



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
South Central Region • Region 3 • 1701 South 24<sup>th</sup> Avenue, Yakima, WA 98902-5720  
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October 8, 2018

Lindsey Ozbolt  
Kittitas County Planning Official  
411 North Ruby St., Suite 2  
Ellensburg, WA 98926

RE: WDFW Comments on SD-18-00002 Vantage Shoreline Development Permit

Dear Ms. Ozbolt,

Thank you for the opportunity to comment on the Shoreline Substantial Development Permit for the Vantage Bay PUD Project (SD-18-00002), “the project”. Washington Department of Fish and Wildlife (WDFW) has reviewed the application and supporting documents. WDFW has several concerns over this development and how the construction of this project will impact mapped Priority Habitat areas that affect wildlife habitats in the area.

The proposed project area is either on or adjacent to two Priority Habitat areas that WDFW has identified as important habitat to wildlife populations in the area (Figure 1). The project footprint is located on shrub-steppe habitat that is mapped as priority shrub-steppe under the WDFW Priority Habitats and Species (PHS) database. Further, the adjacent shoreline areas are mapped as waterfowl concentration areas where large concentrations (thousands) of waterfowl use this area during migration and winter periods. Development of this project will result in clearing of the shrub-steppe habitat and the proposed density of development is likely to have substantial impacts to the ability for waterfowl to use this adjacent shoreline area through increased human disturbance.

With construction of this development, there will be a net loss of shrub-steppe habitat and reduced ability of waterfowl to utilize the adjacent shoreline. Yet, despite this net loss, there are no plans in the application to mitigate for this loss of habitat and their impact on wildlife habitat. WDFW requests that if this permit is approved, the applicant needs to work with Kittitas County and WDFW to develop a habitat management plan that will compensate for this net loss of wildlife habitat prior to construction. One potential option that might be considered in a habitat management plan could include a reduced footprint with no development in the main (southern) priority areas along with habitat enhancement. Waterfowl in particular are quite sensitive to human disturbance, particularly during critical times such as migration and winter when ability to forage is key to their survival. Without sufficient buffers from disturbance, this development is likely to contribute to the increased disturbance of waterfowl in this area and make the habitat nearest to the development as non-functional habitat for these waterfowl concentrations. Another option could include securing conservation protection on compensatory land parcels and habitat

enhancement on other nearby habitats that would benefit the same species as impacted by this development. WDFW can provide expertise on recommendations for buffers and ideas for offset mitigation. WDFW should be consulted on habitat management proposals and should be part of the approval process before any mitigation options are finalized.

In addition to the above concerns, WDFW also has concerns that the development will lead to conflicts with native ungulates (deer, elk and bighorn sheep). These ungulates have been regularly documented moving through this general area and will look to forage upon vegetation such as lawns, gardens and commercial plantings, including the proposed vineyard. WDFW requests that any areas where these ungulates are not welcome be fenced with wildlife exclusion fencing. Conversely, the applicant should accept that unfenced areas will be grazed upon and, when this occurs, should not seek animal damage permits from WDFW. Upon request, WDFW would be happy to provide guidance on appropriate wildlife exclusion fencing for PUD to install.

Please contact me at (509) 457-9307 or [Scott.Downes@dfw.wa.gov](mailto:Scott.Downes@dfw.wa.gov), if you have any questions or concerns regarding these comments and thank you again for the opportunity to review and comment on this project. I look forward to further conversations with the county and the applicant on resolving the habitat impacts and potential mitigation from this development.

Sincerely,



Scott Downes  
Area Habitat Biologist

Cc:  
Elizabeth Torrey, WDFW  
Perry Harvester, WDFW

**Figure 1:** Location and extent of mapped WDFW PHS habitats within the vicinity of the proposed Vantage Bay PUD

