



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Ellensburg District Office • 201 N. Pearl St, Ellensburg, WA 98926
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August 27, 2024

Jamey Ayling
Kittitas County
Community Development Services
411 N. Ruby Street; Suite 2
Ellensburg, WA 98926

RE: WDFW comments on CP-24-00003 Flying A Land PUD

Dear Mr. Ayling,

Thank you for the opportunity to comment on the proposed Planned Unit Development for Flying A Land (CP-24-00003) near Naneum Creek and north of Cascade Irrigation District's main canal. The Washington Department of Fish and Wildlife (WDFW) has reviewed the application materials and we are familiar with the project area. With this proposal, WDFW is primarily concerned about the identification and protection of critical areas on or near the project site and how they may be impacted by future development.

Mapping produced during the County's [Wilson-Naneum-Cherry Assessment](#) show Little Naneum Creek originating from Naneum Creek and flowing through the eastern edge of the project area. During a site visit in September 2021, this channel was dry and appeared to be somewhat managed, although locations downstream maintain perennial flow. Because there are not adequate controls to prevent irrigation deliveries into the channel and there is no fish screen to prevent fish from entering the water course, WDFW still considers this water course to be a regulatory stream. Naneum Creek and Little Naneum Creek are important for conveying irrigation water deliveries as well as providing miles of fish habitat and flow conveyance during periods of high flow. Natural floodplain processes and meandering streams are not only good for fish and fish habitat, but also reduce velocities and therefore reduce flood impacts during high flow events. **Figure 1** is a screen capture from a drone video that was provided to WDFW and Kittitas County Public Works from May 3, 2023 during a flood event. This figure shows Naneum Creek overtopping its banks and flooding much of the area north of Cascade Irrigation District's main canal, including the channel that is likely Little Naneum Creek, based on the meandering channel pattern in the photo. This image also shows much of the eastern portion of the property with standing water and very much within a frequently flooded area, as defined by Kittitas County Critical Areas Ordinance (17A.05).

The riparian vegetation along the streams provide habitat for fish and wildlife and help to stabilize the stream banks, slow and store flood waters, and protect water quality. Maintaining or

improving the function of the riparian areas associated with Naneum Creek and Little Naneum Creek will not only improve fish and wildlife habitat, but it will help moderate flooding.

As this property converts from agriculture to more rural development, it will also be important to properly decommission the irrigation diversions. It is likely a Hydraulic Project Approval (HPA) would be required from WDFW for this work, and we'd welcome the opportunity to work with the project proponents to assist in this manner.

The [National Wetlands Inventory](#) maps almost the entire property as a wetland. This may be a result of current and past irrigation practices and seepage and/or backwatering associated with the Cascade Irrigation District canal. Regardless, a wetland survey should be required prior to approval of this short plat to ensure there will be adequate building locations and septic locations on each new lot.



Figure 1. Screen capture from drone footage on May 3, 2023 taken by a private landowner and provided to WDFW and Kittitas County Public Works.

We appreciate the opportunity to comment and work with the proponents to meet their needs. Please feel free to contact me at (509) 962-3421 or Jennifer.nelson@dfw.wa.gov if you have any questions about these comments.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Nelson". The ink is dark and the signature is fluid, with a long, sweeping underline.

Jennifer Nelson
Area Habitat Biologist