



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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September 22, 2022

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

SUBJECT: WDFW COMMENTS ON RZ-22-00004 and CP-22-00004 Teanaway Ridge

Dear Ms. Bacon,

Thank you for the opportunity to comment on the proposed Rezone and Comprehensive Plan Amendment. The Washington Department of Fish and Wildlife (WDFW) is familiar with the project area, and we have reviewed the application materials on file. We have also recently provided comments for the Yakima River Campground conditional use application (2016 and 2022) for this property which further detail the important critical areas present on the property, particularly the anadromous fish habitats as well as the healthy and complex riparian management zone.

Since at least 1987, WDFW and its predecessor agencies of the Washington Department of Fisheries and the Washington Department of Wildlife have been providing comments about the importance of this property to fish and wildlife resources. These concerns remain relevant in 2022 and WDFW appreciates the County's consideration of these comments to ensure adequate protection of all critical areas and the Shoreline of the Yakima River, consistent with the Goals and Policies within the Natural Environment section of the Comprehensive Plan. Healthy and complex riverine and riparian habitats exist on this parcel in part because natural channel processes are functional and they provide excellent fish habitat for salmon, steelhead, bull trout and other native species.

The overwhelming majority of the property is currently zoned as Forest and Range, with only a small portion zoned as Rural 5. The current zoning map appears to use a thread of the Yakima River as the boundary between zoning types, creating this parcel with two zones. While we agree that an individual parcel should not fall into multiple zoning designations, in this instance, the Forest and Range Designation for the entire property is consistent with the natural resources and critical areas on this property as well as the purposes described in Kittitas County Code (KCC). As stated in KCC 17.56.010, the purpose and intent of Forest and Range Zoning is to provide for areas of Kittitas County wherein natural resource management is the highest priority and where the subdivision and development of lands for uses and activities incompatible with resource management are discouraged. The Teanaway Ridge property is rich with natural resources including Shorelines of the State and all five designated critical areas including Wetlands and Fish and Wildlife Habitat Conservation Areas. In addition to the priority habitats and species present, portions of this property are within the frequently flooded areas as well as the channel migration zone (Geologically Hazardous Areas). The proposed rezone would enable more

parcels and more infrastructure within the project area, thereby increasing risks to public safety as well as increasing impacts to natural resources, including threatened Mid-Columbia Steelhead, spring Chinook salmon, coho salmon, and threatened Bull Trout. Increasing risks to public health and safety (flood risks) or to natural resources (anadromous fishes) are contrary to the Goals and Policies stated within the Comprehensive Plan.

Rezoning the small portion of the property that is zoned Rural 5 to the Forest and Range Zone helps to preserve these important Critical Areas and Shorelines, consistent with the goals and policies within section 11.7.3 Natural Environment in Kittitas County's Comprehensive Plan. Natural Environment Policies NE-P2 and NE-P3 are specific to giving special consideration to anadromous fisheries and protection of their habitats and regulating development in a manner that balances protection of property rights and human health and safety with the protection of critical areas. The Forest and Range Zoning designation for this property is consistent with the policies referenced above and Rural 5 is not.

WDFW strongly recommends the Teanaway Ridge property be zoned as Forest and Range as it currently is for the vast majority of the parcel. The Forest and Range designation is most consistent with the Natural Environment Goals and Policies within the Comprehensive Plan as well as the Best Available Science for protection of Shorelines and Critical Areas.

Thank you again for the opportunity to comment and for the County's commitment to protect critical areas. Please let me know if there are any questions about our comments. I can be reached by phone at (509) 961-6639 or email at Jennifer.nelson@dfw.wa.gov.

Sincerely,

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

Jennifer Nelson
Fish and Wildlife Biologist