



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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May 1, 2024

Planning Department
City of Cle Elum
119 West First Street
Cle Elum, WA 98922

SUBJECT: WDFW COMMENTS ON UPPER KITTTIAS COUNTY RECREATION CENTER (SEPA-2024-001)

Dear City of Cle Elum,

Thank you for the opportunity to comment on the proposed Upper Kittitas County Community Recreation Center. The Washington Department of Fish and Wildlife (WDFW) has specialized knowledge of wildlife and critical areas that intersect the project area. We offer these comments in the spirit of assisting the City of Cle Elum with implementation of their relatively new critical areas ordinance, Cle Elum Municipal Code (CEMC) Chapter 18, and the protection of Fish and Wildlife Habitat Conservation Areas (FWHCA).

The application materials acknowledge FWHCAs, including Biodiversity Areas and Corridors (BAC) as shown in our Priority Habitats and Species (PHS) on the Web, but there has been no critical areas report provided or mitigation measures offered for impacts to these critical areas. A critical areas report and habitat management plan is required for projects that occur within 200 feet of a designated FWHCA (CEMC 18.01.055 D.1 and D.2). The proposed development will permanently and negatively impact wildlife habitat and wildlife movement through this project area. When combined with the 47 North proposal adjacent to this site, cumulatively and individually, these proposals will negatively impact the ability of wildlife to migrate through this BAC and mitigation measures are required per CEMC 18.01.070 C.1.m.

We understand the community's excitement and the importance to implement this project and move forward with this Community Recreation Center. WDFW is a partner within the community, and we hope to collaborate on measures to make this project more compatible with existing wildlife and the need to maintain a safe migration corridor through this BAC, compliant with the City's Critical Areas Ordinance. Embracing the incredible wildlife resources within the City can increase the Recreation Center's offerings by encouraging urban wildlife viewing and is a unique opportunity for this project.

WDFW has the following recommendations that should be implemented prior to moving forward with this proposal:

- A critical areas report should be submitted with the application materials and available for review.
- Consider modifying the site plan such that the most intense development is located adjacent to Bullfrog Road so that areas further from the roadway can be retained for better wildlife mobility. Minimize the need for impervious surfaces to the greatest extent possible.
- Minimize the need for tree and vegetation removal. We recommend that all trees, rootwads, and slash from clearing be used to enhance fish and wildlife habitat. This material can be used to enhance wildlife cover in the open space areas and/or donated to riverine habitat projects that will benefit native aquatic species.
- Include WDFW in early planning conversations to ensure we can assist with implementing the mitigation sequence of avoidance, minimization, rectifying or restoring, and compensating for impacts to FWHCAs.

We offer these comments for consideration to ensure the fish and wildlife habitat conservation areas on and adjacent to this property are protected, consistent with the purpose of the Cle Elum Critical Areas Ordinance. We look forward to working together toward implementation of this exciting project for the community.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Nelson".

Jennifer Nelson
Fish and Wildlife Biologist
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(509) 961-6639