



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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August 20, 2020

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

SUBJECT: WDFW COMMENTS ON VA-20-00006 IMMER

Dear Ms. Bacon,

Thank you for the opportunity to comment on the VA-20-00006 Immer application concerning building a structure at 1071 Yellowstone Road and requested variance to the required setbacks from Coal Creek, an important fish bearing stream. Washington Department of Fish and Wildlife (WDFW) has reviewed the application and supporting documents. Our comments surround concerns over the distance between the foundation and the creek and likely ongoing lateral migration/erosion of the creek.

WDFW has a history of site visits to this property, with the last being in June 2017. During the June 2017 site visit, WDFW measured seven feet from the ordinary high-water mark to the house foundation with potential ongoing lateral erosion of the creek bank. WDFW had begun to work with previous homeowner (Mr. Strobridge) on a bioengineered bank stabilization project prior to his illness and the partially built home collapsing. No approved bank stabilization work was permitted or agreed upon prior to the change in ownership.

In the variance application, it states that WDFW has no objection to this proposal. That characterization of our position is not entirely accurate. Coal Creek is both a priority fish bearing stream and is connected to Gold Creek which is one of the remaining Bull Trout spawning streams in Kittitas County. Currently the creek is subject to a high level of development along its riparian area and WDFW remains concerned about increased encroachment into the riparian environment of this creek. WDFW has stated to the applicant that if the county were to grant rebuilding of the site, there needs to be an agreed upon bioengineered bank stabilization plan that will both protect the foundation of the house from creek erosion and have sufficient habitat elements that it will protect the creek and associated aquatic organisms.

WDFW requests that Kittitas County:

1. **If the variance is granted, a condition of approval would be a WDFW approved bioengineered bank stabilization plan that would be accomplished through an approved Hydraulic Project Approval (HPA).**

2. **Further, to assure that agreement on a bank stabilization plan is possible, WDFW requests that a site visit to discuss a plan is conducted between the applicant, WDFW and Kittitas County prior to approval of this variance.**

Thank you again for the opportunity to comment and look forward to a site visit being scheduled if this application goes forward. Please contact me at 509-607-3578 or Scott.Downes@dfw.wa.gov with concerns or questions regarding the above comments.

Sincerely,



Scott Downes
Area Habitat Biologist

Cc:
Elizabeth Torrey, WDFW
Jeremy Johnson, Kittitas County CDS