

From: [Downes, Scott G \(DFW\)](#)
To: [Jeremiah Cromie](#)
Cc: [Torrey, Elizabeth M \(DFW\)](#)
Subject: RE: CU-21-00003 Ryegrass LPL Expansion - Notice of Application Dec. 2022 WDFW Comments
Date: Thursday, December 15, 2022 11:33:59 AM
Attachments: [WDFW comments on CU-21-00003 Ryegrass LPL Expansion to CDS.pdf](#)

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Jeremiah,

Thank you for the opportunity to provide comments on this. In addition to our previously submitted comments which I'm including here for the record, we have some small clarifications in the SEPA- particularly regarding WDFW quotes and species.

1. Ferruginous Hawk is now a State Endangered Species (it was under review at the time of the last SEPA comment)
2. While WDFW did note that the site had already been cleared during our site visit, the underlying habitat type of the site is clearly shrubsteppe given its surrounding vegetation. That clearing happened before our site visit, but habitat mitigation should have been conducted for that clearing. As part of the habitat mitigation plan for this project (that covers restoration of this parcel when finished using it), WDFW would request that there be included habitat mitigation for this clearing, which would include, potentially, habitat restoration elsewhere on the property of shrubsteppe restoration. So, the habitat mitigation plan should include both restoration once this area is no longer in use and additional mitigation to compensate for the temporal loss of habitat while this area is in use by the landfill. The temporal area should be the same acreage as the cleared area.
3. WDFW would like to further restate that mitigation revegetation should include sagebrush (preferably plugs as seeding in this dry area has limited success) and not just grasses.
4. Under the SEPA checklist 5d. It states "The landfill expansion area is within an existing, fenced, disturbed area of the site that experiences regular operations activity. The proposed location is not conducive to animals, and therefore further development of the area will have low impacts of animals." Animals do use habitats in this area now, including shrubsteppe species listed in 5a. So, approval of this project would have impacts on shrubsteppe wildlife species, which is why if approved, WDFW requests that a habitat mitigation plan be submitted for WDFW review and approval.

Thanks for the opportunity to comment and look forward to dealing with the county further on this application.

Scott

Scott Downes

Fish & Wildlife Habitat Biologist
Washington Department of Fish and Wildlife
Region 3 Habitat Program
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Yakima, WA 98902-5720
Scott.Downes@dfw.wa.gov
Cell-509-607-3578

