



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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

August 26, 2022

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

SUBJECT: WDFW COMMENTS ON CU-15-00002 YAKIMA RIVER CAMPGROUND

Dear Ms. Bacon,

Thank you for the opportunity to comment on the proposed project. The Washington Department of Fish and Wildlife (WDFW) is familiar with the project area, and we have reviewed the application materials on file. The following comments are in addition to our 2016 comments on the same project, which are incorporated by reference with this letter.

In June of this year, the property experienced overland flooding (Figure 1) from the Yakima River as did the private properties immediately to the west (upstream). High flows in the Yakima River activated a side channel, flooding WDFW's access road for the Teanaway Junction Water Access Site and the private properties east of WDFW's parcel, including the pond that was previously constructed within this side channel's flow path. A breach of the eastern pond edge resulted in flooding of the northwestern portion of the Yakima River Campground property where the RV sites are proposed. On June 6, 2022, Teanaway Ridge, LLC requested and received an emergency Hydraulic Project Approval (HPA) from WDFW to remove a culvert from the side channel/slough that was further backing up floodwaters on their property near the proposed RV locations. As of this date, WDFW has not received an application for an HPA to repair the breach of the pond and water is still flowing from this breach toward the Yakima River Campground RV sites (Figure 2). We present this as evidence of several critical areas present on this property including frequently flooded areas, wetlands, geologically hazardous areas, and Fish and Wildlife Habitat Conservation Areas and the need for an updated critical areas assessment and report. This also demonstrates the importance of protecting riparian and floodplain habitat within the channel migration zone (CMZ).

As part of the online record available to review on the County's website, there is a May 6, 2022 letter from Jeremy Johnston, Planning Official, acknowledging changes to the Critical Areas Ordinance since the original comment period and requesting an updated critical areas report and a channel migration zone study. WDFW strongly supports this request and the need for additional information on all critical areas present and how the proposed project will prevent degradation of critical areas (KCC 17A.01.010(1)). The flooding experienced in June is further evidence that the CMZ study requested is a necessary element prior to the project moving forward.

The riparian forest on this property is healthy, resulting in large cottonwood trees and ponderosa pines recruiting to the river as high flows naturally erode riverbanks. This natural riverine process not only creates and maintains excellent fish habitat in this reach but helps to slow and spread floodwaters across the floodplain as well. These dynamic river processes create and maintain side channels on and adjacent to this property creating exceptional fish habitat. This reach is important for both spawning and rearing salmon (Spring Chinook and Coho), steelhead (federally listed as threatened on the Endangered Species List), trout, and other native fish. Protecting the intact riparian forest adjacent to the river is critical to maintaining this exceptional habitat for all native species.



Figure 1. This photo was taken by Jennifer Nelson, WDFW, on June 6, 2022 from the edge of the pond immediately east of the Yakima River Campground property. This photo was taken from the adjacent property, looking at flooding toward the western portion of the Yakima River Campground property; near where the RV sites are proposed (electrical panel is visible between the trees, near center of photo).

Since at least 1987, WDFW and its predecessor agencies of the Washington Department of Fisheries and the Washington Department of Wildlife have been providing comments about the importance of this property to fish and wildlife resources. These concerns remain relevant in 2022 and WDFW appreciates the County's consideration of these comments to ensure adequate protection of all critical areas and the Shoreline of the Yakima River. Healthy and complex riverine and riparian habitats exist on this parcel in part because natural channel processes are functional. Any amount of development along the shoreline, floodplain, floodway, or channel migration zone will degrade fish and wildlife habitat

conservation areas and full mitigation should be required. Consistent with our 2016 letter on this proposal, a SEPA Determination of Significance is appropriate for the proposed project because as proposed, it will permanently degrade fish and wildlife habitat conservation areas; particularly anadromous fish habitat and riparian habitats.



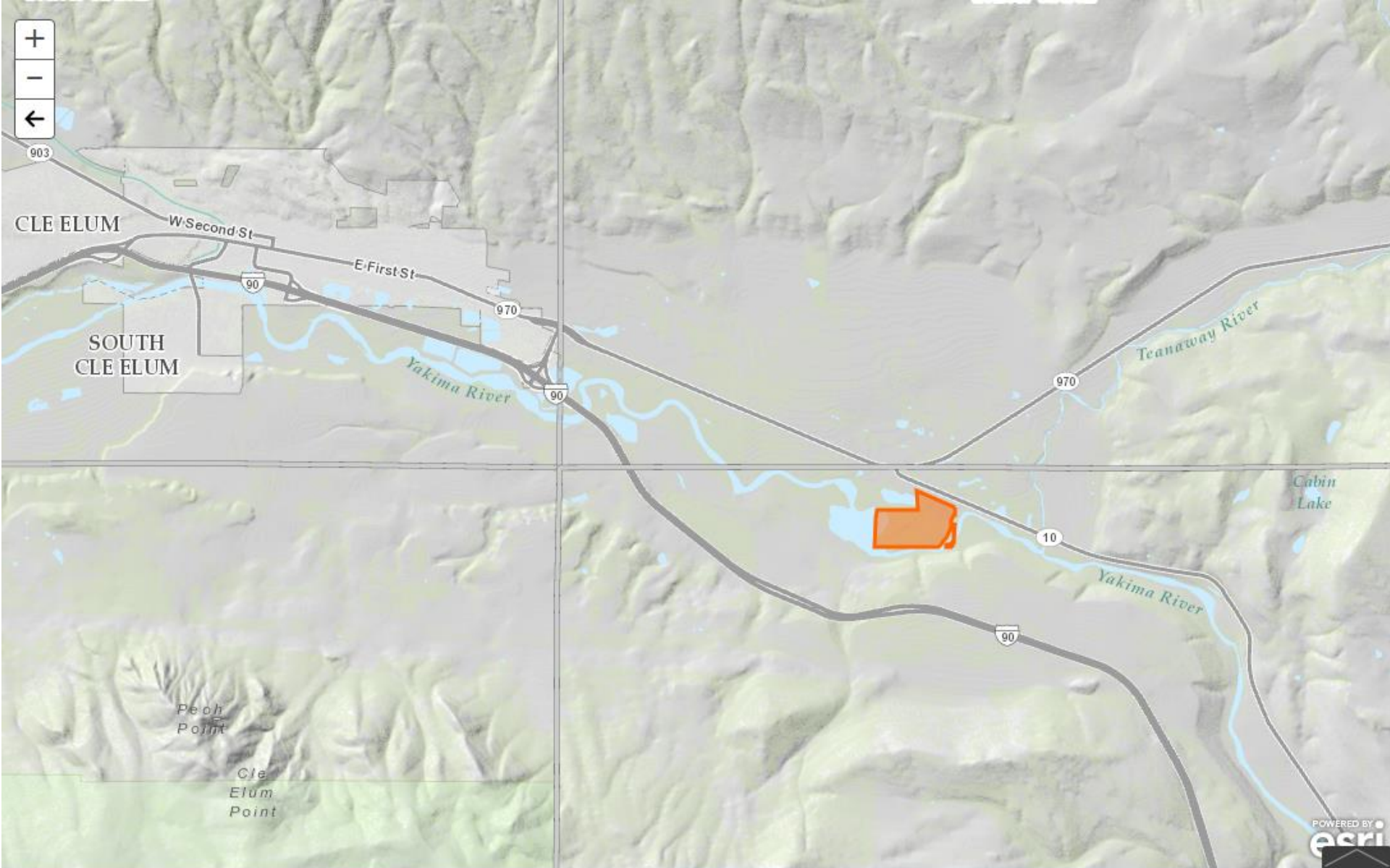
Figure 2. This photo was taken by Elizabeth Torrey, WDFW, on August 9, 2022 from approximately the same location as Figure 1. Water is still flowing through the breach toward the Yakima River Campground property. Electrical boxes for RV sites can be seen through the trees in this image.

