



September 21, 2022

Kelly Bacon  
Kittitas County Community Development Services  
411 N Ruby Street, Suite 2  
Ellensburg, WA 98926

SUBJECT: KITTITAS CONSERVATION TRUST (KCT) COMMENTS ON MARDEE LAKE REZONE AND COMPREHENSIVE PLAN AMENDMENT (RZ-22-000005 & CP-22-000005)

Dear Ms. Bacon,

Thank you for the opportunity to comment on the Mardee Lake Rezone and Comprehensive Plan application. The proposal is requesting that the land be rezoned from Rural Working Land Use to Rural Recreation. There are several substantial concerns regarding this proposal that would allow for more intensive recreation and development activities as it relates to bull trout recovery efforts that are currently underway within this area.

KCT has worked for the last 10 years to understand the causal mechanisms for key limiting factors for bull trout recovery in the Keechelus Watershed. Gold Creek is the only known stream that enters the Keechelus Reservoir that supports spawning and rearing of this genetically distinct population. Coal Creek, of which this proposed rezone is adjacent to, flows through Gold Creek and is known to support rearing and foraging for this population. Further degradation of existing habitats that support this ESA listed species will further hamper current investments that have been made to improve conditions for our Gold Creek Bull Trout. This population is in decline and at high risk of extirpation.

Significant investment has been made by state and federal partners to assess, design, and permit large scale restoration that is needed to improve habitat and flow conditions for bull trout. KCT has led these efforts since 2013. Additional recreation and development activities in and around Coal Creek and next to Gold Creek has the potential to significantly undermine these efforts and prior investments. For successful recovery of fish and wildlife in the Gold Creek watershed, restoration of this area is needed, not further impact on the valley, creeks, and wetlands that support our existing populations. A rezone as proposed is likely to have substantial impact on the environment and current recovery efforts in process.

KCT requests that before a decision or the public hearing on this rezone application, a critical area report is necessary to identify the extent of critical areas that addresses potential impacts on critical areas in and near the proposed rezone. Additionally, potential future development associated with this rezone should also be considered. The report should identify how the proposed application proposes to avoid impacts to critical areas. KCT requests that WDFW and other agency experts on critical habitat areas review and comment on the report prior to the public hearing.

Thank you for the opportunity to comment on this proposal. KCT will provide any of the past data and assessment information collected working on the recovery of the Gold Creek Bull Trout as needed to the county for this application process. Further detail can be found at <https://www.kittitasconservationtrust.org/projects/gold-creek-restoration-flow-and-habitat/>. Please contact me at 509-649-2951 (o) or [mlong@kittitasconservationtrust.org](mailto:mlong@kittitasconservationtrust.org) with questions or further information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mitchell Long', with a long horizontal flourish extending to the right.

Mitchell Long  
Executive Director  
Kittitas Conservation Trust

Cc:  
Dan Carlson, Kittitas County