



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

August 27, 2022

Sent via Email

Kittitas County Community Development Services
c/o Kelly Bacon, Staff Planner
411 N Ruby ST, Suite 2
Ellensburg WA 98926
Email: kelly.bacon.cd@co.kittitas.wa.us

RE: COMMENTS ON RZ-22-00005 & CP-22-00005 Mardee Lake

I write on behalf of the Yakama Nation Department of Natural Resources (“YN DNR”) to provide comments on rezone and comprehensive plan amendment RZ-22-00005 & CP-22-00005 Mardee Lake

YN DNR appreciates the opportunity to comment as the proposed activities are within the ceded territories of the Confederated Tribes and Bands of the Yakama Nation. YN DNR has several important concerns with the issuance of the permit.

Key areas of concern include but are not limited to:

- Water – there are significant concerns about impacts to flow in Coal Creek that currently supports ESA listed Bull Trout.
- Wetlands – the property has extensive wetland complexes that are currently well-functioning and provide important headwater storage/habitat for a number of species.
- Riparian – there is a substantial amount of riparian habitat along Coal Creek, and the existing riparian has been somewhat degraded, and is in need of restoration. Including the floodplain functions. Development along this portion of the stream will likely be at odds with riparian functions and values, or restoration.
- Wildlife Connectivity – the property is adjacent to the largest I-90 Wildlife Bridges on the Snoqualmie Pass East I-90 rebuild project and is located in an area that funnels animals to those structures. Commercial recreational development will put those investments at risk and substantially degrade their function. The Public has made a multi-million dollar investment in constructing these wildlife structures, purchasing the surrounding habitat, and restoring habitat.
- Bull Trout rearing habitat: Coal Creek is currently occupied by juvenile Bull Trout rearing habitat and has already been degraded by upstream development. Coal Creek represents ~13% of all the historically accessible tributary rearing habitat of all the tributaries to Lake Keechelus.

The proposal fails to address impacts to the natural environment. The proposal has a high likelihood of contributing to habitat degradation.

YN DNR is concerned the proposed activities have the potential to degrade aquatic habitat and alter hydrologic function.

YN DNR appreciates the opportunity to comment, and looks forward to working with Kittitas County to ensure that proposed land use plans and regulations promote sustainable development and protect the environment, including the Yakama Nation's Treaty-reserved resources. Please contact YN DNR's Ryan DeKnicker at dekr@yakamafish-nsn.gov with any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Phil Rigdon', with a long horizontal line extending to the right.

PHIL RIGDON, SUPERINTENDENT
YAKAMA NATION DEPARTMENT OF NATURAL RESOURCES