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.

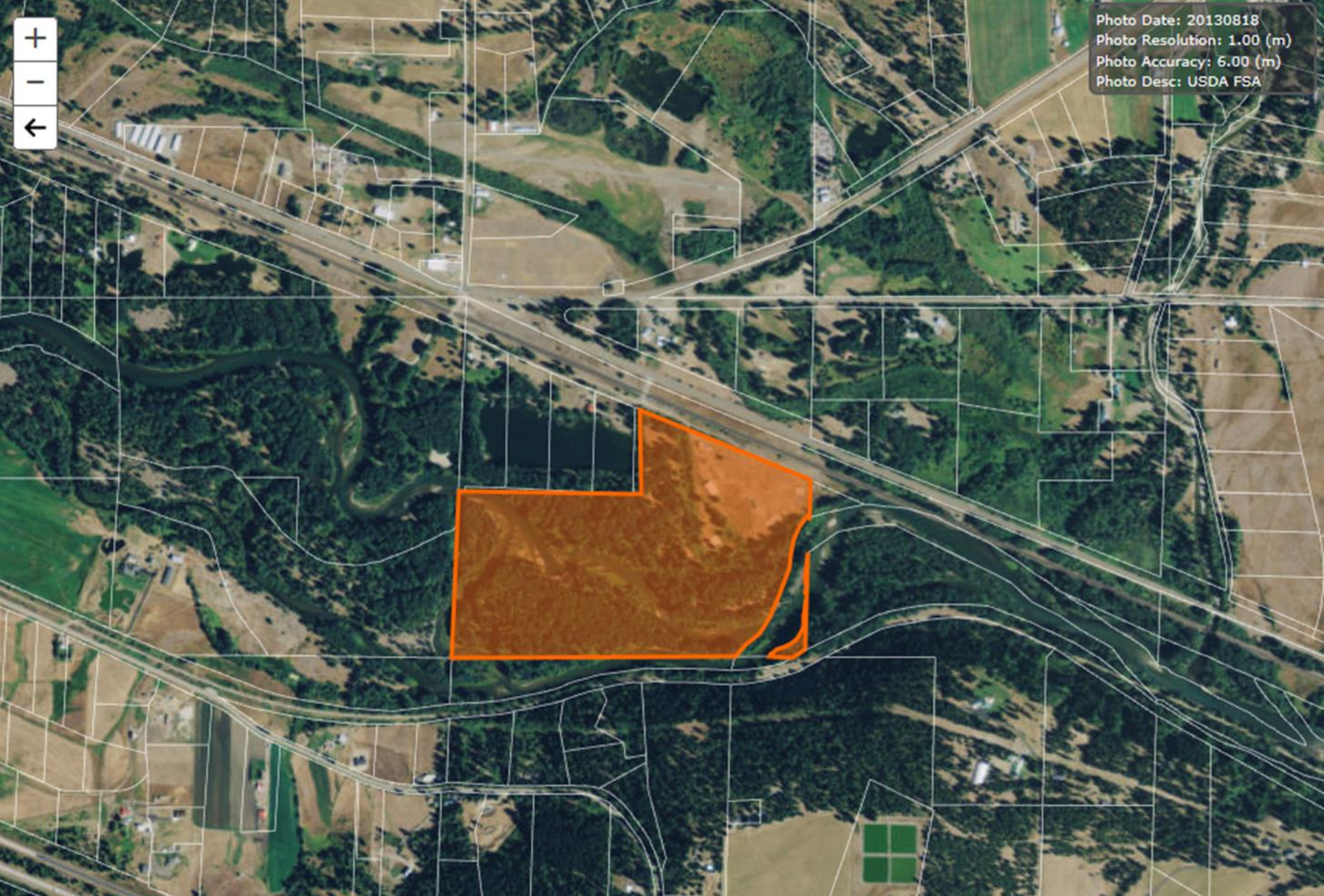
Sincerely,

Handwritten signature of Jennifer Nelson in cursive script.

Jennifer Nelson
Fish and Wildlife Biologist



The parcel proposed for the Yakima River Campground is identified in orange, about 3 miles east of Cle Elum and just upstream of the confluence with the Teanaway River.



The parcel proposed for the Yakima River Campground is identified in orange, about 3 miles east of Cle Elum and just upstream of the confluence with the Teanaway River.

Key	Lot Area (Sq Ft)	Width	Area (Sq Ft)
A	2,274	25	56,850
B	1,138	25	28,950
C	603	25	15,075
D	2,416	22	53,152
E	1,807	25	45,175
F	1,717	25	42,925

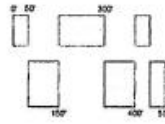
Project RV Resort

A Recreational Vehicle Resort on the Yakima River
Kittitas County, Washington

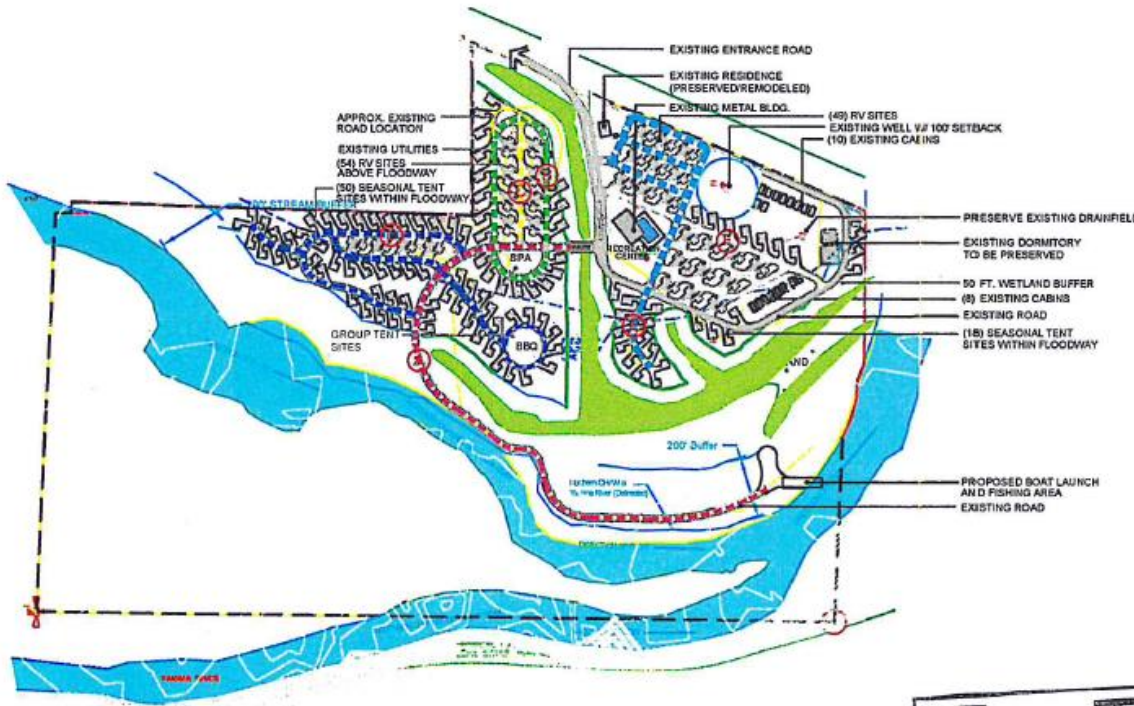
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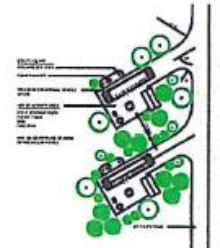
SCALE IN FEET



