

**EXHIBIT 11**  
**ROSLYN RIDGE WEST PLANNED UNIT DEVELOPMENT**  
**PRIORITY HABITAT AND SPECIES CRITICAL AREAS ASSESSMENT**  
**KITTITAS COUNTY CODE 17A**  
**REGARDING THE NORTH 21 PARCELS**

The proposed sending site – identified as parcels 950570, 950761, 950762, 950581, 950582, 950583, 950584, 950585, 950586, 950587, 950588, 950589, 950590, 950591, 950592, 950593, 950594, 950595, 950596, 950597, and 950598 – are contiguous parcels located north of the proposed development area. These parcels are heavily forested, contain state recognized priority species, and are partially covered with slopes that can be hazardous due to steepness.

In the preparatory phase for the Planned Unit Development (PUD) application pertinent to the proposed Roslyn Ridge West project site, the Applicant held meetings and discussions with the Washington State Department of Fish and Wildlife (WDFW). Subsequent to these preliminary dialogues with WDFW, Kittitas County Community Development personnel (Bradley Gasawski) directed the Applicant to provide a comprehensive examination of KCC 17A, which is enclosed within this exhibit. This review encompasses an analysis of the Kittitas County COMPAS map, with particular emphasis on layers delineating Hazardous Slopes, DFW Priority Habitat Species, Critical Aquifer Recharge Areas, Wetlands Investigation Areas, and designated Wetlands.

Enclosed as Attachment A-1 is a series of maps of the 21 parcels subject to this analysis, accompanied by a corresponding map sourced from the official Kittitas County COMPAS online map and the Priority Habitat and Species map provided by the Washington State Department of Fish and Wildlife online mapping tool.

The findings from the Kittitas County COMPAS map are summarized as follows:

1. **Hazardous Slope:** The demarcation of hazardous slopes revealed that 18 of the North 21 parcels exhibit topographical steepness. Ground truthing corroborated these findings, leading the Applicant to remove plans for residential housing from these parcels.
2. **DFW Priority Habitat Species:** No priority habitats or species were detected within the parcels as per the highlighted layer on the COMPAS map.
3. **Critical Area Aquifer Recharge:** The map erroneously indicates the majority of the site under a Group A wellhead protection zone which, upon verification, does not exist within the project's confines.
4. **Wetlands Investigation Area:** No such areas were identified on the map.
5. **Wetlands:** The map did not reveal any wetland areas within the parcels.

Of the 21 lots in the proposed sending site, eighteen contain at least one slope that is identified as having a 30%-35% grade and ground proofed to be over 40% in some areas. There is a large, steep slope with a grades over 35% - 40% that covers a large portion of the slopes of Ridgecrest Road, which runs through the sending site. This would likely create issues during road construction and for future homeowners. Further review of KCC 17A Chapter 17A.04.020(1) directed the Applicant to consult with the WDFW. In an initial phone conversation with a member of the staff (Jennifer Nelson) we were directed to review the Priority Habitat and Species map (PHS Map), located at the following URL: <https://geodataservices.wdfw.wa.gov/hp/phs/>.

In reviewing this map, the Applicant identified and outlined the 21 parcels under scrutiny with a 20-foot buffer to ensure comprehensive identification of Priority Species. The resultant map, along with a catalog of identified priority habitats and species, is presented in Attachment A-2.

The PHS Map identified the following priority species within the project site and surrounding area:

1. Elk (**Cervus elaphus**)
2. Gray Wolf (**Canis lupus**)

3. Grizzly Bear (**Ursus arctos**)
4. Northern Spotted Owl (**Strix occidentalis**)
5. Little Brown Bat (**Myotis lucifugus**)
6. Myotis Sapp (**Myotis yumanensis/lucifugus**)
7. Yuma Myotis (**Myotis yumanensis**)

Following the review of available data on the official Kittitas County COMPAS map and the DFW Priority Habitat and Species map, the Applicant scheduled a meeting with Jennifer Nelson of DFW on May 20, 2024. At this meeting each key location of the project site was reviewed (See Attachment B to this document).

This meeting, along with additional phone calls, email exchanges and an on-site project visit by Jennifer Nelson, yielded the following determinations:

The DFW's PHS Map cites Elk as priority species for the parcels in question. Elk have been seen throughout the property over the years within the project site and adjacent properties. This species is classified as a PHS Listed Occurrence.

The DFW's PHS Map cites the Gray Wolf, Grizzly Bear, and Northern Spotted Owl as priority species for the parcels in question. However, despite historical accounts of their presence, there have been no confirmed sightings within the project site nor adjacent properties in over thirty years. These species are classified as PHS Listed Occurrences.

Additionally, in an email conversation with DFW Staff (Scott Downes) the Applicant was informed that there are no Northern Spotted Owl circles or nets within the project site.

The PHS Map also recognizes the Little Brown Bat, Myotis Sapp, and Yuma Myotis as regional inhabitants known to roost and live within the general area of

the 21 described parcels. However, in an email conversation with Scott Downes, the Applicant was informed that there are no known bat roosts in the project site. The Applicant has observed bats, unidentified by type, in the 21 described parcels. On the DFW website regarding Little Brown Bats (<https://wdfw.wa.gov/species-habitats/species/myotis-lucifugus#desc-range>), the Geographic Range is described as follows:

*“The range of the little brown myotis extends across most of North America from the forested portions of Alaska and northern Canada southward to California, Colorado, and the southeastern United States. The species occurs throughout Washington.*

*This species is a habitat generalist that uses a broad range of ecosystems. In Washington and Oregon, it occurs most commonly in both conifer and hardwood forests, but also occupies open forests, forest margins, shrubsteppe, clumps of trees in open habitats, sites with cliffs, and urban areas. Within these habitats, riparian areas and sites with open water are usually preferred. Elevations up to tree line are inhabited, with males being more common than females at higher elevations.”*

This geographic range description for the Little Brown Bat confirms its widespread distribution and habitat versatility, encompassing the project's locale.

Moreover, this site is heavily forested, which means heavy clearing and grading would be required for homesites.

Considering the COMPAS and PHS Map assessments, it is assumed that the 21 parcels meet the criteria for designation as a recognized critical area, given the forested, elevated terrain and evidence from the PHS Map demonstrating the fertile habitat to support numerous Priority Species. Historical bat sightings further substantiate this classification.

As a mitigation for the development of residential areas within the project site, the proponent advocates for the formal recognition of the 21 parcels, as delineated in Attachment A-1, as a Kittitas County Critical Area. This would be enacted through a covenant filed with the Kittitas County Auditor, requesting for the inclusion of these parcels within the Critical Areas layer of the Kittitas County COMPAS Map.

Concurrently, residential density rights for these parcels would be reallocated to the designated residential zone within the project site pursuant to KCC 17.13 governing the Transfer of Development Rights. See 12: Transfer of Development Rights for the Roslyn Ridge West Planned Unit Development.