



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Region 3 • 1701 South 24<sup>th</sup> Avenue, Yakima, WA 98902-5720  
Telephone: (509) 575-2740 • Fax: (509) 575-2474

December 19, 2023

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

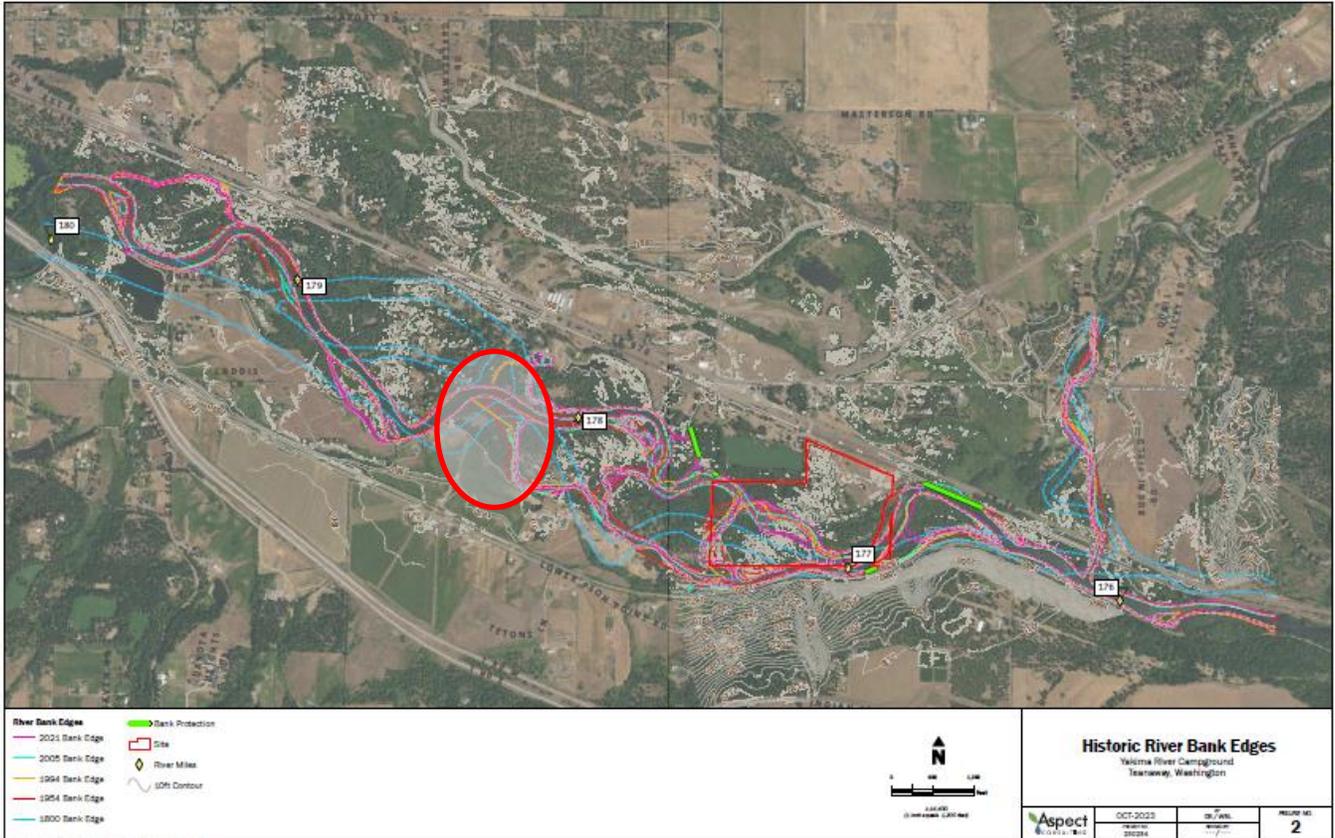
**SUBJECT: WDFW COMMENTS ON SV-23-00001 HORISH SHORELINE VARIANCE**

Dear Mr. Gasawski,

Thank you for the opportunity to comment on the Horish Shoreline Variance application for the proposed driveway and subsequent future residence on parcel 516534. The Washington Department of Fish and Wildlife (WDFW) is familiar with the project area, we've reviewed the application materials available on file, and we are neighboring landowners along the Yakima River. This project area includes a dynamic and complex reach of the Yakima River that provides critical habitat for anadromous and resident fish as well as other wildlife worthy of protection.

The parcel under review has numerous critical areas within the Shoreline jurisdiction that should be considered. The Yakima River, its side channels, and the riparian habitat along the floodplain are Fish and Wildlife Habitat Conservation Areas (FWHCA). The river in this location is home to two species listed as threatened by the Endangered Species Act (Mid-Columbia River Steelhead and Columbia River Bull Trout). This is one of the few areas in the mainstem Upper Yakima River with significant steelhead spawning and this reach consistently provides spring chinook salmon and coho salmon spawning and rearing habitat along with other native resident trout and other native species. The large wood and meandering channels create and maintain excellent fish habitat. The very features that create excellent fish habitat can also create dangerous places for people and infrastructure.

This parcel has a very real flood risk as it is within the Yakima River Channel Migration Zone (CMZ). The lidar and imagery show channel scars throughout this parcel and a recent CMZ report for a nearby project clearly confirms the active channel present within this parcel (Figure 1). From the site plan, it is difficult to tell exactly where the driveway and/or home is proposed relative to the southerly side channel of the Yakima River on the parcel. Currently, the river appears to be migrating toward the north, but as part of the active channel migration zone, we can anticipate that the river will return to its southerly alignment at some point (see Figure 2). Planning for this change now will minimize the need for emergency actions in the future. This parcel is mapped as a special flood hazard area by FEMA and flood and/or erosion risks are likely to increase with vegetation clearing and removal to accommodate road construction and home construction.



**Figure 1.** This figure shows the meandering nature of the Yakima River channels in the vicinity of the subject property (red circle). This figure comes from an October 6, 2023 [Memo](#) from Aspect Consulting to the Teanaway Ridge, LLC for RU-23-00001.

Any crossing of the channels or work with that occurs in, over, or near the channels of the Yakima River floodplain is likely to require a Hydraulic Project Approval (HPA) permit from WDFW. Information about our permits and processing can be found at this [link](#), or feel free to reach out to us directly.

There does not appear to be adequate information provided about the existing critical areas within the Shoreline jurisdiction, the potential for Channel Migration at the site, or location of proposed structures to properly evaluate the potential impacts to critical areas, including critical habitat for federally threatened steelhead and other important anadromous fish resources. **WDFW recommends a full critical areas report be completed for the project that includes a channel migration study, to better understand the potential impacts to the Shoreline environment and critical areas on the site.**



**Figure 2.** This is an aerial photo of the project area from August 12, 1954. In this image, the upper extent of the side channel through the property is more visible than in current imagery.

Thank you again for the opportunity to comment and for the County's commitment to protect critical areas. Please let me know if there are any questions about our comments. I can be reached by phone at (509) 961-6639 or email at [Jennifer.nelson@dfw.wa.gov](mailto:Jennifer.nelson@dfw.wa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Nelson".

Jennifer Nelson  
Fish and Wildlife Biologist