



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 W Alder St • Union Gap, WA 98903-0009 • (509) 575-2490

November 25, 2019

Chelsea Benner
Kittitas County Community Development
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

Re: SV-19-00001, SE-19-00011

Dear Chelsea Benner:

Thank you for the opportunity to comment during the optional determination of nonsignificance process for the construction of the Thayer Bridge. We have reviewed the documents and have the following comments.

WATER QUALITY

Manastash Creek is a protected waterbody. The portion of Manastash Creek immediately to the east of the Thayer's property (where most of the road work will occur) is included in Washington State's list of impaired waters, with documented summer water temperatures above Washington State water quality standards. Therefore, any work associated with the proposed project should maintain as much of the existing stream-shading vegetation as possible.

Additionally, Manastash Creek and the West Side Canal are both included in the Upper Yakima River Basin Suspended Sediment, Turbidity, and Organochlorine Pesticide Total Maximum Daily Load (TMDL) water quality improvement program. This TMDL program requires that any discharges to the creek should not increase levels of suspended sediment or turbidity in the creek. Project planning and construction, and all future use of the site, will need to include water quality protection.

The SEPA checklist does not state when the project will be completed. It will be preferable to replace the bridge over West Side Canal outside of the irrigation season, to avoid as much sediment pollution as possible.

Please contact **Jane Creech** at 509-454-7860 or email at jton461@ecy.wa.gov if you have any questions or concerns about the TMDL program or impaired water body listings.

Project with Potential to Discharge Off-Site

If the project anticipates disturbing ground with the potential for stormwater discharge off-site, the NPDES Construction Stormwater General Permit is recommended. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days.



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

In the event that an unpermitted Stormwater discharge does occur off-site, it is a violation of Chapter 90.48 RCW, Water Pollution Control and is subject to enforcement action.

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 **Lloyd Stevens, Jr.** at the Dept. of Ecology, 509-574-3991, with questions about this permit.

