



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Washington Fish and Wildlife Office
Central Washington Field Office
215 Melody Lane, Suite 119
Wenatchee, WA 98801

September 17, 2009

In Reply Refer To:

USFWS Reference: 13260-2009-TA-0156
Cross Reference: 13260-2008-B-0013
Hydrologic Unit Code: 17-03-00-01-01

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SEP 21 2009

Kittitas County
CDS

Kirk Holmes, Interim Director
Kittitas County Planning Commission
Kittitas County Community Development Services
411 N. Ruby St., Suite 2
Ellensburg, WA 98926

RE: SnoCadia on Gold Creek Long Plat and Planned Unit Development (P-07-00058)

Dear Mr. Holmes:

The U.S. Fish and Wildlife Service (Service) is submitting this letter in response to your Notice of Application for the SnoCadia on Gold Creek Long Plat and Planned Unit Development (P-07-00058). Thank you for the opportunity to comment on this proposed development. The Service believes that a Determination of Non-Significance under Washington's State Environmental Policy Act (SEPA) is not appropriate for this project. As proposed, this project is likely to result in significant impacts to several components of the Natural Environment surrounding Gold Creek. An Environmental Impact Statement (EIS) is needed to analyze the degree to which this proposal will narrow the range of beneficial uses of this area's Natural Environment. We focus our SEPA comments on impacts to components of the Natural Environment, but we believe significant impacts to the Built Environment are also likely (particularly involving Light and Glare, and Sewer/solid waste).

In addition to having significant impacts in the SEPA context, this project is fundamentally inconsistent with other activities in the area. For decades, many partners have been working together to achieve a vision of sustaining robust fish and wildlife populations in the Cascades, made possible by well-connected natural habitats across ownerships. Achieving this vision in many ways hinges on protecting intact natural habitats in the rare places like the Gold Creek Valley where fragmentation by human development is limited. As a member of this partnership, the Service has allocated over \$26 million dollars to land acquisitions in the I-90 corridor, including the Gold Creek valley. The Service's objectives in making these acquisitions are to promote the conservation goals of Habitat Conservation Plans developed by large landowners such as the Plum Creek Timber Company and the Washington Department of Natural Resources, and to protect and restore ecological connectivity across

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completion, rain-on-snow events from this development will make a large contribution to flood flows into Lake Keechelus. Because stormwater infiltration features are difficult to maintain in deep snow, and due to the proximity of the proposed development to Gold Creek, contaminants that accumulate on parking lots and roadways will likely be discharged into Gold Creek and its floodplain. Survival and productivity of salmonids is known to be diminished by exposure to low concentrations of hydrocarbons and dissolved metals. In addition to contaminants in stormwater, this development will lead to increased discharges of estrogen disruptors and other pharmaceuticals that are not fully degraded by standard wastewater treatment methods. Runoff from residential lawns is likely to carry fertilizers and pesticides because homeowners frequently use these products in “off label” applications. All of these contaminants are known to adversely affect amphibians, salmonids, and insects. The effects of these contaminants on water quality in terms of aquatic species and use of this water for domestic and agricultural water supply needs to be analyzed in an EIS.

Ground water will also be affected by the proposed large area of impervious surface. Water is a precious resource in the Yakima Basin, and groundwater is particularly precious because it contributes to maintaining base flows in late summer and early fall when precipitation is scarce and demand for water is high. Impervious surfaces associated with the project will not only increase runoff, but they will also reduce the amount of water from precipitation or snowmelt that infiltrates into the soil and becomes groundwater. Base flows in lower Gold Creek will likely be diminished, with consequences for both bull trout and kokanee that migrate into Gold Creek to spawn. Changes in the Gold Creek hydrograph resulting from the proposed development need to be analyzed in an EIS, with particular attention to effects on total water supply available in Lake Keechelus.

Habitat for fish and wildlife are likely to sustain the most significant impacts from the proposed project. In addition to the negative effects on aquatic habitats associated with the impacts described above, the proposed development will have a range of direct and indirect effects on a wide variety of terrestrial and aquatic species found in the area. For example, the proposed development may contribute to increased mortality rates of adult salmonids. Bull trout and kokanee are relatively large fish that spawn in shallow, clear streams like Gold Creek. By increasing the number of people living and recreating near Gold Creek, this development will likely lead to increased disturbance and harm of spawning bull trout and kokanee. Youthful curiosity, ignorance, and malice will all likely to contribute to removal of spawning adults.

Road density in watersheds is one of the most reliable indicators of the health of salmonid populations. Lower densities ($< 1 \text{ mi/mi}^2$) are associated with healthy populations. The entire Gold Creek watershed is currently below this threshold (0.42 mi/mi^2), but existing roads are highly concentrated in lower watershed, and the proposed development would worsen this situation. The impacts of the proposed development on road density in the watershed, and the impacts of this increased density on fish and wildlife populations need to be analyzed in an EIS.

The proposed development is also likely to affect the structure and function of riparian and aquatic habitat components. Like other salmonids, bull trout prefer complex riparian areas

cc:

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