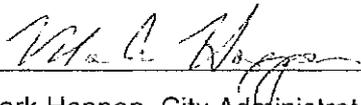
"1. The revised analysis is satisfactory in that it addresses the impracticality of creating a significant habitat linkage between Wetlands S, T, D4, and E1 where no significant linkage has been documented to exist presently between all wetland units. I agree that measures have been provided in the 1A Plat to preserve connections between Wetlands T and D4 and to retain the connection of Wetland E1 to other habitats. Habitat connections to Wetland S are however limited by existing disturbances and this wetland does not have the potential or opportunity for a significant habitat connection to Wetlands T, D4, and E1."

2. It is stated in the letter to Stacey Welsh from Wetland Resources, Inc., August 12, 2013, that split rail fencing and native vegetation has been removed from the wildlife corridor connections analysis. To clarify our intent in item #2 of our July 12, 2013 response memo, we were specifically evaluating these items in relationship to Condition of Approval #89 of the City of Black Diamond Hearing Examiner's Decision. In this consideration, it was our determination that fencing and native vegetation in the developed landscape would not serve to create a significant habitat connection between all wetland units. These features are however required for other ecological purposes in the plat conditions and in the Development Agreement and will provide ecological benefit and are not recommended to be omitted."

Regarding Perteet's comment #2 above, split-rail fencing for wetland buffers is already required by plat condition #2. MPD condition #122 requires native vegetation in street landscaping and parks. Although not listed in the Wildlife Corridor Connections Analysis, these are already requirements of The Villages MPD and the Phase 1A Preliminary Plat.

The Wildlife Corridor Connections Analysis for The Villages MPD Phase 1A Preliminary Plat has been reviewed by the Designated Officials, the contracted Master Development Review Team wetland consultant (Perteet), and the SEPA Responsible Official.

Based on the advice and expertise of Perteet, the undersigned SEPA Responsible Official hereby approves the Wildlife Corridor Connections Analysis for The Villages MPD Phase 1A Preliminary Plat, dated August 12, 2013, with no additional mitigation required.



Mark Hoppen, City Administrator
SEPA Responsible Official