



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

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April 4, 2024

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

SUBJECT: WDFW COMMENTS ON CU-24-00001 Vantage Valley Properties

Dear Mr. Pederson,

Thank you for the opportunity to comment on the CU-24-00001 Vantage Valley Properties application concerning the development of an outdoor training center for law enforcement, search and rescue, outdoor firearms, and emergency response training. 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 habitat and the area's wildlife species. Specifically, our comments are to ensure that if the application is approved that the development will not result in loss of Fish and Wildlife Habitat Conservation Areas (FWHCA) under Kittitas County Critical Areas Ordinance (CAO). In addition to providing comments to ensure that the application is consistent with the CAO, WDFW is also an adjacent land manager, and we have additional comments on requests to be able to successfully manage adjacent lands.

**Fish and Wildlife Habitat Conservation Areas (FWHCA)**

Nearly the entire site is covered by shrubsteppe habitat which is both listed as a Priority Habitat by WDFW and as a critical area under Kittitas County FWHCA. Under the guidelines of both the WDFW Priority Habitat and Kittitas County Critical Area, the guidance is to look to avoid impacts to the habitat to the degree possible and to apply compensatory mitigation to impacts that cannot be avoided. Impacts to the habitat are not limited to clearing and grading, but other measures that could degrade the condition of the shrubsteppe. In this application, construction of roads, buildings, target shooting and explosive areas are all likely to have significant impacts to the shrubsteppe and its associated wildlife. These impacts are direct impacts to shrubsteppe habitat. Potential indirect impacts through fire are addressed later in these comments.

WDFW requests that if the application is approved, that a condition be placed on the approval that the applicant must work with WDFW to develop an approved habitat management and mitigation plan which would include measures to avoid habitat impacts where possible, to rehabilitate temporary impacts, and mitigate for those permanent impacts that cannot either be avoided or rehabilitated. To ensure that appropriate measures are developed, WDFW recommends the opportunity to meet with the applicant to discuss these measures before a habitat management plan is developed.

The SEPA checklist is incomplete for animal species listed as present. The site is part of a Biodiversity Area and Corridor, which is a Priority Habitat and Species (PHS) designation for a wildlife migration corridor. The area is also mapped as winter range habitat for both Mule Deer and Elk. While no formal wildlife surveys have been conducted on the property, a myriad of PHS wildlife species are known to occur in the immediate vicinity, including the following, all listed as Washington State Candidate species: Townsend's Ground Squirrel, Black-tailed and White-tailed Jackrabbit, Burrowing Owl, Sage Thrasher, Sagebrush Sparrow, Loggerhead Shrike, Golden Eagle and potentially Ferruginous Hawk. These species likely do or have the potential to use the shrubsteppe habitat on site, which is why the importance of proper avoidance and mitigation is necessary to prevent further local declines in these populations. These species should be reflected in an updated SEPA checklist so that they can be factored into a proper determination.

There is a stream listed on the map, with a designation of a fish-bearing stream. While we note that the memorandum included in the application stated that the stream did not meet the definition of either a fish-bearing stream or a stream in general, WDFW would like to comment that the memorandum definition of a Type F stream or a stream in general is not consistent with current stream typing definitions. A Type F stream for Eastern WA has a bankfull width average of 3 feet or more, with a gradient of 16% or less. WDFW requests a site visit with Kittitas County and the applicant to verify the stream typing on the property to assist with determination of appropriate Riparian Management Zone (RMZ) setbacks under the CAO.

