

Dan Valoff

To: Dan Valoff
Subject: SEPA Appeal hearing
Attachments: OpinionThirdLtr.doc; CougarTrackingData.pdf; TeanawayF&W.pdf; KittitasCtyListAnimalsPlants072408.pdf

Importance: High

From: Anna Nelson [mailto:anelson@GordonDerr.com]
Sent: Wednesday, August 11, 2010 7:27 AM
To: Dan Valoff
Cc: Katie F. Cote; Neil Caulkins
Subject: FW: SEPA Appeal hearing
Importance: High

From: Brose, Jim [mailto:jim.brose@symetra.com]
Sent: Wednesday, August 11, 2010 6:13 AM
To: Anna Nelson; cds@co.kittitas.wa.us
Subject: FW: SEPA Appeal hearing

We are submitting this for the record and for the SEPA hearing August 11th, 2010.

Thanks, Jim



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August 10, 2010

Kittitas County Board of Adjustment &
Community Development Services
Attn: Anna Nelson, AICP, Contract Planner

c/o Mr. James Brose
Citizens Alliance for a Rural Teanaway (CART)
P.O. Box 177
Cle Elum WA 98922

**RE: Request for Denial of Decision: SEPA Issued MDNS
SEPA Appeal Hearing: August 11, 2010
Teanaway Solar Reserve Conditional Use Permit CU-09-00005)
Northeast of the City of Cle Elum off of Highway 970
Cle Elum, Unincorporated Kittitas County WA**

Dear Mr. Brose and Ms. Nelson:

The purpose of this letter is to file a written response to deny the July 15, 2010 Kittitas County Community Development decision to issue a State Environmental Policy Act (SEPA) Mitigated Determination of Non-Significance (MDNS) for the above referenced project. The information presented in this letter will document the supportive information to show that the MDNS decision made by the Representative Official of Kittitas County Community Development is **clearly erroneous** with a firm conviction that a **mistake has been committed**.

According to SEPA Chapter 42.21C RCW an Environmental Impact Statement (EIS) **must** be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The information presented in this letter will show that relevant environmental factors on this site related to threatened, endangered, and sensitive species were not adequately surveyed and studied before reaching the decision to issue this MDNS. In reaching its threshold determination, Kittitas County has not shown and has not adequately documented that the potential environmental impacts associated with the proposed project to threatened, endangered, and sensitive species were properly assessed, surveyed, studied, considered, and addressed.

This request to deny the MNDS is based on the incomplete and inadequate information of record presented to Kittitas County by the applicant (Teaaway Solar Reserve, LLC) in their **initial** and **supplemental** CUP applications, Development Agreements, SEPA (and expanded) checklists, and the Mitigation Agreement between Washington

Department of Fish and Wildlife (WDFW). The decision to issue a determination of MDNS **must** be based on information sufficient to evaluate the proposal's environmental impact. This letter is presented to bear the burden to prove that the MDNS decision made by Kittitas County is **clearly erroneous, is wrong, and a mistake has been committed**. Diligent and careful analysis of the full-range of environmental elements were not surveyed on the project site according to protocol.

Specifically the applicant **did not** perform the necessary **seasonal** and **diurnal** field studies, surveys, and assessments as listed in the County Critical Areas Code 17A and as recommended by WDFW in their 2009 document titled Wind Power Guidelines. These additional surveys have also been requested by **EnCo** in two opinion letters presented to CART dated December 2009 and March 2010, was presented by CART on June 26, 2010 in their SEPA MDNS challenge appeal, and has been requested from other concerned citizens of Cle Elum on this issue (on record).

Kittitas County Code Title 17A

Listed below are the referenced Critical Area Codes in 17A that were not followed for this MDNS determination by Kittitas County. A response to each of these codes is presented after the citation.

Kittitas County Code Title 17A Section 17A.02.230

*"**Priority species habitats**" are fish and wildlife habitat conservation areas that include a **seasonal range** or habitat element in which a priority species is located, and which, if altered, may reduce the likelihood that the species will maintain and reproduce over the long term. The WDFW has **preliminarily** identified priority habitats and species on its maps. However, the unique land ownership patterns and terrain of Kittitas County result in the majority of the priority species habitats being located on big game winter range, riparian habitat, and wetlands, all as defined herein. (Ord.94-22 part, 1994).*

Kittitas County Code Title 17A Section 17A.02.240

*"**Priority animal species**" are designated by the state of Washington as endangered, threatened, or sensitive, pursuant to Chapter 232-12 WAC as of the date of the adoption of the ordinance codified in this chapter. Priority animal species have a **primary association** with priority animal species **habitat** as defined in Section 17A.02.230. (Ord. 94-22 part, 1994).*

Kittitas County Code Title 17A.07.020 Priority Species Habitat

"Designation of habitat under this section will only occur if the threatened, endangered, or sensitive priority species is not located in a riparian habitat, floodplain, or wetland, which is dealt with elsewhere in this chapter. To the extent not otherwise protected under this chapter, the area designated shall be the mapped location of a threatened, endangered, or sensitive priority species".

