

**From:** [White, Lori \(FCY\)](#)  
**To:** [Kelly Bacon \(GD\)](#)  
**Cc:** [Lindsay Ozbohl](#)  
**Subject:** RE: SX-19-00018 - Daniels Wetland Biologist Report  
**Date:** Friday, December 6, 2019 1:25:12 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image005.png](#)  
[image007.png](#)  
[image008.png](#)  
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[image018.png](#)

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Good Afternoon Kelly,

I have reviewed Mr. Sewall's report and I am not convinced the wetland is from irrigation. Historical images from 1954 show the area to be connected to Naneum previously, and consisting of side channels (Image 1, 2, and 3; approximate area of interest is outlined in red). Topographic features or the old channels can be found in Lidar imagery (Image 4). It is currently located outside the Creek's floodplain. There is likely still some subsurface connection occurring, as the wetland appears to be part of a larger complex this should be evaluated further.

In addition, I believe some other areas on the parcel should be investigated for potential wetland habitat and any offsite but adjacent wetlands should be rated. The area, that is now a drive way appears to have previous wetland signatures based on the desk review I have conducted. IF the wetland is still connected to the southern lobe (Image 5), as it once was, it would be influencing/influenced by the creek and therefore considered shoreline. Mr. Sewall did not provide evidence that he investigated areas outside of the NW corner of the property. The investigation was conducted in early November, once the vegetative growing season was over and seasonal variations were not present. If grazing is not year round, it would be helpful to revisit the site in the spring.

Additional investigation and information is needed to determine if it is a shoreline wetland. The hydrologic regime, including frequency, extent and duration of flooding of Naenum Creek should be discussed and evaluated in the report. Feel free to contact me should you have any questions or would like to discuss the comments below.



