

## Testimony on Cross Base Highway before the Sound Transit Board, Jan 26, 2006

My name is Michael Marsh. My training and experience are in the population and community ecology of animals and plants. I am a Board member and former Conservation Committee Chair of the Washington Native Plant Society. It's reported that the Sound Transit Board and the Regional Transportation Investment District, RTID, will consider presenting a joint funding package to the legislature, and that the proposed cross-base highway, designated State Route 704 would be part of this proposal. I will tell you why I think this highway should not be built.

### 1. Value of native landscape -

a. all natural landscape has intrinsically higher ecological value than land that has been cleared for farming or for development. Native plant and animal communities provide the habitat which many native species of plants and animals require for survival. Roads across natural landscapes are the most dangerous initial threat to their continued existence. Roads divide and isolate natural populations, sometimes below a critical level for long-term survival. They bring in non-native invasive plants and animals and admit vehicles which kill animals and spread pollutants. The proposed highway will traverse an un-roaded and relatively undisturbed portion of Ft Lewis, destroying, disturbing or total isolating over 1700 acres of native habitat.

b. the Garry oak woodlands and native prairie that will be destroyed or disturbed by the Cross Base Highway are the plant communities that are rarest in Washington today, because this level, fertile land was the first to be cleared for agriculture or development. They are the subject of special concern by the Washington Native Plant Society.

c. Military bases across this country are among the major protectors of natural communities of plants and animals, and under most recent administrations base commanders have been encouraged to give consideration and care to these communities; thus it is especially troubling that construction of the proposed highway will complete the encirclement of McChord AFB with roads and other development, while at the same time placing a major public road across land used by Ft Lewis for military training purposes. If past actions of the Base Realignment and Closure Commission are predictive, the road will probably place McChord, in particular, high on the list for base closure in the near future.

### 2. Several Threatened plant and animal species are imperiled by the road.

Water howellia, *Howellia aquatilis*, is listed under the Endangered Species Act as Threatened. It occurs only in three isolated locations in Washington. It has disappeared from locations in three northwestern states, thus its geographic range is diminishing, one reason why it is listed. Water howellia occurs only in small wetlands which, because of local hydrology, fill and dry each year. Its habitat requirements are so narrow that in a survey of 34 wetlands on McChord AFB, only 3 besides Bentsen were suitable habitat for water howellia. The FEIS identified a large population, in South Bentsen wetland, which is within ½ mile of the preferred highway alignment. A survey conducted for McChord AFB in 2005 by the Nature Conservancy found a few individuals of this species in the smaller North Bentsen wetland, which is only 1/4 mile from the highway alignment and within the so-called "disturbance area" described in the FEIS. One potential danger of the proposed highway which is not addressed in the FEIS is that it would disturb the subsurface flow of water in the region to the wetlands now harboring water howellia in ways that could lead to its local extinction.

The western gray squirrel, once common on the partially wooded prairies and oak/pine forests near Puget Sound, has become rare statewide as these habitats were destroyed by man. The squirrel in our cities is a different species, the eastern gray squirrel. The proposed road will go straight through the center of the oak woodland that is home to the only known western gray squirrel population in western Washington. It will destroy, disturb, or totally isolate 660 acres of oak and mixed oak forest, of which 264 acres are on essentially undisturbed land and furnish the most valuable habitat for the squirrel. This fragmentation of habitat is very likely doom this population, which is probably genetically distinct from other populations of the species. The USFWS wrote that the Puget trough population in Washington, [quoting] “which is at a high risk of extirpation, is now centered on Fort Lewis in southern Pierce and northern Thurston Counties where the largest area of oak woodland remains”. The western gray squirrel is listed as Threatened by the Washington Department of Fish and Wildlife. The Department is developing a recovery plan for the western gray squirrel, and Fort Lewis has developed a 10-year oak woodland management strategy that includes protective strategies for the species. Washington State law RCW 77.15.130 (formerly RCW 77.16.120) protects nest trees used by western gray squirrels. A western gray squirrel was recently sighted in a tree on the preferred alignment of the cross base highway.

It is ill-advised to spend money on this un-needed, ecologically damaging highway which would only serve a small group of people, when the same money could be used in the three counties served by Sound Transit to make existing highways safer and strengthen our public transit system. We urge Sound Transit not to support this highway,

Please see comments on the Final Environmental Impact Statement under “Cross Base Highway Debate, Comments, etc.”, at: [http://www.wnps.org/conservation/conservation\\_reports](http://www.wnps.org/conservation/conservation_reports) which point out the complete inadequacy of the suggested mitigations.