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KITTITAS COUNTY
CDS

Kittitas County Community Development Services
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

July 18, 2008

Dear Darryl Piercy,

I am writing to submit comments on behalf of Conservation Northwest and our nearly 5,000 membership households statewide on the land use change application filed by Shallbetter Law to de-designate Section 11, T21, R12E. We oppose this request due to its irreversible impacts to the landscape and conservation investments in the I-90 corridor. We also realize that there has been a proposal in Section 3 for increased density in the past year, and these actions need to be looked at for their cumulative impacts and at a landscape scale.

Our organization has a history of involvement in the I-90 corridor through our involvement in The Cascades Conservation Partnership, I-90 Wildlife Bridges Coalition, and our National Forest program. From 2000 to 2004, we were on the steering committee of The Cascades Conservation Partnership that inspired more than 16,000 people to give \$16 million in private dollars to protect over 40,000 acres of forestland in the I-90 corridor. The purpose of these protections was to improve wildlife connectivity and recreational access by resolving the checkerboard ownership pattern of the lands just north and south of Interstate 90. Following this effort, we helped to launch the I-90 Wildlife Bridges Coalition that has brought together over 40 national and local organizations to ensure high quality wildlife connectivity measures in the proposed expansion of 15-miles of Interstate 90 from Hyak to Easton. The WA State Department of Transportation has released a preferred alternative design for this project that the coalition has endorsed for its exceptional measures to increase the safety of this stretch of highway for wildlife and motorists. Finally, we have engaged for years through our National Forest Program on the management of the Wenatchee National Forest by participating in forest planning, policies, commenting on timber projects, and direct restoration projects as they occur.

The proposed de-designation is in direct conflict with the objectives we have spent over a decade promoting and coordinating with a wide range of interests on in this location. We oppose the application request for de-designation of these lands from "Commercial Forest" to "Rural" at this time as these specific lands have a regional and local biological significance for wildlife connectivity, a direct impact on large conservation investments in the past and future, and potential impact to forest management on adjacent lands. We ask that any de-designation to be considered within the I-90 corridor from Hyak to Easton be further analyzed by the stakeholders that have a vested interest and investment in the area including citizens, NGO's, WA Department of Transportation, and US Forest Service.

Biological Significance

Section 11 is surrounded on all four sides by national forestland, and is within 2 miles of important wildlife crossing structures to be constructed in the I-90 Snoqualmie Pass East Project. The national forest land surrounding this parcel has been recognized as part of a critical connective link around Interstate 90 to maintain wildlife movement north and south in the Cascades. Large

protected habitats lie just north of Interstate 90 and this parcel beginning with the Alpine Lakes Wilderness system and moving into the full North Cascades ecosystem, while protected blocks of public land both in wilderness and other management allocations lie south of Interstate 90. To ensure that these two sets of wild lands on either side of the interstate do not become biological islands, we must ensure connectivity of our landscape near Interstate 90. The Price and Noble Creek wildlife corridor is used by a range of species. In partnership with The Wilderness Awareness School and I-90 Wildlife Bridges Coalition, we install and maintain remote cameras in Section 10 adjacent to this parcel to record wildlife presence near the proposed wildlife crossing structures to be built on I-90. In addition to our remote cameras, we have done salamander surveys in Price and Noble Creeks as well as annual snowtracking surveys in the area. To date we have found a range of wildlife use in these corridors including elk, deer, bobcat, black bear, and pacific giant salamanders within the actual creeks. Attached you will find a selection of images from these efforts, and we would be happy to provide you with full reports on the range of species and activity in the area. As important as this corridor is to those species that are currently using it, it is how vital to the recovery of species that are listed under the Endangered Species Act.

The biological significance of the Interstate 90 corridor is recognized locally and regionally, and has drawn international attention as well through the innovative partnerships and solutions that have arisen in this location. Just this year, a national Road Ecology Course hosted by the Southern Rockies Ecosystem Project was held at Suncadia Resort in Roslyn, WA to highlight the efforts underway in Kittitas County on I-90. The relationships between private and public entities to find solutions to maintaining functioning habitat so close to population centers is something that Kittitas County should be proud of, and work with private landowners to protect.

Conservation Investments

As noted above, there have been significant past and anticipated future investments in the larger I-90 wildlife corridors and specifically in the Price/Noble creek area. The \$16 million private dollars raised through The Cascades Conservation Partnership leveraged over \$60 million from Congress through the Land and Water Conservation Fund and other public sources to protect over 40,000 acres just north and south of Interstate 90. These investments followed the large-scale I-90 Land Exchange that aimed to consolidate public ownership of lands in Washington's Central Cascades, and set the stage for the remaining conservation work to be done with lands that were left out of the exchange. The work to protect lands through purchase, conservation easements, and other tools continues today in this area through the Cascade Land Conservancy, Trust for Public Land, The Nature Conservancy, Mountains to Sound Greenway, Kittitas Conservation Trust, and other local land trusts. Private and public funds continue to leverage one another to attempt to conserve this landscape for natural and social resources. The approval of the proposed de-designation would negatively impact these conservation purchases made by the public in this area by further fragmenting the habitat, and introducing a new use to the area that was not understood when the purchases were made.

