



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

September 1, 2020

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

SUBJECT: WDFW COMMENTS ON SE-20-00003 BROWN & JACKSON

Dear Ms. Bacon,

Thank you for the opportunity to comment on the proposed grading permit and SEPA for the Brown & Jackson Storage Ponds project near Parke Creek. The Washington Department of Fish and Wildlife (WDFW) is familiar with this area and nearby critical areas that should be considered as part of this review and determination process.

We offer the following information for consideration to ensure Parke Creek, its floodplain, and the fish, wildlife, and habitats associated with it are protected, consistent with the Growth Management Act (GMA) goal to protect the environment and enhance the state's highest quality of life, including air and water quality and the availability of water (RCW 36.70A.020(10)), the GMA's RCW 36.70A.172 to designate and protect critical areas, as well as all other local and state regulations.

Our comments are as follows:

- Improvements to the roadway and/or water crossing structures over Parke Creek, its tributaries, and/or distributaries will likely require a Hydraulic Project Approval (HPA) from WDFW for the protection of fish life. Additionally, other work associated with construction of the storage ponds that will use, divert, obstruct, or change the natural flow or bed of these waters will also require an HPA from WDFW (RCW 77.55). In the SEPA checklist, the answer to question 10a states that the tallest amount of fill will be approximately 9.5 feet. From the submitted plans, it is not possible to determine where this fill will be placed and whether it will change the natural flow of water within the Parke Creek watershed. **Please provide more detailed drawings showing the elevations of each proposed element relative to the surrounding water bodies.**

- The grading permit application for this project erroneously stated that there were no critical areas present. Numerous “Fish and Wildlife Habitat Conservation Areas” (FWHCAs) are on or near the subject property and ought to be considered during this review period
 - The County’s online COMPAS mapper correctly displays Parke Creek, the seasonal stream referenced in the application materials and another seasonal stream that enters the property just south of the location of the proposed southern pond. There is another Type 9 stream that is shown on the COMPAS maps in the south east portion of the parcel as well (Figure 1). Each of these streams and their associated riparian ecosystems are FWHCAs and they are also displayed on the United States Fish and Wildlife Services online *National Wetland Inventory Wetland Mapper*.
 - Multiple maps, including the County’s COMPAS mapper, show a potential 1.3-acre freshwater emergent wetland on the property southwest of the proposed ponds yet there is no mention of this potential wetland within the application materials available for review.
 - WDFW’s Priority Habitat and Species (PHS) online mapper for this parcel shows the water-related critical areas in addition to identifying 1) *Oncorhynchus mykiss* (rainbow trout) present in Parke Creek, 2) shrubsteppe habitat, 3) elk winter range, and 4) mule deer winter range.
 - The Washington Wildlife Habitat Connectivity Working Group has identified this area as habitat conservation areas (HCAs) for American Badger, beaver, and White-tailed Jackrabbits; badger and White-tailed Jackrabbits are listed as species of greatest conservation need in Washington’s State Wildlife Action Plan (SWAP). Our SWAP also identifies much of the shrubsteppe habitat nearby as imperiled.

WDFW recommends that a qualified professional identify all of the critical areas, the potential impacts (including cumulative), and proposed mitigation measures for this proposal. One such mitigation measure could include permanent protection of the approximately 67 acres of shrubsteppe habitat that is not planned for construction of the ponds or land application.

- The LIDAR available for this area and surveyed drawings submitted with the application clearly show three distinct streams within the parcel. The lidar imagery shows a meandering channel upstream of and through the project area and aerial photos show limited riparian habitat along the stream banks. Parke Creek is currently somewhat incised, but ice and/or debris jams during large storm or rain-on-snow events could result in out of bank flows through the parcel. The online USGS program, StreamStats, was used to calculate the estimated 100-year peak flood for this location. The model predicts

a 100-year flow of 1,160 cubic feet per second in Parke Creek. WDFW's online application for [Culverts and Climate Change](#) looks at ten different climate models to compare expected changes in hydrology. For this location in Parke Creek, all ten models agree that the 100-year flow will increase by the 2080s (Figure 2). The topography around the proposed septage storage ponds and Parke Creek does not seem to protect water quality in Parke Creek or the fish and wildlife associated with it if floodwaters were to overtake the storage ponds. **WDFW recommends that the applicant complete a full hydraulic and hydrologic report for WDFW's review prior to approval of the project to ensure there will be no impacts to the channel migration zone or frequently flooded areas of Parke Creek.**

