



# Washington Native Plant Society

*Appreciate, Conserve, and Study Our Native Flora*

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

9 September 2004

Kittitas County Community Development Services  
411 North Ruby Suite 2  
Ellensburg, Washington

Dear Mr. White:

**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 like to focus on.

1) Improvements to the roads accessing the project will increase the vulnerability of the hedgehog cactus (*Pediocactus simpsonii*) to wholesale removal - we have seen this same species of cactus stripped from Selah Butte in the vicinity of the road accessing the towers on top of the ridge (between I-82 and SR 821 just south of the Kittitas-Yakima County Line), it is still present in reasonable abundance further from the road along the ridge top.

2) Construction of improved gravel roads using non-local materials (that is created by moving material more than a hundred feet) increases the probability of spreading noxious weeds, such as diffuse knapweed and puncturevine, and other non-native species such as mullein. Careful cleaning of equipment before entry into the area can reduce the risk of introducing seeds and other propagules of weeds and other non-native species. Selection of sites for raw materials such as crushed gravel and fill, which are free of weeds or careful preparation of such sites to remove all weeds before moving any material to be used elsewhere can limit the spread of weeds already present in the area.

3) Maintenance of gravel roads can enhance the spread of weeds. Operation of road graders to resurface the road moves material along the road, if this includes weeds or weed seeds they can be spread or "pushed back toward their origin" depending upon the direction of travel relative to existing populations of weeds within the roadway. Stockpiles of crushed gravel, which have been left exposed for more than one growing season, are often sources of weed seeds - in our experience weeds colonize gravel stockpiles more frequently than native species. The use of herbicides along roads generally excludes native species without controlling several invasive weeds (most notably: Russian thistle or tumbleweed, diffuse knapweed and kochia).

While we appreciate the ready access we have had to the public and private lands around Whiskey Dick Mountain and recognize that this is not pristine habitat, we would like to see measures adopted to address the concerns stated above. In particular, require the adoption of the measures we have suggested (or equivalent) for controlling the introduction and spread of weeds during construction and operation of the facilities. We are less certain of what would be effective measures to reduce the risk of poaching of the cactus without significantly interfering with public access to these marvelous public lands, but do ask you to consider reasonable measures to protect a species which has been stripped from many areas already. There are small electronic devices (PIT tags, passive integrated transponders: capsules about the size of a grain of wild rice) which are used by the fisheries programs to uniquely identify individual juvenile salmon. There are also small, marked pieces of wire (coded wire tags), which are used to mark populations of fish (e.g. which hatchery they were raised in). If either of these were embedded in the cactus, they would allow identification of stolen plants - once they have been located and identified as probably stolen. Knowledge that the population had been tagged might serve to deter theft.

If we can be of any assistance in reviewing proposals to address these issues, consulting with people interested in implementing our suggestions or otherwise helping to improve the protection of our natural heritage, please do not hesitate to contact us.

Sincerely,

Phelps Freeborn  
President  
Central Washington Chapter  
Washington Native Plant Society  
3409 Taylor Way  
Yakima, Washington 98902  
(509) 454-0871 H (leave a message if I am not there)