

## Sewall Wetland Consulting, Inc.

PO Box 880  
Fall City, WA 98024

Phone: 253-859-0515

July 15, 2025

Lynne Thomas  
808 East 6<sup>th</sup> Avenue  
Ellensburg, Washington 98926

RE: Critical Areas Report & Reasonable Use Justification  
Parcel 186635  
Kittitas County, Washington  
SWC Job #24-117

Dear Lynne,

This report describes our observations and delineation of any jurisdictional wetlands or streams on Parcel #448135, located at 4421 Kachess Lake Road in the Easton area of unincorporated Kittitas County, Washington (the "site").



*Above: Vicinity map of the site.*

The site consists of a 3.01 acre rectangular shaped parcel located within Section 7, Township 21 North, Range 13 East of the W.M.



*Above: Kittitas County Taxsifter aerial image of the site.*

## **METHODOLOGY**

Ed Sewall of Sewall Wetland Consulting, Inc. inspected the site in April of 2024. The site was reviewed using methodology described in the ***Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0)*** (USACOE September 2008) as required by the US Army Corps of Engineers starting in June of 2009. This is the methodology currently recognized by Kittitas County for wetland determinations and delineations. The site was also reviewed using methodology described in Soil colors were identified using the 1990 Edited and Revised Edition of the ***Munsell Soil Color Charts*** (Kollmorgen Instruments Corp. 1990).

Wetlands in Kittitas County are rated using the 2014 Washington State Department of Ecology Washington State *Wetland Rating System for Eastern Washington, 2014 Update* dated June 2014 Publication No. 14-06-018.

## **OBSERVATIONS**

### *Existing Site Documentation.*

Prior to visiting the site, a review of several natural resource inventory maps was conducted. Resources reviewed included the Kittitas Taxsifter website, National Wetland Inventory Map, WDNR Fpars Stream Typing Map, Kittitas County flood & critical areas mapping, WDFW Priority Habitats and Species Maps, and the NRCS Soil Survey online mapping and Data.

### **Kittitas Taxsifter Website**

The Kittitas Taxsifter website with streams and wetland layers activated depicts a linear emergent wetland as well as a Type F stream north of the site. This layer is taken from the NWI map which has had no ground verification.



*Above: Kittitas County TaxsiFTER with wetland and stream layers activated.*

### **National Wetlands Inventory (NWI)**

The NWI map depicts a stream north of the site. These areas were interpreted from aerial photographs by the US Fish and Wildlife Service using 2017 aerial photographs with no ground-truthing.



