



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 7, 2018

Lindsey Ozbolt
Planning Official
Kittitas County Community Development Services
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

RE: Comments for The Commons at Dry Creek Wetland Reconnaissance Report and Memo

Dear Ms. Ozbolt:

Thank you for sending a copy of the recent wetland reconnaissance, conducted on December 29, 2017 for The Commons at Dry Creek, to the Washington State Department of Ecology (Ecology) for review and comment and the February 23, 2018 memo.

The initial investigation used incorrect methodologies to determine wetland habitat was not present. Ecology previously recommended the County request a wetland delineation utilizing current wetland delineation methodologies (those conducted in accordance with the *US Army Corps of Engineers Wetland Delineation Manual, 1987*; *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, 2008*; and best available science) prior to further processing the proposed plat application for The Commons at Dry Creek development. Based on review of Land and Water Solutions, LLC report and memo, Ecology has the following comments:

Ecology provided comments for the Commons at Dry Creek's preliminary plat (Ecology SEPA 6503) to the County in a letter dated August 15, 2017. This letter provided detailed information regarding the use of incorrect methodologies to determine the presence or absence of wetland habitat on the parcel. Ecology recommended a wetland delineation be conducted using the correct methodologies within the above stated federal manuals. The absence of wetland habitat could not be verified due to the lack of data. Information provided in Land and Water Solutions, LLC's wetland reconnaissance report does not supplement the initial report as the necessary data is still lacking.

The recent wetland reconnaissance report states that in addition to the Federal manual, Land and Water Solutions, LLC has developed and implemented a wetland reconnaissance protocol for



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reviewing converted agricultural lands with irrigation influenced hydrology. The methodology used within this protocol needs to be stated within the report.

During the recent investigation six (6) priority evaluation sites (PES) were sampled using manually dug test holes, however it did not provide data sheets to support the findings nor a map showing test site locations. The follow-up memo states this information was not provided as it was a reconnaissance and there was not a need to conduct a routine wetland delineation. Ecology cannot verify the initial wetland report's findings nor these due to the lack of data and information. Soil, hydrology, and hydrophytic vegetation data collected using the current methodologies needs to be provided to support the absence of wetland habitat conclusion. A map locating the sample sites is needed due to the existing areas of interest identified in Ecology's letters dated August 15, 2018 and November 2, 2017.

The recent wetland reconnaissance was conducted in December 2017, which is outside the timeframe to establish the presence of hydrophytic vegetation and hydrology. Wetland delineations or investigations need to be conducted during the growing season, preferably within the wet part of the growing season.

Lastly, Ecology's letter dated November 2, 2017, addressed the need for a wetland investigation and rating of Currier Creek's riparian corridor due the observance of wetland vegetation. While this was addressed through the lack of admittance on the neighboring property, additional investigation of the riparian corridor is needed prior to platting and construction activities to determine potential buffer overlay onto the project site.

The wetland reconnaissance report does not contain sufficient information to determine wetland habitat is not present on the Jackson property. Ecology recommends the County request a complete wetland delineation report using current wetland delineation methodologies prior to further processing the preliminary plat application.

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 call me at (509) 575-2616.

Sincerely,



Lori White
Wetland/Shoreline/Federal Permit Specialist

cc: Lindsey Ozbolt, Kittitas County
Jennifer Nelson, Washington Department of Fish and Wildlife