- We were pleased to see a minimum of 100-foot setbacks from the waterbodies for land application of the biosolids. To help ensure this setback distance is maintained throughout the lifetime of operation of this project, **WDFW recommends installing permanent fencing of the riparian habitats and planting native riparian species along the banks to help stabilize the banks, improve fish and wildlife habitat, and assist in filtering any pollutants that may approach waters of the state.**

Thank you again for the opportunity to comment and please let me know if there are any questions or comments we can answer.

Sincerely,



Jennifer Nelson
Fish and Wildlife Biologist
Jennifer.Nelson@dfw.wa.gov
(509) 961-6639



Figure 1: Image taken from Kittitas County’s COMPAS mapper, demonstrating four mapped watercourses (three Type 2 streams and one Type 9) in addition to the Kittitas Reclamation District canal and a potential wetland) on the subject parcel.

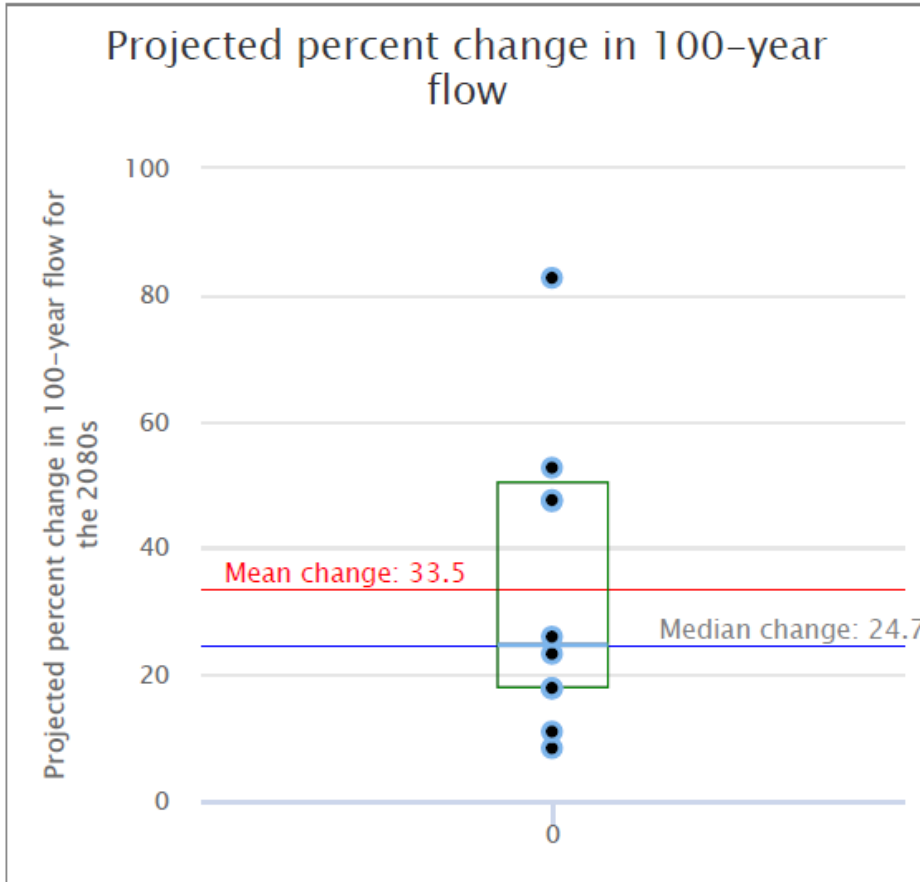


Figure 2: This graph comes from WDFW’s *Culverts and Climate Change* web application. For Parke Creek on the subject parcel, ten out of ten models agree that the 100-year flow will increase in Parke Creek by the 2080s.