

Lindsey Ozbolt

From: Downes, Scott G (DFW) <Scott.Downes@dfw.wa.gov>
Sent: Thursday, November 12, 2015 8:11 AM
To: Lindsey Ozbolt
Cc: Renfrow, Brent D (DFW); Harvester, Perry J (DFW)
Subject: RE: Big Creek Trails RZ-15-000001 Notice of Application
Attachments: WDFW comments on Big Creek Trails Proposed Development.pdf

Lindsey,

Attached are WDFW comments on the proposed PUD zoning for Big Creek Trails development. While we appreciate some planning steps that the applicant has done to minimize impacts on fish and wildlife habitat, WDFW has some additional concerns over this development's impact on fish and wildlife habitat in the area. Please forward this letter to the applicant and let them know that we would like to be involved in subsequent planning and management plans for this development.

Thank you,

Scott

Scott Downes

Fish & Wildlife Habitat Biologist
Washington Department of Fish and Wildlife
Region 3 Habitat Program
1701 South 24th Ave
Yakima, WA 98902-5720
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From: Lindsey Ozbolt [mailto:lindsey.ozbolt@co.kittitas.wa.us]
Sent: Thursday, October 15, 2015 10:59 AM
To: Brenda Larsen; Josh Hink; Kim Dawson; Julie Kjorsvik; Lisa Iammarino; Myers, Holly (DOHi); Lisa Lawrence; Patti Johnson; Christina Wollman; Candie M. Leader; 'jessica@yakama.com' (jessica@yakama.com); 'jmarvin@yakama.com' (jmarvin@yakama.com); 'johnson@yakama.com' (johnson@yakama.com); 'Thalia Sachtleben (enviroreview@yakama.com)'; ECY RE SEPA REGISTER; ECY RE SEPA REGISTER; Clear, Gwen (ECY); Reed, Catherine D. (ECY); Renfrow, Brent D (DFW); Downes, Scott G (DFW); Nelson, Jennifer L (DFW); Kaehler, Gretchen (DAHP); 'jorgenja@cwu.edu' (jorgenja@cwu.edu); 'nelmsk@cwu.edu' (nelmsk@cwu.edu); Michael Flory; Lou Whitford; Amber Green; Steph Mifflin; Mau, Russell E (DOH); HAZLETT, LINDA (DNR); PRESTON, CINDY (DNR); DNR RE AQ LEASING RIVERS; Allison Kimball (brooksideconsulting@gmail.com); Stoner, Jana; 'terry@nkctribune.com'; 'jmarkell@kvnews.com'; Johnston, Mike (DOHi); Knaub, Deborah J NWS (Deborah.J.Knaub@usace.army.mil); krd.keli@fairpoint.net; 'wargog@cersd.org'; 'davisb@cersd.org'; 'montgomeryr@cersd.org'; 'office@kcf7.com'; Robert Omans; Jim Leonhard; Toni Fields; klarned@fs.fed.us; Pat Deneen (pat@patrickdeneen.com); daynaridlon@johnlscott.com; Olson,Lesli D (CONTR) - TERR-BELL-1 (ldolson@bpa.gov)
Cc: Doc Hansen; Jeff Watson; Kaycee Hathaway; Angela San Filippo
Subject: Big Creek Trails RZ-15-000001 Notice of Application

[RZ-15-00001 Big Creek Trails](#)

Kittitas County has received the above referenced land use application. Agencies within the county network may review the application master file via the above link. Agencies outside of the county network may view the related documentation at the by following this link: <http://www.co.kittitas.wa.us/cds/land-use/current-planning.aspx?title=Rezones> and opening the designated file by application number or may view the related file documents at Kittitas County Community Development Services (CDS) office at 411 N. Ruby, Suite 2, Ellensburg WA, 98926. Written comments on this proposal can be submitted to CDS any time prior to 5:00 pm on Friday, November 13, 2015.

Lindsey Ozbolt
Planner II
Community Development Services
411 North Ruby St., Suite 2
Ellensburg, WA 98926
509.962.7637

Notice: All email sent to this address will be received by the Kittitas County email system and may be subject to public disclosure under Chapter 42.56 RCW and to archiving and review.

message id: 38eb45916c6dcbdac24bb8719d004a14



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November 12, 2015

Lindsey Ozbolt
Kittitas County Community Development Services, Planner II
411 North Ruby St., Suite 2
Ellensburg, WA 98926

RE: RZ-15-00001 Big Creek Trails

Dear Ms. Ozbolt,

Thank you for the opportunity to comment on this proposal. The Washington Department of Fish and Wildlife (WDFW) has reviewed the SEPA checklist and supporting documents for the Big Creek Trails Rezone, Short Plat, and Shoreline Substantial Development Permit. We have some concerns over the proposed development and are submitting the following comments to be considered in review of the applicants permit evaluations.

Background

Pat Deneen as a representative of D. K. Professional Consultants Inc. (the Applicant) has submitted a rezone application, shoreline substantial development permit application & three lot short plat application to change the current zoning from Rural Recreation & Rural 5 to PUD. This proposal is for 58 recreational home or cabin sites, RV storage, open space areas, non-motorized parks and outdoor and/or indoor recreation to be developed in multiple stages/phases. The project is located on 11 parcels (approx.. 290 acres), located west of the City of Cle Elum in the Nelson Siding Area off of Lund Lane, in a portions of Sections 28, 29, &32, T20N, R14E, WM in Kittitas County, bearing Assessor's map numbers 20-14-28000-0018 &-0054, 20-14-29000-0006, -0015, -0017, -0018, & -0019, and 20-14-32000-0003, -0004, & -0005.

