



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Central Region Office
1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

July 25, 2022

Tammy Miller
City of Cashmere
101 Woodring Street
Cashmere, WA 98815

Re: 202203256, 2022-002

Dear Tammy Miller:

Thank you for the opportunity to comment during the Optional Determination of Non Significance process for the CDRPA Wood Waste Removal Project. We have reviewed the documents and have the following comments.

TOXIC CLEAN UP

The proposed action is adjacent to a known contaminated site, the Cashmere Mill Site, Ecology Facility/Site ID 20168, Cleanup Site ID 11386. Contaminants may be present at the site of the proposed action. If contamination is discovered, it must be reported to the Department of Ecology, Central Regional Office. Contaminated soils or water may require special handling and/or disposal to protect site workers, visitors, public health, or the environment.

If you have any questions or would like to respond to these Toxics Clean-up comments, please contact **Valerie Bound** at (509) 454-7886 or email valerie.bounds@ecy.wa.gov.

WATER QUALITY

There are multiple Total Maximum Daily Load (TMDL's) listings for the Wenatchee Watershed. Any construction within the watershed should consider the impacts to local watersheds and to downstream users. Numeric criteria for water quality standards for surface waters for the state of Washington can be found in WAC 173-201A. If you have any questions, please reach out to Cole Provence at (509) 379-3557 or cole.provence@ecy.wa.gov.

SHORELANDS

Thank you for the opportunity to provide comments to this project as it pertains to the Shoreline Management Act of 1971, RCW 90.58; State master program approval/amendment procedures and master program guidelines, WAC 173-26; Wetlands 90.48; and Shoreline management permit and enforcement procedures, Chapter 173-27 WAC.

The provided JARPA states that a wetland report was provided demonstrating the development will occur outside of the wetland buffer however this report was not provided. Demonstration of the proposed area of disturbance, including grading plan was not provided. The project site is located in part of the 200' shoreline jurisdiction, in the

High Intensity shoreline environment and a shoreline permit may be required. The JARPA states the project in the Urban shoreline environment however the parcel is located in the City of Cashmere city limits within the "High Intensity" shoreline environment and should be consistent with the applicable SMP. In the Cashmere SMP, a 70' shoreline buffer should be demonstrated on the plan. Adverse impacts to shoreline vegetation are considered to occur when vegetation is removed that would reduce the performance of any of the functions listed in Cashmere SMP Section 4.5.1.A.

A shoreline exemption must still comply with the applicable goals, policies, and regulations of the local SMP and the policies of the SMA. WAC 173-27-040(1)(b) states An exemption from the substantial development permit process is not an exemption from compliance with the act or the local master program, nor from any other regulatory requirements. To be authorized, all uses and developments must be consistent with the policies and provisions of the applicable master program and the Shoreline Management Act. A development or use that is listed as a conditional use pursuant to the local master program or is an unlisted use, must obtain a conditional use permit even though the development or use does not require a substantial development permit. When a development or use is proposed that does not comply with the bulk, dimensional and performance standards of the master program, such development or use can only be authorized by approval of a variance.

For projects within Shoreline Jurisdiction, a complete application for a substantial development, conditional use, or variance permit shall contain, as a minimum, the following information found at WAC 173-27-180 and WAC 173-27-130.

Ecology staff is available to provide technical assistance to the local jurisdiction by reviewing wetland delineations, ratings, and verifying provided wetland and ordinary high water mark determinations in the field.

Please contact Alicia Schulz, Shorelands and Environmental Assistance, alicia.schulz@ecy.wa.gov or (509) 379-4541 if you have any questions about the comments provided.

Sincerely,



Tricia Sawyer
Central Regional Office
crosepacoordinator@ecy.wa.gov