Response to Kittitas County Code Sections 17A.02.230, 17A Section 17A.02.240 & 17A.07.020: The very limited field work (5 days in the summer 2009) dedicated to the field survey for **endangered, threatened, and sensitive habitats and species** did not include performing **diurnal and seasonal** range assessments and surveys for range wildlife such as large and small mammals, reptiles, amphibians, owls, and other sensitive birds (passerine, game, and raptor). Over a year has passed since the initial **5 day limited** survey was completed (August 2009) and to date no additional field surveys and assessments were performed for **threatened, endangered, and sensitive species**. In addition the field crew during these limited 5 days performed a wetland delineation, priority habitat assessment, and stream classification which in itself require a significant amount of time to perform thereby taking more time away from adequately assessing the site for **threatened, endangered, and sensitive species**.

The applicant, applicant's consultant, Kittitas County, and the WDFW has not responded to several written attempts since last fall to address the necessary **seasonal and diurnal studies** that are needed as **recommended by WDFW** to adequately assess and survey the project site for such species.

The applicant's consultant states in Section 4.1, page 15 of the Sensitive Species Survey: "**Potential suitable habitat for several listed species does occur within the Ponderosa Pine Forest and Woodland habitat**". In addition: "**State or federal resource agencies may require additional surveys to determine if any rare plants or listed wildlife species occur in the survey area**". Additional surveys were not completed therefore it is not known if **endangered, threatened, or sensitive** reside or periodically use the site. Kittitas County stated (Page 11 August 4 Staff Report) that "**Limited** amounts of wetlands, wildlife habitat areas, and geologically hazardous areas were identified on the site". The statement that "limited amounts of wildlife habitat areas" is not true as presented in the supportive surveys conducted by the applicant.

According to applicant the WDFW PHS database **priority species** that may occur in the vicinity of the proposed project area include:

Black-Backed Woodpecker (State Species of Concern)
Northern Goshawk (Federal Species of Concern and State Candidate for Listing)
Fisher (Federal Candidate for Listing and State Listed Endangered)
Gray Wolf (Federal and State Listed Endangered)
Mountain Quail (Species of Local Significance)

The following **sensitive or range animal species** were observed or documented on the site by the applicant:

White-headed woodpecker (Washington Candidate Species) was found in the northwest portion of the survey area (page 14 of Sensitive Species Survey)

Elk (documented on the site)

Mule Deer (documented on the site)

Others species not discussed by the applicant that are documented by WDFW (See attached Teanaway Fish and Wildlife map) in the near vicinity of the project site are listed below.

Northern Spotted Owl (a documented owl site is about 2.3 miles north of NE corner of the project site and documented owl range from this spot is only **0.18 mile (950 feet)** from the project site.

Grizzly Bear (5 to 6 miles northwest of project site)

Cougar (well documented on the project site)

The **species of animals listed above do have a potential to exist** on the project site and therefore more detailed and extensive surveys must be conducted.

Native rare plant surveys were not performed in the early spring months when budding and flowering occurs. The brief survey performed in the summer of 2009 did **not adequately address** the **seasonal** variation and numbers of a given species that can occur in any given season. At this point it is not known if rare plant species exist on the project site because of the time of year of the study (August 2009) and time constraints to assess over 980 acres of land in less than 5 days while at the same time performing a wetland delineation, stream characterization, and an animal survey.

Kittitas County Code Title 17A.03.025

*"The dates of all of the foregoing maps (including **WDFW priority habitats and species maps**) shall precede the date of adoption of the ordinance codified in this chapter. Revised maps as issued by various governmental authorities after the date of adopting this chapter shall not be utilized as a preliminary source of information until such time as utilization of such maps is authorized by amendments to this chapter". In addition: "These maps are used as a **general guide to the location and extent of critical areas**. Any presumption created by these maps may be **rebutted by a preponderance of the evidence**"*

Response: The use of readily available critical area and **priority habitat and species maps** from WDFW and others is recommended to be used **only** as a **general guide to the location and extent** of these species. The applicant, applicants' consultant, and the WDFW **relied heavily** on these general maps to determine the likely presence or absence of priority habitat and species when assessing and surveying the project site during the 5 days in 2009. The lack of

evidence as to whether or not additional and yet undiscovered priority animal species exists, periodically exists, or could exist based on the existing habitat features cannot be accurately made without performing more extensive **seasonal** and **diurnal** surveys.

The necessity to perform **seasonal** studies and the cautionary reliant use of readily available **agency maps** are codified in the **Kittitas County Critical Areas Code** – 1994 and are presented and discussed in detail in the **WDFW Wind Power Guidelines** – 2009. Both of these referenced documents/manuscripts were **extensively** used by the applicant, the applicant's consultant, and the WDFW to make their case that an EIS should not be required and that adverse impacts to fish and wildlife resources will be mitigated (WDFW Mitigation Agreement) to a less than significant level. Based on the Kittitas County code and WDFW Wind Power Guidelines, the adverse impacts to **endangered, threatened, and sensitive species** cannot be accurately made without requiring **seasonal** and **diurnal** evidence and **local knowledge** from naturalists in the area as to what exists, periodically exists or could exist based on the existing habitat features on the project site.

