



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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March 19, 2021

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

SUBJECT: WDFW COMMENTS ON CU-20-00005 HIDDEN POINT

Dear Ms. Bacon,

Thank you for the opportunity to comment on the CU-21-00002 Sweetwater Ranch application concerning the construction of an event center on Charlton Road near Naneum Creek (“the project”). Washington Department of Fish and Wildlife (WDFW) has reviewed the application and supporting documents. Our comments are regarding the project’s impact on priority fish and wildlife habitats, particularly shrubsteppe and riparian habitats.

Within the project footprint are several critical areas that could potentially have impact on fish and wildlife habitat conservation areas if avoidance or mitigation is not implemented in the proposal. In the northwest of the proposal area is priority shrubsteppe habitat which is used by a variety of priority wildlife species, including but not limited to mule deer. In the eastern part of the project area is Naneum Creek and its associated riparian area. Naneum Creek is an important fish-bearing stream and its associated riparian area supports a wide diversity of wildlife for breeding, wintering, and migration. Naneum Creek in this vicinity has characteristics of a Channel Migration Zone (CMZ) and the unnamed tributary referenced in the report is likely a side channel of Naneum Creek. The critical areas report does not mention a CMZ here. Riparian and shoreline impacts should be measured from the edge of the CMZ and to properly designate the shoreline impacts here, a measurement of the CMZ should be conducted and factored into the assessment.

The proposed parking areas, particularly Parking Area D and E (and potentially C depending on the extent) are within priority shrubsteppe habitat and converting these areas to a parking area would result in loss of shrubsteppe habitat through clearing. Further, from aerial imagery there appears to be a drainage with some riparian vegetation going through these proposed parking areas that would be impacted. It is stated in the critical areas report that this is an irrigation ditch, yet no assessment of current habitat quality or function of that area is described. WDFW would like to understand the impacts of that drainage for fish and wildlife habitat. Parking Area B is next to a well vegetated area which the critical areas report identifies as an irrigation ditch. WDFW would like to understand the connection of that ditch to Naneum Creek and the implications of the parking area on the associated habitats here. WDFW requests that these parking areas either be configured to avoid these habitat impacts, or habitat mitigation proposed (such as enhancement of other habitat areas on the property)

to offset these impacts. WDFW would like to meet on site with the applicant and Kittitas County to further discuss the issue of minimization of habitat impacts and/or habitat mitigation.

Other elements of the proposal, listed in the project narrative, in addition to the parking areas include water rights, potential fire wising and trails listed including the existing pole barn already well within the riparian area of Naneum Creek. WDFW is concerned that if the proposal is granted there could be further impacts to the riparian area and Naneum Creek itself. WDFW requests that proposed trails and fire wising extents be shown on the site plan to better understand the impacts and there be no net loss of function from the existing riparian area of Naneum Creek. If habitat impacts are expected, then habitat mitigation in the form of riparian enhancement in other areas of the riparian area to offset impacts are requested. Regarding the proposed water right, WDFW coordinates with Kittitas County and Department of Ecology regarding water rights and their impacts on instream flows. If the water right being proposed here would have impacts on the instream flows of Naneum Creek, WDFW would expect to be involved and consulted.

Thank you again for the opportunity to comment and look forward to discussing this project further with the county and the applicant, ideally on site through a visit to understand habitat impacts further. Please contact me at 509-607-3578 or Scott.Downes@dfw.wa.gov to discuss these concerns.

Sincerely,



Scott Downes
Area Habitat Biologist

Cc:

Elizabeth Torrey, WDFW
Jeremy Johnson, Kittitas County CDS