### **Fire Management Plan**

The surrounding area has recently been subject to several large fires, causing immense long-term recovery of the shrubsteppe habitat in the area. This proposal has elements of live fire and explosives, which depending on the time of year and Best Management Practices (BMPs) in place, could significantly increase the risk of surrounding lands and habitat to fire. Fire has the ability here to have significant indirect impacts on the shrubsteppe habitat. The surrounding lands include both public and private lands. Among the public land managers is WDFW. In the SEPA checklist, there are no plans to mitigate for potential fire risk or impacts. In the site plan, there is reference to a single road to act as a fire break. Rather, the SEPA checklist states that this proposal does not affect the surrounding lands. WDFW disagrees with this conclusion and requests that if the application is approved, that a condition be placed on the approval that the applicant must work with WDFW to develop an approved fire management plan. That plan could include measures such as having appropriate fire suppression resources on site should the activities result in a fire, to further clear some areas where live fire is proposed to lessen the risk of fire and potentially some conditions on season and timing of allowed live fire activities to ensure that they do not occur during high-risk periods such as extreme vegetation dryness or high winds. An appropriate fire management plan should allow the applicant to avoid or stop ignitions on their lands and not allow them to spread to adjacent shrubsteppe lands.

### **WDFW Concerns Over Proposed Site Plan**

Much of the surrounding landscape is either managed directly by WDFW as part of the LT Murray Wildlife Area or for wildlife habitat as a goal (WDFW has a Conservation Easement on Puget Sound Energy's Wild Horse Wind Farm). As part of that management, it is the goal of WDFW land management to manage the land and habitat consistent with fish and wildlife use of the land. There

are elements of the site plan that make it difficult to properly manage portions of that landscape as fish and wildlife habitat and we request that further discussions on these elements be conducted through discussions involving Kittitas County, WDFW, and the applicant. The impacts (safety, noise etc..) should be contained within the boundaries of the application and WDFW has concerns that as currently proposed, those impacts are not adequately contained.

Those elements are:

- As currently proposed, a minimum 10-foot setback from the western property boundary (which includes WDFW managed land) and proposals for explosives area, training areas, and test fires. Both wildlife and recreational visitors could be on either side of this boundary. The project needs to further demonstrate how these activities will not impact either the wildlife or the recreational users. The information currently provided in the SEPA checklist is incomplete to draw this conclusion. Potential modifications could include the need to increase the buffer distance from these activities (particularly in high-risk activities such as explosives), and the property line, add berms, and clearly mark the boundaries with proper warnings.
- In the northern portion of the site plan, a Heli-pad is proposed. As this area is a Mule Deer and Elk wintering area, consultation with WDFW is requested and proposed flight paths in and out of this Heli-pad need to be discussed to ensure the applicant is not displacing the animals away from vital winter forage, but also potentially displacing deer and elk into other properties or onto the Vantage Highway.
- While the SEPA checklist acknowledges some intent to work with noise levels, it appears to be only human related and not wildlife related. Additional information and analysis is needed to demonstrate that the noise from the facility is largely contained within the site plan. If the noise is not able to be contained, then either modifications to the site plan, season or times of use, or including those impacts on wildlife habitat as part of the mitigation discussion is warranted.
- Little detail is shown on the site plan, showing the direction of live fire, or proposed berms/backstops. Further the roads are shown as direct lines, yet the topography suggests that it will be difficult to construct due to the steepness of the grade. Please include WDFW in these discussions as the site plan and its associated impacts develop.
- We understand that based upon the current site plan, that the current access through WDFW lands would no longer be necessary. Coordination with WDFW on the management of that road going forward is vital, including signage and fencing to keep the public accessing this site from unauthorized vehicle entry onto adjacent lands.

In summation, WDFW is not opposed to the facility, but as currently proposed, and without further clarity, the project could have significant impacts on the habitats and the wildlife of the area with no mitigation to offset these impacts proposed. WDFW requests that Kittitas County include mitigative measures to address the above identified concerns as conditions of approval if the project is approved. Thank you again for the opportunity to comment and look forward to discussing this

further with the county and the applicant. Please contact me at 509-607-3578 or Scott.Downes@dfw.wa.gov to discuss these concerns.

Sincerely,

A handwritten signature in cursive script that reads "Scott Downes".

Scott Downes  
Regional Land Use Planner

Cc:

Perry Harvester, WDFW

Hannah Bates, WDFW