



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Region 3 • 1701 South 24<sup>th</sup> Avenue, Yakima, WA 98902-5720  
Telephone: (509) 575-2740 • Fax: (509) 575-2474

April 20, 2026

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

SUBJECT: WDFW COMMENTS ON RU-26-00001 Pazaruski

Dear Mr. Torrance-Smith,

Thank you for the opportunity to review and comment on Kittitas County Reasonable Use Application RU-26-00001 Pazaruski, a proposal to construct a 992 square foot residence, 600 square foot detached garage, driveway/access improvements and the installation of a culvert crossing on Kittitas County parcel 558535. The Washington Department of Fish and Wildlife (WDFW) is familiar with this parcel and has previously been on site (2018) to review the streams on the property. Our comments are regarding the project's impact on Fish and Wildlife Habitat Conservation Areas (FWHCAs, CAO Chapter 17A.04), specifically stream and riparian habitat.

As referenced in the critical areas report and observed during WDFW's prior site visit, there are two streams on the property. The critical areas report states: "These appear to be seasonal streams." WDFW observed both streams flowing in October 2018. The streams should be considered perennial unless a formal stream typing is completed by the Department of Natural Resources' Timber, Fish & Wildlife collaborative and determines otherwise. The streams are tributaries to Coal Creek, a fish-bearing tributary to Lake Keechelus. Coal Creek, including its tributaries, provide important habitat for native salmonids, such as Endangered Species Act (ESA) listed bull trout, and westslope cutthroat trout.

The proposed project is wholly within the Riparian Management Zone (RMZ, CAO 17A.04.030) of the streams. Kittitas County's Critical Areas Ordinance (CAO) states that RMZs and buffers shall be maintained in a predominately well-vegetated and undisturbed condition to ensure that they perform their intended function of protecting the FWHCA. Further, Riparian is identified as a Priority Habitat under WDFW's Priority Habitat and Species Program.

Under Kittitas County's CAO, 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 the [SPTH mapping tool](#), the RMZ buffer at this location is 126 feet from the ordinary high water mark (OHWM).

We recommend following the mitigation sequencing of avoidance, minimization and mitigation. Avoiding and minimizing impacts to the RMZ as much as possible by reducing the development footprint as feasible and siting the infrastructure as far away from the streams as possible. Where impacts cannot be avoided, compensatory mitigation will be needed to offset the impacts to the streams' riparian buffers.

While Kittitas County's CAO doesn't include mitigation ratios for disturbance to riparian areas, the standard is mitigation must achieve equivalent or greater biological functions, including the loss of shade and any impervious surfaces being placed within the RMZ that preclude ecosystem function.

The Narrative Owner Statement included with the application materials states: "... opportunities for formal mitigation are limited ... several measures will be implemented to minimize impacts and protect existing environmental functions." These measures include minimizing clearing, retaining native vegetation, constructing best management practices, stream crossing design, and post-construction stabilization. Although these measures may minimize the disturbance of the project, they will not achieve no net loss of ecological function.

The proposed stream crossing will need to meet [WAC 220-660-190](#) and will require a Hydraulic Project Approval (HPA) permit from WDFW prior to construction. The water crossing structure must be designed to pass the 100-year flood flow, including ice, large wood and associated debris. During a site visit in October 2018, WDFW reviewed a potential access road for this parcel, with access from Snoqualmie Drive, and took bankfull measurements of the stream. The bankfull width measurements ranged from 11-14 feet. Based on these measurements, the 48" culvert proposed on the site plan is not sufficient. Following WDFW's Water Crossing Design Guidelines and WAC 220-660-190, WDFW recommends a bridge. We request a site visit with the landowner to review the proposed stream crossing location and discuss the water crossing structure.

WDFW recommends development of a mitigation plan for the impacts to the Riparian Management Zone, to be reviewed and approved by WDFW. The mitigation plan should quantify the proposed disturbance within the RMZ and the mitigation measures to achieve equivalent or greater biological functions of the FWHCA consistent with Kittitas County's Critical Areas Ordinance (CAO 17A.04.070). If planting is proposed as mitigation, it should include monitoring to ensure survivability of the planted plants. We recommend at least three years of monitoring with 80% survivability. If metrics fall below 80%, we recommend that similar plants be planted to replace those that did not survive.

Given there are two streams on this small parcel, and the RMZs wholly encompass the parcel, the plan should also explicitly state how much of the riparian area is to be left. Significant incursions into the riparian area are likely to result in substantial impacts to the streams and avoidance and minimization should be the first step of this mitigation plan. We recommend the mitigation plan be developed prior to approval of this application to determine if the impacts could be mitigated for.

WDFW requests to meet on site with the applicant and the County to review the proposed development, discuss the streams and mitigation, and determine the appropriate water crossing structure and sizing.

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](mailto:Cassandra.Weekes@dfw.wa.gov) if you have any questions or concerns regarding these comments.

Sincerely,



Cassandra Weekes  
Area Habitat Biologist