*Above: NWI map of the area of the site*

### **Soil Survey**

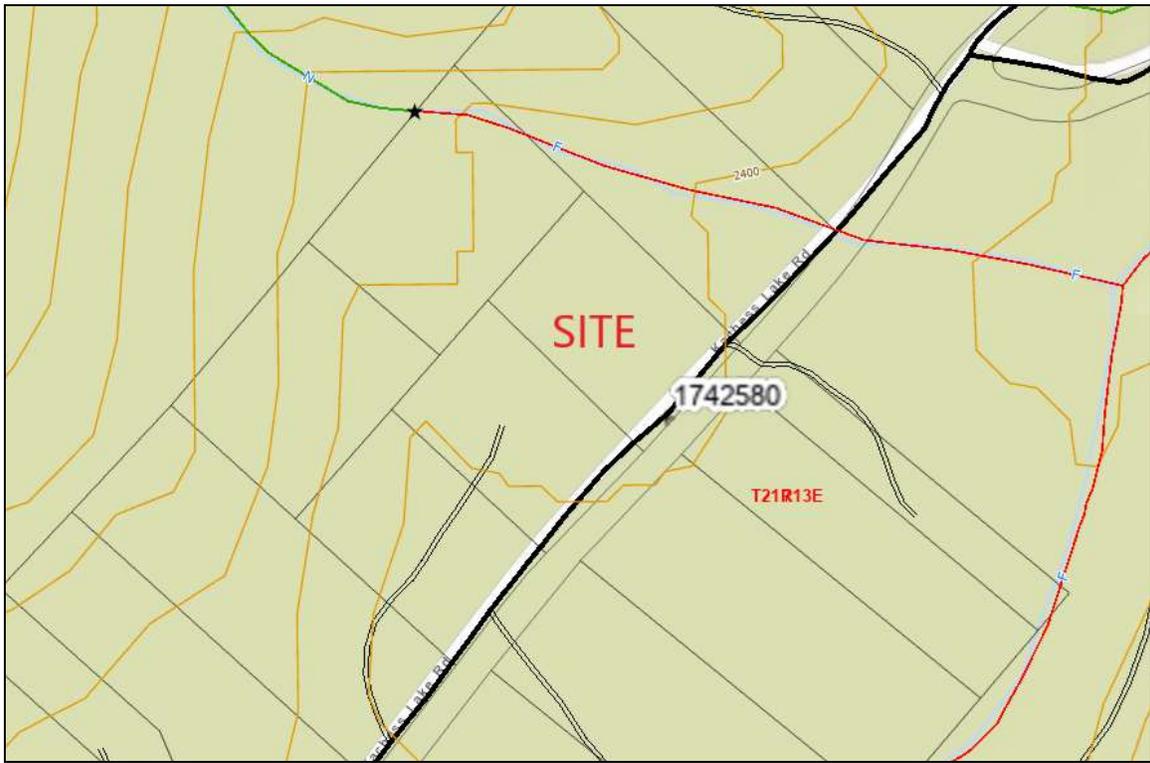
According to the NRCS Soil Mapper website, the site is mapped as containing well-drained Kachess gravelly loam soils. The Kachess series consists of very deep, well drained soils formed in ablation glacial till over glacialfluvial deposits and an admixture of volcanic ash. Kachess soils are on glacial valley floors and toeslopes. Slopes are 5 to 25 percent. Kachess soils are not considered "hydric" or wetland soils according to the publication Hydric Soils of the United States (USDA NTCHS Pub No.1491, 1991).



*Above: NRCS soil map of the site.*

**WADNR FPARS website**

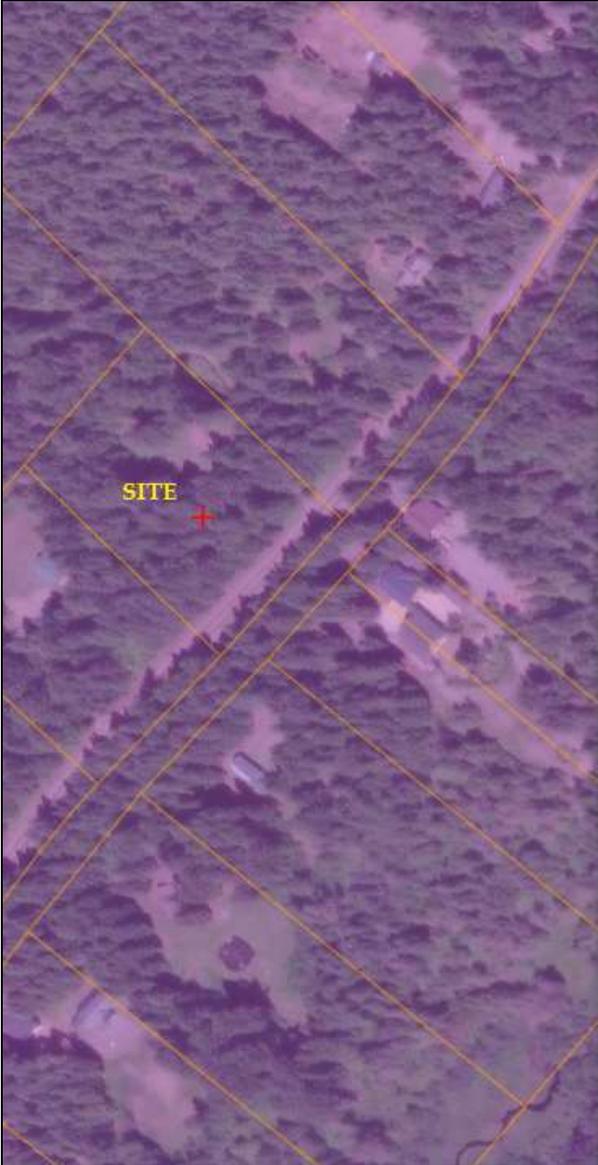
According to the WADNR FPARS website with stream types layers activated there is a Type F (fish bearing) stream mapped on the west side of the site.



