State of Washington
DEPARTMENT OF FISH AND WILDLIFE
South Central Region • Ellensburg District Office • 201 N. Pearl St, Ellensburg, WA 98926
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January 24, 2018

Chelsea Benner
Kittitas County
Community Development Services
411 N. Ruby Street; Suite 2
Ellensburg, WA 98926

RE: WDFW comments on SP-17-00003 Mitchell Short Plat along the Ferguson Branch of Naneum Creek

Dear Ms. Benner,

Thank you for the opportunity to comment on the proposed short plat (SP-17-00003 Mitchell) to divide the existing parcel into three lots. Naneum Creek flows southerly toward the western property boundary and the Ferguson Branch of Naneum Creek flows southerly through proposed lots 1B and 1C. The Washington Department of Fish and Wildlife's (WDFW) primary concern with this proposal is to protect the fish and wildlife habitat and other critical area functions associated with Naneum Creek and the Ferguson Branch.

Naneum Creek and the Ferguson Branch both flow year round and are fish bearing streams. We have included a series of images showing the streams and their relation to the property. Both streams are important for conveying irrigation water deliveries as well as providing miles of fish habitat and flow conveyance during periods of high flow. Natural floodplain processes and meandering streams are not only good for fish and fish habitat, but also reduce velocities and therefore reduce flood impacts during high flow events. The riparian vegetation along Naneum Creek and the Ferguson Branch provide habitat for fish and wildlife and help to stabilize the stream banks, slow and store flood waters, and protect water quality. Maintaining or improving the function of the riparian areas associated with Naneum Creek and the Ferguson Branch will not only improve fish and wildlife habitat, but it will help moderate flooding on this property and downstream properties.

Review of the County's LIDAR data and aerial photos clearly show that the Ferguson Branch is one part of Naneum Creek's broad alluvial fan. Flows from Naneum Creek are distributed across this alluvial fan (and through the Mitchell Property) during all seasons and on this property, Ferguson Branch actually has two channels. The Ferguson Branch can convey the majority of Naneum Creek's flows in this reach, overwhelming Cascade Canal and resulting in Naneum/Ferguson waters spilling into Coleman Creek. The draft flood models associated with the County's Wilson/Naneum/Cherry Watershed Assessment also represent both Ferguson Branch channels as active during the two year (approximate bankfull event) and 100 year flood

events (see attachment). As currently proposed, parcels 1B and especially 1C look to have extremely limited future buildable areas if proper critical area protections are applied for 1) wetlands, 2) geological hazards (alluvial fans, channel migration zones), 3) frequently flooded areas, or 4) fish and wildlife habitat conservation areas (streams, riparian areas).

As part of the short plat process, future building and septic locations should be considered such that these critical areas can be protected and to protect new infrastructure and help ensure public safety. At least four of five critical areas are likely present on the property that do not seem to be represented in the Master File for this proposed short plat.

We believe lot 1C may not have a future building site that will not be at risk of flood damage and that will protect critical area functions associated with the Ferguson Branch. We recommend a reconfiguration of the proposed lots to ensure a non-buildable lot is not created with this process. Please ensure approval of this short plat will provide adequate protection to the Ferguson Branch and the critical areas associated with it into the future.

We appreciate the opportunity to comment and work with the proponents to meet their needs. Please feel free to contact me at (509) 962-3421 or Jennifer.nelson@dfw.wa.gov if you have any questions about these comments.

Sincerely,

Jennifer Nelson
Area Habitat Biologist