



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

April 19, 2019

Lindsey Ozbolt
Planning Official
Community Development Services
411 N. Ruby Street, Suite 2
Ellensburg, WA 98926

SUBJECT: WDFW COMMENTS ON PROPOSED COMPREHENSIVE PLAN UPDATE

Dear Ms. Ozbolt,

Thank you for the opportunity to comment on the Comprehensive Plan update (“the draft plan”) for Kittitas County. The Washington Department of Fish and Wildlife (WDFW) is supportive of the overall update to the Comprehensive Plan. We provide our comments and recommendations in keeping with our legislative mandate to “perpetuate fish and wildlife”—a mission we can only accomplish in partnership with local governments.

There are many aspects of the draft plan that we would like to praise:

T-P23 and T-P24: Reducing impacts to wildlife and incorporating wildlife-friendly design features in transportation projects benefits not only fish, wildlife, and habitat, but also public safety. We are very supportive of this language.

4.6: WDFW would like to commend Kittitas County for their foresight, collaboration, and success with leveraging funding sources to replace fish passage barriers throughout the county.

RR-G3: Thank you for including this goal. WDFW will be happy to work with the county to ensure that this goal is met.

RR-P122: Conservation and preservation plans are an important tool in preserving open space and wildlife habitat; thank you for including this.

RPO-P4 and RPO-P5: We greatly support this language.

NE-G4: Thank you for including this goal.

NE-P6: Providing accurate critical area maps is extremely important for protection fish and wildlife species and habitats; WDFW would like to offer our assistance as you develop the maps which pertain to our areas of expertise.

NE-P18: WDFW will be happy to support Kittitas County in their goal of evaluating opportunities to protect these listed fish and wildlife habitats.

There are also parts of the draft plan that WDFW believes would benefit from further revision:

2.2.4: This section discusses the challenges presented by the County's 5,900 nonconforming lots. WDFW recommends using this paragraph of the draft plan to memorialize language about the opportunity for landowners to use the Kittitas County Transfer of Development Rights (TDR) program, the fee simple property acquisition and conservation easement program offered by Kittitas Conservation Trust, the Washington Conservation Commission's Agricultural Easement program, or any of the other programs available which conserve resource lands and open spaces in Kittitas County.

LU-G5: WDFW supports this statement; however, it should be noted that there are currently no receiving sites for the TDR program.

2.4.3: The second paragraph under *Water Rights* should be modified to state that Kittitas County has "a duty and the authority to protect ground and surface water quantity and quality".

2.7: Until Kittitas County adopts an updated Critical Areas Ordinance, this section should state that the county recognizes all 5 critical areas (wetlands, aquifer recharge areas, frequently flooded areas, geologically hazardous areas, and fish and wildlife habitation conservation areas). Additionally, this section should direct county staff to consult with the agencies with expertise for all potential land use actions that could impact one or more of those critical areas.

2.9: Instead of specifying the 2012 Kittitas County Multi-Jurisdictional Hazard Mitigation Plan, WDFW recommends that, to allow for future updates, the language be modified to state that the Comprehensive Plan will adopt the most recent version of the Hazard Mitigation Plan.

Table 3-1: WDFW would like to point out the conundrum presented by this table. Although the intent of the GMA is to focus development in urban areas, this table demonstrates that unincorporated Kittitas County has experienced a 63% growth rate, whereas incorporated areas have only grown by 21%.

4.1: A 6th bullet point should be added to the list of goals: "restore, provide, and maintain ecological connectivity". This will bring Kittitas County in line with the other major transportation entities who have realized the importance of ecological connectivity in terms of human safety on public roadways. Preliminary data for Washington State indicates that over 300 million dollars are spent every year on car-wildlife collisions; providing connectivity in the form of wildlife crossings not only reduces human fatalities and injuries, but also reduces maintenance and insurance claim costs.

LU-P78: “Kitsap County” should be changed to “Kittitas County”.

U-G9: Include “critical areas” as areas to avoid routing transmission lines.

11.2.1: The L.T. Murray Wildlife Area is owned and managed by WDFW; we recommend incorporating this into the sentence.

11.2.2: “Game management Units” should be changed to “Game Management Units” to reflect the proper capitalization of this term.

Voluntary Stewardship Program, page 130: Although it is correct that lands which participate in VSP are not subject to the goals listed in the draft plan, it should be noted that once those lands are no longer conducting agricultural practices, they are then subject to the Critical Areas Ordinance. For clarity, this section should be revised to reflect this important point.

NE-P37: As it is written, the language of this goal is broad and nonspecific – the phrases “sufficiently flexible” and “enjoyment of private property” are particularly subjective and non-discrete. We encourage you to work with the Washington Department of Ecology to provide further clarification on this section.

Thank you again for the opportunity to comment and participate in this important update process. Please contact me to discuss WDFW’s recommendations or any of the other comments presented within this letter.

Sincerely,



Elizabeth Torrey
Assistant Regional Habitat Program Manager
Elizabeth.Torrey@dfw.wa.gov
509-607-6711

cc: Jennifer Nelson, WDFW Fish & Wildlife Biologist