STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

October 28, 2013

Jeff Watson
Kittitas County Community Development
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

Re: LP-12-00001

Dear Mr. Watson:

Thank you for the opportunity to comment during the optional determination of nonsignificance process for the Reecer Ranch subdivision of 192.16 acres into 34 lots, proposed by Teanaway Ridge, LLC. We have reviewed the documents and have the following comments.

SHORELANDS/ENVIRONMENTAL ASSISTANCE

A wetland delineation should be completed for the entire site before action is taken on this application. Because the site has been farmed, the delineation will need to be based primarily on hydrologic and soil characteristics. NWI maps are based on aerial photo interpretation (many maps are more than 35 years old), and while they provide some information about the extent of site wetlands, many wetland areas are successfully farmed, so the wetlands on this property may be much more extensive than what is being depicted on the critical areas map. Given that Reecer Creek flows through the middle of the property, it is possible that low spots in old creek channel scars (as Reecer Creek has wandered around on this alluvial plain over time) would be considered wetland areas. Ecology GIS maps show brown areas where crops have not grown well. It is not clear whether these are high or low spots.

If wetlands are present and will be impacted (by filling, loss of buffer area, changes in hydrologic regime, etc.); then impacts must be mitigated. Farmed wetlands still have functional values that must be replaced, especially as they relate to floodplain storage function and water quality improvement.

Reecer Creek has historically moved around on this alluvial floodplain. Any residential areas on this alluvial fan are subject to flooding in a similar manner as those residential areas already established on the Manastash fan. Perhaps a reduction in lot size and clustering them all together

in a less vulnerable spot (if there is one) on this parcel would make better sense with respect to County risk management and future flood control needs.

Ecology wetland technical staff would be happy to make a site visit with the County and or applicant to look at potential farmed wetland areas to determine whether wetlands are present.

If you have any questions or would like to respond to these Shorelands/Environmental Assistance comments, please contact **Catherine Reed** at (509) 575-2616.

WATER QUALITY

Project with Potential to Discharge Off-Site
The NPDES Construction Stormwater General Permit from the Washington State Department of Ecology is required if there is a potential for stormwater discharge from a construction site with disturbed ground. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit is a minimum of a 38 day process and may take up to 60 days if the original SEPA does not disclose all proposed activities.

The permit requires that Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) is prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water (this includes storm drains) by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading or construction.

More information on the stormwater program may be found on Ecology's stormwater website at: http://www.ecy.wa.gov/programs/wq/stormwater/construction/. Please submit an application or contact **Chris Coffin** at the Department of Ecology, (509) 575-2821, with questions about this permit.

Sincerely,

Gwen Clear

Gwen Clear
Environmental Review Coordinator
Central Regional Office
(509) 575-2012

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