



Confederated Tribes and Bands  
of the Yakama Nation

Established by the  
Treaty of June 9, 1855

Thursday, January 22, 2009

Clint Short Plat (SP-08-00054)  
ATTENTION: Allison Kimball  
411 N. Ruby St., Suite 2  
Ellensburg, WA 98926

I appreciate the opportunity to provide comments on the Notice of Application (NOA) to Kittitas County regarding the proposed Clint Short Plat (SP-08-00054). This proposal is for a 2 lot subdivision along Reecer Creek.

Please find attached correspondence to me from my fisheries staff. I concur with the findings of the report for fisheries protection. As you may know, substantial funding is being invested in the Yakima River Basin, to allow it to once again support a viable salmonid and resident fish population. The proposed lot configuration in the floodplain of Reecer Creek may add to the cumulative negative effects that result in a degraded watershed.

Please contact my staff regarding your response to the mitigation measures noted in the attached memo. John Marvin can be reached at 509-966-7406.

Sincerely,

Philip Rigdon  
Deputy Director of Natural Resources  
Yakama Nation

## MEMORANDUM

TO: Phil Rigdon, Deputy Director, DNR  
THROUGH: Scott Nicolai, Yakima Subbasin Habitat Coordinator, YKFP  
FROM: John Marvin, Habitat Biologist, YKFP  
DATE: Thursday, January 22, 2009  
RE: Clint Short Plat (SP-08-00054)

Kittitas County is accepting public comments on a Notice of Application for a 2-lot subdivision (SP-08-00054) on approximately 39 acres along the Reecer Creek. The subject property is directly north of Clarke Road, approximately 2.75 miles northwest of the City of Ellensburg. The proposal is to create two lots, with Reecer Creek as the property line.

According to the Kittitas County web mapping, the subject property contains at least three critical areas: 100-year floodplains, wetlands, and Reecer Creek. While there is no evidence of anadromous fish presence in this reach of Reecer Creek, potential impacts downstream should be addressed.

The best available science indicates that division of critical areas often leads to onsite and downstream degradation, in addition to increases downstream flooding.

### **Floodplains**

Reecer, Currier and Dry Creeks all contributed to significant flooding in West Ellensburg in January of 2009. There was significant flooding along Reecer Creek well outside the designated FEMA 100-year floodplain; although it is not known whether the subject property was affected. Development in and along streams often has unintended impacts on flooding patterns downstream. The subdivision is proposing to create a “flag” parcel to access Clarke Road; this will necessitate a bridge to access Lot 2 for any future development. The applicant is also the adjacent property owner of parcel 14032 to the south along Clarke Road. A boundary line adjustment in addition with proposed short plat could provide access from Clarke Road without the need for a bridge. If a bridge is required, it should be designed to meet FEMA standards.

### **Wetlands**

The National Wetlands Inventory indicates the subject property contains a palustrine, emergent, seasonally flooded wetland approximately 3 acres in size. Wetlands are important floodplain features and help to attenuate downstream flooding.

### **Recommendation**

- Reconfigure parcel dimensions to place Reecer Creek on one parcel.
- A boundary line adjustment with parcel 14032, in addition to the proposed short plat could provide access from Clarke Road without the need for a bridge. If

parcel reconfiguration is not required, bridge engineering should be provided to meet FEMA standards.

- A wetland delineation should be provided, and wetland dimensions recorded on the final plat.

c: file