



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 25, 2025

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

SUBJECT: WDFW COMMENTS SE-25-00014 Shamkhi

Dear Mr. Gasawski,

Thank you for the opportunity to comment on SE-25-00014 Shamkhi, a SEPA checklist for proposed improvements to Jay Way, a private road that provides access to the lots located along Jay Way. The Washington Department of Fish and Wildlife (WDFW) is familiar with the area and has been on site for a prior land use application for a Jay Way parcel. We have reviewed the application materials on file and our comments are regarding the project's impact on Fish and Wildlife Habitat Conservation Areas, such as priority habitats and species (PHS), particularly stream and wetland habitats.

Coal Creek, a perennial fish-bearing tributary to Lake Keechelus, is within the project vicinity, as reflected in the Critical Areas Report. Coal Creek is an important tributary that provides habitat for native salmonids, such as Endangered Species Act (ESA) listed bull trout, and westslope cutthroat trout.

The project area is also located within a large wetland complex. Wetlands are crucial ecosystems that provide habitat for a wide variety of fish, amphibians, reptiles, birds, mammals and beyond. Wetlands also have human-related benefits, such as flood control and water quality improvement. Any infrastructure-related impacts to Coal Creek and the wetlands are likely to degrade the habitat quality and quantity and must be adequately mitigated.

Coal Creek, the Riparian Management Zone (RMZ) of Coal Creek and the wetland complex are designated Fish and Wildlife Habitat Conservation Areas (FWHCAs) under Kittitas County's Critical Areas Ordinance (CAO; Chapter 17A.04) and mitigation for alteration or impacts to these areas shall achieve equivalent or greater biological functions (Chapter 17A.04.070).

The Critical Areas Report is primarily focused on development of the nine parcels located on Jay Way, although we believe provides sufficient information to evaluate the current proposal – road improvements to Jay Way – impacts on Fish and Wildlife Habitat Conservation Areas.

The proposed mitigation ratio of 1:1 as suggested in the Critical Areas Report is inadequate to achieve equivalent or greater biological function and needs to be increased in order to be consistent with Kittitas County's CAO. Jay Way is located within wetland buffers and the Coal Creek RMZ. Kittitas County's CAO lists mitigation ratios for Category II forested wetlands from 4:1 (Restoration) up to 16:1 (Enhancement) and Category III wetlands from 2:1 (Restoration) up to 8:1 (Enhancement). While no mitigation ratios are listed for disturbance to riparian areas, the standard is that the mitigation must achieve no net loss, including loss of shade and any impervious surfaces being placed within the RMZ that would preclude ecosystem function.

WDFW requests that Kittitas County include development of a comprehensive Habitat Management Plan (HMP) to be reviewed and approved by WDFW prior to the SEPA determination. A completed HMP is necessary to evaluate if the proposal meets the no net loss standard of critical areas function required for approval of the application. The plan should quantify the proposed development impacts and identify sufficient mitigation for all RMZ and wetland impacts, consistent with the Best Available Science and associated recommendations.

Along Jay Way, one Reasonable Use Application is already under review for development of parcel 738035 and the SEPA checklist for Jay Way improvements also mentions two homes will be built on lots 7 and 8, parcels 718035 and 728035. Because the mitigation requirements for elements of the Jay Way development are overlapping with individual parcel development, WDFW would welcome an opportunity to work collaboratively with the County and Jay Way landowners to evaluate impacts associated with the development holistically in an effort to streamline mitigation review and decisions. Consideration of the entire development (nine parcels and the road) at a single time is likely to expedite review for the landowners and provide them with some certainty moving forward.

Thank you for the opportunity to comment and for the County's commitment to protecting critical areas. Please let me know if there are any questions about our comments; we look forward to working collaboratively on next steps. I can be reached by phone at (509) 406-3206 or email at Cassandra.Weekes@dfw.wa.gov.

Sincerely,



Cassandra Weekes
Area Habitat Biologist