Washington Department of Fish and Wildlife Wind Power Guidelines - April 2009

Listed below is the referenced sections WDFW Wind Power Guidelines that were not adequately followed for this MDNS determination by Kittitas County. A response to specific sections in this document is presented after the citation.

Page 1: The purpose of the WDFW Wind Power Guidelines is to provide consistent statewide guidance for the development of land-based wind energy projects that avoid, minimize and mitigate impacts to fish and wildlife habitats in Washington State.

Page 1: WDFW serves as Washington's principal agency on species protection and conservation (RCW – Title 77). Legislative Mandate RCW 77.04.012 establishes that wildlife, fish, and shellfish are property of the state and that WDFW is entrusted by and through the Fish and Wildlife Commission to ... "**preserve, protect, perpetuate, and manage the wildlife and food fish, game fish and shellfish** ..." and "... *attempt to maximize the public recreational game fishing and hunting opportunities of all citizens...*" Therefore, these wind power guidelines acknowledge the need for increased energy production in Washington, while attempting to balance natural resource protection with the broad interests of the public.

Page 1: Compliance with the State Environmental Policy Act (SEPA) is required for wind energy proposals. WDFW is considered an agency with environmental expertise through SEPA and provides review and comments on environmental documents. The permitting authority is responsible for SEPA review before issuing a project permit. However, wind project developers and permitting agencies are **encouraged to consult with WDFW as early as possible** in the **site selection process** to discuss the potential environmental impact of the development prior to formal SEPA review. Early

consultation with WDFW can ultimately result in a more efficient review of the proposal with upfront discussion of potential impacts.

GUIDING PRINCIPLES

Page 2: Environmental impacts of concern include those to wildlife species or their habitats that may result from placement or operation of wind turbines. In some instances, the **Department may conclude that a proposed project should not be constructed due to excessive and unavoidable wildlife impacts.**

With this in mind, **WDFW recommends** the following guiding principles for addressing potential wildlife impacts based on the ecology and behavior of wildlife species to the Pacific Northwest.

1. Several categories of wildlife species – including various categories of listed species and those that aggregate during **any season** – are potentially impacted by wind project development.
2. Various aspects of the ecology and behavior of potentially vulnerable species should be considered in risk assessments and management work. **For example, wildlife can be present during one or more seasons or life stages at a project site, and this seasonality should be taken into account.** Also, some species may not breed or be present every year, and this would **require that more than one year of surveys be conducted** to better understand their use of or occurrence at the site. Similarly, some species may be difficult to detect or varying times of occurrence from one year to the next that **might require multiple survey visits to provide data on site use.** In addition, some species have **substantially larger home ranges** than others, and assessments should take these species-specific differences into account.
3. Protection of certain species may be accomplished by protection of sensitive habitats, whereas other species will be best protected by certain management actions involving degraded or more common habitats. This occurs when species or species groups – for example, sandhill cranes, waterfowl, shorebirds, and **raptors** – aggregate in areas that are not considered sensitive or special habitats. As a result, **both habitat value and species needs should be considered.**
4. From a wildlife conservation perspective, a **species in decline may be absent from an area** with specific consideration to avoid or minimize environmental impacts it formerly occupied, **yet the habitat remains important for the conservation or recovery of that species.**

- 6 There are a number of important considerations related to information needed to inform management decisions. First, even the **most basic information is lacking for many species in major agency databases**. Consequently, the **absence of data does not necessarily indicate the absence of a particular species at the site**. Second, although application of some off-site information (including information on disturbance buffers) may be appropriate, multiple factors may complicate extrapolation and result in the **need for local information**. Finally, information used to assess impacts and upon which to base management decisions should be judged as to both the standards with which it was generated and its ability to credibly and appropriately inform the decision-making process.

PRE-PROJECT ASSESSMENT

Page 3: The primary purposes of pre-project assessment studies are to 1) **collect information suitable for predicting the potential impacts of the project on wildlife, habitat and plants** and 2) design the project layout (e.g., turbine locations) so that impacts on biological resources are avoided and/or minimized. **Species status or the potential to impact large numbers of common species should be taken into consideration** when developing a target list of species to be surveyed. The pre-project assessment may utilize relevant information from projects in comparable habitat types in locations close to the proposed project. The site-specific components and the **duration of the assessment should depend on the size of the project, the availability and extent of existing and applicable information in the vicinity of the project, the habitats potential affected, the likelihood and timing of occurrence of threatened, endangered and other special-status species at the site**, the magnitude of impacts to other species (e.g., bats, passerines, etc.) and other factors such as issues and concerns identified during the SEPA public process.

