



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Ellensburg District Office • 1130 W. University Way, Ellensburg, WA 98926

July 3, 2019

Jeremy Johnston
Community Development Services
Kittitas County
411 North Ruby Street
Ellensburg, WA 98926

SUBJECT: SE-19-00006 MDNS for MRM Waste Piles

Dear Mr. Johnston,

The Washington Department of Fish and Wildlife (WDFW) has reviewed the application materials associated with the Mitigated Determination of Nonsignificance for the proposed MRM waste piles permit. Our understanding is that this process simply enables MRM to continue operating the way they currently are, but the applications materials provided with the SEPA leave some doubt as to what is actually proposed vs. current operations. Additional clarification would be appreciated.

This location is immediately adjacent to the Yakima River, its associated wetlands and riparian habitat. The Yakima River Shoreline and associated critical areas warrant protections for future and/or expanded development. Numerous native salmonid species use this portion of the river during at least one phase of their lives. Protecting water quality will be important for Mid-Columbia River Steelhead and Bull Trout which are both listed as threatened by the Endangered Species Act. Spring Chinook salmon, coho salmon, and sockeye salmon will spawn and/or migrate through this reach in addition to numerous other native resident species. The riparian forest is used by numerous migratory song birds and raptors as well as mammals. Deer are frequently seen crossing Umptanum Road near this location.

Adjacent to this property, the Bureau of Reclamation has begun floodplain and side channel restoration efforts to improve fish and wildlife habitat and floodplain connectivity. It's imperative that any actions on the MRM property do not hinder or reduce the habitat improvements that others are providing through these restoration efforts.

There were no maps of the site available for review, so it is difficult to determine potential impacts to fish, wildlife, and their habitats associated with the waste piles permit. We appreciate the mitigation measure applied to limit operation and material storage to the existing nine acres that is currently in operation. Without knowing the actual operations or slope of the site, we also make the following recommendations:

- The nine acre disturbance limits should be surveyed and recorded to avoid potential confusion into the future.
- All manure and organic materials be stored and mixed as far away from the Yakima River and Shoreline critical areas as possible.
- Provide more information on the existing collection pond and potential for interactions with Yakima River, the floodway, and the riparian forest.

- Crowd as much of the operation toward the northwestern portion of the property to avoid most interactions with the floodway, Yakima River, and riparian habitat.

Thank you for your considerations and please feel free to contact me at (509) 961-6639 or Jennifer.nelson@dfw.wa.gov with any questions about these comments.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Nelson". The signature is written in black ink and is positioned to the left of the typed name.

Jennifer Nelson
Area Habitat Biologist