



Zach Torrance-Smith
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Re: *Phenning Plat (SE-25-00009)*

June 2, 2025

Dear Mr. Torrance-Smith,

This letter is in response to the Notice of Application received on May 19, 2025. I am a resident of parcel #054734, located directly southeast of parcel #12392. I am writing to express my concerns regarding the potential environmental impacts of the proposed development.

As part of my review, I have reviewed the SEPA Environmental Checklist dated May 7, 2025, prepared by Tyler Glahn of Crytyl Enterprises, Inc. ("SEPA"), and the Critical Area Report prepared by Ed Sewall of Sewall Wetland Consulting, Inc., dated May 7, 2025 ("Report"). However, I was unable to locate a complete site plan for the proposed development, which is required under City of Ellensburg Municipal Code 15.610.090.C.2. The attachment included in the Report appears to be only a partial copy of the proposed site plan.

According to the City of Ellensburg Municipal Code 15.600.010.D.3 & .5, the purpose of limiting development in critical areas is to:

- "Maintain healthy, functioning ecosystems through the protection of unique, fragile, and valuable elements of the environment, including ground and surface waters, wetlands, and fish and wildlife and their habitats," and to
- "Prevent cumulative adverse environmental impacts to water quality, wetlands, and fish and wildlife habitat, and the overall net loss of wetlands, frequently flooded areas, and habitat conservation areas."

The Report (p. 9) identifies a riverine wetland on parcel ##12390 and 12392 as a "Category III wetland." It states (p. 12) that "All work is to the west of the wetland and stream on the site," and that "No impacts to the wetland or stream are proposed." Meanwhile, the SEPA (p. 6) states that the "natural habitat will remain undistributed" and (p. 5) that "no work will be within 200 feet of the creek during development of the 40 lot plat." However, the Report (p. 9) notes that per City of Ellensburg Municipal Code 15.620.030.10.c, a 130-foot buffer is required unless all components of Table 15.620.030.E.2 are implemented, in which case a 90-foot buffer may be used. Additionally, the Report (p. 13) indicates that buffer averaging is proposed, reducing the buffer to a minimum width of 67.5 feet (75% of the standard 90 feet), with mitigation measures intended to meet the required criteria. There also appears to be a discrepancy in the number of lots planned for the eastern portion of the development: SEPA (p. 11) references 10 lots, while the Report (p. 12) refers to 6 lots ("Lots 32, 33, 34, 35, 38 & 39").

I would appreciate clarification on both the proposed buffer width and the number of lots planned for the eastern side of the development.

Protecting the wetland buffer is vital to maintaining the wetland's ecological functions. Buffers serve as natural filters, mitigating pollutants and sediments, and providing critical habitat for wildlife. Besides "sparrows and various song birds," (SEPA p. 7), in the five years I have lived on parcel #054734, I have regularly observed diverse species in and around Lyle Creek and the wetland, including red-winged blackbirds, herons, frogs, raccoons, skunks, mallard ducks, muskrats, and garter snakes. According to the Report (pp. 11–12), Lyle Creek may also be fish-bearing. The wetland supports native vegetation like yellow iris and cattails, which play a key role in maintaining a healthy aquatic ecosystem.

If the project proceeds, I urge the City to ensure that the development does not encroach upon Lyle Creek, the wetland, or its buffer, and that the mitigation measures outlined in Table 15.620.030(E)(2) (Report p. 11) are fully implemented. These include essential protections such as directing lights away from the wetland, managing toxic runoff, and properly handling stormwater runoff. Although the Report (p. 12) states that "No impacts to the wetland or stream are proposed," I want to be certain that this commitment is upheld, especially as we rely on Lyle Creek for irrigation water on our property.

The City is actively working to improve water quality and habitat through initiatives such as the Gateway II Project along Vantage Highway. This project is designed to collect and treat stormwater runoff from the highway, reducing pollution entering Lyle Creek and enhancing ecological conditions in Lyle Creek, as well as downstream in Wilson Creek and the Yakima River. I sincerely hope the developer will show the same level of care and responsibility in protecting Lyle Creek and the surrounding wetland areas throughout this project.

Thank you for your attention and for the opportunity to contribute comments.

Sincerely,



AJ de Vries