INFORMATION REVIEW

Page 3: Existing information on species and **potential habitats in the vicinity of the project area should be reviewed and if appropriate, mapped**. Sources of existing information should include resource agencies, local experts, recognized databases (e.g., Priority Habitats and Species [PHS] database, Wildlife Program Wildlife Resources Data System [WRDS]), and data gathered at other nearby wind facilities or other types of projects. This **information should be used to develop field and analysis protocols reviewed and approved by the WDFW**.

HABITAT MAPPING

Page 4: Key information about general vegetation and land cover types, wildlife habitat, habitat quality, extent of noxious weeds, and physical characteristics within the project area should be collected and compiled **using *current protocols*¹**. These protocols are to be developed using best available science **in consultation with WDFW**.

SURVEYS FOR THREATENED, ENDANGERED AND SENSITIVE SPECIES

Page 5: If existing information **suggests the probable occurrence** of state and/or federal **threatened, endangered (T&E) or sensitive-status species** on the project site at a level of concern, **focused surveys are recommended during the appropriate season** to determine the presence or likelihood of presence of the species. For example, if T&E species were expected to overwinter in concentrations in the project vicinity, targeted surveys to estimate T&E species use of the site would be appropriate. For ESA listed species, **early consultation with the US Fish and Wildlife Service for species specific survey protocols is highly recommended**.

GENERAL PRINCIPLES FOR HABITAT MITIGATION

Page 8: These principles are intended for land-based projects proposed throughout Washington State. These principles are not intended for evaluating offshore wind facility proposals and would likely require review and revision for relevance and applicability as such.

- Implementation of the habitat mitigation measures contained in this proposal are presumed to fully mitigate for habitat losses for all species, including species classified as “protected,” in the Washington Administrative Code (WAC 232-12-011), with the exception of species classified as state “threatened” or “endangered” and/or federally “threatened” or “endangered,” for which additional species- and site-specific mitigation may be necessary.
- Wind project developers **should be encouraged to site wind power projects on disturbed lands (i.e., developed, cultivated, or otherwise disturbed by road or other corridors)**, except where such land hosts significant aggregations of wildlife or are used by state or federally listed species.
- Wind project developers should be encouraged to place linear facilities (such as collector cable routes, transmission line routes, or access roads) in or adjacent to existing disturbed corridors in order to minimize project footprint, habitat fragmentation and habitat degradation.

- Wind project developers should be **discouraged from using or degrading high value habitat areas, and habitat areas that are difficult to restore.**
- Wind project developers are responsible for acquiring replacement habitat under this proposal and for management of such lands for the life of the project, unless otherwise indicated.
- Mitigation packages would be negotiated in consultation with WDFW and the permitting authority.
- The functions and value of the migration package should meet the extent of the impact on habitat.

Response:

The timing of the limited 5 days of field surveys in 2009 to determine whether or not **threatened, endangered, and/or sensitive habitats & species** exist, periodically exist, or could exist based on existing habitat features on the project site **were not performed** according to **field and analysis protocols as recommended by WDFW** in their referenced manual. **Species can be present during one or more seasons or life stages and this was not taken into account. Multiple survey visits and focused surveys are recommended** if the information **suggests the probable occurrence of state and/or federal threatened, endangered or sensitive species on the project site.** As stated before the applicant's consultant performed their priority habitats and species survey on a total of 982 acres on June 16th through June 19th and on July 9, 2009, for a total of only 5 days. This is a very limited time frame and is not suitable to accurately assess and survey the site for threatened, endangered, and sensitive species that could reside, periodically use, or could exist based on the existing habitat features on the site. The potential for environmental impacts to threatened, endangered and sensitive species cannot be determined at this time because it is not known if such species exist or periodically exist on the project site.

The **field surveys and protocols** performed for 5 days in 2009 by the applicant's consultant was **not submitted nor approved by the WDFW as recommended** in the referenced manual. The pre-project assessment study did not collect information suitable for predicting the potential impacts on the project on species because **seasonal and diurnal studies were not performed as recommended by the WDFW document.**

Most basic information is **lacking for many species in major agency databases** such as the WDFW Priority Habitats and Species maps. The **absence of data or plotted animals species on agency maps does not necessarily indicate the absence of a particular species on the site.** These maps are to be used in a **general manner** and extensive field surveys need to

be conducted on such a large site with proximity to threatened, endangered, and sensitive species. **These maps were heavily relied upon by the applicant** in their threatened, endangered and sensitive species determinations. Additional study is needed to adequately assess the site for such species. **Local plant and animal enthusiasts were not consulted as recommended by WDFW.**

The WDFW also recommends to site energy projects on **disturbed lands such as developed, cultivated, or otherwise disturbed by road or other corridors.** To meet this WDFW recommendation an **alternative site analysis** needs to be conducted to determine if another site in the area would be more suitable for the proposed project.