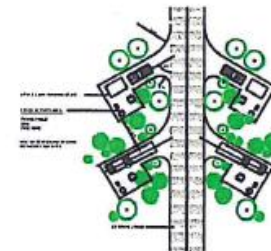
KBA
KBA ASSOCIATES
1000 EAST JEFFERSON ST. - PULLMAN, WA 99163
PH: 509-962-2222 FAX: 509-962-2223
WWW.KBAASSOCIATES.COM



TYPICAL DOUBLE PULL THRU CAMPSITE



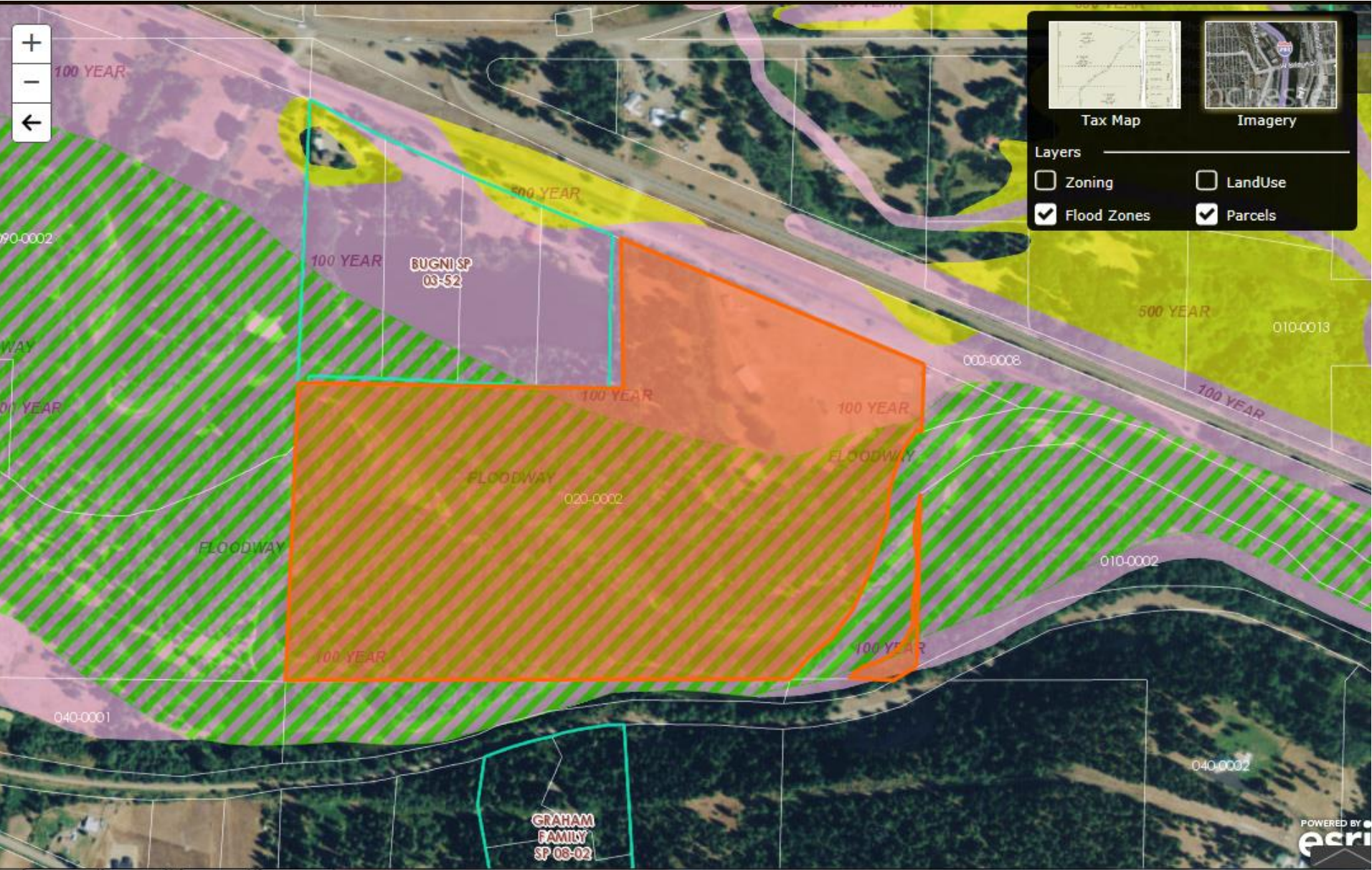
TYPICAL SINGLE BACK-IN CAMPSITE



SEASONAL PRIMITIVE TENT SITE

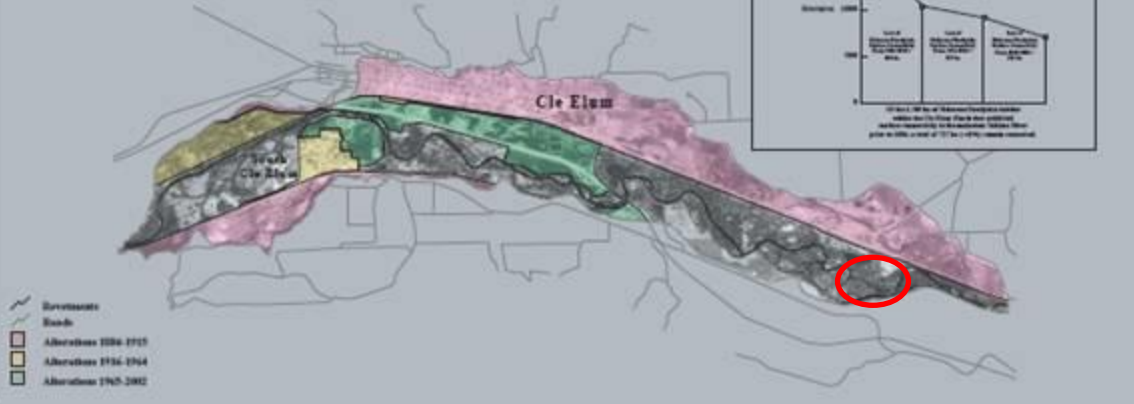
RECEIVED
 APR 17 2013
 KITTITAS COUNTY
 CDS

Proposed Development for the Yakima River Campground



The parcel proposed for the Yakima River Campground is identified in orange, with the FEMA floodway and floodplain overlaid in green hatch and pink, respectively.

Loss Of Lateral Connectivity To The Cle Elum Holocene Floodplain From 1884 To 2002



Anthropogenic Features Responsible For The Loss Of Lateral Connectivity To The Cle Elum Holocene Floodplain



THE CLE ELUM BASIN
 By
 Mark L. Yablonski, Clay E. Brown, and Douglas J. Ebeling

1. Also known as the Cle Elum Basin (CEB), the Cle Elum River Basin encompasses a half mile of the Yakima River in the Cle Elum Basin, just below the dam at the Cle Elum Dam. The basin is a floodplain of the Yakima River. The basin is a floodplain of the Yakima River. The basin is a floodplain of the Yakima River. The basin is a floodplain of the Yakima River.
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REFERENCES
 Baker, B. W., B. R. Webb, Jr., V. A. Richey, Jr., D. A. Swenson, G. B. Roper, and B. D. Borchert. 2005. *Geology Map of the Cle Elum Basin, Washington, United States*. USGS Miscellaneous Investigations Series Map I-3733.
 United States Geological Survey. 1965. *Map Sheet 1-3733 (Washington, Washington)*.
 Yablonski, M. L., D. J. Ebeling, and M. E. Brown. 2005. *The Cle Elum Basin Project: A Geologic History*. USGS and United States Geological Survey, Department of Geology and Land Reclamation.

