

September 22, 2014

RE: Kittitas County Conservation Coalition comments on the Draft SMP for Kittitas County.

Dear Commissioners Berndt, Jewell and O'Brien,

Thank you for this opportunity to comment on the Draft Shorelines Management Program Final Draft. We see the SMP as an important tool for conservation of natural resources and critical in its content and enforcement as it pertains to this county and our position in the larger Yakima River Basin.

To that point, recovery of natural functions lost in the county over time and improvements to natural functioning of the ecosystems related to our shorelines will play an important contributing role in achieving the goals of the Yakima River Basin Integrated Plan and other efforts in which the county is involved. To achieve the "biggest bang for the public buck" in addressing these improvements we have committed to requires us to have the most effective Critical Areas Ordinance and Shorelines Management Plan we can adopt.

Buffers are a critical component of this effort. By coordinating buffer policies in the CAO and SMP, the overall effect is improved when contrasted to treating these policies separately. By including cross references between these documents for continuity and including buffers for critical areas within the SMP, we believe application of buffers to project proposals where appropriate will be easier to implement and enforce for the county and to implement by the land owner/applicant.

Wetland identification and protection has long been an area of concern to the KCCC. Wetland functions in relation to flood abatement and management and overall health of habitats essential for better functioning of aquatic and related systems is important in the overall context of public safety, health and welfare. It is also important to the success of many of the goals of the YRB Integrated Plan. To avoid the need to mitigate for wetland values losses is the best and least costly approach. Wetland replacement should not be recommended as it is a concept once accepted as a reasonable alternative but has been found to be inadequate at best.

The KCCC endorses the changes to Regulation 4.2F on page 43 as identified in the Futurewise letter of September 17, 2014 and we encourage the county to rely on the Department of Ecology buffer recommendations referenced by Futurewise in the same letter. We also concur with their recommendation to maintain buffers for all sizes of subdivisions. Shoreline buffers identified on page 75, "Aquatic Habitat Conservation Area Buffers" need to be wider to allow space for protective vegetated areas to be viable.

The membership of the KCCC is on record as supporting use of Priority Habitat and Species mapping and recognition of these areas and species when reviewing land use applications. An example of their use is determining the best placement of clustered lots in relation to the identified habitats - not only on the parcels owned by the applicant but also in an area-wide or even regional manner where applicable.

We endorse the Futurewise recommendations regarding geologic hazards for the reasons mentioned. We have experienced earthquake shaking from earthquakes originating west of the Cascades and will likely again. Kittitas County is also identified as an area where earthquakes can originate. Coordination of mapping with a strong building code will reduce damage to people and property in the future.

The KCCC is a long time advocate for public access protection, restoration and expansion to public lands within the county. To that end, we endorse the recommendations made by Futurewise in this area. Particularly by including more specific requirements for public access under the Shorelines Management Act policies and by supporting revisions to 4.4.B.3 on page 71 related to new shoreline uses.

Thank you for this opportunity to offer our comments and we thank you for your consideration of the same.

Sincerely yours,

Marge Brandsrud, Chair
Kittitas County Conservation Coalition

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