WDFW Mitigation Agreement dated April 18, 2010

Listed below is the referenced sections WDFW Mitigation Agreement that were not adequately followed for this MDNS determination by Kittitas County. A response to specific sections in this document is presented after the citation.

Page 1: TSR has undertaken **initial and supplemental site impact assessments to identify and quantify wildlife, wildlife habitat,** runoff, vegetation, and other impacts expected from the construction, operation, maintenance, and decommissioning of the project. The anticipated impacts have been identified and proposed mitigation measures to offset adverse impacts are consistent with the WDFW Wind Power Guidelines.

Page 2: WDFW based its review of the project on a **site visit conducted on March 15, 2010,** as well as TSR's project plans and specifications as the date the Agreement was finalized. At the discretion of WDFW, any subsequent material changes to the project plans or design **may trigger amendments to this Agreement or rescission** of this Agreement and development of a new agreement.

Page 2: Based on this Mitigation Agreement, the site visit, and the information provided to WDFW by TSR, **WDFW agrees that this project is consistent with the WDFW Wind Power Guidelines** and that mitigation for this project as set forth in Exhibit B offsets the adverse project impacts to fish and wildlife.

Page 5: Overall site selection is **designed to avoid all areas with documented endangered, threatened species.**

Response:

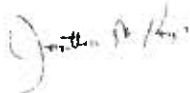
The initial and supplemental site impact assessments cannot be accurately determined because the project site was not adequately surveyed according to protocol for **seasonal and diurnal** time periods. The one day site visit by WDFW in March does not suffice for an accurate survey of the site for endangered, threatened, and sensitive species. **The project is NOT consistent with the WDFW Wind Power Guidelines** as

discussed in elsewhere in detail in this letter. The site has not been adequately studied (seasonally and diurnally) so it is impossible to state that the project is designed to avoid all areas with documented endangered and threatened species as stated by the WDFW on Page 5 of the Mitigation Agreement.

The Responsible Official did not require that additional **seasonal** and **diurnal** studies be performed by the applicant on and adjacent to the project site as codified in the Critical Area Code 17A and as recommended in the WDFW Wind Power Guidelines. Several attempts have been made in the record to perform these surveys to no avail. This constitutes that a “mistake has been made” and proves that the Responsible Official “acted in a clearly erroneous manner” in its threshold determination of MDNS. Therefore the project site property must be subject to further and extensive environmental analysis including the completion of a full EIS and retraction of the MDNS. The EIS will provide a more accurate representation of baseline conditions and will determine by seasonal and diurnal surveys whether threatened, endangered, and/or sensitive species may exist, periodically exist or could exist on the project site.

If you have any questions concerning the information presented in this letter you can contact me by telephone (243.841.9710) or by e-mail at jkemp@encoec.com.

Sincerely,



Jonathan M. Kemp
Wildlife & Fisheries Biologist
Principal, EnCo Environmental Corporation

KITTITAS COUNTY

Updated 7/24/2008

LISTED

Endangered

Gray wolf (*Canis lupus*)

Threatened

Bull trout (*Salvelinus confluentus*) – Columbia River distinct population segment

Grizzly bear (*Ursus arctos horribilis*)

Canada lynx (*Lynx canadensis*)

Marbled murrelet (*Brachyramphus marmoratus*)

Northern spotted owl (*Strix occidentalis caurina*)

Spiranthes diluvialis (Ute ladies'-tresses), plant

Designated

Critical habitat for the northern spotted owl

Critical habitat for the Columbia River distinct population segment of the bull trout

CANDIDATE

Fisher (*Martes pennanti*) - West Coast distinct population segment

Greater sage grouse (*Centrocercus urophasianus*) – Columbia Basin distinct population segment

Yellow-billed cuckoo (*Coccyzus americanus*)

SPECIES OF CONCERN

Animals

Bald eagle (*Haliaeetus leucocephalus*) (delisted, monitor status)

Black swift (*Cypseloides niger*)

Burrowing owl (*Athene cunicularia*)

Ferruginous hawk (*Buteo regalis*)

Larch Mountain salamander (*Plethodon larselli*)

Loggerhead shrike (*Lanius ludovicianus*)

Long-eared myotis (*Myotis evotis*)

Northern goshawk (*Accipiter gentilis*)

Olive-sided flycatcher (*Contopus cooperi*)

Pacific lamprey (*Lampetra tridentata*)

Pallid Townsend's big-eared bat (*Corynorhinus townsendii pallescens*)

Peregrine falcon (*Falco peregrinus*) (Delisted, monitor status)

Pygmy whitefish (*Prosopium coulteri*)
Redband trout (*Oncorhynchus mykiss*)
River lamprey (*Lampetra ayresi*)
Sagebrush lizard (*Sceloporus graciosus*)
Sharptail snake (*Contia tenuis*)
Townsend's ground squirrel (*Spermophilus townsendii*)
Western brook lamprey (*Lampetra richardsoni*)
Western gray squirrel (*Sciurus griseus griseus*)
Westslope cutthroat trout (*Oncorhynchus clarki lewisi*)
Wolverine (*Gulo gulo*)

