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January 23, 2016

Washington State Parks & Recreation Commission
PO Box 42650
Olympia, Washington 98504-2650

Re: Candidate Sites for Recreation Business Activities- Crystal Springs

Dear Commissioners,

On behalf of the I-90 Wildlife Bridges Coalition, I am writing to comment on your proposed Candidate Sites for Recreation Business Activities, and specifically Crystal Springs, part of the Iron Horse State Park in Kittitas County. This proposal should be removed from the list due to its impacts on wildlife and the inconsistency of the proposed actions with the land management focus and conservation investments of the landscape of which this park is a part.

The draft proposal suggests a lodge with up to 20 rooms, up to 100 cabins, an RV facility, retail shops, equipment rental and year-round recreation facilities. This contradicts the conservation investments made to date and underway in this area. There are ample opportunities at Snoqualmie Pass and farther east in Kittitas County for vacation rentals and recreation equipment sales and rentals, but the Crystal Springs property is in a location where there are limited options for fish and wildlife.

The habitat linkage between the north and south Cascades is extremely narrow. Forests extend only from North Bend to Easton, and these are broken up by existing developments such as at Snoqualmie Pass, and physical barriers such as Keechelus Lake. Thus, east of the crest there is only a small corridor near Hyak/Gold Creek and a somewhat larger corridor between Keechelus and Kachess reservoirs. Crystal springs lies in this second corridor, which is critical for wildlife connectivity. This corridor is already affected by roads, powerlines and private cabins. We must maintain the habitat that is left and restore where we can.

Over 60 species of vertebrates- use this corridor. Most are not noticed by the casual visitor, but all would be affected by additional development. Feeding, migrating, mating, denning, dispersal, hibernating,

hiding from predators - all are critical activities for these species. Smaller and less mobile species often cannot move through impacted areas. In the winter, limiting energy expenditure can mean the difference between survival and not. Human disturbance can be the factor that makes that difference.

The I-90 Snoqualmie Pass East Project is a 15-mile highway improvement project stretching from Hyak to Easton that integrates more than 20 wildlife crossing structures to improve ecological connectivity and make the roadway safer for people and wildlife. The Crystal Springs property lies immediately south of three of those wildlife crossing structures currently under construction. Wildlife are already using the completed structures just a few miles west of Crystal Springs, and our volunteers in the Citizen Wildlife Monitoring Project have documented numerous wildlife present in the vicinity of Crystal Springs.

The WSDOT is not alone in recognizing the importance of habitat connectivity in this landscape, often referred to as the I-90 corridor. Public agencies and conservation organizations have protected over 100,000 acres with public and private dollars in this landscape over the past several decades to consolidate the checkerboard land ownership patterns. This includes acquisition of lands by State Parks adjacent to the Iron Horse State Park to ensure a natural environment along the trail corridor and avoid additional cabin development sprawling in the valley near Stampede Pass. The US Forest Service manages much of this landscape, known as the Snoqualmie Pass Adaptive Management Area, for the primary purpose of promoting late successional habitat and habitat connectivity. Public and private dollars, as well as thousands of volunteer hours, have been contributed to habitat protection and restoration.

Since 2000, the I-90 Wildlife Bridges Coalition and The Cascades Conservation Partnership, have played a lead role in acquiring and protecting over 34,000 acres of forest habitat just north and south of Interstate 90 near Snoqualmie Pass. Our coalition's mission is to advocate for high quality wildlife connectivity measures in the I-90 Snoqualmie Pass East Project, while ensuring the habitat adjacent to these structures contributes to their success.

As recreational users of this area, we understand the need for a basic trailhead facility in the winter. There is no need for lodges and commercial buildings. While many enjoy this area, we must all be mindful of our impact on the native wildlife, and adapt our activities to avoid impacting their survival.

Washington State Parks has a "commitment to stewardship that transmits high quality park assets to future generations", but the current proposal for Crystal Springs does not recognize the tremendous natural resource value of the property nor the asset that restoration through an alternative proposal could provide. Instead of commercializing the park, State Parks should undertake restoration of the site, and re-establish high quality habitat, contributing to large contiguous areas of natural habitat and low human impact.

Crystal Springs should be a day use only facility, with a limited footprint. This would be an excellent place to provide signs and other information on the importance of this and surrounding properties for wildlife, and highlight the amazing transformation of I-90 from an impenetrable wildlife barrier, to a world class example of transportation structures providing ecological connectivity.

Recreation is an important part of the economic future of Kittitas County, and for each economic activity there are appropriate places to be located. A critical wildlife corridor is not an appropriate place to put this type of high impact recreation resort development. State Parks should investigate other more appropriate locations, asking first- are there are private lands available for this type of development?

In consideration of the landscape context and potential impacts, please remove the Crystal Springs proposal from your list and initiate a dialogue with public and private partners including our coalition on an alternative proposal that restores the habitat value of this property while providing recreational offerings in balance with natural resource protection and restoration.

Thank you for this opportunity to comment on your park planning.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charlie Raines". The signature is written in dark ink and is positioned centrally below the word "Sincerely,".

Charlie Raines
Coalition Director