Yakima River Campground is circled in red on maps produced by the BOR Reaches Study



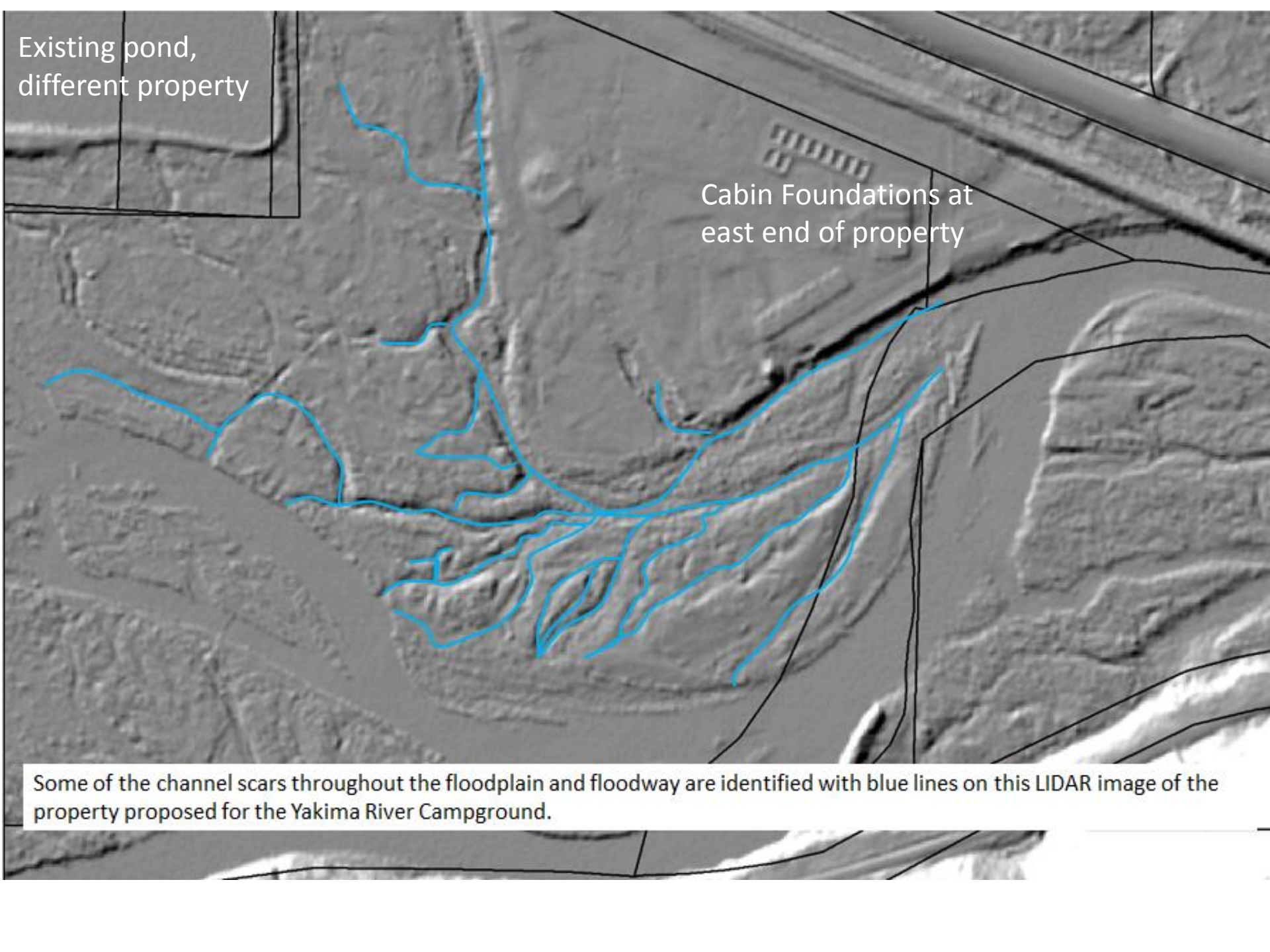
2009

The LIDAR image with the proposed Yakima River Campground parcel highlighted in orange. The flow paths and recent channel scars are evident throughout most of the property.

Existing pond,
different property

Cabin Foundations at
east end of property

Some of the channel scars throughout the floodplain and floodway are identified with blue lines on this LIDAR image of the property proposed for the Yakima River Campground.



8-12-54

August 12, 1954



Orange polygon represents approximate parcel of interest, but does not represent precise property boundaries. Main river channel is on the south.



July 18, 1994

Teanaway 70

Lambert Rd

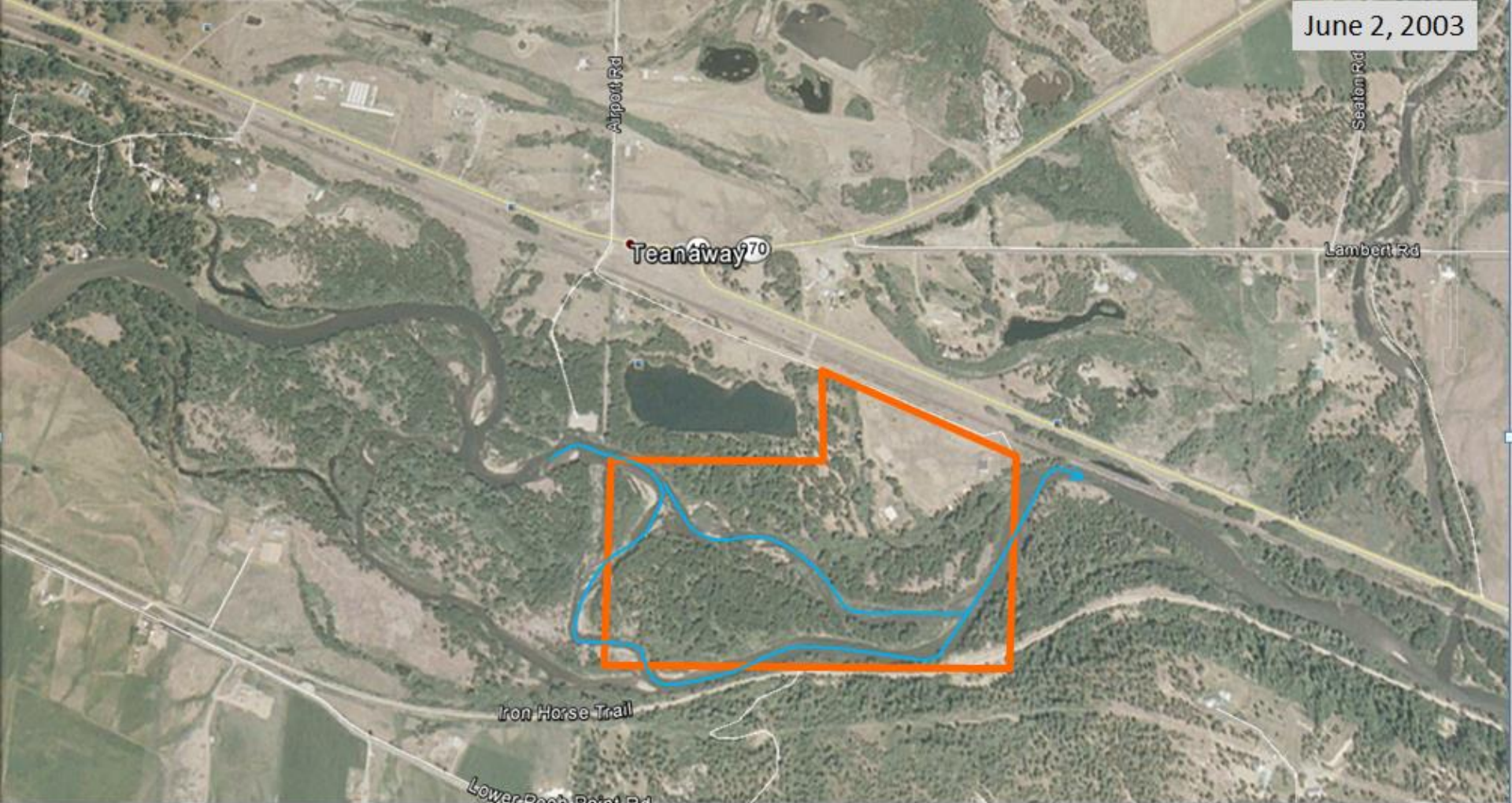
Iron Horse Trail

Orange polygon represents approximate parcel of interest, but does not represent precise property boundaries. Main river channel is on the south.

