



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 2, 2019

Chelsea Benner
Kittitas County Community Development Services
411 N. Ruby St., #4
Ellensburg, WA 98926

RE: Comments for Vantage PUD Shoreline Substantial Development Permit

Dear Chelsea Benner:

Thank you for providing the Department of Ecology (Ecology) the opportunity to review the revised critical area report and supplemental information for the Vantage Bay PUD Substantial Development Permit application.

The current SEPA review is being conducted due to a request for a Shoreline Substantial Development Permit. Per coordination with Kittitas County, the application materials are being processed and reviewed under the current Shoreline Master Program (SMP) and its permit requirements.

Wetlands located within the shoreline jurisdiction are subject to regulation under the County's SMP, as well as their buffers. Wetlands associated with the shoreline, but are located outside the shoreline jurisdiction, are subject to the County's SMP; however, their buffers may be regulated under the County's Critical Area Code. The wetlands of interest are located within the County's shoreline jurisdiction and therefore the wetlands and their buffer habitat are subject to the SMP's regulatory authority.

Per Kittitas County's 2016 adopted Shoreline Master Program (SMP), Section 5.2(H)(1), "Reporting requirement: if a proposed use or development is located within three hundred (300) feet of a known or suspected wetland, a wetland critical areas report is required, and shall include the following:

- a. The category and precise location of the boundary of the wetland(s); and
- b. All wetlands and required buffers within three hundred (300) feet of the project area shall be depicted on the site plan. Best available information should include, but not be limited to, aerial photos, soil maps, and/or topographic maps; and
- c. An analysis of the onsite wetland(s) including the following site-and proposal- related information:



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- i. Documentation of the any fieldwork performed on the site, including, but not limited to, field delineations data sheets for delineations, the wetland rating forms, and baseline hydrologic data;
- ii. A description of the methodologies use to conduct the wetland delineations; and
- iii. The vegetative, faunal, and hydrologic characteristics of the wetland.”

According to the recent submission, the project is located within 126 feet of the wetland boundary. The revised critical area report did not provide wetland boundaries, wetland delineation data sheets, nor wetland rating forms for review and verification. Within the report, the wetland is listed as either a category II or III wetland. The report stated the wetland “was not officially rated or delineated during 2017 using the Washington State Wetland Rating System for Eastern Washington 2014 Update.” According to the Approval Ordinance from 2006, the wetland was rated as a category II wetland. The category of wetland habitat within or adjacent to the project site should be rated in order to determine the appropriate County regulated buffer width.

Plan sheets show an 80’ wide buffer surrounding the potential category II or III wetland. Per the Approval Ordinance from 2006, a *minimum* 80’ wide buffer is to be maintained from wetlands. According to Section 5.2(G), Table 5.2-1, Wetland Buffers for Wetlands in Shoreline Jurisdiction, wetland buffers for category III wetlands surrounded by high intensity use and development are to have a minimum of 150 feet wide buffer (200 feet for category II).

As the project is currently proposed, wetland buffer impacts are likely. With the information provided and the requirements of the County’s SMP, the County should request a new wetland delineation and rating be conducted for the project site.

Ecology looks forward to providing the County with technical assistance and expertise in the future. If you have any questions or would like to discuss my comments, please give me a call at (509) 575-2616.

Sincerely,



Lori White
Wetland/Shoreline/Federal Permit Specialist

cc: Chelsea Benner, Kittitas County
Gwen Clear, Ecology
Scott Downes, WDFW