



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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APR 27 2016

KITTITAS COUNTY  
CDS

April 22, 2016

Robert "Doc" Hansen  
Kittitas County Community Development Services  
411 N Ruby Street, Suite 2  
Ellensburg, WA 98926

Re: P-07-31

Dear Mr. Hansen:

Thank you for the opportunity to comment during the optional determination of nonsignificance process for the Palomino Fields preliminary subdivision revision, proposed by Cle Elum Pines East, LLC. We have reviewed the documents and have the following comments.

#### **SHORELANDS/ENVIRONMENTAL ASSISTANCE**

There is no description in the provided documents as to what work will be done in each planned phase and how elements of the original MDNS with its requirements to comply with critical areas protection will be carried forward into the development agreement phases. This information should be made available for public review. No new construction should occur without the environmental reports being completed and made available for review.

Locations of critical areas, including floodplain and floodway location, location of wetlands, and depth to groundwater may have changed since original approval in 2008 due to up-gradient and offsite activities. All these critical elements and any previously submitted reports should be updated and made available for public review and comment as part of this action.

Both state and federal agencies require new or updated wetland reports for those reports that are older than 5 years. If previously submitted information indicates that there were no wetlands on site, then a new wetland delineation and rating report should be required. It is highly likely that with one stream on site and one just adjacent to the property, and up-gradient regional application of irrigation waters that there would be areas that would meet wetland criteria.

Ecology considers housing densities of greater than one house per one acre to be "high density" with respect to the size of buffer required to protect wetland resources. Ecology recommends that required buffers be outside of private lot lines, and put into permanent "open space" designation in a separate common area.



Mr. Hansen  
April 22, 2016  
Page 2

It is very important that the current and potential flood regime of the site be accurately understood, using data that is recent. Adjacent properties with similar planned urban housing densities are already experiencing problems dealing with stormwater run-off. Stormwater facilities should be designed at a minimum to be consistent with the Eastern Washington Stormwater Manual (EWSM). ~~The EWSM in chapter 2 provides guidance on when and how existing site wetlands may or may not be used for stormwater storage, and chapter 5 describes how constructed wetlands can be used for detention and stormwater treatment.~~

If you have any questions or would like to respond to these Shorelands/Environmental Assistance comments, please contact **Catherine Reed** at (509) 575-2616 or email at [catherine.reed@ecy.wa.gov](mailto:catherine.reed@ecy.wa.gov).

Sincerely,



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