Washington Native Plant Society

Appreciate, Conserve, and Study Our Native Flora

6310 NE 74th Street, Ste 215E, Seattle, Washington 98115
(206) 527-3210

5 January 2005

Jan Sharar
Kittitas Count Community Development Services Department
411 North Ruby Suite 2
Ellensburg, Washington

Dear Ms. Sharar

Subject: Wildhorse Wind Power Project, Wind Resource Development Permit Z-2004-20

I am writing to you as the president of the local (Central Washington) chapter of the Washington Native Plant Society. We are concerned about the potential adverse impacts that the construction of the proposed wind power project could have on the native plants in the area. The most severe, short term impacts will be where native vegetation is removed. There are several long term issues which we fear could result in even more significant impacts on the native plant communities which we would also like to comment on. We submitted comments about the potential for road construction to introduce or spread noxious weeds and to provide readier access to the Hedgehog cactus for thieves during an earlier comment period.

The Development Agreement seems to provide more detail and we have had more discussions about potential impacts of this proposal since our previous comments, these extend those comments. We are not opposed to wind power, it is preferable to most of the fossil fuel power generating techniques, if implemented responsibly.

The areas where the native hedgehog cactus (Pediocactus simpsonii) grows in the area of the project usually have little or no soil present, which includes ridge tops. For a long time, ridge tops without soil were of little utility and left largely undisturbed. In the past few decades, this has changed and ridge tops are being developed for radio towers, microwave relay stations, cellular telephone towers and towers for generating electrical energy from wind power. Combined with other human activities, this has put pressure on this species and its community. Like most of the perennial species in these habitats with little or no summer (growing season) precipitation, the cactus grows slowly and appears to reproduce very slowly.

Burying the power cables and control system wiring within the area which has already been disturbed during construction of the roads (including using the roadway for the temporary storage of the material removed from the trench for the cables) would reduce the amount of native habitat disturbed. The cryptogamic crust (the algae, lichens and mosses between the larger plants and a key indicator of native communities which have not been disturbed

seriously recently) is easily disrupted, including by burying under a thin layer of dirt, and appears to be a key to the resistance of plant communities to the invasion of non-native species (e.g. noxious weeds), so that not using undisturbed areas for temporary storage of materials excavated from trenches would be greatly appreciated.

We would appreciate it if an area equal to the area of P. simpsonii habitat being disturbed were set aside with permanent protection from disturbance and that a similar area where the cactus has been largely eliminated (e.g. stolen) be replanted with cactus and protected so that the there is "no net loss" of cactus and suitable habitat.

The discussions of revegetation emphasize the process rather than the result. The experience with reclamation projects, is that simply seeding, especially if there are weed seeds present, is not often very effective. My experience suggests that many native plants, which are perennials (typically the dominant component of the community), are successful in establishing new plants only infrequently - probably only during a series of years which are exceptionally well suited for a seedling to develop its root system. Some species, such as big sagebrush and lupines, seem to be able to establish themselves from seed if there is deep soil without excessive competition, but they seem to be the exceptions. Therefore, the revegetation should be judged by how successful it was at re-establishing native species on the site, for example at comparable (within 50% of the density of nearby undisturbed sites) densities rather than that an effort was made. If the seeding was not successful, weeds will succeed and the disturbed area will become a source for the further introduction of weeds.

The discussion of noxious weeds addresses the concern about introducing more plants and seeds. It does not take into account the fact there are likely to be populations of noxious weeds already on the site, which could be spread by the construction and road maintenance activities. The roads and construction sites should be surveyed for the presence of weeds and appropriate plans developed. These should include management of weeds and weed seeds on areas which will be cleared, e.g. eradication before clearing, so that the weeds and as many weed seeds are eliminated as possible and are not spread when the soil is spread or replaced. Weeds established along existing roads should be controlled before any grading is done which might spread the weeds and there seeds. Where control is not effective, grading should be scheduled so that weeds and seeds are not spread, e.g. the grader always works toward the center of infested areas not outward.

Thank you for considering our concerns.

Sincerely,

Phelps Freeborn, President
Central Washington Chapter
Washington Native Plant Society
3409 Taylor Way
Yakima, Washington 98902