Cross Base Highway testimony by Fred Weinmann January 26, 2006

The project I would like to talk about is the Cross-Base highway. My name is Fred Weinmann. I worked for 29 years as a wetland ecologist and botanist for Federal and state government and in the private sector. I am also the immediate past president of the Washington Native Plant Society. In November, 2003 I sent a letter to the Federal Highway Administration, the Washington State Dept. of Transportation and Pierce County expressing the concerns of the WNPS regarding the ecological impacts of the Cross Base Highway. The WNPS has over 2000 members. Our goal is to conserve Washington's native plants and their habitats.

The concerns we expressed in our letter of November, 2003 have not been resolved. Our most significant concerns are briefly summarized as follows.

The WNPS has determined that conservation of Garry Oak Woodland communities and associated prairie communities is one the most important native plant protection issues in the State of Washington. These kinds of plant and animal communities have always been limited in western Washington and 90% of them have already been eliminated. The Cross-Base highway project will directly eliminate hundreds of acres of these habitats as well as fragmenting others as it passes through Garry Oak communities and prairies.

Several plant species listed as rare by the Washington State Heritage program occur in Garry Oak Woodlands. These include Hall's aster (Aster hallii), Short white-topped aster(Aster curtus) and the small flowered trillium (Trillium parviflorum). This project has the potential to impact all of these species. The proposed highway will also run smack through the habitat of the western gray squirrel, a very rare species in Washington. This is not the common eastern gray squirrel of urban areas!

The proposed highway alignment will pass within ¼ mile of a series of wetlands where the federally listed rare species, Howellia aquatilis has been found. In fact the highway will pass between several wetlands and may have significant effects on the hydrology of these wetlands i.e. it may make some of them drier and some wetter. The potential for such impacts has not been adequately studied, analyzed or addressed by the EIS for the project—and no acceptable plan for avoiding or minimizing impacts has been proposed. One of the canons of wetland ecology is that the most significant (and often least analyzed and most insidious) impacts to wetlands are those caused by hydrologic impacts and manipulation. Vegetation will often grow back if appropriate hydrology is in place, but once the hydrology has been altered, wetlands are difficult or impossible to restore.

The most serious impact of the project is the habitat fragmentation it will cause;

Habitats will be bisected which will interrupt the normal movement of animals.

Wetlands will be dissected with potential for hydrologic impacts Wildlife corridors will be disrupted

And one additional very important issue: Roads and highways provide the easiest and most used route for invasion of non-native plant species into natural habitats. The proposed highway will without doubt contribute significantly to the introduction of non-

native species into areas which currently are relatively free of non-natives. This issue has been essentially ignored by the project proponents and in the EIS. WNPS considers the habitat impacts of invasive plant species to be one of the three most important current threats to native plants in Washington.

Impacts of the issues discussed above have not been adequately studied, nor has adequate mitigation been proposed for those impacts that have been identified. In their review of the final EIS for the project, the Environmental Protection Agency has stated: "Upon reviewing the final EIS we find that issues remain and conclude that this Final EIS is still not adequate......"; and later in the same letter "We agree with the state Department of Fish and Wildlife and the US Fish and Wildlife Service that the conceptual mitigation in the Final EIS is inadequate."

There are many important transportation projects that should be funded. Inclusion of the Cross-Base highway project in a transportation package for the legislature will only serve to weaken the entire package.