Image U.S. Geological Survey

Google earth

June 2, 2003



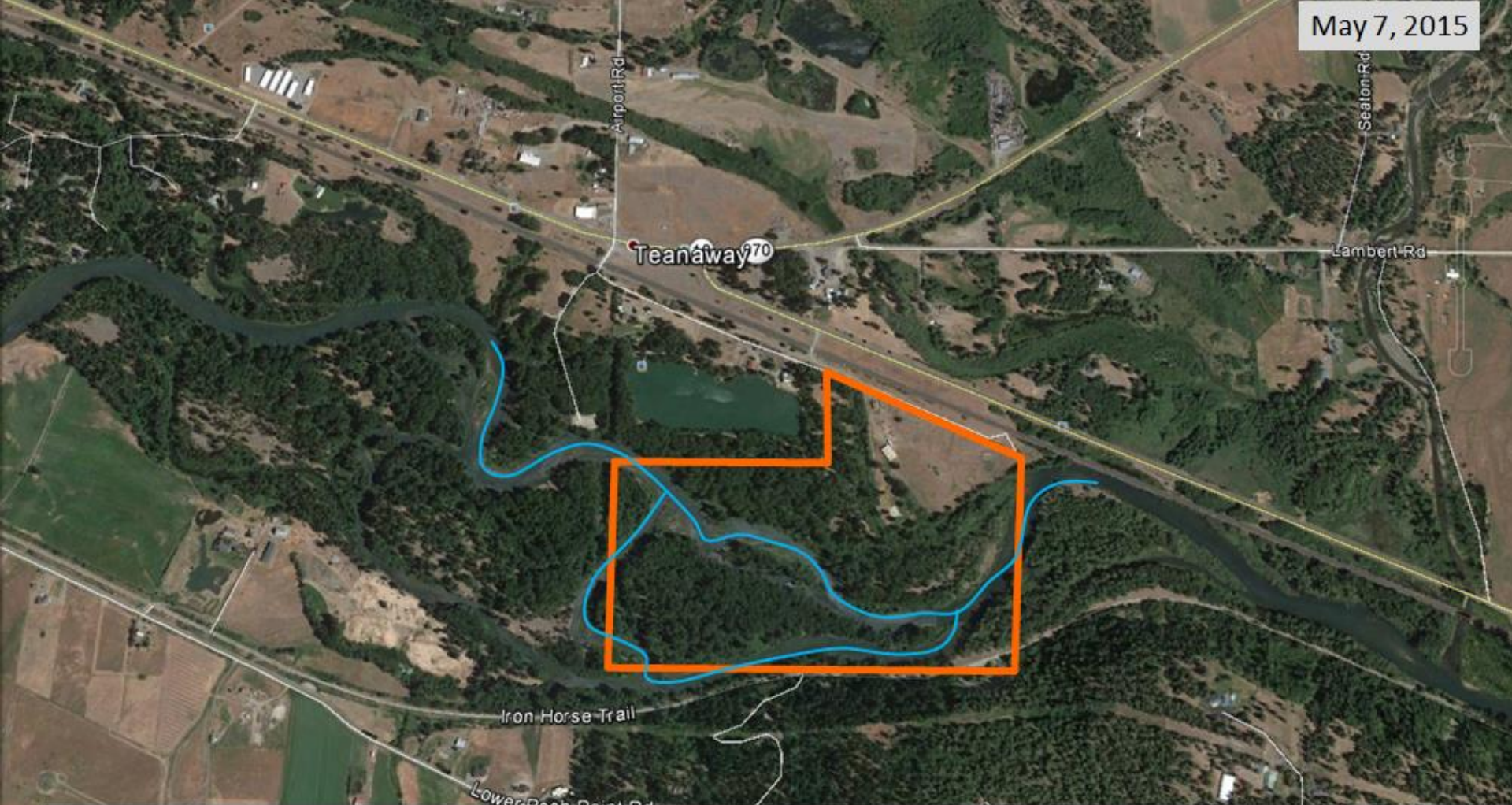
Orange polygon represents approximate parcel of interest, but does not represent precise property boundaries. Blue lines show that the main channel is still south, but northern channel is larger than previous photo.

July 9, 2013



Orange polygon represents approximate parcel of interest, but does not represent precise property boundaries. The main thread of the channel is on the north.

May 7, 2015



Orange polygon represents approximate parcel of interest, but does not represent precise property boundaries. The most recent aerial photo shows the main channel still towards the north, but both channels are significant.

[Click to see historical imagery from 1994.](#)



Aerial photo of eastern edge of property and outlet of stream. Yakima River flows from bottom to top of photo. Note logs and complexity in channel and on floodplain.



Aerial photo of property. Yakima River flows from left to right in the photo. Note logs and flow complexity in channel and on riparian forest on floodplain.