Vascular Plants

Astragalus columbianus (Columbia milk-vetch)
Cypripedium fasciculatum (Clustered lady's-slipper)
Delphinium viridescens (Wenatchee larkspur)
Lomatium tuberosum (Hoover's desert-parsley)
Phacelia minutissima (Least phacelia)
Pinus albicaulis (Whitebark pine)
Silene seelyi (Seely's silene)
Tauschia hooveri (Hoover's tauschia)

Mosses

Orthotrichum praemorsum



WASHINGTON STATE DEPARTMENT OF
Natural Resources

[Return to Washington
Natural Heritage Program](#)

*Washington
Natural
Heritage
Program*

Reference Desk

Reference Desk	Location Search	Rare Plants	Rare Animals	Communities
GIS	Field Guides	Publications	Natural Heritage Plan	

**Washington Natural Heritage Information System
List of Known Occurrences of Rare Plants in Washington
February 2009
Kittitas County**

A key to status fields appears below. If a scientific name is underlined you may click on it to go to a field guide page (pdf format, average size 300 kb) for that taxon.

Scientific Name	Common Name	State Status	Federal Status	Historic Record
<u>Agoseris elata</u>	tall agoseris	S		
<u>Anemone patens var. multifida</u>	pasqueflower	T		
<u>Anthoxanthum hirtum</u>	common northern sweet grass	R1		H
<u>Astragalus arrectus</u>	Palouse milk-vetch	T		H
<u>Astragalus columbianus</u>	Columbia milk-vetch	S	SC	
<u>Astragalus misellus var. pauper</u>	Pauper milk-vetch	S		
<u>Camissonia pygmaea</u>	dwarf evening-primrose	S		
<u>Camissonia scapoidea ssp. scapoidea</u>	naked-stemmed evening-primrose	S		
<u>Carex comosa</u>	bristly sedge	S		H
<u>Carex macrochaeta</u>	large-awn sedge	T		H
<u>Carex pauciflora</u>	few-flowered sedge	S		
<u>Carex scirpoidea ssp. scirpoidea</u>	Canadian single-spike sedge	S		
<u>Chaenactis thompsonii</u>	Thompson's chaenactis	S		
<u>Collomia macrocalyx</u>	bristle-flowered collomia	S		
<u>Cryptantha gracilis</u>	narrow-stem cryptantha	S		
<u>Cryptantha leucophaea</u>	gray cryptantha	S	SC	
<u>Cryptantha rostellata</u>	beaked cryptantha	T		
<u>Cryptantha scoparia</u>	miner's candle	S		
<u>Cypripedium fasciculatum</u>	clustered lady's-slipper	S	SC	
<u>Delphinium viridescens</u>	Wenatchee larkspur	T	SC	
<u>Eatonella nivea</u>	white eatonella	T		
<u>Erigeron basalticus</u>	basalt daisy	T	SC	
<u>Erigeron piperianus</u>	Piper's daisy	S		H
<u>Erigeron salishii</u>	Salish fleabane	S		H
<u>Gentiana douglasiana</u>	swamp gentian	S		
<u>Hackelia hispida var. disjuncta</u>	sagebrush stickseed	S		H
<u>Lilium longisepala</u>	longsepal globemallow	S		
<u>Juncus howellii</u>	Howell's rush	T		
<u>Lomatium tuberosum</u>	Hoover's desert-parsley	S	SC	

<u>Mimulus suksdorfii</u>	Suksdorf's monkey-flower	S	
<u>Minuartia nuttallii ssp. fragilis</u>	Nuttall's sandwort	T	
<u>Montia diffusa</u>	branching montia	S	H
<u>Nicotiana attenuata</u>	coyote tobacco	S	
<u>Oenothera caespitosa ssp. caespitosa</u>	caespitose evening-primrose	S	
<u>Ophioglossum pusillum</u>	Adder's-tongue	T	H
<u>Oxytropis campestris var. gracilis</u>	slender crazyweed	S	H
<u>Pediocactus nigrispinus</u>	snowball cactus	R1	
<u>Pellaea breweri</u>	Brewer's cliff-brake	S	
<u>Penstemon eriantherus var. whitedii</u>	fuzzytongue penstemon	S	
<u>Phacelia minutissima</u>	least phacelia	E	SC
<u>Pyrrocoma hirta var. sonchifolia</u>	sticky goldenweed	S	
<u>Sidalcea oregana var. calva</u>	Wenatchee Mountain checker-mallow	E	LE
<u>Silene seelyi</u>	Seely's silene	S	SC
<u>Spiranthes porrifolia</u>	western ladies-tresses	S	
<u>Subularia aquatica var. americana</u>	water awlwort	R1	
<u>Tauschia hooveri</u>	Hoover's tauschia	T	SC

Description of Codes

Historic Record:

H indicates most recent sighting in the county is before 1977.