*Above: WDNR Fpars Stream Mapping of the area of the site.*

### **WDFW Priority Habitats Maps**

According to the WDFW Priority Habitat Website with Public access layers activated, the site is located within the Township in which the northern spotted owl and wolverine, both federally listed, are known to exist.



PHS Identify	
SGCN	N
Display Resolution	AS MAPPED
Management Recommendations	<a href="#">Click for more info.</a>
Geometry Type	Polygons

Occurrence Name	Northern Spotted Owl
Scientific Name	<i>Strix occidentalis</i>
Notes	This polygon mask represents one or more records of the above species or habitat occurrence. Contact PHS Data Release at <a href="mailto:phsproducts@dfw.wa.gov">phsproducts@dfw.wa.gov</a> for obtaining information about masked sensitive species and habitats.
Federal Status	Threatened
State Status	Endangered
PHS Listing Status	PHS Listed Occurrence
Sensitive	Y
SGCN	Y
Display Resolution	TOWNSHIP
Management Recommendations	<a href="#">Click for more info.</a>

Occurrence Name	Wolverine
Scientific Name	<i>Gulo gulo</i>
Notes	This polygon mask represents one or more records of the above species or habitat occurrence. Contact PHS Data Release at <a href="mailto:phsproducts@dfw.wa.gov">phsproducts@dfw.wa.gov</a> for obtaining information about masked sensitive species and habitats.

Above: WDFW Priority Habitats Map of the site.

**Field observations**

The site is a roughly rectangular parcel bordered by Kachess Lake Road on the southeast, a single-family residence to the south, and undeveloped parcels to the west and north. A gravel driveway enters the site from Kachess Lake Road and accesses an existing clearing on the site which contains an existing potable water well. The remainder of the site is vegetated with third growth confers including douglas fir, western

red cedar and mountain hemlock. Understory species include vine maple, elderberry, mountain huckleberry and sword fern.

Soils on the site are a gravelly loam with soil colors of 10YR 3/3 with no hydric indicators.

No areas meeting wetland criteria were found on or within 300' of the site.

### ***Critical Areas***

#### **Type F Stream**

As previously described, a stream is located on the northern side of the site. The south ordinary high water mark (OHWM) of the Type F stream was flagged with blue flags labeled S1-S15 (gps points 491-505).

The Type F stream consists of boulder, cobble and gravel bottomed channel with well-defined and eroded banks. Although no fish were observed within the channel, the channel meets the criteria for presumed fish use being below a 16% gradient and greater than 3' in width. The stream has also been confirmed as a Type F stream by WDFW.

According to Table 17A.04.030-4 of the Kittitas County Municipal Code, Type F waters within the "Cascade Ecoregion" have a 150' buffer (RMZ) measured from the OHWM.



*Above: Mapping of the south OHWM (blue line) of the Type F stream and its associated 150' buffer (yellow line) on the site. The existing clearing is defined by gps points 506-521 (points 511 & 512 are errors).*

**4. Standard Riparian Management Zones for Waters of the State.**

Table 17A.04.030-4 Standard RMZ Widths  
 Kittitas County Nonshoreline Rivers, Streams, Lakes and Ponds  
 (does not include building setback [KCC 17A.01.090.5])

Stream Type	Riparian Management Zone Widths <sup>1,2</sup>	
	Cascade Ecoregion (feet)	Columbia Plateau Ecoregion (feet)
Type S (Shoreline)	See the SMP	See the SMP
Type F	150	100
Type Np	100	65
Type Ns	50	40

