



Grant County
PUBLIC UTILITY DISTRICT
Excellence in Service and Leadership

August 7, 2013

RE: Ecology Comments received from Kittitas County per the Rocky Coulee Tent Camping Recreation Project

Public Utility District No. 2 of Grant County, Washington (Grant PUD) appreciates the opportunity to submit the following responses to Kittitas County Community Development Services and Washington Department of Ecology pertaining to Ecology comments submitted on July 19, 2013 on the Rocky Coulee Tent Camping Recreation project.

Ecology issued a comment letter to Kittitas County on July 19, 2013. The following four comments will be addressed:

1. Why was the western edge of Wetland C delineated at the Ordinary High Water Mark (OHWM)?
2. Why were the wetlands at the site (Wetlands A, B, and C) split into three separate wetlands?
3. Why was the lowest buffer size of 20 feet (from a range of 80 to 20 feet) applied to Wetlands A and B?
4. The monitoring plan should encompass an aggressive weed control program and span a minimum of 5-years in order to assure that the plantings will be successful.

COMMENT 1

The western edge of Wetland C was delineated at the OHWM based on observations of multiple lines of evidence. The grade of the reservoir is gradual below and up to the OHWM, however at the OHWM the grade shifts up creating an abrupt grade change and the adjacent shoreline/riparian areas do not contain hydric vegetation, hydric soils, or wetland hydrology (Wetland B, located above the OHWM, was an exception to this and is described below, see Comment 2). Dominant vegetation within the riparian fringe (adjacent to the reservoir edge) possesses either a UPL, FACU or FAC wetland indicator status. For example black locust and tree-of-heaven are classified as Facultative Upland (FACU), Siberian elm is classified as Upland (UPL) and Russian olive is classified as Facultative (FAC).

COMMENT 2

The wetland areas at the site were split into three distinct units based on distinct hydrologic features and changes in water regime.

Wetland C is a large mosaic lake-fringe wetland located entirely below the OHWM of the Wanapum Reservoir. It contains emergent (submerged) vegetation exclusively, and possesses mucky-silty soils characteristic of a reservoir with varying water levels. Wetland C has areas of seasonal and permanent inundation as well as areas of saturation only.

Wetland A is a small lake-fringe wetland located entirely below the OHWM of the Wanapum Reservoir. Vegetation within Wetland A consists primarily of a non-native rose (sweetbriar) and reed canary grass with tree-of-heaven (FACU) and black locust trees along its landward boundary (west side). The boundary between Wetland C and Wetland A consists of a small linear natural berm feature that separates the exclusively emergent and mucky-sediment environment of Wetland C from the more terrestrial soils and shrubs of Wetland A. A small area of the berm had a lower elevation and it appeared as though water from the reservoir is occasionally backing up into Wetland A during brief periods of extreme reservoir levels or during storms. Debris lines, shifts in vegetation and evidence of past inundation within Wetland A provided further evidence that Wetland A is located below the OHWM. Wetland A has areas of occasional inundation (from both overtopping of the shallow berm and a high water table) as well as areas of saturation only.

Wetland B is a small lake-fringe wetland located entirely above the OHWM of the Wanapum Reservoir. Vegetation within Wetland B consists primarily of reed canary grass and a non-native rose (sweetbriar) with one Siberian elm rooted along its landward boundary. The boundary between Wetland C and Wetland B consists of a narrow, linear, natural berm feature (an area of higher elevation approximately 1 to 2 feet wide and vegetated with reed canary grass) that separates the exclusively emergent and mucky-sediment environment of Wetland C from the more terrestrial soils and shrubs of Wetland B. The presence of a complete berm at the boundary of Wetland C and Wetland B, a lack of debris lines, and no observations of past inundation within Wetland B provided evidence that Wetland B is located above the OHWM. Wetland B has a few small areas of occasional ponding (from a high water table), a high water table (below the surface) as well as areas of saturation only.

COMMENT 3

Wetland C is a large, Category III, mosaic wetland dominated by emergent vegetation. The vegetation serves to reduce erosion along the shore (from boat wakes) and to settle out sediments which could contain contaminants. The submerged and emergent vegetation within Wetland C provides cover for young fish and other aquatic species and provides food for omnivorous and herbivorous waterfowl. Based on the range of possible buffers stipulated by Kittitas County (80 to 20 feet), a conversation with a Kittitas County planner (Valoff, D. 2012), and the above listed functions provided by Wetland C, the regulatory buffer for Wetland C was assumed to be 60 feet.

Wetlands A and B are small, Category III wetlands dominated by invasive plant species. Past disturbance within these areas and installation of non-native plants along the Columbia River by early settlers created an environment where non-native plants could become established within these wetlands. Limited plant diversity and the non-native status and invasive natures of the sweetbriar rose (introduced from Europe) and reed canary grass (native to Europe, Asia, and parts of North America) have resulted in poor habitat conditions within Wetlands A and B. Wetlands A and B have less opportunity to improve water quality than Wetland C, because where Wetland C is permanently and seasonally inundated with water from the Wanapum reservoir (where motor boats are used), Wetland A is inundated only occasionally and Wetland B even less

frequently during storms. Based on the range of possible buffers stipulated by Kittitas County (80 to 20 feet), a conversation with a Kittitas County planner (Kittitas County 2012), and the above listed low level of wetland functions provided by Wetlands A and B, the regulatory buffers for Wetlands A and B were assumed to be 20 feet.