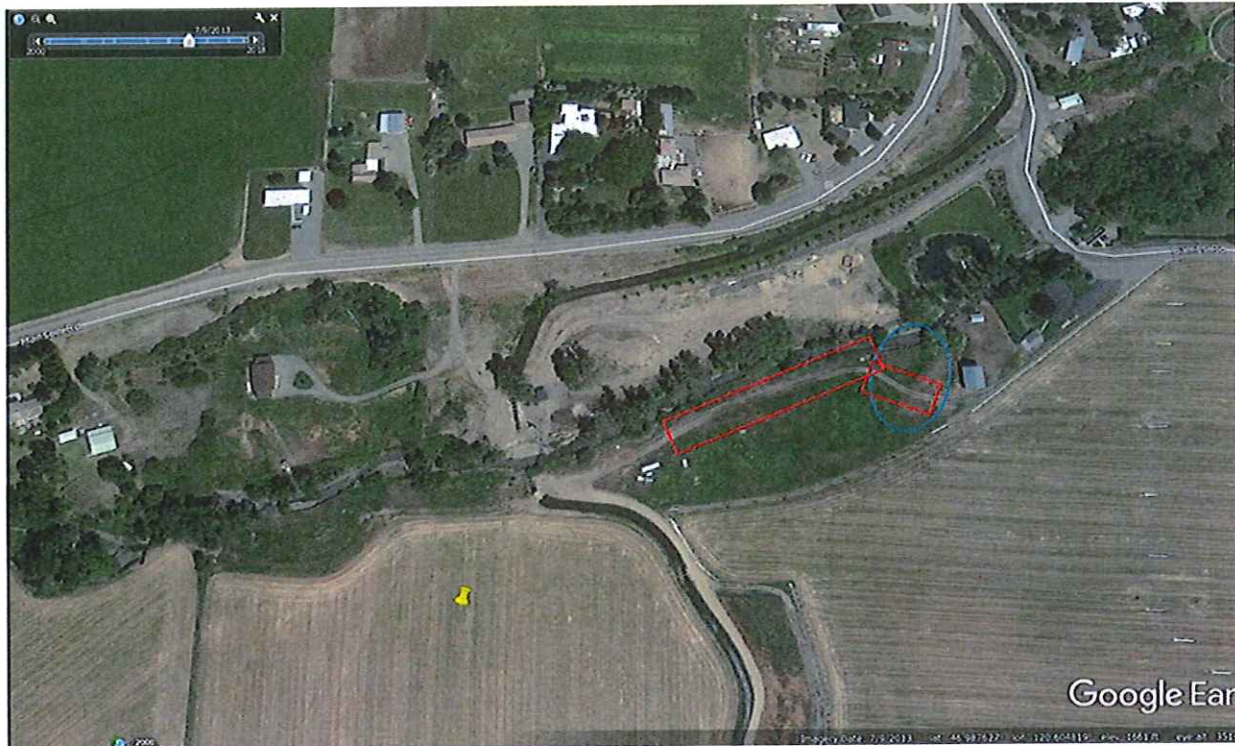
SHORELANDS/ENVIRONMENTAL ASSISTANCE

Ecology recognizes the need to conduct the proposed work within the existing easement, which extends from Barnes Road SW to the irrigation canal; however, the proposed work may occur in a wetland. The provided site plan shows a topographical feature extends from Manastash Creek landward (outlined in a blue circle in Image 1) and through the existing roadway. Lidar imagery supports a lower elevation in this area as well (Image1). Portions are located within the 100 year Floodplain. Historical aerial imagery aligns with the depressions, showing signatures of saturation and vegetation shifts during the dry time of the year and without irrigation.

Image 1.



Image 2. Aerial from 7/9/2013



Work conducted within the red rectangle and landward must be investigated for wetland characteristics. Per Revised Code of Washington (RCW) 90.48.030, the Department of Ecology has authority to control and prevent pollution of waters of the State. Therefore, Ecology has the ability to request a copy of the wetland delineation conducted on the site to prevent the pollution of state waters. Please submit a copy of the delineation for review and verification prior to approval of the expansion plan.

Any wetland habitat found within the easement (or adjacent to) should be rated using the 2014 Update for the Washington State Wetland Rating System for Eastern Washington (Hruby, 2014). Rating scores will be used to determine the width of the County's required upland buffer surrounding any delineated wetlands per Chapter 5(G)(1) and Table 5.2-1 of the County's Shoreline Master Program, which has an intent and purpose to designate, protect, manage, or regulate critical areas within the shoreline per Chapter 5.2(A)(2). All rating forms should be submitted for review prior to approval in order to verify wetland categories, wetland buffer requirements, and wetland mitigation ratio requirements.

Ecology staff would like to request a site visit determine if a wetland delineation is needed. If a site visit cannot be arranged, we recommend the County request a wetland delineation be conducted within the easement and a wetland rating be conducted for any wetlands located within 250 feet of the work area boundary. Ecology staff are available to provide technical assistance to the County by reviewing documents related to wetland habitats and conducting a joint site visit to verify the presence or absence of wetlands on the property. In the event wetland

Chelsea Benner
November 25, 2019
Page 4

or wetland buffer occurs in the area and impacts cannot be avoided a mitigation plan must be submitted for review.

In order to minimize construction impacts on wetlands, Best Management Practices (BMPs) for sediment and erosion control should be implemented. This should include functional silt fences, and immediate revegetation and mulching.

Placement of fill in wetlands may require an individual or general (nationwide) permit from the U.S. Army of Corps of Engineers (Corps). We advise the applicant to contact the Corps to determine if a permit is needed.

Please contact **Lori White** at 509-575-2616 or lori.white@ecy.wa.gov should you have any questions or would like to discuss the above comments.

Sincerely,



Gwen Clear
Environmental Review Coordinator
Central Regional Office
509-575-2012
crosepa@ecy.wa.gov

201906184