

State of Washington DEPARTMENT OF FISH AND WILDLIFE South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720 Telephone: (509) 575-2740 • Fax: (509) 575-2474

January 11, 2024

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

SUBJECT: WDFW COMMENTS ON CU-23-00006 HONEST CUT MEATS

Dear Mr. Pedersen,

Thank you for the opportunity to comment on the proposed Conditional Use permit for the Honest Cut Meats project near Parke Creek. The Washington Department of Fish and Wildlife (WDFW) is familiar with this area and nearby critical areas, and we are active participants in the County's Voluntary Stewardship Program (VSP). We offer the following information for consideration to ensure Parke Creek, its floodplain, and the associated critical areas are protected if the expansion moves forward as proposed.

The use of prefabricated structures is likely to minimize the overall footprint and disturbance associated with the project, however there will be at least 480 square feet of new impervious surfaces near Parke Creek and a proposed holding pen that will likely send runoff toward Parke Creek. At least portions, if not all, of the development is within 100 feet from Parke Creek. The standard buffer width in the County's Critical Areas Ordinance would call for a 100-foot buffer plus a 15-foot setback. WDFW's guidance for riparian ecosystems in this location also recommends a 100-foot minimum setback to protect water quality. Ecology's <u>Voluntary Clean</u> <u>Water Guidance for Agriculture</u> recommends animal confinement areas (holding pens) be placed at least 150 feet away from streams in Eastern Washington and livestock exclusion of at least 100 feet to allow for a fully functioning riparian ecosystem.

There may be some gray area as to the applicability of the VSP to this proposal, but WDFW strongly encourages the applicants to include native woody riparian vegetation along Parke Creek to mitigate impacts from placing and operating these new facilities in close proximity to Parke Creek. Enhancing the riparian vegetation through this reach would help ensure the project does not degrade the water quality or Fish and Wildlife Habitat Conservation Areas on the property and would be consistent with <u>Kittitas County's VSP Approved Work Plan</u>. Establishing native woody vegetation along Parke Creek in this location may also help control the invasive reed canary grass that dominates the riparian area on this property.

The proposed prefabricated structures appear to be located near or within the 100-year floodplain as mapped by FEMA. Unmitigated placement of structures within the floodplain may result in

increased flood risks to existing structures and agricultural infrastructure. If compensatory flood mitigation is needed, WDFW recommends consideration of inset floodplain terraces adjacent to Parke Creek for effective flood mitigation and improved fish and wildlife habitat. We would be pleased to work with the applicants to further explore this option.

WDFW recommends a robust riparian establishment project be incorporated into the project proposal such that the project will be consistent with the goals for the local VSP work group. We welcome the opportunity to collaborate with the applicants and County to ensure this project will protect and enhance critical areas while also maintaining agricultural viability in Kittitas County.

Thank you again for the opportunity to comment and please let me know if there are any questions we can answer.

Sincerely,

Jenniper Nelson

Jennifer Nelson Fish and Wildlife Biologist Jennifer.Nelson@dfw.wa.gov (509) 961-6639