



State of Washington

Department of Fish and Wildlife

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Marion Meadows Draft Environmental Impact Statement (DEIS)

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Marion Meadows Planned Unit Development (PUD) and subdivision. We have reviewed the documents and have the following comments at this time.

Zone/ Plat Terrain

The number of proposed lots appears excessive when the topography and terrain are taken into consideration. Some of the terrain is quite steep. Applying parcels or a parcel grid formula uniformly across the property independent of terrain appears blind to site constraints. Ground that is steep should not be treated the same as gentle terrain for the purpose of placing lots.

Mountain Goats

The mountain goat habitat that is mapped under represents the goat use of the area. The impact of this urban density development on mountain goats is a concern at this location. The dense development that is proposed will eliminate hundreds of acres of habitat. The development also has the potential to significantly reduce or eliminate access to important winter elevations that mountain goats use during harsh winter conditions. Disturbance associated with construction, snow management and or removal as well as the general disturbance that comes with high density (urban) development are concerns. Motorized recreation within and accessing surrounding lands is a concern. High density development along the Interstate 90 corridor forecloses on options that allow for movement across the valley. These issues are insufficiently addressed in the DEIS.

Connectivity Across Interstate 90

This proposal has the strong potential to negatively impact the substantial investment that Washington State Department of Transportation (WSDOT) is making in the I 90 corridor to make it permeable to animal movements. Subsequent phases of the Interstate 90 widening project will require costly measures to remediate the impacts associated with this proposal. This issue is inadequately addressed in the DEIS.

Silver Creek and Water

Silver Creek located just west of the proposed development is a fish bearing stream. We are concerned with groundwater impacts from hundreds of parcels serviced by septic systems. The quantity of wastewater from septic systems going into the ground, much of it up gradient of Silver Creek, is a significant concern. This is insufficiently addressed in the DEIS. The municipal wastewater treatment system discussed in the DEIS appears unrealistic financially. The well moratorium currently precludes exempt well from servicing the development. We would be concerned with individual wells and their impact on flows in Silver Creek. The quantity of water available does not appear sufficient to support the dense development that is proposed.

Upper Parcels

It is strongly recommended that the (6) six existing upper parcels be extinguished in order to remove the disturbance and habitat loss that developing these parcels would represent. The integrity of the habitat above and below these parcels would be compromised. In alternative 5 where the development is directed below the transmission lines, the development of these parcels conflicts with and degrades the effectiveness of the open space.

Alluvial Fans/ Debris Flow Hazards

Alluvial fans are dynamic features that should rightly be treated as geologic hazards as well as stream features. Placing lots that will ultimately develop into houses or that are in the path of these features should be avoided. Trying to train these features and then placing infrastructure in these areas instills a false sense of security that ultimately damages habitat as well as property. How these area will be managed is insufficiently addressed in the DEIS.

Houses in a Forested Setting

Houses in forested settings are an issue when fires start. The limited firefighting resources are invariably directed to protect homes and property. The number of resources available to control the spread of the forest fire is reduced and fires that may have been controlled at an earlier stage grow and consume more forest and habitat. This issue is inadequately addressed in the DEIS.

Conclusion and Recommendations

All of the alternatives are deleterious to fish and/or wildlife resources. Many acres of wildlife habitat will disappear under houses and pavement. Additionally, the level of disturbance that comes with urban development renders and area inhospitable for many wildlife species seasonally or year round. The cultural carrying capacity of the area changes as well. Large wild animals in housing developments cause people to contact authorities to remedy what they see as a problem. This impacts WDFW since we have to respond to issues that are entirely foreseeable. Pets conflict with wildlife. Their food can attract wildlife and they chase or kill wildlife. Pets themselves are chased and killed. Fencing interrupts movement corridors, makes habitat inaccessible and can force moving animals to locations where conflicts arise. Covenants should be placed on the parcels that informs prospective owners of these issues associated with this location.

The alternative that appears least harmful is alternative 5. The proposed parcels and development in alternative 5 located upslope of the transmission line should be excluded to allow for access to and movement across the property. The six existing parcels should be deleted during this process and the entire area above the transmission line should become dedicated protected open space. Fencing that blocks animal movement should be avoided. Travel corridors should be established through the development that facilitate animal movement and keep the area permeable.

Thank you for the opportunity to comment on this proposal. If you have any questions regarding these comments, please feel free to contact me. I can be reached at (509) 962-3421.

Sincerely,



Mark S. Teske
WDFW Habitat Program

cc: Perry Harvester, WDFW Region 3 Program Manager