



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720
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July 18, 2024

Chace Pedersen
Community Development Services
Kittitas County
411 N. Ruby Street, Suite 2
Ellensburg, WA 98926

SUBJECT: WDFW COMMENTS ON SE-24-00021 JOHNSON AG UTILITY BUILDING

Dear Mr. Pedersen,

Thank you for the opportunity to comment on the proposed Johnson Ag Utility Building proposal near Manastash Creek. The Washington Department of Fish and Wildlife (WDFW) is familiar with this property and nearby critical areas that should be considered as part of this review and determination process. We offer the following information for consideration to ensure all the critical areas on and around the property are identified and protected, consistent with Kittitas County Code 17A. WDFW appreciates the County's commitment to helping us achieve our mission to preserve and protect fish, wildlife, and their habitats throughout Kittitas County.

We appreciate the reports, studies and information provided with the application materials by the applicant. This information was helpful in our review. In addition to the materials provided, WDFW staff have visited this property and adjacent properties prior in recent years. We have observed a very active beaver colony that is creating habitat and potentially altering the location of Manastash Creek and its side channels. The presence of an active beaver colony was not reflected in the channel migration study or site photos. We provide this information as it will likely alter the flow regimes over time and should be considered for all future developments, including new buildings and infrastructure.

Some of the photos and information provided show that there are talus slopes and/or cliffs present near the proposed building site. Talus slopes and cliffs are priority habitats within WDFW's Priority Habitats and Species (PHS) program and warrant further consideration for how they will be protected and/or mitigated for with construction of the building that appears to be cut into the slope. This parcel and surrounding properties are also recognized as important mule deer winter range, another PHS listing. WDFW requests that all critical areas in the project area be identified and evaluated for the need for a habitat management and/or habitat mitigation plan.

Manastash Creek has been a priority for restoration of salmon and steelhead and there are many success stories. All the fish passage barriers have been removed and the irrigation diversions are

properly screened for the protection of fish life. Chinook and coho salmon can be found in this reach of Manastash Creek as well as federally threatened Mid-Columbia Steelhead. It is critical to the recovery of salmon and steelhead that these investments are protected and enhanced where possible. WDFW also wants to ensure that any work over, near, or in Manastash Creek is only completed after a Hydraulic Project Approval (HPA) permit has been secured from WDFW.

WDFW appreciates the efforts that have already occurred to identify the Geologically Hazardous Areas (GHA) such as the Channel Migration Zone and steep slopes. We did not see information provided about frequently flooded areas or other critical areas such as Critical Aquifer Recharge Areas, Wetlands, or Fish and Wildlife Habitat Conservation Areas (FWHCA). We would welcome the opportunity to have a site visit with the applicants and/or County to better understand the potential risks or benefits to all critical areas, particularly the FWHCAs.

We understand how the overlapping critical areas in this area may be overwhelming. We are committed to working cooperatively to help this project move forward while ensuring the proper identification and protection of the critical areas present. We would welcome the opportunity to visit the site with the proponents to better understand the proposal and discuss avoidance and mitigation strategies for the FWHCAs. Thank you again for the opportunity to comment and please let me know if there are any questions or comments we can answer.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Nelson". The ink is dark and the signature is fluid, with a long, sweeping underline.

Jennifer Nelson
Fish and Wildlife Biologist
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