

October 1, 2018

Chelsea Benner Kittitas County Community Development Services 411 N. Ruby Street; Suite 2 Ellensburg, WA 98926

## RE: WDFW comments on SD-18-00001 Williams Shoreline Substantial Development along Manastash Creek

Dear Ms. Benner,

Thank you for the opportunity to comment on the proposed Shoreline Substantial Development Permit (SD-18-00001 Mitchell) to construct a private bridge for a single family residence.

Mid-Columbia Steelhead have been documented in Manastash Creek and they are currently federally listed as threatened on the endangered species list and are a state candidate species. Manastash Creek supports other fish species as well; including chinook and coho salmon. Millions of dollars in habitat restoration have been invested in the Manastash Watershed for salmon and steelhead recovery and the fish are responding to these conservation efforts. The Williams' have been willing partners on several of these restoration projects.

WDFW met onsite with Mr. Williams and his bridge engineer for a pre-application meeting to discuss the bridge design in July 2018. Preliminary review of the bridge designs indicate that the design meets our current regulations and guidelines for new bridges and Mr. Williams has started the application process for a Hydraulic Project Approval (HPA) from WDFW. The design includes using the cleared trees in channel and along the banks for additional instream fish habitat. The large wood installation within the channel should be part of the Shoreline Development Permit proposal.

While the application materials may be sufficient for hydraulic project review, they lack information needed for the Shoreline Development Permit review. The application materials do not reflect the clearing or fill (grading) needed for driveway construction through the vegetated riparian habitat and Shoreline designated as Rural Conservancy. In the SEPA checklist, the area of disturbance and impervious surface only describes the footprint of the bridge deck (14' x 60') and does not describe actions within the Shoreline jurisdiction that will occur to construct the driveway on either side of the proposed bridge. Without this information, it is difficult to assess impacts to the Shoreline environment, critical areas, or the 100 year floodplain. The riparian corridor along Manastash Creek provides habitat for fish and wildlife and it helps to stabilize the

stream banks, slow and store flood waters, and protect water quality. Additionally, there is little mention of the nearby infrastructure that delivers supplemental water to Manastash Creek; it is critical to ensuring perennial flow in lower Manastash Creek for fish and riparian vegetation.

Please provide additional information for the design and construction of the driveway associated with the proposed bridge and any other work that is proposed within the Shoreline jurisdiction.

We appreciate the opportunity to comment and work with the proponents to meet their needs. Please feel free to contact me at (509) 961-6639 or <a href="mailto:Jennifer.nelson@dfw.wa.gov">Jennifer.nelson@dfw.wa.gov</a> if you have any questions about these comments.

Sincerely,

Jennifer Nelson

Area Habitat Biologist

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