

From: [Downes, Scott G \(DFW\)](#)
To: [Rachael Stevie \(CD\)](#)
Cc: [Torrey, Elizabeth M \(DFW\)](#)
Subject: RE: SE-18-00008 Sparks Park - Notice of Application WDFW Comments
Date: Tuesday, August 31, 2021 10:21:09 AM

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Rachael,

Thank you for sending over the additional documents (road plan and the drainage report) for review. Here are WDFW comments:

1. The area is located in WDFW PHS designated Elk Wintering Area. While the road itself may not have significant impacts to the habitat, the road is likely to lead to future development (even mentions likely future development in the drainage report). The entire plan (road and future development) needs to be evaluated together and how the habitat impacts potentially can be offset. If only the road is being evaluated now, WDFW requests that at least a placeholder to acknowledge the designated PHS habitat and a condition that the applicant must work with WDFW to minimize impacts for future development and mitigate for those habitat impacts that cannot be minimized.
2. Drainage, similar comment on evaluating overall impacts. The drainage report indicates that subsequent development is likely to follow the road building, however is only evaluating the impacts of removed trees and impervious surfaces for the road. A drainage report should not be piecemealed and the entire development of the site should be evaluated for runoff impacts. Drainage from this property is likely to flow through I-90 culverts towards Lake Easton and it is important to evaluate if those culverts are adequately sized and thus a drainage report needs to evaluate all planned activities that will result in land clearing and building of impervious surfaces to adequately evaluate impacts. Thus, WDFW believes that the conclusion of the drainage report: "The project will not add significant runoff to the existing drainage system" is premature and possibly inaccurate until a full drainage report for all planned activities is conducted.

In conclusion, WDFW believes that this road building needs to be combined with environmental review of the other planned development of the parcel to accurately evaluate impacts to both PHS wildlife habitat and potential drainage issues to areas like Lake Easton.

Thank you. If you have any questions, my contact information is below.

Scott

Scott Downes

Fish & Wildlife Habitat Biologist

Washington Department of Fish and Wildlife

Region 3 Habitat Program

1701 South 24th Ave

Yakima, WA 98902-5720

Scott.Downes@dfw.wa.gov

Office-509-457-9307

Cell-509-607-3578