

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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December 11, 2024

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

SUBJECT: WDFW COMMENTS ON WILDWOOD RANCH SUBDIVSION

Dear City of Cle Elum,

Thank you for the opportunity to comment on the application for a subdivision (SUB-2023-003), Development Agreement (DA-2024-001), and SEPA (SEPA-2024-004) for the Wildwood Ranch Subdivision (project). The Washington Department of Fish and Wildlife (WDFW) has specialized knowledge of the wildlife and critical areas near the project area and we look forward to working together to ensure no net loss of critical area function and value.

The critical areas report submitted with the application materials identifies Deer Canyon Creek correctly as a fish bearing stream, north of the project area. This stream has been piped near the northeastern corner of the project area, but the exact location of the piped stream is unknown to WDFW. Although piped underground, this is still a fish bearing stream and should be treated as such, including providing the appropriate sized buffers to the stream/pipe. Maintaining the riparian buffer, even where the stream is piped, protects the future opportunity to daylight the stream, it maintains the opportunity to complete maintenance or repairs on the existing pipe, and helps ensure new infrastructure is not unknowingly constructed over the stream. For consistency with the City's Critical Areas Ordinance, **WDFW recommends identifying the exact location of the underground section of Deer Canyon Creek and ensuring the appropriate 50-foot riparian buffer (CEMC 18.01.070.C.1a.iii, Table 18.01-5) is applied along the creek, even where it is currently underground.**

The critical areas report also identifies the pond near the southeast corner of the property as a man-made pond and that "generally man-made ponds are not regulated as wetlands or jurisdictional waters". Within CEMC 18.01.030.G7, naturally occurring and manmade ponds under twenty acres in size are considered a Fish and Wildlife Habitat Conservation Area. The riparian trees and shrubs around the pond and the water itself provide valuable wildlife habitat within the urban area and for consistency with the critical areas ordinance, **WDFW recommends formal identification and protection of the pond and associated riparian habitat and the development of a habitat management plan to ensure no net loss of functions and values of this existing critical area.**

The southern and southwestern part of the project has some lower elevation areas and is more likely to be in or near a historic channel of the Yakima River. The groundwater throughout the project area likely fluctuates with the Yakima River. The Yakima River in this reach has artificially high flows during the summer irrigation months, creating a high ground water table in the project area. **WDFW recommends seasonal groundwater monitoring throughout the year to ensure the proposed treatment methods will meet state standards year-round and that the stormwater will not negatively impact water quality or quantity within the pond.**

We offer these recommendations and requests 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 (CEMC 18.01.010), which is to "…protect critical areas" and look forward to working together on this project. Please don't hesitate to get in touch with any questions about these comments.

Sincerely,



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