The largest anticipated investment with a large regional biological impact and direct Price/Noble Creek impact is the Washington State Department of Transportation's proposed I-90 Snoqualmie Pass East Project. This \$525 million highway improvement project has wildlife connectivity as one of its stated objectives in the purpose and need of the project alongside traffic efficiency, roadway maintenance, and safety. The proposed de-designation application is located adjacent to several mitigation sites, including wildlife crossing structures, hydrologic crossing structures, and wetland restoration areas. The effectiveness of these investments and mitigations will be seriously compromised if this de-designation request is approved, as the structures must lead functional habitat. We suggest that no rezone or land use changes from "Commercial Forest" to "Rural" requests should be granted within habitat in the connectivity analysis zones of the I-90 corridor project area from Hyak to Easton unless the County, WSDOT and the I-90 Mitigation Development Team including the US Forest Service agree that the proposed actions will not adversely impact the I-90 Snoqualmie Pass East project and the National Forest land goals for this area.

Forest Management Implications

In addition to the impacts to wildlife connectivity that the proposed rezone poses, we also are concerned with impacts to other forest management goals. The increase in development of homes and cabins adjacent to our national forests causes problems with access to popular recreation sites and fire/fuels management. Forest Service Road 4832 is a popular route for snowmobiles and cross country skiers during the winter, and the access to that road from I-90 often has many families sledding during the winter daytime. It is expected that further private development of these roads may cause interruption with recreation in the area. The fire/fuels management issue is of specific concern to our organization in light of current agency budgets to handle the fuels situation near our communities and high fuel loadings throughout our national forests. We must ensure that we utilize all planning efforts at the county level to plan wisely how our counties will grow, and how we can best protect our resident's homes from fire. The installation of more development adjacent to our national forests places a strain on the agency to focus on fire management near these homes, and this type of management may be in conflict with the habitat protections that the public lands in this area demand through policy and law.


Conclusion

Past re-zone requests in this vicinity to change land zoning from "Commercial Forest" to "Rural" (i.e. Keechelus Ridge HOA, 2007) have had no mention of the impacts of their proposal on the regional biological needs of this corridor, or on the investments noted within this letter. Rather they focused on the viability of commercial forestry on their land, which they assert is not economically feasible for various reasons including a lack of mills. There is an active movement to seek an increase in mill capacity in Central Washington that we are engaged in, and due to the large-scale need of fuels reduction work on our public lands we feel optimistic that a mill other than the Yakama National tribal milling capacity will be added to the region. If interests work together including small forest landowners such as these, we may be able to identify solutions with our timber industry such as portable hew saws or new milling potentials that can help the Kittitas County economy and health of our forest lands. Currently, The Nature Conservancy of Washington is conducting an economic feasibility study of dry forest restoration on lands east of the Cascades from Highway 2 south to Naches. These kinds of studies can help to inform us of the potential for a future involving forestry in Kittitas County, and guide our working together to re-invigorate a sustainable natural resource industry. There are exciting new prospects for natural resources including biofuels, and the commercial forestry lands of Kittitas County should be engaged in them.

The application for a land use change of such a large amount of acreage from "Commercial" to "Rural" would allow the owners to subdivide their land into smaller parcels for ownership and potential development. We hope that the Kittitas County Planning Commission rejects this proposal, and considers this and all future proposals in light of the investments and importance of this area for wildlife and a natural resource industry. We would be happy to provide any further information on the topics notes in this letter.

Thank you for the opportunity to comment on this proposal.

Sincerely,



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Cascades Citizen Wildlife Monitoring Images Attachment

For the past three years, the Cascades Citizen Wildlife Monitoring Project has engaged in remote camera, snowtracking, and salamander survey monitoring in Section 10 adjacent to the section proposed for de-designation. This monitoring has been to engage and education citizens in wildlife science in the Cascades, and to contribute information on wildlife presence to the WA Department of Transportation and other agencies engaged in the I-90 Snoqualmie Pass East Project.



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Van Watkins

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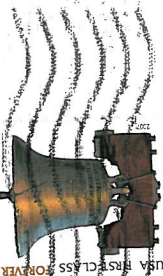
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Formerly Northwest Ecosystem Alliance

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