State Status

State Status of plant species is determined by the Washington Natural Heritage Program. Factors considered include abundance, occurrence patterns, vulnerability, threats, existing protection, and taxonomic distinctness.

Values include:

- E = Endangered. In danger of becoming extinct or extirpated from Washington.
- T = Threatened. Likely to become Endangered in Washington.
- S = Sensitive. Vulnerable or declining and could become Endangered or Threatened in the state.
- X = Possibly extinct or Extirpated from Washington.
- R1 = Review group 1. Of potential concern but needs more field work to assign another rank.
- R2 = Review group 2. Of potential concern but with unresolved taxonomic questions.

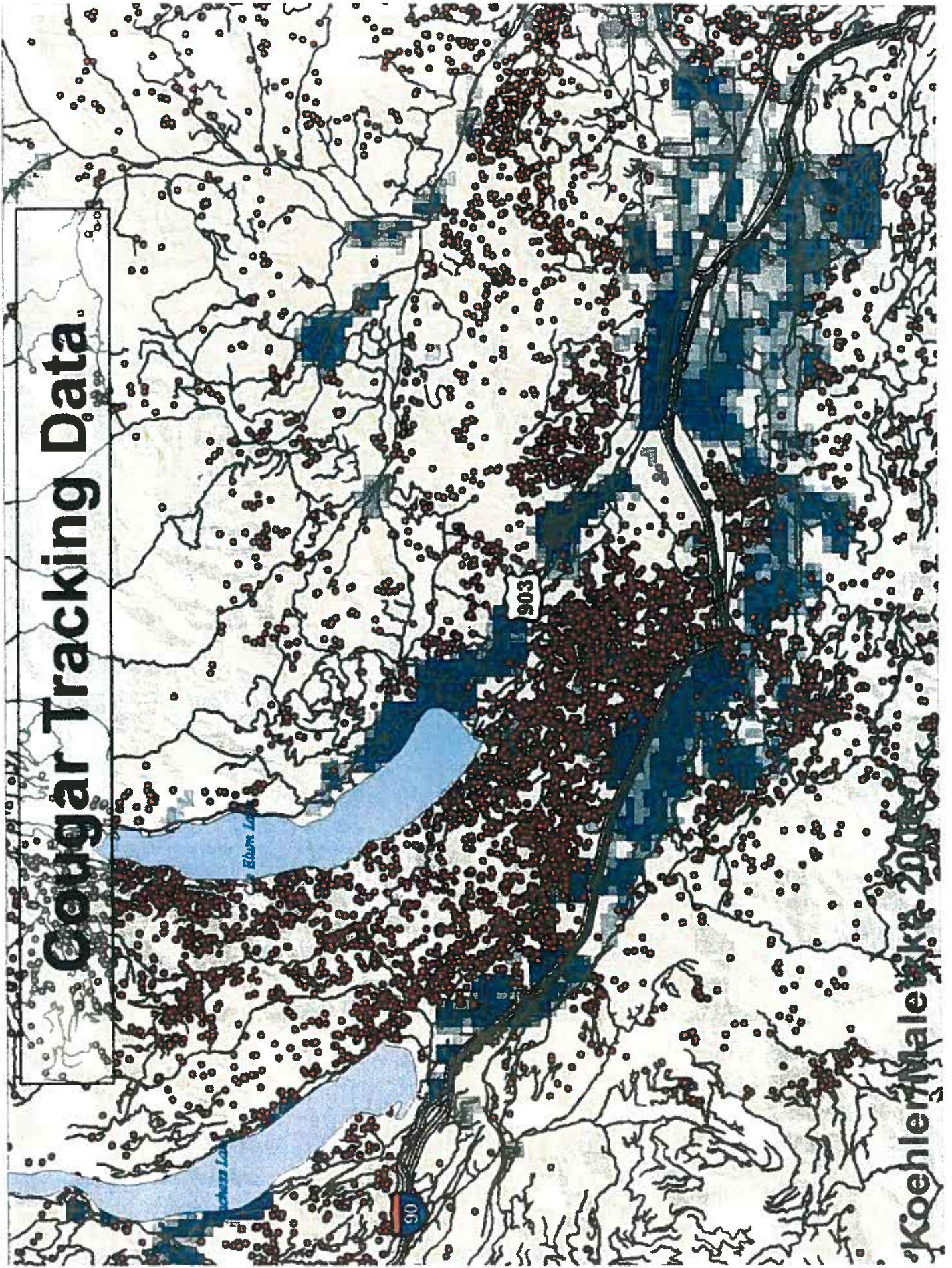
Federal Status

Federal Status under the U.S. Endangered Species Act(USES) as published in the Federal Register.

- LE = Listed Endangered. In danger of extinction.
- LT = Listed Threatened. Likely to become endangered.
- PE = Proposed Endangered.
- PT = Proposed Threatened.
- C = Candidate species. Sufficient information exists to support listing as Endangered or Threatened.
- SC = Species of Concern. An unofficial status, the species appears to be in jeopardy, but insufficient information to support listing.

