

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

April 22, 2024

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

SUBJECT: WDFW COMMENTS ON SE-24-00012 SOLAR DOLAR SEPA

Dear Mr. Gasawski,

Thank you for the opportunity to comment on the Solar Dolar application for a driveway to serve a future home and shop. The Washington Department of Fish and Wildlife (WDFW) is familiar with the project area and we've reviewed the application materials available on file. This project area includes multiple fish and wildlife habitat conservation areas (FWHCA) and we look forward to working collaboratively to ensure their functions and values are adequately protected.

There is no critical area report or identification of Fish and Wildlife Habitat Conservation Areas in the project materials. Much of the property is shrubsteppe habitat-a priority habitat identified in WDFW's Priority Habitats and Species (PHS) program. Our PHS web mapper clearly shows a Biodiversity Area and Corridor (BAC) as well as deer and elk winter range in addition to shrubsteppe habitat. These are all critical habitats that are not identified by the applicant or staff critical area maps.

Kittitas County Code 17A.02.330 defines FWHCAs to include movement corridors, seasonal ranges, and priority habitats and species (PHS) as identified by WDFW and KCC 17A.04.020(d) designates all PHS as FWHCA. The proposed driveway and subsequent development may negatively impact multiple Fish and Wildlife Habitat Conservation Areas and yet there is no mention of how the proposed project was designed to avoid these impacts or minimize the impacts.

We are concerned there will be negative impacts to critical areas, specifically the FWHCAs. Prior to approval,

- WDFW recommends the development of Critical Areas Report and a Habitat Management
 Plan that identifies all the Fish and Wildlife Habitat Conservation Areas onsite as well as
 mitigation measures for how the driveway and subsequent development will impact them.
- At a minimum, WDFW recommends 2:1 mitigation for impacts and/or conversion in shrubsteppe habitat.
- WDFW recommends the mitigation planning occur prior to approval of the MDNS to minimize project delays.

Thank you for the opportunity to comment and for the County's commitment to protect critical areas. Please let me know if there are any questions about our comments; we look forward to working together on this project. I can be reached by phone at (509) 961-6639 or email at Jennifer.nelson@dfw.wa.gov.

Sincerely,

Jennifer Nelson

Fish and Wildlife Biologist

Jennifer Melson