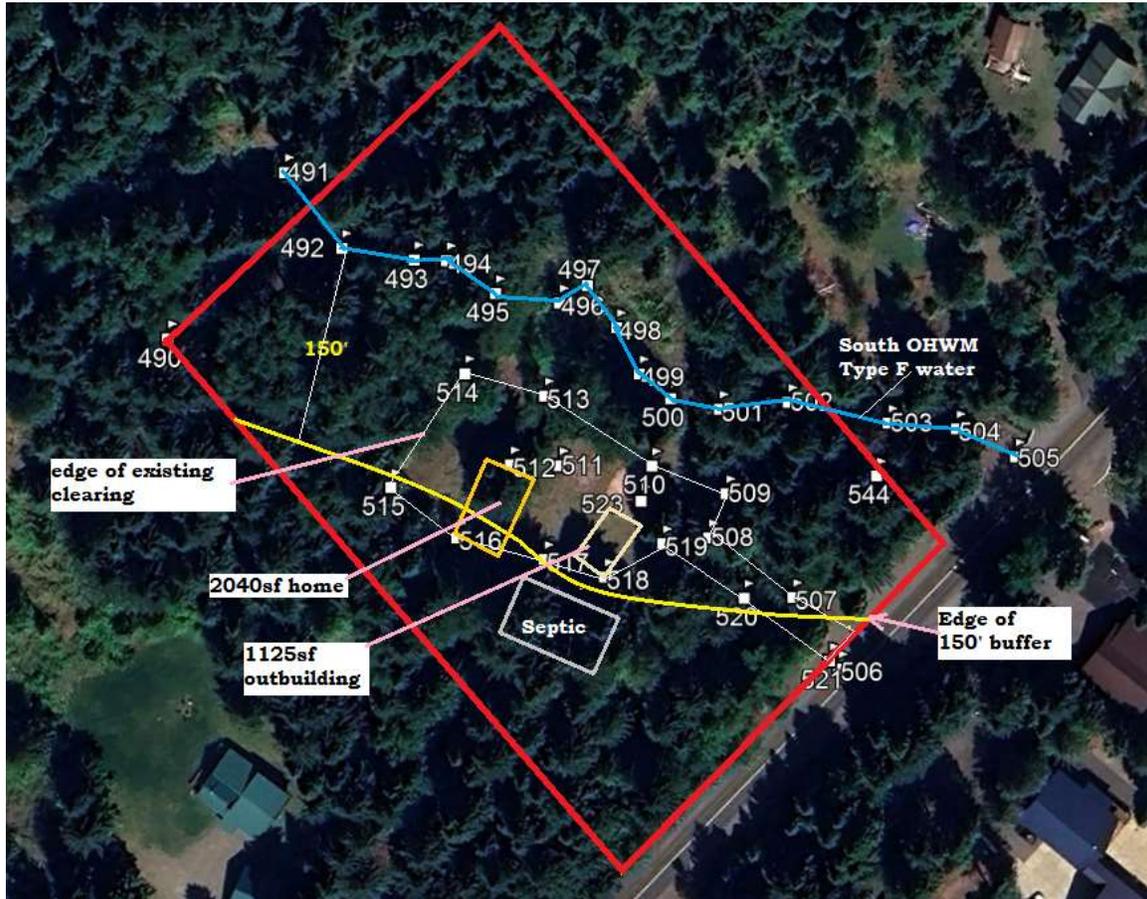
**Proposed Project**

The proposed project is the construction of a single-family home with associated on-site septic system. Given the extent of the 150’ buffer on the site it is not possible to avoid impacting the buffer. The proposed impact area is within an existing clearing which performs little if any buffer functions.

The total footprint of the new structures in the buffer is 2,485sf (*1,125sf for outbuilding and 1,360sf of home*). With the addition of the 15’ BSBL around the structures in the buffer, the total impact area is 8,841sf of stream buffer.

These proposed improvements are in the buffer but entirely within the low function existing clearing. Using the clearing eliminates the need to remove large amounts of forested area on the site and within the buffer so it is the best option for location of the structures. There is no area on the site to accommodate buffer averaging within the 75% minimum buffer and avoid the septic system, well setback and road and sideyard setbacks. As a result, the use of KCMC 17A.04.030.6 which provides the criteria to do buffer averaging for impacts to the buffer/RMZ of the stream is not feasible.

The best way any improvements on this property can occur and use the existing cleared area to avoid further buffer impact is the use of Reasonable Use Exception, as described in KCMC 17A.01.060.