The Mitigation Plan discusses the following proposed improvements at the Rocky Coulee Tent Camping Facility:

- Demolition of Existing: roadbed (portions of Recreation Drive), site fencing, and concrete bases; for portable toilets;
- Paved Americans with Disabilities Act (ADA) parking stalls;
- Gravel parking stalls delineated by wheel stops;
- Single concrete vault toilet;
- Double concrete vault toilet;
- Benches;
- Stabilized gravel trails of various widths, including accessible routes;
- Paved ADA and maintenance access road with ADA parking at the terminus;
- Picnic areas, including ADA accessible tables;
- Tent campsites, including two ADA accessible sites;
- Stormwater handling improvements;
- Barrier rock and fencing;
- Site access gate; and
- Regulatory, way-finding and interpretive signage.
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Permanent impacts at the site are quantified and discussed for two habitats: 1) permanent impacts to uplands/sagebrush, and 2) permanent impacts to riparian habitats (See the Mitigation Plan, GeoEngineers 2013, Table 6-1). Riparian habitats at the site consist of the forested and shrub community adjacent to the reservoir. This area of riparian forested habitat varies in width from 85 to 150 feet from the OHWM, compared to the 60-foot buffer for Wetland C. Because the riparian forest area is larger than the 60-foot buffer for Wetland C, the buffer areas for the 60-foot and 20-foot wetland buffer areas overlap entirely with the riparian forest area. Impacts to the riparian forest area and overlapping wetland buffer areas are all categorized and addressed as “riparian forest impacts”. If buffers for Wetlands A and B were to be increased from 20 feet to 60 feet, a small portion of sagebrush in the southern portion of the site (west of Wetland B) would become wetland buffer. Permanent buffer/riparian forest impacts, are proposed to be compensated for (with a 1:1 ratio) through mitigation plantings within the riparian forest in disturbed areas and areas of sparse vegetation. In addition to mitigation plantings, restoration plantings within the riparian forest are also proposed (almost twice the area of permanent riparian forest impacts). Impacts within sagebrush habitats will be compensated through seeding and stabilizing disturbed areas within the sagebrush.

In summary, because the mitigation plan for the site mitigates for impacts in the riparian forest/wetland buffer area at a 1:1 ratio and in addition restores riparian habitat at a 1.8:1 ratio, permanent impacts to riparian forested buffer and wetland buffer areas are compensated at a total ratio of 2.8:1. If buffers for Wetlands A and B were to be increased from 20 feet to 60 feet, and the small portion of sagebrush habitat in the southern portion of the site (west of Wetland B) were to become wetland buffer, the proposed restoration/mitigation actions at the site would more than compensate for this small increase in buffer habitat.

COMMENT 4

The Monitoring Plan was prepared in anticipation of requirements typically seen on Kittitas County Shoreline Substantial Development Permits and Washington State Department of Fish and Wildlife Hydraulic Project Approvals. The District will mitigate all construction impacts and monitor them as required, currently for a period of 3 years at 80% survival. These monitoring standards are consistent with the requirements of Shoreline Substantial Development Permits previously received from Kittitas County. Grant PUD will utilize manual and chemical methods of weed control as appropriate throughout the Rocky Coulee Tent Camping area.

Please feel free to contact me should you have questions or issues related to this response. I can be reached at Darrell Pock at (509) 754-5098 and jpock@gcpud.org. Thank you very much.

Sincerely yours,

J. Darrell Pock
Project Specialist III

Cc: Gwen Clear
Washington Department of Ecology – Central Regional Headquarters

Bc: Brandon Little
Julie Pyper
Jeri Mickle
Greg Cardwell
Darrell Pock
NR Records

Lindsey Ozbolt

From: Lindsey Ozbolt
Sent: Wednesday, August 07, 2013 1:26 PM
To: 'Darrell Pock'
Cc: Igor Shaporda (Ishapor@gcpud.org); erisdon@gcpud.org
Subject: RE: GCPUD Responses to Ecology's July 19, 2013 Comments - Rocky Coulee Tent Camping Recreation Project Cover Letter 080713.doc

Darrell, this information will be included in the file record and provided to the hearing examiner. Igor has requested the staff report and I will provide that to him, Edrie and yourself no later than tomorrow as I need to get the staff report to our hearing examiner by 5pm tomorrow. It will also be available on the county website.

Regards,

Lindsey Ozbolt
Staff Planner

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From: Darrell Pock [mailto:Jpock@gcpud.org]
Sent: Wednesday, August 07, 2013 10:30 AM
To: Lindsey Ozbolt
Cc: Gwen Clear (GCLE461@ECY.WA.GOV)
Subject: GCPUD Responses to Ecology's July 19, 2013 Comments - Rocky Coulee Tent Camping Recreation Project Cover Letter 080713.doc

Ms. Ozbolt: Per your email to me on July 19, 2013 Grant PUD has prepared responses to Ecology's comments on the Rocky Coulee Tent Camping project. Please see the attached document.

If you or Ecology have additional comments or concerns related to this project please feel free to contact me.

Thank you

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