



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720
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November 30, 2023

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

SUBJECT: WDFW COMMENTS ON RU-23-00001 Teanaway Ridge

Dear Mr. Gasawski,

Thank you for the opportunity to comment on the Reasonable Use application for the Yakima River Campground project. The Washington Department of Fish and Wildlife (WDFW) is familiar with the project area, and we have reviewed the application materials on file. This project area includes a dynamic and complex reach of the Yakima River that provides critical habitat for anadromous and resident fish as well as other wildlife worthy of protection. The following comments are in addition to our previous comments on the project, which are incorporated by reference with this letter.

We appreciate the work the project proponents have completed to better understand the critical areas on the property, including the potential for Channel Migration onto the property. With this information, the proponents have described a substantial decrease in the proposed development of the Yakima River Campground Conditional Use Permit (CU-15-00002) near the Yakima River and the riparian habitats based on the narrative provided. However, there is no updated site plan to review, making it difficult to fully evaluate for potential impacts to critical areas functions and values. **We request an updated site plan that clearly shows the new proposed layout for the site prior to approval to ensure we understand the proposal and potential for impacts to critical areas.**

The critical areas report provided references updates as of March 2023, but does not reflect the culvert removal between Wetlands A and AA that occurred during a flood in June 2022. The wetland report still shows the now removed culvert separating the two wetlands and Shoreline (KCC 17B) vs. Critical Areas (KCC 17A) jurisdiction. The report also makes no mention of the change of conditions in the northwestern portion of the property that breached the pond berm on the adjacent parcel to the west. **We request further review and consideration of any wetland identification or classification given the water crossing structure is no longer present and the pond is breached. It is possible this review may result in this area being a single wetland within Shoreline jurisdiction.** WDFW has determined that a Hydraulic Project Approval (HPA) is required for work within the pond and channel to mitigate impacts to fish life because there is connectivity with the mainstem Yakima River.

The Channel Migration Zone Summary Memo clarified the potential for lateral migration at the project location. The report identifies more rapid migration near the western portion of the property and the

properties immediately upstream of the subject parcels but does not assess the potential for an avulsion on the WDFW property that could travel through the adjacent pond and onto the western portion of the property. In June 2022, flood waters breached the berm of the pond and flooded the northwestern portion of the property where several RV sites have been proposed in previous site plans. WDFW has experienced more frequent flooding of the road to our water access site upstream of this project site and to the best of our knowledge, the pond berm has not been repaired. We believe there is a relatively high flood risk on the northwestern portion of the property (see photos in our 2022 letter) that is not reflected in the information available to review. **If the northwestern portion of the property is proposed for development in the new site plan, we request further evaluation of the potential for avulsion and/or flood risks through this area.**

Without an updated site plan and based on the information provided in the updated critical areas report and CMZ summary along with the existing infrastructure, **WDFW believes the image presented in our 2016 comments for the Yakima River Campground Conditional Use Permit (Figure 1) represents the area most suitable for a Reasonable Use Exception on this property and meets the intent of KCC 17A.01.060(2).**

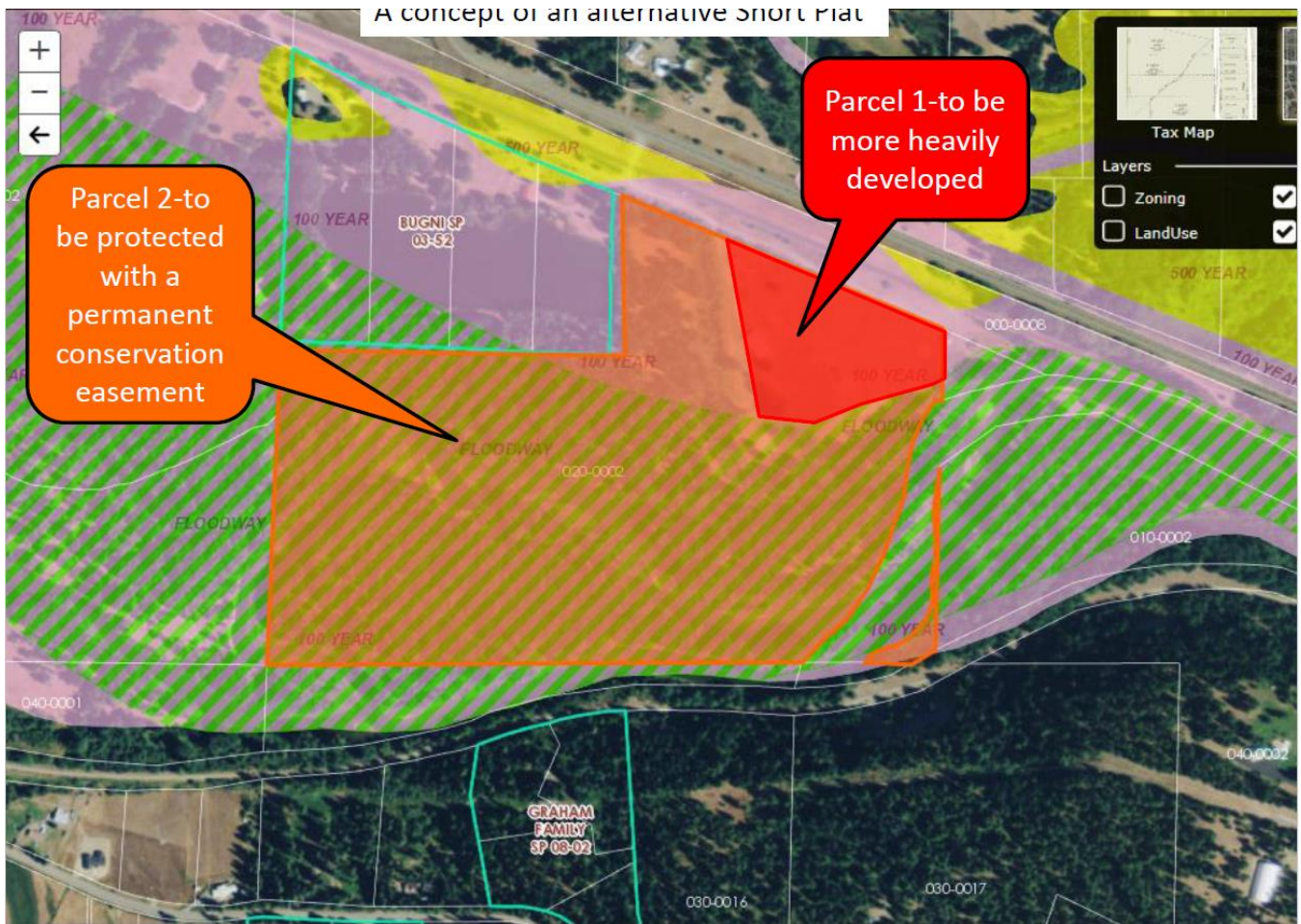


Figure 1. This image was part of WDFW’s comments in 2016 for the Yakima River Campground (CU-15-00002, SD-15-00001, SP-15-00001).

Thank you again 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. I can be reached by phone at (509) 961-6639 or email at Jennifer.nelson@dfw.wa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Nelson". The signature is written in a dark ink and is positioned above the typed name.

Jennifer Nelson
Fish and Wildlife Biologist