Above: Proposed site plan

This portion of the code states;

*17A.01.060 Exceptions*

*2. Reasonable Use. If the application of this Title would deny all reasonable economic use of the subject property, the County shall determine if the property owner may apply for an exception pursuant to the following:*

*a. Exception Request and Review Process. An application for a reasonable use exception shall be made to the County and shall include a critical areas report, as described in KCC 17A.01.080, including mitigation plan, if*

*necessary; and any other related project documents, such as permit applications to other agencies, special studies, and environmental documents prepared pursuant to the State Environmental Policy Act (Chapter 43.21C RCW and rules thereunder in Chapter 197-11 WAC).*

*The application shall follow the administrative project permit review process outlined in KCC 15A.03. In determining what is considered reasonable use of an undeveloped parcel, the Director may consider additional information such as zoning, and comparable structure sizes and land uses of the surrounding area.*

*b. Director Review. The Director shall approve, approve with conditions, or deny the request based on the proposal's ability to comply with all the reasonable use exception criteria in Subsection 2(c).*

The following describes the criteria for the Reasonable Use review;

*c. Reasonable Use Review Criteria. Criteria for review and approval of reasonable use exceptions include:*

*i. The application of this Title would deny all reasonable economic use of the property;*

Response: The parcel is zoned for a single-family home and given the extent of the 150' stream buffer, there is no reasonable way to build a home on the site without impacts to the buffer.

To not allow the construction of a home on the parcel, as well as a septic system would deny the legal reasonable economic use of the property.

*ii. No other reasonable economic use of the property has less impact on the critical area and its buffer;*

Response: There is no other use of this parcel other than for a single family home with less impact on the stream buffer than is proposed on the existing attached site plan.

*iii. The proposed impact to the critical area is the minimum necessary to allow for reasonable economic use of the property;*

Response: The proposed 2,040sf single family home is typical in size of that in the area.

*iv. The inability of the applicant to derive reasonable economic use of the property is not the result of actions by the applicant after the effective date of this Title;*

Response: The existing parcel existed prior to the enactment of the stream buffers which now require this reasonable use, which went into effect in December of 2021. This parcel existed prior to the effective date of this Title and is not a result of any action taken by the owner of this parcel.

*v. The proposal does not pose an unreasonable threat to the public health, safety, or welfare on or off the development proposal site;*

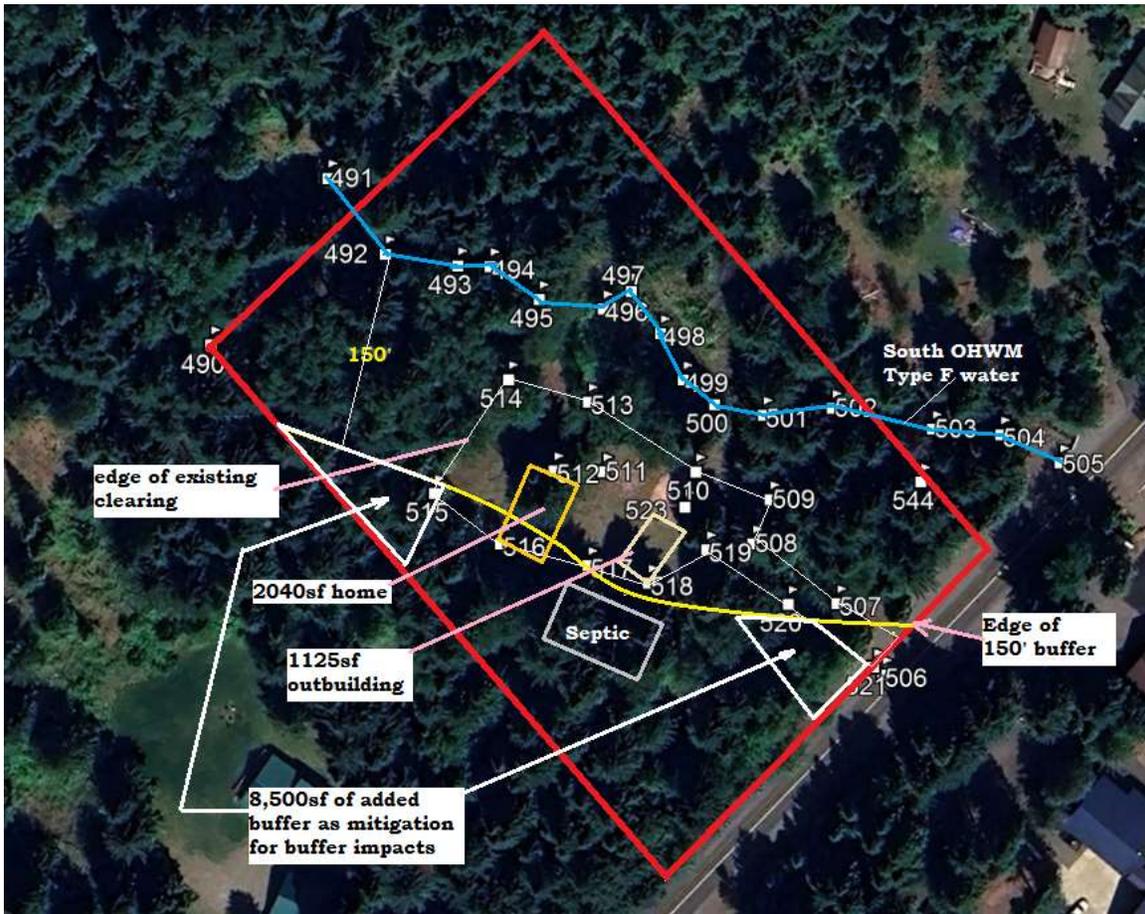
Response: The proposed single-family home does not pose any threat to public health, safety or welfare on or off the site.