Image 2. 6/3/2000

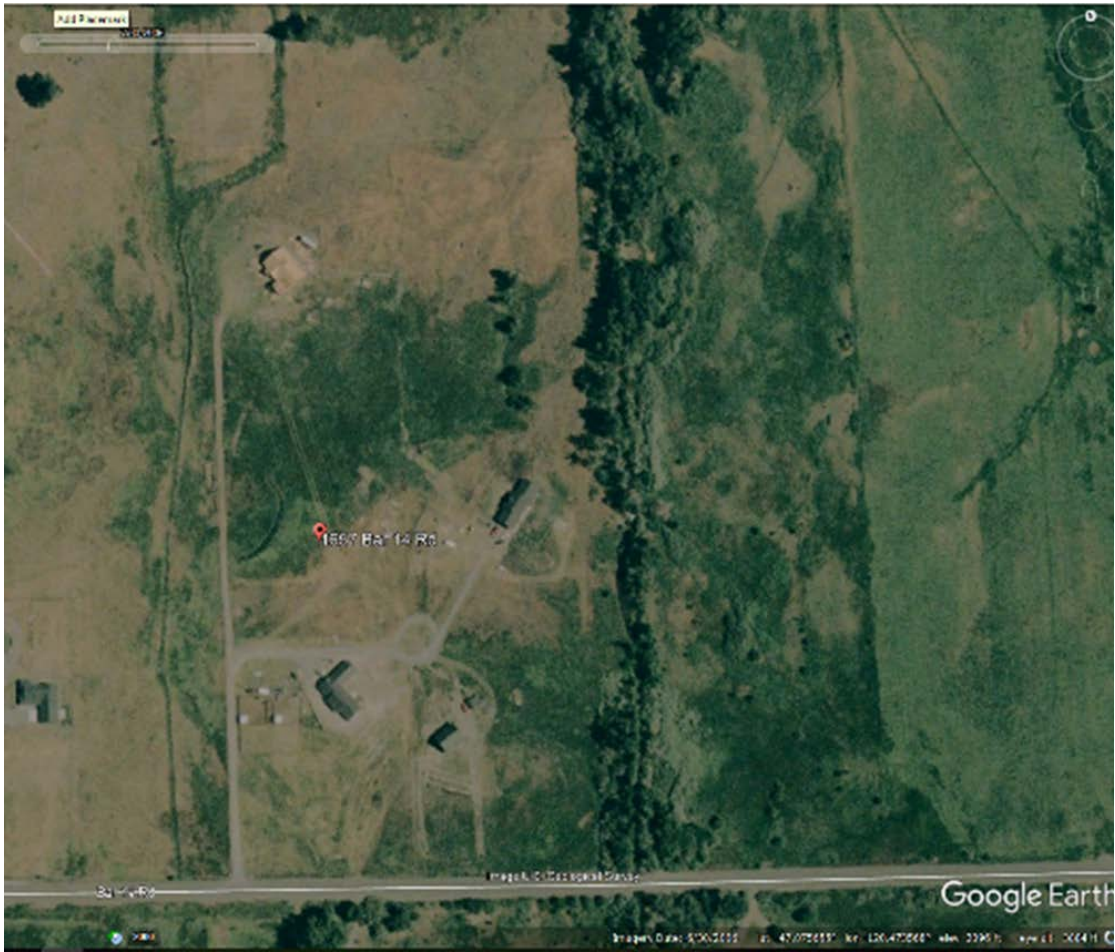


Image 3. 7/30/2006



Image 4. Lidar

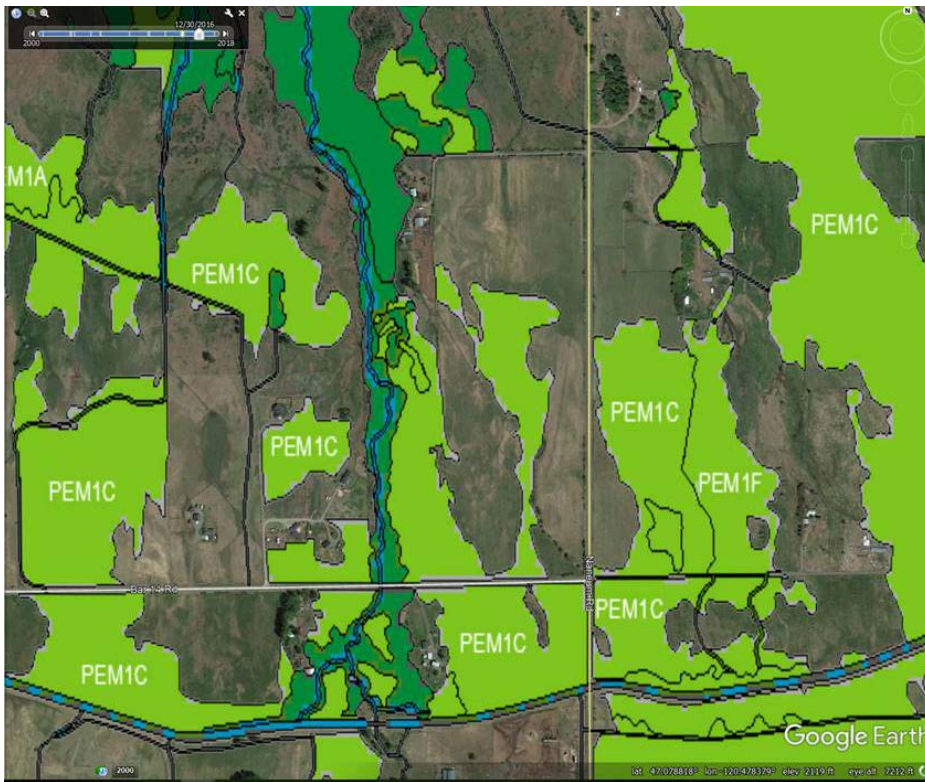


Image 5. NWI data

*Lori B White*  
Shoreland & Wetland Specialist

Department of Ecology • 1250 W Alder Street • Union Gap, WA 98903 • [lori.white@ECY.WA.GOV](mailto:lori.white@ECY.WA.GOV) • 509-575-2616



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**From:** Kelly Bacon (CD) <kelly.bacon.cd@co.kittitas.wa.us>  
**Sent:** Wednesday, December 4, 2019 8:52 AM  
**To:** White, Lori (ECY) <lowh461@ECY.WA.GOV>  
**Cc:** Lindsey Ozbolt <lindsey.ozbolt@co.kittitas.wa.us>  
**Subject:** SX-19-00018 - Daniels Wetland Biologist Report

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Good morning Lori,

I am currently working on a Shoreline exemption permit for tax parcel 20937. During the initial Critical Area review, it was determined that the property contained wetlands that needed to be identified. The property owner hired Sewall Wetland Consulting, Inc., which completed a delineation. The report specifically states that the identified wetland is not associated with the adjacent Reecer Creek. Would you be willing to review the report and advise?

Hope you have a wonderful Wednesday!

## **Kelly Bacon**

### **Planner I**

#### **Kittitas County Community Development Services**

411 N. Ruby Street, Ste 2

Ellensburg, WA 98926

Office: (509) 962-7539

[Kelly.bacon.cd@co.kittitas.wa.us](mailto:Kelly.bacon.cd@co.kittitas.wa.us)

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