



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

August 15, 2017

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

RE: Ecology SEPA 6503 Comments for The Commons at Dry Creek preliminary plat

Dear Mr. Pilkington:

Thank you for sending a copy of the application for the proposed preliminary plat, The Commons at Dry Creek, to the Washington State Department of Ecology (Ecology) for review and comment.

Ecology staff electronically received the following documents for review:

- *The Commons at Dry Creek preliminary plat* by MDJ Contractors LLC, dated July 14, 2017
- *The Commons at Dry Creek Project Narrative* by MDJ Contractors LLC, dated stamped received by Kittitas County CDS on July 21, 2017
- A July 29, 2014, *Wetland Inventory Report for Jackson (1910 Dry Creek Road, Ellensburg, WA)*, prepared by Lee Boad of The Wetland Corps.

Based on the information you provided, we offer the following comments.

The Wetland Inventory for the Jackson property utilized incorrect methodology for evaluating the subject property in determining whether or not wetlands are present on or adjacent to the area proposed for development. The Washington State Wetlands Identification and Delineation Manual (1997) is no longer the accepted manual to follow. Wetland delineations and determinations at the Jackson property should be completed in accordance with procedures outlined in the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0)* (USACOE, 2008).

Based on review of The Wetland Corps data collected onsite, Ecology has the following comments regarding the methodology employed to evaluate the presence of wetlands on the Jackson property.



1. The area was surveyed during late July when conditions are dry with little rainfall. Plant communities can shift seasonally and wetland habitat can be difficult to detect in the Arid West Region due to the lack of precipitation and extreme heat during the summer months.
2. A single datasheet was prepared for all four plots investigated. Each plot must have a separate data sheet to show the characteristics found at each location investigated on the property. Combining test plots on a data sheet is not standard practice and does not follow agency guidance or methodology for collecting data.
3. Test holes were dug using an excavator. This method reduces many details of the soil profile that are necessary to correctly identify soil characteristics.
4. The Arid West Data sheet was not utilized for collecting data, resulting in incomplete collection of necessary data to make a wetland determination. The most current National Wetland Plant List for Washington, at the time of data collection, was not applied. Within the Arid West Region Supplement, five types of wetland status indicators are used. The plus (+) and minus (-) modifiers are no longer applicable. The horsetail (*Equisetum*) species should be identified to species in order to apply the proper indicator status.
5. An existing swale is mentioned within the Wetland Inventory, however it is not identified on the maps provided, nor is it clear if a data point was taken within the existing feature. The topographic feature should be evaluated further for wetland conditions.

The Wetland Inventory references the *Washington State Wetland Rating System for Eastern Washington* (Hruby, 2004). The 2004 publication has been replaced with the *Washington State Wetland Rating System for Eastern Washington: 2014 Update* (Publication #14-06-030). Classification must follow the current wetland rating publication.

Dry Creek is in close proximity to the Jackson property; therefore, the ordinary high water mark, stream classification and regulated buffer setback need to be identified. Any regulated buffer overlap on The Commons at Dry Creek should be identified and shown on plan sheets.

Ecology is unable to perform substantive technical assistance review and cannot confirm the findings of The Commons at Dry Creek documents received, as the wetland review by The Wetland Corps was not conducted in accordance to the prescriptive manual for wetland delineations and determinations. According to the National Wetlands Inventory (NWI) data, the majority of the parcel consists of an emergent wetland. Additionally, current and historic aerial photography review suggests there are vegetation changes indicative of potential wetlands

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scattered throughout the Jackson property. Ecology recommends the County request the applicant provide a wetland delineation report of the Jackson property utilizing current wetland delineation methodologies prior to further processing of The Commons at Dry Creek preliminary plat application. Attached to this letter are two guidance documents that outline components of a complete wetland delineation report. We recommend providing a copy of these documents to the applicant for reference.

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

Attachments: as noted

ec: Dusty Pilkington, Kittitas County
Gwen Clear, Ecology

References Cited

Hruby, T. 2014. Washington State Wetland Rating System for Eastern Washington: 2014 Update. Washington State Department of Ecology Publication #14-06-030.

U.S. Army Corps of Engineers. 2008. Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0), ed. J.S. Wakeley, R.W. Lichvar, and C.V. Noble, ERDC/EL TR-08-28. Vicksburg, MS: U.S. Army Engineer Research and Development Center.