



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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January 7, 2026

Zach Torrance-Smith
Kittitas County Community Development Services
411 N. Ruby Street, Suite 2
Ellensburg, WA 98926

SUBJECT: WDFW COMMENTS ON RU-25-00004 Thomas

Dear Mr. Torrance-Smith,

Thank you for the opportunity to review and comment on Kittitas County reasonable use application RU-25-00004 Thomas, a proposal to construct a single-family residence, an outbuilding and associated infrastructure on Kittitas County parcel 186635. The Washington Department of Fish and Wildlife (WDFW) has reviewed the application materials on file and our comments are regarding the project's impact on Fish and Wildlife Habitat Conservation Areas (FWHCAs, CAO Chapter 17A.04), specifically riparian habitat.

As referenced in the critical areas report, there is a perennial fish-bearing stream on the northern portion of the property. The stream is a tributary to Lodge Creek, ultimately flowing into Lake Kachess.

The proposed new residence and outbuilding are located within the stream's Riparian Management Zone (RMZ, CAO 17A.04.030). RMZs shall be maintained in a predominantly well-vegetated and undisturbed condition to ensure that they perform their intended function and value of protecting the FWHCAs. The RMZ width shall be either the site-specific Site Potential Tree Height (SPTH) or 100 feet, whichever is greater, consistent with Best Available Science for pollution removal and Volume 2 of WDFW's Riparian Ecosystem Management Recommendation (CAO 17A.04.030(2)). Using WDFW's [SPTH mapping tool](#), the RMZ buffer at this location is 212 feet.

The Site Potential Tree Height mapping tool lists the average maximum height of the tallest dominant trees for a given area. At this specific location, western white pine is the tallest tree with a value of 212 feet and the secondary tree species is douglas fir with a value of 148 feet. WDFW is available for a site visit to determine if western white pine is present and dominant in the vicinity or if the secondary value may be appropriate.

To ensure no net loss of the RMZ, we recommend the mitigation sequencing of avoidance, minimization and ultimately mitigation. We recommend avoiding and minimizing impacts to the riparian management zone by siting the new infrastructure as far away from the stream as possible and reducing the development footprint as feasible. Where impacts cannot be avoided, mitigation will be needed to offset the impact to the stream's riparian buffer.

The critical areas report notes two different values for the permanent development impact (8,841sq ft and 8,481sq ft) and references the prior County CAO Standard RMZ widths for buffer protection. The critical areas report proposes to compensate for the permanent impact by adding 8,500sq ft to the riparian buffer on the southern portion of the property using buffer averaging. We don't see a plan/exhibit included with the application materials that specifically identifies where the 8,500sq ft proposed addition to the existing buffer is located. Further, WDFW believes preservation alone doesn't achieve no net loss. Are stream or riparian enhancements included in the proposal? Is the area fully within the RMZ identified by SPTH? How will the area be protected in perpetuity? We request additional information on the proposed mitigation to evaluate the adequacy and ensure no net loss of the riparian buffer function and value.

We recommend development of a mitigation plan, to be reviewed and approved by WDFW prior to construction, as a condition of the reasonable use determination. The mitigation plan should quantify the proposed mitigation measures and demonstrate equivalent or greater biological functions of FWHCAs consistent with Kittitas County's Critical Areas Ordinance (CAO 17A.04.070). If developing a planting plan, it should include monitoring to ensure survivability of the planted plants. We recommend at least three years of monitoring with an 80% survivability. If metrics fall below 80%, we recommend that similar plants be planted to replace those that did not survive.

We look forward to working collaboratively with the County and the applicant on this project. Please contact me at (509) 406-3206 or Cassandra.Weekes@dfw.wa.gov if you have any questions or concerns regarding these comments.

Sincerely,



Cassandra Weekes
Area Habitat Biologist