



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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April 22, 2024

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

SUBJECT: WDFW COMMENTS ON SE-24-00001 JANSEN SUBDIVISION SEPA

Dear Mr. Gasawski,

Thank you for the opportunity to comment on the Jansen subdivision with road access application. The Washington Department of Fish and Wildlife (WDFW) is familiar with the project area and we've reviewed the application materials available on file and conducted a site visit with the proponents in November 2023. This project area includes multiple fish and wildlife habitat conservation areas (FWHCA) and we look forward to working collaboratively to ensure their functions and values are adequately protected.

The critical areas report and SEPA checklist seem to adequately identify the streams and wetlands on in the project area, but there is little mention of other FWHCAs present on the property and how they will be protected. The parcels under review have numerous critical areas with little mention as to how they will be avoided, or impacts minimized or mitigated per KCC 17A.01.100. Much of the property is shrubsteppe habitat—a priority habitat identified in WDFW's Priority Habitats and Species (PHS) program. Our PHS web mapper also clearly shows a Biodiversity Area and Corridor (BAC) and elk winter range as well as riparian habitat along the stream corridors. In addition to these priority habitats, specific species listed in our PHS program that are present or likely to be present include Golden Eagle and Sagebrush sparrow; both are State Candidate species as well as Columbia Spotted frog, Sharp-tailed snake, Loggerhead Shrike and Sage Thrasher to name a few.

Kittitas County Code 17A.02.330 defines FWHCAs to include movement corridors, seasonal ranges, and priority habitats and species (PHS) as identified by WDFW and KCC 17A.04.020(d) designates all PHS as FWHCA. The proposed roadway and subsequent development will negatively impact multiple Fish and Wildlife Habitat Conservation Areas and yet there is little mention of how the proposed project was designed to avoid these impacts or minimize the impacts within the critical areas report.

Any crossing of the streams or work occurring near them 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. Stream crossing impacts to the streams and riparian areas can likely be largely avoided by following our Water Crossing Design Guidelines and through the HPA process.

Currently, all critical areas have not been identified and there are little to no mitigation measures proposed for the project. We are concerned there will be significant impacts to critical areas, specifically the FWHCAs. Prior to approval,

- **WDFW recommends the development of a Habitat Management Plan that addresses all the Fish and Wildlife Habitat Conservation Areas onsite as well as mitigation measures for how the road and subsequent development will impact them.**
- **At a minimum, WDFW recommends 2:1 mitigation for impacts and/or conversion in shrubsteppe habitat.**
- **WDFW recommends the mitigation planning occur prior to approval of the MDNS to minimize project delays.**

Thank you 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; we look forward to working together on this project. I can be reached by phone at (509) 961-6639 or email at Jennifer.nelson@dfw.wa.gov.

Sincerely,

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

Jennifer Nelson
Fish and Wildlife Biologist