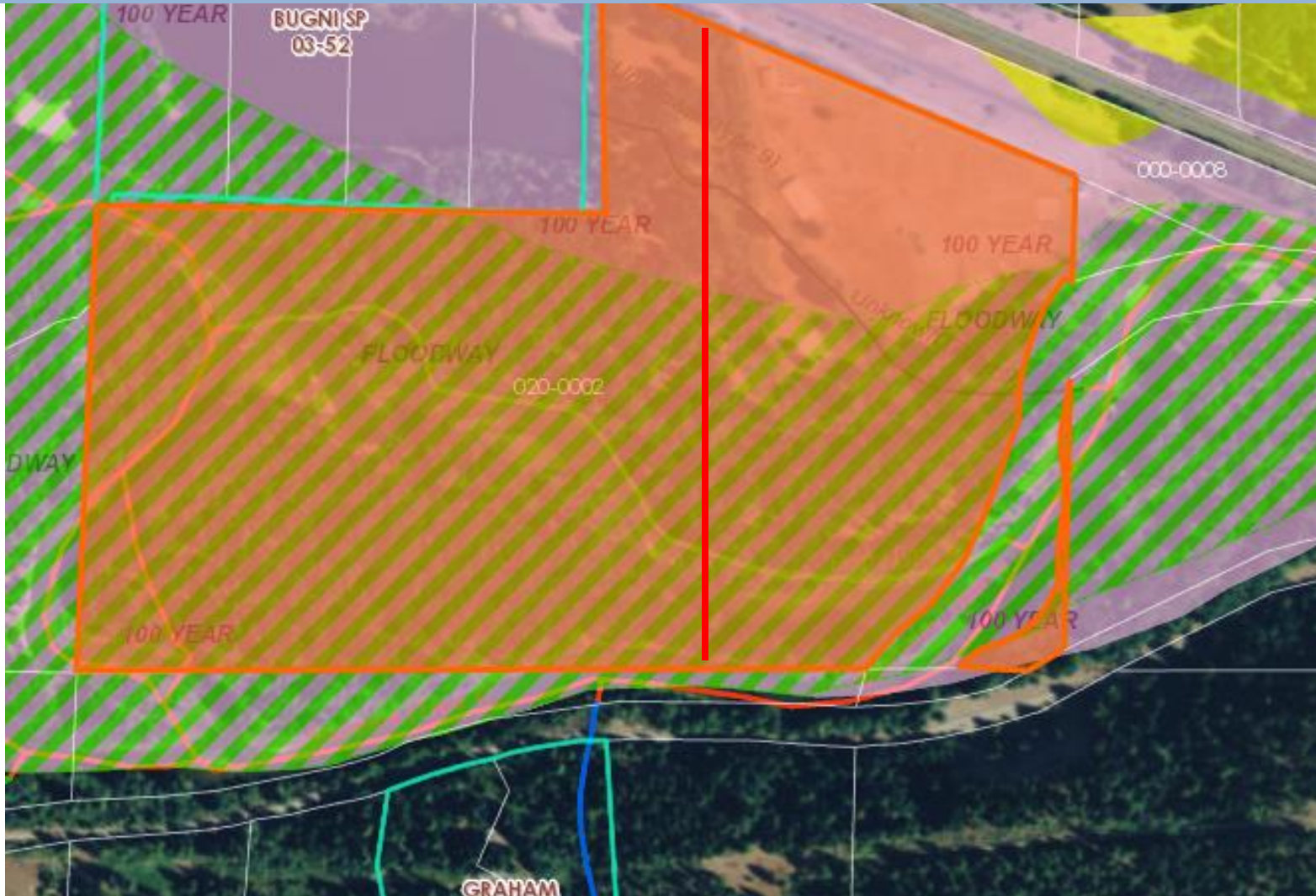
Aerial photo of western edge of property. Yakima River flows from left to right in the photo. Note logs and flow complexity in channel and islands. This is one of the side channel splits in the river.

Orange polygon represents approximate parcel of interest, but does not represent precise property boundaries; blue line represents approximate location of relic side channel prior to development.



August 12, 1954

Currently Proposed Short Plat with floodway, floodplain and streams identified. The Unknown/Type 9 stream through the northern portion of the proposed parcels appears to follow the old side channel path present in the 1954 aerial photo. With construction of the adjacent pond, the channel no longer flows in this alignment and is actually more north/south oriented. Nonetheless, development opportunities on the western lot would be limited by CMZs and other critical areas.



A concept of an alternative Short Plat



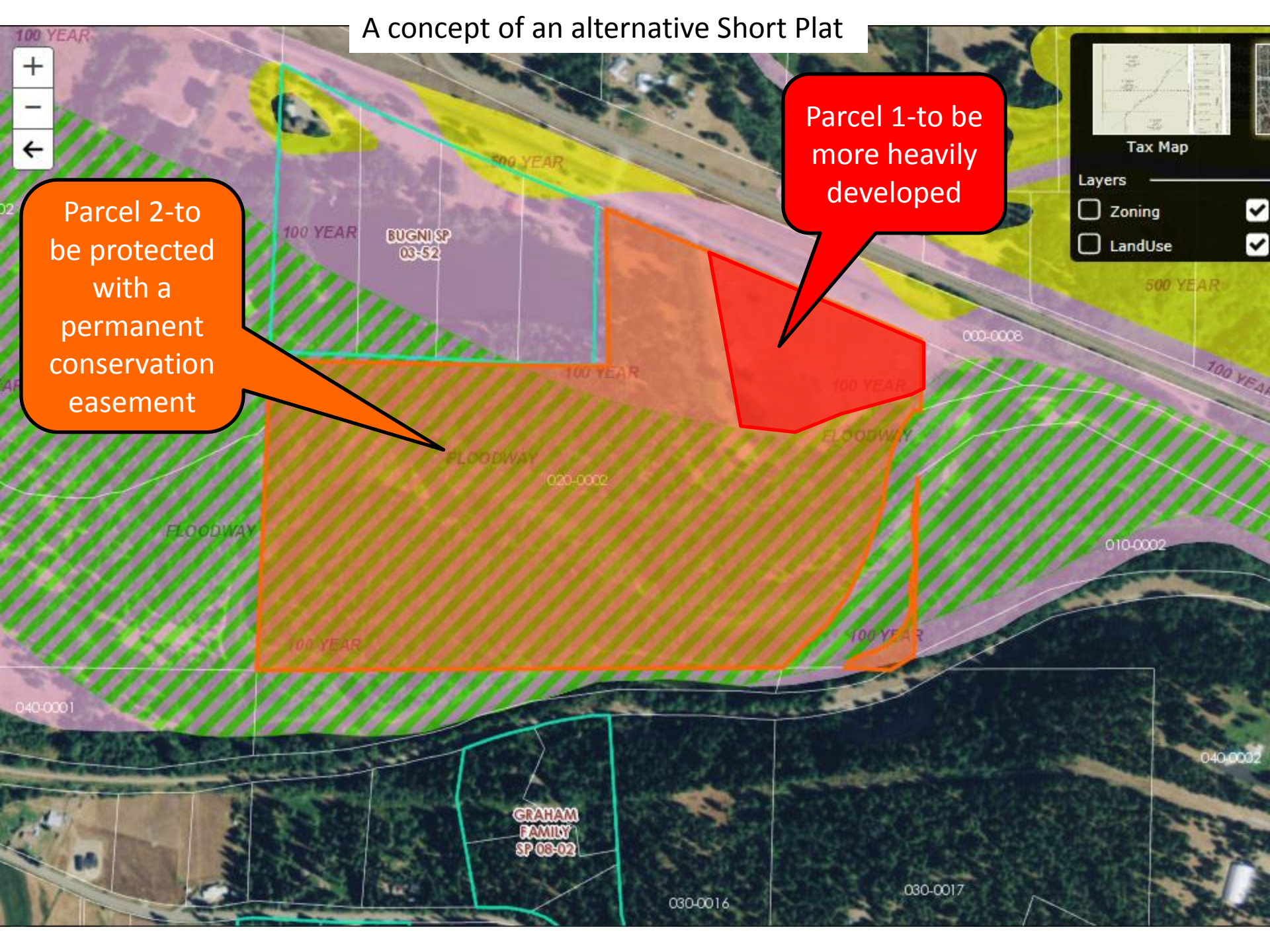
Parcel 2-to be protected with a permanent conservation easement

Parcel 1-to be more heavily developed

Tax Map

Layers

- Zoning
- LandUse





State of Washington
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Ellensburg District Office • 201 N. Pearl St, Ellensburg, WA 98926
Telephone: (509) 962-3421 • Fax: (509) 575-2474

March 4, 2016

Robert "Doc" Hansen, Director
Kittitas County Community Development Services
411 N. Ruby Street; Suite 2
Ellensburg, WA 98926

SUBJECT: Yakima River Campground (CU-15-00002, SD-15-00001, SP-15-00001) shoreline/floodplain development located near the confluence of the Yakima and Teanaway Rivers

Dear Mr. Hansen,

INTRODUCTION

Thank you for the opportunity to review this proposal and provide comments. The Washington Department of Fish and Wildlife (WDFW) has reviewed the application materials associated with this proposal and we are familiar with the property. (WDFW has been issuing Hydraulic Project Approvals on this property since at least 1994 and we've been commenting on development proposals since at least 1987.) I was able to make a site visit with the proponents in March 2015 and had a meeting with them in February 2016.