From: Jeremiah Cromie <jeremiah.cromie@co.kittitas.wa.us>

Sent: Tuesday, December 13, 2022 10:18 AM

To: Joe Dietzel <joe.dietzel@co.kittitas.wa.us>; Kim Dawson <kim.dawson@co.kittitas.wa.us>; George Long <long@kittcom.org>; Julie Kjorsvik <julie.kjorsvik@co.kittitas.wa.us>; Toni Berkshire <toni.berkshire@co.kittitas.wa.us>; PublicHealth Inspectors <PublicHealthInspectors@co.kittitas.wa.us>; Melissa Schumaier <melissa.schumaier@co.kittitas.wa.us>; Lisa Lawrence <lisa.lawrence@co.kittitas.wa.us>; Patti Stacey <patti.stacey@co.kittitas.wa.us>; Kelee Hodges <kelee.hodges.pw@co.kittitas.wa.us>; Candie Leader <candie.leader@co.kittitas.wa.us>; David Ohl <david.ohl@co.kittitas.wa.us>; Codi Fortier <codi.fortier@co.kittitas.wa.us>; 'enviroreview@yakama.com' <enviroreview@yakama.com>; 'corrine_camuso@yakama.com' <corrine_camuso@yakama.com>; 'jessica_lally@yakama.com' <jessica_lally@yakama.com>; 'noah_oliver@yakama.com' <noah_oliver@yakama.com>; 'casey_barney@yakama.com' <casey_barney@yakama.com>; 'kozj@yakamafish-nsn.gov' <kozj@yakamafish-nsn.gov>; 'matj@yakamafish-nsn.gov' <matj@yakamafish-nsn.gov>; 'barh@yakamafish-nsn.gov' <barh@yakamafish-nsn.gov>; Petropoulos, Terra (ECY) <tebu461@ECY.WA.GOV>; White, Lori (ECY) <lowh461@ECY.WA.GOV>; ECY RE Former Orchards <formerorchards@ECY.WA.GOV>; Neet, Wendy (ECY) <wnee461@ECY.WA.GOV>; ECY RE CRO SEPA Coordinator <crosepa@ecy.wa.gov>; Carp, Lizzie (ECY) <lcar461@ECY.WA.GOV>; Grieves, Kimberly <ksar461@ECY.WA.GOV>; Rivard, James (ECY) <JRIV461@ECY.WA.GOV>; Downes, Scott G (DFW) <Scott.Downes@dfw.wa.gov>; Nelson, Jennifer L (DFW) <Jennifer.Nelson@dfw.wa.gov>; Torrey, Elizabeth M (DFW) <Elizabeth.Torrey@dfw.wa.gov>; DAHP SEPA (DAHP) <sepa@dahp.wa.gov>; 'jorgenja@cwu.edu' <jorgenja@cwu.edu>; 'nelmsk@cwu.edu' <nelmsk@cwu.edu>; Jeremy Larson <jeremy.larson@co.kittitas.wa.us>; Steph Mifflin <stephanie.mifflin@co.kittitas.wa.us>; Mau, Russell E (DOH) <Russell.Mau@DOH.WA.GOV>; DNR RE AQ LEASING RIVERS <DNRREAQLEASINGRIVERS@dnr.wa.gov>; YOUNG, BRENDA (DNR) <brenda.young@dnr.wa.gov>; Warthen, Luke (DNR) <Luke.Warthen@dnr.wa.gov>; DNR RE SEPACENTER <SEPACENTER@dnr.wa.gov>; Andrews, Garren (DNR) <Garren.Andrews@dnr.wa.gov>; MAUNEY, MARTY (DNR) <MARTIN.MAUNEY@dnr.wa.gov>; 'brooksideconsulting@gmail.com' <brooksideconsulting@gmail.com>; 'tribune@nkctribune.com' <tribune@nkctribune.com>; 'terry@nkctribune.com' <terry@nkctribune.com>; 'mbreckenridge@kvnews.com' <mbreckenridge@kvnews.com>; 'legals@kvnews.com' <legals@kvnews.com>; 'Deborah.j.knaub@usace.army.mil' <Deborah.j.knaub@usace.army.mil>; 'Jenae.N.Churchill@usace.army.mil' <Jenae.N.Churchill@usace.army.mil>; 'lhendrix@usbr.gov' <lhendrix@usbr.gov>; 'mark.a.gradwohl.civ@mail.mil' <mark.a.gradwohl.civ@mail.mil>; 'Kimberly.peacher@navy.mil' <Kimberly.peacher@navy.mil>; 'Robert.d.bright10.civ@army.mil' <Robert.d.bright10.civ@army.mil>; Haley Mercer <haley.mercer@co.kittitas.wa.us>; Christy Garcia



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April 14, 2021

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

SUBJECT: WDFW COMMENTS ON CU-21-00003 Ryegrass LPL Expansion

Dear Mr. Cromie,

Thank you for the opportunity to comment on the CU-21-00003 Ryegrass LPL Expansion application concerning the expansion of the existing limited purpose landfill by Kittitas County Solid Waste. Washington Department of Fish and Wildlife (WDFW) has reviewed the application and supporting documents. Our comments are regarding the project's impact on priority fish and wildlife habitats, particularly shrubsteppe/sagebrush. In the previous application for this parcel, SE-20-00009 WDFW expressed concern over additional clearing of shrubsteppe and the MDNS noted that "additional clearing would require consultation with WDFW for potential mitigation" and "when fields are no longer being used for treatment they should be replanted with sagebrush".

While it appears that some of the expanded footprint is in previously disturbed areas, some of the project areas do appear to include shrubsteppe habitats. WDFW would like to request that the mitigation measures registered with SE-20-00009 should also be applied to this proposal and that WDFW should meet with the applicant to find ways to avoid existing sagebrush areas and in areas that are unavoidable, mitigation opportunities to restore other areas into sagebrush.

Thank you again for the opportunity to comment and look forward to discussing this project further with the county and the applicant, ideally on site through a visit to understand habitat impacts and mitigation opportunities further. Please contact me at 509-607-3578 or Scott.Downes@dfw.wa.gov to discuss these concerns.

Sincerely,

A handwritten signature in cursive script that reads "Scott Downes".

Scott Downes
Area Habitat Biologist

Cc:

Elizabeth Torrey, WDFW
Jeremy Johnson, Kittitas County CDS