*vi. The proposal will result in no net loss of critical area functions and values consistent with the best available science;*

Response: The proposed cumulative impacts from the garage and its associated 15' BSBL totals of 8,481sf of existing buffer. The majority of this impact is within existing cleared buffer with little buffer function.

To compensate for the 8,481sf of permanent impact to the buffer from the homes and road, 8,500sf of buffer area will be added to the existing buffer on the southern portion of the site. Although the proposed site plan would not meet the criteria under buffer averaging, we are proposing averaging of the buffer outside those Code limitations as a form of mitigation.

The proposed buffer enhancement will result in no net loss of buffer function to the stream, will increase tree cover to the Type F stream, and utilizes best available science.



Above: Proposed site plan with added buffer as mitigation for buffer impacts.

vii. The proposal is consistent with other application regulations and standards.

Response: The proposal is consistent with other applicable regulations and standards.

If you have any questions in regards to this report or need additional information, please feel free to contact me at (253) 859-0515 or at [esewall@sewallwc.com](mailto:esewall@sewallwc.com) .

Sincerely,  
*Sewall Wetland Consulting, Inc.*

A handwritten signature in black ink on a light-colored rectangular background. The signature is cursive and appears to read "Ed Sewall".

Ed Sewall  
Senior Wetlands Ecologist PWS #212

## **REFERENCES**

Cowardin, L., V. Carter, F. Golet, and E. LaRoe. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Fish and Wildlife Service, FWS/OBS-79-31, Washington, D. C.

Environmental Laboratory. 1987. Corps of Engineers Wetlands Delineation Manual, Technical Report Y-87-1. U. S. Army Corps of Engineers Waterways Experiment Station, Vicksburg, Mississippi.

Kittitas County Municipal Code Title 17A

Muller-Dombois, D. and H. Ellenberg. 1974. Aims and Methods of Vegetation Ecology. John Wiley & Sons, Inc. New York, New York.

Munsell Color. 1988. Munsell Soil Color Charts. Kollmorgen Instruments Corp., Baltimore, Maryland.

National Technical Committee for Hydric Soils. 1991. Hydric Soils of the United States. USDA Misc. Publ. No. 1491.

Reed, P., Jr. 1988. National List of Plant Species that Occur in Wetlands: Northwest (Region 9). 1988. U. S. Fish and Wildlife Service, Inland Freshwater Ecology Section, St. Petersburg, Florida.

Reed, P.B. Jr. 1993. 1993 Supplement to the list of plant species that occur in wetlands: Northwest (Region 9). USFWS supplement to Biol. Rpt. 88(26.9) May 1988.

USDA NRCS & National Technical Committee for Hydric Soils, September 1995. Field Indicators of Hydric Soils in the United States - Version 2.1