BACKGROUND INFORMATION

Floodplain

The site of the proposed development is environmentally sensitive and has features that warrant special consideration in SEPA review. The entire development lies within the floodplain and channel migration zone (CMZ) of the Yakima River. These areas are dynamic and present special hazards for people and developments. Much development is proposed for locations within the FEMA floodway (the area of greatest danger when floods occur). These same areas (floodplain, CMZ, floodway) along with the shoreline and riparian forest habitats are essential for fish and wildlife and are key to the restoration of the anadromous fish runs of the Yakima Basin.

The loss of floodplain connectivity and habitat has been identified in numerous documents as a limiting factor for salmon and steelhead recovery within the Yakima Basin. According to the BOR's Reaches Study, approximately 59% of the historic floodplain in the Cle Elum Reach of the Yakima River has been lost to dikes, roads, and railroad fill. Recently, the Yakima Basin Integrated Plan (YBIP) has been funding the acquisition and restoration of floodplain properties and functions. Kittitas County Flood Control Zone District is an active participant in the YBIP. Properties with similar functions and values as the proposed development site have been identified as having high environmental value and are actively being acquired to maintain the habitat values present. Active floodplains act as sponges for floodwaters; storing water during high flow events and slowly releasing hyporheic water during lower flow periods.

Site Specific Habitat Issues

The mainstem of the river has consistently had large pools that provide critical holding habitat for Spring Chinook salmon that migrate into the river in the spring and wait until September/October to spawn. These deep pools also provide refuge for coho salmon, Mid-Columbia River Steelhead (federally listed as threatened

by the Endangered Species Act), Columbia River Bull Trout (also listed as threatened by the Endangered Species Act), and other native fishes. This reach also gets heavy spawning use by spring Chinook salmon, Steelhead, and rainbow trout. Recent radio-telemetry studies have documented steelhead spawning adjacent to the proposed Yakima River Campground. This is one of the few areas in the mainstem Upper Yakima River with significant steelhead spawning.

The side channels and slough provide critical rearing habitat for juvenile salmonids, particularly during the sustained unnaturally high flows of summer irrigation deliveries through this reach. Juvenile rearing habitat has been identified as a primary limiting factor for salmon and steelhead recovery in the Upper Yakima River. Maintaining good rearing habitat in and adjacent to spawning areas is of upmost importance to restoration of the Yakima Basin fish populations (anadromous and resident fishes).

Floodplain Geography

The property is uniquely situated at a point immediately upstream of where the Yakima River floodplain becomes constrained between the artificial railroad grade and the natural hillslope. This constriction ensures the floodplain is relatively broad and the channel is dynamic at the project site. During large flood events, this constriction can create a backwater effect (which can be exacerbated by flood debris), increasing the flood stage on the property. During a large flood event that will likely result in inundation and/or bank erosion, public safety as well as water quality (chemicals stored on site, petroleum products, waste materials, septic drains, etc) would be primary concerns for WDFW during the emergency. Additionally, once infrastructure is built and placed within the floodway and floodplain, there are almost always proposals to construct flood control structures and/or bank protection projects that ultimately result in further degradation and a loss of fish and wildlife habitat.

Channel Migration

The river channel has historically changed at this location and it will continue to change in the future because of the site's geographic features. Within the CMZ, there is a high risk for damage to buildings and infrastructure and during flood events there will be risks to public safety. The attached aerial photo series show that the main thread of the Yakima River has moved north and south across its floodplain throughout this reach of the river and this property within a short geologic timescale. From a fish and wildlife habitat perspective, a wide and dynamic floodplain with channel shifts and access to multiple channels are good things. Maintaining access to the entire active floodplain and CMZ will be critical for dynamic fish habitat as well as public safety. The LIDAR image for the property shows numerous channels and flow scars throughout the proposed development areas for RV and tent sites. It seems reasonable that the river and its side channels could re-occupy these channels relatively easily given the floodplain complexity and large woody material depositions which naturally form immediately upstream of and adjacent to the proposed development property. When evaluating the LIDAR image, there is no clear topographical reason for why the line separating floodway from floodplain has been drawn where it is; the majority of the property appears likely to flood under moderate flood events. We recognize that the FEMA maps are the local jurisdiction's regulatory tools, but WDFW encourages incorporating local knowledge and best available science into development proposals, particularly in and around stream and rivers.

GENERAL COMMENTS

We appreciate the applicants' efforts to minimize disturbance and floodplain rise during construction. They've made efforts to use existing developments to minimize their impacts.

Challenges with This Development at This Site

Operating and maintaining a safe camping area in the floodway and floodplain is nearly impossible to do without serious degradation of fish and wildlife habitat. Inevitably, riparian forests that are full of cottonwood

trees become “hazard trees” that make campsites unsafe. One by one and clump by clump, trees and snags will be removed from the floodplain and CMZ in an attempt to make unsafe areas safe for organized public recreation. Roads will be elevated to reduce flood debris and flood damage during moderate high flow events. Development within the floodway and floodplain is often followed by proposals to protect the investments/developments. These protection measures often include removal of large woody material, armoring banks to prevent natural channel migration, and building flood control structures; all of these measures result in the loss of fish and wildlife habitat. The proposed project should be evaluated for its immediate impact upon the environment as well as the long term operation and maintenance of the facility. The existing dynamic floodplain must not be replaced with a “safe” park like setting. High densities of camp sites within the floodway and floodplain will require specific mitigation measures for success.

Concepts for Alternative Development of the Site

We encourage the applicant to focus their development on the most stable, high ground with the least risk of flooding, erosion, or avulsion. Based on the LIDAR image, this is the area where all of the existing buildings are located and approved. If campsites are to be located in the floodway, they should be walk in only and a much lower density than is currently proposed. Campsite location and density needs to address the need for preserving shoreline vegetation (which is critical for shoreline stability). Occupancy of the campsites should be limited to certain times of the year when risks of flood are low as nearly all tent sites and RV sites are located west of the stream and will need to use the single small bridge to safely exit the campground. An alternate exit west of the current driveway may be worth considering.

SPECIFIC COMMENTS

New or Updated Critical Report Needed

The Critical Areas Report was written in 2009 for a different development and it’s unclear why a new report or an updated supplement was not provided to evaluate impacts associated with the current proposal using the updated methods for assessing wetlands. Based on our knowledge of the site, review of aerial photography (the 1954 aerial photo shows the spring brook channel through the property was previously a side channel of the Yakima River), and LIDAR imaging, the wetlands and spring brook channel identified in the report appear to be in hydraulic continuity with the Yakima River, making them subject to the Shoreline Management Act (RCW 90.58) and the SMA Administrative rules (WAC 173-22-040(3)(c)). Further, the Critical Areas report identifies most of the southern portions of the property as high value to fish and wildlife (WDFW agrees) and the soils information shows that most of the property is identified as having “frequently flooded” soils. Development in high value fish and wildlife habitat and in frequently flooded areas is contrary to Kittitas County’s Critical Areas Ordinance.

Streams and Wetlands Incorrectly Characterized

The classification of the stream as a Type 3 (moderate to slight use by fish or wildlife) is inaccurate as it was stated to contain salmonids and is a relic side channel of the Yakima River prior to adjacent developments.

Buffer Widths

Development and disturbance should be minimized to the greatest extent by providing the maximum buffer widths. Larger buffers will minimize conflicts with hazard trees, beaver activity, and will reduce impacts to fish and wildlife habitat and the essential functions of wetland and streams. The proposed buffers are inadequate to protect the functions and habitat of the streams and wetlands. We recommend including the management recommendations from Washington’s Priority Habitats: Riparian document <http://wdfw.wa.gov/publications/00029/>. Pages xii and 157-170 contain the best available science regarding riparian habitat.