Washington Natural Heritage Program - www.dnr.wa.gov/ResearchScience/Topics/NaturalHeritage/Pages/amp_nh.aspx/ [back to top](#)
 Washington Dept. of Natural Resources, PO Box 47014, Olympia, WA 98504-7014

Cougar Tracking Data



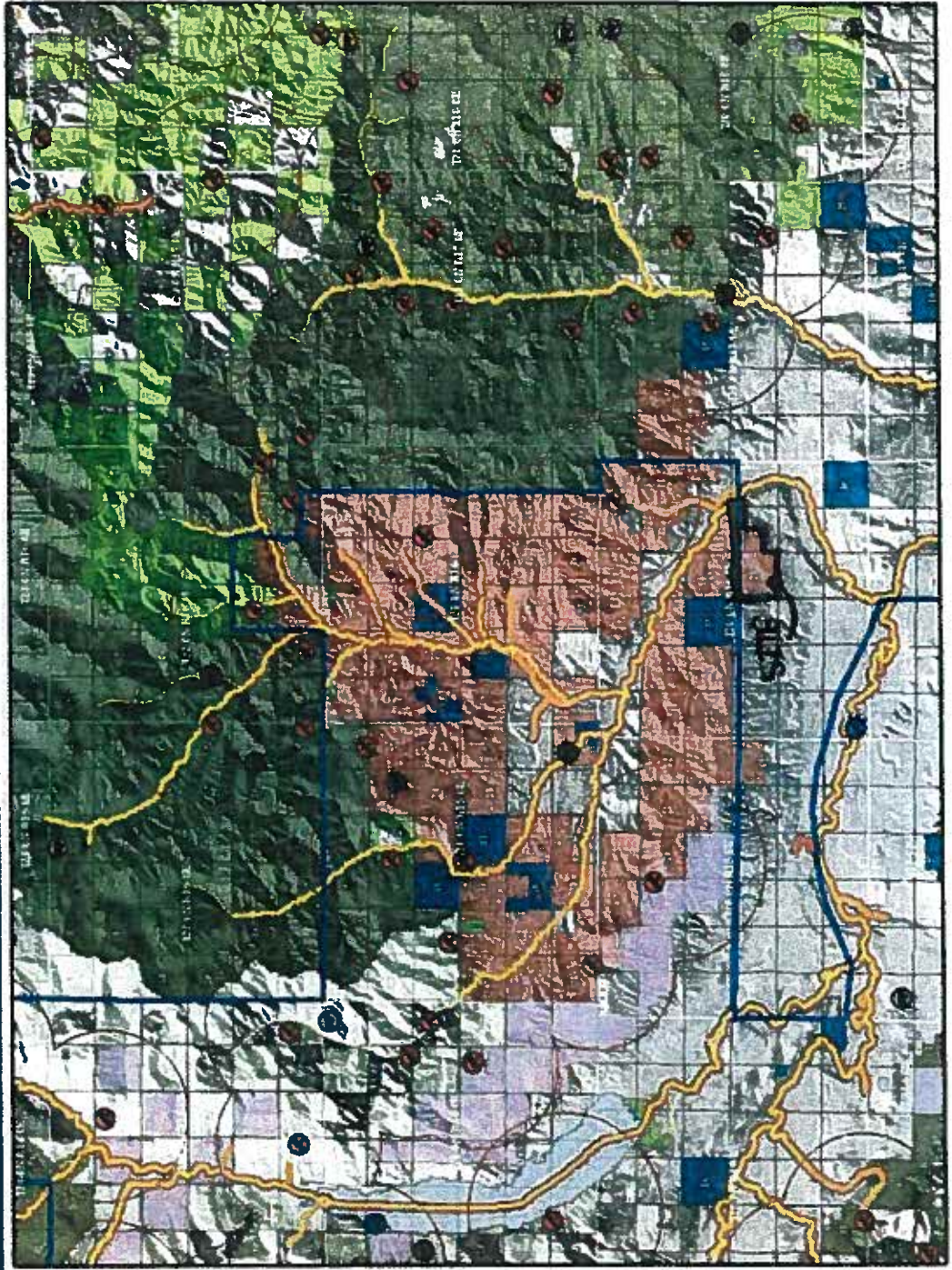
Koehler/Male et al. 2001

Teanaway Fish & Wildlife



Figure 1.
Teanaway Basin
Habitat Acquisition

- Northern Spotted Owl SDCs
- Gray Wolf Sighting
- Lynx Sighting
- Grizzly Bear Sighting
- Bald Eagle Nest
- Bull Trout Presence
- Steelhead Presence
- Chinook Presence
- 1985 spotted Owl Special Emphasis Area
- Proposed for Acquisition
- Plain Creek - HCP M. Acquisition
- VA DNR - HCP M. Acquisition
- Forest Service - Conservators Management
- Forest Service Mgmt.
- Forest Service Adaptive Management



0 0.5 1 2 Miles



1:160,000