



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
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April 21, 2021

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

**SUBJECT: WDFW COMMENTS ON LP-21-00001 BULL RANCH**

Dear Rachael Stevie,

Thank you for the opportunity to comment on the proposed Bull Ranch project near Lyle Creek. The Washington Department of Fish and Wildlife (WDFW) is familiar with this area and nearby critical areas that should be considered as part of this review and determination process. We offer the following information for consideration to ensure Lyle Creek and the associated critical areas are protected as this property is converted from commercial agricultural production to more urbanized development.

Lyle Creek is a distributary channel of Wilson Creek; it branches off from Wilson Creek north of Ellensburg and flows back into Wilson Creek south of this project area near Berry Road. WDFW has limited fish sampling data for Lyle Creek, but Wilson Creek supports chinook and coho salmon, steelhead, and other native fishes so our expectation is that Lyle Creek does as well since it is connected at the upstream and downstream extents of its channel.

Our comments and recommendations are as follows:

- Lyle Creek and its riparian habitat support a variety of fish and wildlife and these critical areas become even more important to wildlife movement and shelter as we develop the urban growth areas. For these reasons, **WDFW recommends that the critical area buffers be marked on all parcel maps and in the field such that future development avoids these areas.**
- Thank you for including Lyle Creek and the City of Ellensburg's 50-foot critical area buffer on the site plans. We acknowledge that the City's requirements are reflected in the site plans but that there appear to be **open space areas that could be planted with a variety of native plants to help provide more of the functions and values associated with the riparian ecosystem.** WDFW would welcome the opportunity to assist the project proponents with habitat enhancements to the stream, riparian ecosystem, and other open space areas throughout the development.

- The Stormwater Site Plan Report available to review for this project shows a concrete structure in Lyle Creek (Site #2 in photos) that is likely used to divert irrigation water from Lyle Creek to the ditch network and fields to the south. This structure forms an artificial constriction in the channel and possibly a seasonal fish passage barrier. To our knowledge, the ditch is not screened to prevent the entrainment of fish into the diversion. **We recommend that the proponents contact the local WDFW staff to help rectify these features prior to build out and while there is still ease of access for construction equipment.** A Hydraulic Project Approval (HPA) would likely be required from WDFW to complete this work.
- The Lyle Creek crossing under Bull Road is undersized and does not meet WDFW's current guidelines and may be a fish passage barrier as well as a constriction that could create backwater and increased flood risks to the new development. Lyle Creek and the surrounding properties are not mapped by the FEMA flood maps, but that does not necessarily mean there are no risks of flooding. **WDFW recommends that the Bull Road culvert be replaced with a new water crossing structure as part of this development that will provide fish passage and pass the expected flows and debris in Lyle Creek.**
- Based on aerial photos, lidar, and familiarity with the area, we believe there may be wetlands present on this property or the adjacent parcels. **WDFW recommends that a full wetland delineation occur to ensure this development will not encroach upon wetlands or wetland buffers that may be located on or adjacent to the subject parcel.**

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

Sincerely,



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Fish and Wildlife Biologist  
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