Channel Migration Zone Assessment Needed

The CMZ should be accurately mapped and assessed prior to approving any development at this location to ensure the site will be safe for the intended uses. A channel avulsion through the proposed campground would be detrimental to the owners, people recreating at the site, and fish and wildlife habitat if the development is there.

Road and Boat Ramp

The map of the proposed development shows a road throughout the floodway leading to a boat ramp and parking area but this component of the project is not discussed anywhere else in the proposal. We recommend excluding this from the proposal or at the very least, minimizing the road construction through the floodway to the shortest route possible. As currently shown, the road and boat ramp would have substantial adverse impacts and should be eliminated from the proposal. The road identified does currently exist in a degraded and overgrown condition, with portions being eroded by the actively moving channels of the Yakima River. Although the road exists, we have no evidence of roads being approved in the floodway so the existing road is likely not authorized and should not be upgraded, used, or maintained.

Open Space

Within the application materials there is reference to 28+ acres of open space but this is not clearly identified in the map or narrative. Please identify the open space and what uses will be allowed within the open space designation. In the existing approval for the guest ranch, 22 acres were proposed for development, while the remaining 63 acres were to remain in their natural condition with no development. This proposal is significantly different than the previous approval.

Floodplain Ponds

Within the JARPA, the applicants mention the potential to create a “natural” pond where the basketball courts currently exist. While WDFW would be happy to work with the applicants to improve habitat and restore this side channel to improve fish habitat through the developed portion of the property, a pond may not be the best alternative to improve fish habitat for our cold water salmonids as they often result in warmer water temperatures, shelter non-native species, and would be difficult to maintain. We welcome the opportunity to work with the applicants to improve habitat throughout the property.

The SEPA checklist references the option of constructing a pond within the floodway for flood storage. Such a pond would quickly fill with hyporheic flow and would not provide any additional flood storage, but may result in adverse impacts to fish, wildlife, and their habitats.

If ponds are desired, WDFW will to work with the applicants to come up with a proposal that will be compatible with the site and native fish and wildlife.

SEPA Checklist

The SEPA checklist appears to have some inconsistencies with the project narrative and map of proposed plans. It refers to roads outside of the 200 foot shoreline buffer and yet the map shows roads within this buffer. It also mentions that the floodway will be part of the designated open space, yet the map shows numerous camp sites within the floodway. It goes on to say that open space will allow for recreational trails, sitting areas, picnicking areas, viewpoints and ponds. It would be helpful to have more information on what the “open space” designation means, what will be allowed and encouraged, and where it will occur. The floodplain pond that is referenced above would not effectively increase flood storage. The primitive tent campsites are described as being natural (no pad construction), but plans show they will have roads, fire rings, a BBQ, and picnic tables.

Short Plat

The proposed short plat to divide the property into 2 parcels is of concern to WDFW. The existing wetlands, side channels, CMZ, and floodway make development within this area quite challenging. The proposed short plat divides the property into parcels that will likely require variances and exceptional treatment for development by future landowners. If the short plat is simply a tool to vest the applicant's proposal in the outdated 1975 Shoreline Master Program, rather than the updated 2016 SMP, it seems to defeat the intent and purpose of the Growth Management Act and the Shoreline Management Act.

Existing Approvals

In review of the existing conditional use permit and associated FEIS, it states that the floodway will be excluded from the development proposal and access to the floodway will be limited. It also talked about no motorized access in the floodway and yet an unimproved road exists through this area, leading to the proposed boat ramp. The FEIS associated with the existing permit also indicates that water and power were not to be provided to the 50 RV parking spaces west of the spring brook channel; according to the applicant's water and power is available to those parking areas and that it will be improved/upgraded. The current approved use states that the guest ranch facilities will be used approximately 32 days a year; the new proposal may have year round use and will be significantly different than what has already been approved. The FEIS states that 63 acres will remain undeveloped in its natural state and only 22 acres will be developed. This proposal seems to be an expansion of a previously approved project with the expansion largely occurring within the mitigation area for the original project. Enforcement of the existing approval should occur. At the least, improvements should not be allowed to be made to unapproved roads, facilities, and services particularly when the FEIS specifically stated that those actions would not occur.

RECOMMENDATIONS

Hydraulic Project Approvals

Any project that will use, divert, obstruct, or change the natural flow or bed of any waters of the state will require a permit from WDFW. Work within, over, or near the Yakima River, side channels, and spring brook channels will require a Hydraulic Project Approval from WDFW. This would include any modifications or replacements to the existing bridge across the stream as well as any pond creation.

More Information

Clarification is needed on a few topics listed below for a better understanding of the potential impacts to fish, wildlife, and their habitats. The following information should be provided for further review:

- It would be helpful to have more information on what the "open space" designation means, what will be allowed and encouraged, and where it will occur.
- Please clarify exactly what is proposed within the floodway. The narrative states that no construction will occur for the seasonal primitive tent sites but on the very next page it states that each of the 69 units will be 61' long and 32' wide. The map indicates that parking spaces, picnic tables, fire rings and BBQs will be provided at each site in addition to the roads required to access these campsites.
- Please provide a map with a clear delineation of the proposed development, the ordinary high water mark, the shoreline buffer taking into account the associated wetlands, and other stream and wetland buffers on the site.
- Please provide additional explanation for restroom facilities that will be provided to the tent camp sites. Currently, it appears that the facilities are located in the opposite corner of the property, making it unlikely campers will use them regularly, particularly at night.

Short Plat Options

If necessary, we suggest drawing the short plat lines differently such that the slight terrace where the existing buildings are with minimal vegetation is one parcel and the remaining lower elevation forested and floodplain is the second parcel; it could be placed in a conservation easement to protect it development in perpetuity while providing a tax incentive to the owner. A draft concept of this is provided in the enclosure.

Meeting with Proponents

WDFW would like to meet with the proponents to discuss potential changes and mitigation measures that could be incorporated into their proposal to reduce the impacts to fish, wildlife, and their habitats while still providing camping and development opportunities on the property.

CONCLUSIONS

The project as proposed will have significant adverse impacts on fish, wildlife, and their habitats, it will adversely affect shoreline resources, wetlands, floodplain connectivity and function, restoration of salmon and steelhead populations, and public environmental resources. A SEPA Determination of Significance is appropriate and an EIS should be required. The proposed project will permanently degrade fish and wildlife habitat. Specific concerns we have include 1) clearing of riparian vegetation, 2) construction of hardened bank protection, 3) disruption of floodplain function, 4) access to disturb and/or harass spawning fish, 5) stormwater runoff from parking areas and impervious surfaces, 6) pollution from failed septic systems, and 7) simplification and confinement of the dynamic channels. For these reasons, WDFW feels strongly that a determination of non-significance is not adequate and that a Determination of Significance is warranted. An EIS was required for the previous guest ranch proposal for which the existing approvals are based upon. The current proposal is even more invasive into the floodway, floodplain, and CMZ and certainly warrants a thorough environmental review. A new EIS is needed as the previous EIS for the property is out dated and does not include specific issues raised by the current proposal.

Please feel free to contact me at (509) 962-3421 or Jennifer.nelson@dfw.wa.gov if you have any questions about these comments. I welcome the opportunity to meet with the proponents and/or the County staff to explore alternatives that may have fewer impacts to fish, wildlife, and their habitat.

Sincerely,

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

Jennifer Nelson
Area Habitat Biologist

Enclosure: Aerial photos of site, LIDAR, and proposed site plan