



May 10, 2019

Carrie Rushby
Deputy Clerk/Planning and Zoning Administrator
PO Box 649
Cascade, ID 83611

Re: Response to Cascade River Ranch City Comments dated May 3, 2019

Dear Carrie:

I have reviewed the City Comments provided by the City dated May 3, 2019 and below are my responses to the comments that relate to Engineers and specifically design, wetlands and floodplains.

Below is a list of the City comments and our response.

Design Considerations Section:

- 1. As per comments received from Army Corps of Engineers (USACE), please provide the 404(b)(1) Analysis Report provided to the Corps for City review and deliberation with USACE.*

The applicant is in the 404-permit process and the 404 permit is currently being prepared and cannot be finalized and submitted to the USACE until all wetland impacts are known. This cannot be finalized until a Preliminary Plat is approved so the final layout is known. I suggest that the city require that applicant obtain a 404 permit prior to filling of any jurisdiction wetlands and prior to approval of final plat.
- 2. Approval of any development within the floodplain/way and wetlands will be conditional upon final Army Corp review and approval and will be subject to their stipulations and permitting.*

No development is proposed within the floodway. The USACE only regulates fill within wetlands and therefore will not review or approve work within a floodplain. The applicant is in the process of obtaining the necessary 404 permit from the USACE for filling of wetlands as needed for the project.
- 3. Provide evidence that the pond fill excavated is sufficient to both raise the entirety of the building area of the development, and that calculations and fill area will avoid impact to properties up-and-downstream.*

The proposed pond is intended to generate fill material to fill the first phase of the project. If needed the applicant will import fill to raise the proposed building pads above the BFE. Filling the floodplain is allowed by City code. Fill material will be generated on site or from other near by borrow sources and should have no impact on neighboring properties. Grading plans including cut and fill volumes will be provided to the city for review as part of the building permit and floodplain development permit process after preliminary plat approval is obtained.



Flood Prone Areas, and Wetland Avoidance Section:

1. *Approval of Preliminary Plat and Planned Unit Development is conditional upon FEMA review and approval of removing lots out of the floodplain.*

The lots will be removed from the floodplain by submittal of a Letter of Map Revision based on Fill (LOMR-F). This first requires that the project be constructed and the plat recorded.

2. *Please provide Army Corp of Engineers approval of wetland delineation and development within the area.*

The applicant is in the 404-permit process and the 404 permit is currently being prepared and cannot be finalized and submitted to the USACE until all wetland impacts are known. This cannot be finalized until a Preliminary Plat is approved so the final layout is known. I suggest that the city require that applicant obtain a 404 permit prior to filling of any jurisdiction wetlands and prior to approval of final plat.

3. *Given the special development area, City will require inclusion of an Erosion and Sediment Control Plan with CD's*

Agreed, the applicant will include a copy of the ESC plan with construction plan submittal to City.

4. *Per State Flood Coordinator correspondence, the development is subject to Title 44 of the Code of Federal Regulations State Statute 60.3 and NFIP regulations which require that a BFE (BASE Flood Elevation) prior to approval. City requires that any area of the plat that does not have an approved and established BFE obtain a BFE and submit it as condition of approval. Requirements as per the correspondence received from the State Flood Coordinator will be a condition of approval prior to start of construction.*

The current FEMA flood map became effective February 1, 2019. A portion of the project site is within FEMA special flood hazard area AE with established BFE's. Please provide a copy of the referenced State Flood Coordinator correspondence for review.

I am available to discuss this further if you would like. I can be reached at 208-323-2288 or dsterling@to-engineers.com.

Respectfully,

David N. Sterling, P.E.

CC: Steve Arnold
Josh Davis