



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Region 3 • 1701 South 24<sup>th</sup> Avenue, Yakima, WA 98902-5720  
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December 22, 2025

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

SUBJECT: WDFW COMMENTS ON RU-25-00003 Sage

Dear Ms. Myers,

Thank you for the opportunity to review and comment on Kittitas County reasonable use application RU-25-00003 Sage, a proposal to construct a dry cabin on parcel 885835. The Washington Department of Fish and Wildlife (WDFW) is familiar with the property and met with Maryn Sage (landowner) on site in July 2025 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 riparian habitat.

As observed during the site visit and referenced in the critical areas report, there are two perennial streams on the property. The stream bisecting the parcel is Townsend Creek, a fish-bearing tributary to Lake Keechelus. The second stream is a tributary to Townsend Creek and flows into Townsend Creek on the property.

The proposed cabin location is within the Riparian Management Zone (RMZ, CAO 17A.04.030) of Townsend Creek. 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 the [SPTH mapping tool](#), the RMZ buffer at this location is 109 feet.

To ensure no net loss of function and value of the RMZ, we recommend avoiding and minimizing impacts to the RMZ as much as possible by siting the cabin and any associated infrastructure as far away from the stream as feasibly possible. Where impacts cannot be avoided, mitigation will be needed to offset the impacts to Townsend Creek's riparian buffer.

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

The critical areas report states "To compensate for the 1,887sf of permanent impact to the buffer from the home and road, an equal amount of buffer (1,887sf) will be added to the stream buffer as compensation." We request clarification on what this means. Are stream or riparian enhancements proposed within this area? WDFW believes preservation alone doesn't achieve no net loss. Further, according to the Stream Buffer Averaging Exhibit in the critical areas report, a portion of the proposed buffer expansion is beyond the stream's riparian buffer area, as defined by WDFW's Site Potential Tree Height mapping tool. We don't believe buffer averaging is appropriate in this situation.

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.

Thank you for the early coordination and 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