



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 West Alder Street • Union Gap, Washington 98903-0009 • (509) 575-2490

March 15, 2021

Kelly Bacon
Kittitas County Community Development
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

Re: SEPA Register 202101042, CU-20-00006

Dear Kelly Bacon:

Thank you for the opportunity to comment on the Pre-Threshold Consultation for the establishment of the Swiftwater Storage 12 mini warehouse facilities, 3 carport style roof-over-concrete structures, uncovered boat and RV storage and a single family residence, proposed WLC Property Holdings, LLC. The Department of Ecology (Ecology) has reviewed the environmental checklist and has the following comments.

SHORELANDS/ENVIRONMENTAL ASSISTANCE

Upon reviewing the October 12, 2020, Critical Area Report for Parcel 15445, conducted by Sewall Wetland Consulting, Inc. Ecology staff would like to request a joint site visit with County to verify the wetland boundary. The delineated wetland boundary was not provided within the critical area report. It is unclear where the boundary of the wetland is proposed. Ecology recommends the County request a detailed map demonstrating the wetland boundaries prior to conducting a joint site visit.

Ecology staff concur a Category II wetland with a Habitat Score of 8 or greater requires a largest buffer width, the County can offer at 100 feet. However, the statement the buffer could “possibly reduced below 100’ with enhancement plantings”, is incorrect.

Ecology’s interagency guidance document, Wetland Mitigation in Washington Part 1, outlines the use of buffer averaging and recommended buffer widths. In addition, both can also be found in the Eastern WA CAO Guidance document (publication 16-06-002). These documents demonstrate that the buffer is assumed to be appropriately vegetated with native species and if it is sparsely vegetated, mowed/maintained, or vegetated with non-native, invasive species, it is to be planted prior to a conversion in landuse. Therefore the use of enhancement planting in buffer as mitigation is not acceptable.

The buffer width should be vegetated prior to construction. As there is a change in landuse the buffer must be planted. Without a planted buffer the storage unit should be located even further away from the wetland. Planting the buffer will reduce noise, dust and other pollutants from entering the wetland, and provide structure adjacent to the wetland.

Mitigation sequencing must be used to avoid and minimize impacts to wetland habitat to the greatest extent possible.

In the event impacts to wetlands and wetland buffers are unavoidable, a compensatory mitigation and monitoring plan must be submitted to the City for review and consideration, per their Critical Area Code.

Discharges into Waters of the State are regulated by the State under the Water Pollution Control Act, RCW 90.48 and Section 401 of the Clean Water Act and could require Ecology's review and authorization.

Placement of fill in wetlands may require an individual or general (nationwide) permit from the U.S. Army of Corps of Engineers (Corps). We advise the applicant to contact the Corps to determine if a permit is needed.

Ecology recommends the County request a copy of the proposed wetland boundary lines, set up a time for a joint site visit this spring, and request a buffer planting plan for those area located within the buffer that will not be impacted, and a mitigation plan for those area within the buffer that will be impacted. We look forward to continuing to work with the County in the protection of their critical areas and implementation of their wetland codes. Please contact **Lori White**, at (509) 575-2616 or lori.white@ecy.wa.gov, should you have any questions regarding the above comments.

WATER QUALITY

Project with Potential to Discharge Off-Site

If the project anticipates disturbing ground with the potential for stormwater discharge off-site, the NPDES Construction Stormwater General Permit is recommended. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days.

The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.

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In the event that an unpermitted Stormwater discharge does occur off-site, it is a violation of Chapter 90.48 RCW, Water Pollution Control and is subject to enforcement action.

More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/>. Please submit an application or contact **Wendy Neet** at the Dept. of Ecology, 509-454-7277, with questions about this permit.

Sincerely,



Gwen Clear
Environmental Review Coordinator
Central Regional Office
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