As currently planned, there will be no project construction within 200 feet of OHWMs of Big Creek or Little Creek. The Project, named Big Creek Trails is to be developed as a Planned Unit Development under Section 17.36 of the Kittitas County Zoning Code. Open space will be divided up to include indoor and outdoor recreation, wetlands, critical areas, shorelines and parks.

Project Related Issues Regarding Fish and Wildlife Habitat

WDFW appreciates that some planning regarding protection of fish and wildlife habitat has been incorporated into the site plans for this development. Both Big and Little Creeks are important tributaries for anadromous and resident fish production. ESA listed steelhead are present in both watersheds as well as chinook salmon, coho salmon, cutthroat trout, and resident rainbow trout. There are bull trout records for Big Creek as well. Several projects have been completed and/or are underway to improve habitat for these fish in both creeks. Protecting these investments and the productivity of these watersheds is of primary concern to WDFW.

Among the habitat benefits of the project as currently planned are:

- The amended application states that no project construction within 200 feet of the OHWM of both Big and Little Creeks, including trails, picnic areas and parks. This will allow for the riparian areas of these two creeks that are important for fish habitat to remain relatively intact. WDFW would welcome the opportunity to work with you to develop the Shoreline Management Guidelines and other management plans/guidelines associated with the development. Stream associated wetlands are considered part of the shoreline areas and no project construction should occur in these areas, even if the wetland outer boundary is beyond 200 feet from the OHWM.
- Removing existing roads through the riparian space and wetlands. Reducing these impacts on the riparian habitat will help to enhance this high quality fish and wildlife riparian habitat. We would welcome the opportunity to help develop the management plans for the different uses throughout the PUD.
- Planting/retaining native habitat on homesites beyond the 70' clearing limit from the homesites. WDFW would like to see native habitat retained to the extent possible, including leaving important understory vegetation. Part of the charm of living in these areas is to enjoy the wildlife. Wildlife will fare better if both the overstory trees and the understory brush and logs are left around homesites.
- WDFW appreciates that the applicant has grouped homesites to facilitate for the existence of open space and wildlife habitat. Perhaps the homesites could be further clustered. Currently shown on the site plans are two disjoint homesites from the other 56 homesites in the southeast corner of the property near Little Creek. These will be closer to National Forest lands, lead to further habitat fragmentation and development near forested lands which will influence future firefighting strategies and potentially lead to further displacement of wildlife movements. WDFW recommends that either these two homesites be eliminated from the site plan or that each parcel could be reduced and the 58 homesites could be fit into the footprint of the current 56 homesites.
- WDFW appreciates that the applicant has established wetland and wildlife critical areas. WDFW would like to see that outdoor recreation planned for the site is consistent with the planning of these critical areas. We would be more than happy to work with you to develop such plans.
- WDFW appreciates your efforts to maintain access for maintenance to the existing fish screen and irrigation delivery system. We would like to provide further review and comment on park facilities planned near the facility to ensure migrating fish are protected and not put at increased risk of harm by encouraging public viewing. Fish using fishways and near fish screens are already vulnerable and we do not want to exacerbate that risk.
- WDFW agrees with the applicant that all outdoor lighting be facing the ground. Lighting geared towards the sky can have attractant issues for nocturnal flying wildlife including birds. The proposed strategy will lessen impacts on nocturnal wildlife movement.

Concerns for the project:

- This property is currently occupied by many wildlife species; some of which are not always welcomed in more developed areas. Please adequately plan for the presence of beaver, deer, elk, bear, and cougar such that no control or damage issues arise.
 - Big and Little Creeks can have relatively rapid flow increases that result in overland flows and flooding of property. The flood mapping in this area is inaccurate. A more thorough analysis of
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flood potential is recommended prior to development to ensure future structures are not at increased risk of flooding. Nearby properties have suffered flood damages on relatively frequent flood occurrences (well below the 100 year flow).

- Areas of the open space are specified that may include both invasive and non-invasive forms of outdoor recreation. Invasive forms listed could include summer wheeled dog sled races, snowmobile trails, ORV use, and mountain bike competitions. These forms of recreation can be quite disturbing to wildlife both from increase human presence and increased noise levels. They may cause temporary or permanent displacement of various species of wildlife. WDFW would like to have open discussions with the applicant over the possibility of limiting the invasive recreation to certain times of the year or certain restricted areas of the open space to lessen disturbance and displacement of wildlife in the open space areas; this is particularly true for planned races or events. Some of the open space in the southern property limits borders National Forest lands where Northern spotted owls historically resided. If this endangered species recovers in the area, WDFW would like to see that outdoor recreation in this area is consistent with owls living on the adjacent National Forest land.
- WDFW along with Kittitas Reclamation District (KRD) and other partners have worked to provide year-around water for both Big and Little Creek as both creeks provide vital fish habitat as explained above. WDFW is concerned that increased water use in the Big Creek system may further complicate the ability to keep these two streams watered year-around. WDFW requests that the applicant demonstrate that the withdrawal of water from this PUD does not diminish summer flows in Big Creek that would endanger listed fish species.
- WDFW reminds both the applicant and the county that any work that would influence the flow or bed of either Big or Little Creek would be required to work with WDFW to obtain a Hydraulic Project Approval (HPA) for that work.

Thank you for the opportunity to review this project. We will be happy to work with you and the proponent to minimize and reduce impacts to fish and wildlife, and their habitats. Please contact me at (509) 457-9307 or Scott.downes@dfw.wa.gov, if you have any questions or concerns regarding these comments.

Sincerely,



Scott Downes
Area Habitat Biologist

Cc: Brent Renfrow, WDFW
Perry Harvester, WDFW