



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720
Telephone: (509) 575-2740

March 19, 2025

Ellie Myers
Community Development Services
Kittitas County
411 N Ruby Street, Suite 2
Ellensburg, WA 98926

RE: WDFW Comments Merten AU-25-00003

Dear Ellie,

Thank you for the opportunity to provide comments for the proposed project to classify the existing manufactured home as an accessory dwelling unit (ADU) and eventually build a new single-family residence on parcel #239433. The Washington Department of Fish and Wildlife (WDFW) is familiar with the project area and nearby critical areas. WDFW provides the following comments for your consideration prior to approval of this project or the approval of a new single-family residence on this parcel.

The entirety of the parcel is within the regulatory floodplain as defined by FEMA and Kittitas County. The site plan available for review shows a "No Name Slough" near the southwest corner of the parcel. This watercourse is a modified historic channel of the Yakima River and serves as the fish bypass return path for any fish entrained from the Yakima River into the Cascade Irrigation District's canal. This channel flows into a watercourse referred to as the Holmes Side Channel, near the Yakama Nation's Sampson Coho Facility, before entering the Yakima River. This channel is fish bearing throughout and has had substantial beaver activity; warranting full protection of the Type F channel and the associated Riparian Management Zone prior to approval of the project.

The site plan also shows existing irrigation ditches along the eastern portion of the parcel. The site plan shows the termination points for these ditches, but it's unclear what watercourse these channels may terminate into. WDFW would like to better understand the surface and ground water interactions associated with these channels to determine if they are wholly artificial or if they are modified natural floodplain features that warrant critical area protections. WDFW requests a site visit with the applicant and Kittitas County to better understand these water courses and what impact the proposed project may or may not have on Fish and Wildlife Habitat Conservation Areas.

The National Wetland Inventory identifies potential wetlands near the property. Riverine wetlands provide important habitat for numerous fish and wildlife species, and they are a priority

habitat within WDFW's Priority Habitat and Species (PHS) program. Even if there are no wetlands on this parcel, it is likely the buffers for nearby wetlands may extend onto the parcel.

WDFW recommends that a full critical areas report be completed and that we have the opportunity to review the report prior to approval of this project or the approval of a new single-family residence and the associated septic tank to ensure the proposed building site will be consistent with Kittitas County's Critical Areas Ordinance and there will be no need for variances or reasonable use exemptions for the additional proposed developments on this property. WDFW looks forward to working with the applicants and County staff to avoid impacts to critical areas

Thank you for the opportunity to provide comments for the proposed project. If you have questions about these comments, please contact me at (509) 961-6639 or Jennifer.nelson@dfw.wa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Nelson". The signature is written in dark ink and is positioned below the "Sincerely," text.

Jennifer Nelson
Area Habitat Biologist