



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

February 10, 2025

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

SUBJECT: WDFW COMMENTS ON PARKE CREEK LANDING PLANNED UNIT DEVELOPMENT (PD-24-00002, PLAT LP-24-00004, SEPA SE-25-00001)

Dear Mr. Ayling,

Thank you for the opportunity to comment on the planned unit development proposal for Parke Creek Landing, LLC near Parke Creek. The Washington Department of Fish and Wildlife (WDFW) has specialized knowledge of the wildlife and critical areas surrounding the project area. As the agency of expertise and as a nearby land manager, we offer the following comments to be considered as part of this review and determination process in addition to our November 2023 letter for the rezoning of the parcel (CP-23-00001), hereby incorporated by reference.

The parcel proposed for this Planned Unit Development (PUD) and associated Off Road Vehicle (ORV) Park contains numerous critical areas, including several different Fish and Wildlife Habitat Conservation Areas (FWHCA). The application materials available for review on the website reference a critical areas report, although none was available online for review. **WDFW recommends early coordination between the project proponents, Kittitas County CDS staff, qualified critical area professionals, and WDFW staff to ensure all our concerns can be efficiently and effectively addressed in the report. As the agency with expertise for FWHCA, WDFW requests to review and provide comments to CDS staff on the technical merits of the critical areas report, prior to approval of the project.**

Much of the parcel is shrubsteppe habitat; a priority habitat as identified in WDFW's Priority Habitats and Species (PHS) Program. This parcel is also a part of two different Biodiversity Area and Corridors (BAC), providing connectivity for deer, elk, Townsend's Ground Squirrels, and numerous other species. The eastern portion of the parcel contains intact shrubsteppe habitat, despite a history of agricultural grazing, and provides habitat for numerous shrubsteppe obligate species, including Blacktail Jackrabbits, Burrowing Owls, Townsend's Ground Squirrels, Sage Thrashers, and Sagebrush Sparrows to name a few. This area has historically been occupied by Greater Sage Grouse as well and has been identified in the Washington Shrubsteppe Restoration and Resiliency Initiative (WSSRI) as a priority corridor for sage grouse recovery. **We request wildlife surveys occur for sensitive and PHS species prior to approval of the project and prior to any ground disturbing activities. WDFW requests to work**

collaboratively with the project team on these surveys to ensure they meet the approved protocols, increasing efficiency for the project proponents. Appropriate wildlife survey timing is likely to be in the spring, around April-May.

Parke Creek is a fish bearing stream that runs through the parcel. We appreciate the applicants' acknowledgement and proposed protection to Parke Creek and its riparian habitat. According to Kittitas County Code 17A.04.030, the required riparian management zone for Parke Creek is 100 feet on each side of the stream, with measurements beginning at the ordinary high-water mark.

WDFW supports the applicants' proposal to protect and enhance the entire riparian management zone along Parke Creek, consistent with the County's critical areas ordinance, but the protection of this FWHCA and adherence to the riparian management zone widths within the code does not mitigate impacts to other critical areas from the project.

The application materials available for review reference the existing and proposed irrigation infrastructure on the property. WDFW is familiar with the unscreened irrigation diversion just upstream of the northern property boundary. Any use or modification of this diversion and associated ditch should result in properly screening the diversion to prevent fish entrainment and ensuring fish passage, consistent with RCW 77.57 as well as installation of a meter, consistent with RCW 90.03.360. WDFW would be pleased to work with the landowners and water users to assist them with compliance for this irrigation diversion. It is unclear if the proposed pond that is up to 3,300 cubic yards of material removed would be within this irrigation ditch, or if it is located elsewhere on the project site. **WDFW requests additional information about the proposed irrigation pond and whether it will be fed by Parke Creek water or Kittitas Reclamation District water.**

Any construction work over or adjacent to Parke Creek, including irrigation related work and water crossing structures will require a Hydraulic Project Approval (HPA) from WDFW for the protection of fish life. **Please include WDFW early in the design phases so we can help ensure an efficient HPA review process.**

There are several references within the application materials to the nearby Quilomene Wildlife Area Unit, managed by WDFW. Our wildlife area provides critical winter range for deer and elk herds as well as important habitat for numerous other wildlife species, including many shrubsteppe obligates. WDFW is pleased to provide recreational access to the public, and requests that if our wildlife areas are advertised within this project, our rules of conduct, including the Green Dot Road rules and Discover Pass requirements, also be advertised. **WDFW requests collaboration on potential signage and education materials for residents and visitors to the ORV Park and RV Storage Area.**

The materials available for review discuss the removal of most of the shrubs within the intact shrubsteppe portion of the project, where the Outdoor Recreation Area will be built. Several places within the application dismisses this shrubsteppe habitat as non-important and as not fitting in with the surrounding land uses. WDFW strongly disagrees with these statements. **We look forward to better understanding the details for the proposed project, including what is**

planned for Tract D, and collaborating on a path forward that will adequately mitigate for all potential impacts to all critical areas onsite.

The notice of application for this project indicates that the County expects to issue a Determination of Non-Significance (DNS) for this proposal. While we acknowledge that the applicant proposes to identify and avoid impacts to the riparian management zone of Parke Creek, the proposal completely dismisses any and all impacts to shrubsteppe habitat and the PHS species that rely on it. **WDFW recommends delaying a SEPA determination until 1) the appropriate wildlife and habitat surveys have been completed; 2) a comprehensive Habitat Management Plan has been developed, reviewed and agreed to by WDFW; and 3) appropriate mitigation has been applied and completed for all critical areas, consistent with the Best Available Science and associated recommendations. Without these mitigation measures, we recommend a Determination of Significance due to the unmitigated impacts to shrubsteppe habitat.**

We look forward to spending time with the applicant and their team, to help address some of these concerns. Thank you again for the opportunity to comment and please let me know if there are any questions or comments we can answer.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Nelson".

Jennifer Nelson
Fish and Wildlife Biologist
Jennifer.Nelson@dfw.wa.gov
(509) 961-6639