



Washington Department of Fish and Wildlife

Lands 20/20: Fall 2020-Spring 2021

Public Review Support and Opposition Letters

Lands 20/20 2020 – 2021 Public Support Letters

Chester Butte Project



**BACKCOUNTRY
HUNTERS & ANGLERS**
WASHINGTON

Washington Department of Fish & Wildlife
Real estate Services
P.O. Box 43158
Olympia, WA 98504

February 10th, 2021

Dear WDFW Lands Staff:

The Washington Chapter of Backcountry Hunters and Anglers would like to thank the Washington Department of Fish and Wildlife for prioritizing land acquisitions for continued perpetuation of our State's wildlife and for expanded access to public lands. BHA feels that all the land acquisitions that are being proposed would increase recreation opportunities and benefit our wildlife, but there are three that we believe would provide the largest benefit.

Centralia Mine Project

This land acquisition would expand access to hunters and anglers in SW Washington, something that is vital as Tacoma, Olympia, and the Vancouver metro areas continue to grow. Getting ahead of the curve and continuing to create new access and opportunities close to urban areas for hunters and anglers will distribute pressure and improve users outdoor experience. Additionally, the size of the project at 9,800 acres would provide an opportunity to restore degraded habitat on a large scale, providing a long-term benefit to a number of fish and wildlife species. This geographic area is also a vital corridor for linking the Olympics to the Cascades. Further protection of land that links critical habitats together is a growing need as development and population growth fractures these areas.

Chehalis Wildlife Area Expansion

Expanding the Chehalis Wildlife Area will benefit many stakeholders. For sportsmen and women, this acquisition would expand waterfowl opportunity and improve salmonid populations by preserving vital wetlands and floodplains. In addition, the Chehalis Basin has a long history of major flood events that cause catastrophic damage to the region's residents and businesses. Keeping intact wetland that can absorb and divert water during major flooding must be a priority in this area.

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Thank you again for the opportunity to comment on 2021 land acquisition proposals.



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Furthermore, Conservation Northwest recognizes the potential for the Satsop River and its connected network of riparian corridors to act as pathways into the Olympics. Hwy 12 crosses over the Satsop River creating a narrow bottleneck through which species must cross to move out of, or into, the basin. In fact, Conservation Northwest is trying to find ways remove invasive plant species from under the bridge, plants that may prohibit movement for some species. This acquisition will help protect parts of the Satsop River corridor and parts of the Chehalis River corridor, enhancing a riparian network that will make our work at the Satsop even more advantageous for wildlife movement in and out of the area. All of these factors make the Chehalis Wildlife Area expansion an exciting proposal for our Cascades to Olympics program, and we are supportive of an acquisition that includes engagement with nearby landowners to support the needs of the local community.

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We strongly support this extremely exciting proposal, as it offers a suite of benefits to wildlife and the community. With restoration and better management, this area could boast high-quality wetland and grassland habitats, which could provide much needed critical habitat for threatened

and endangered species. Furthermore, it is already home to important local populations of fish and wildlife. Interestingly, the proposed parcels have the potential to be part of a key corridor for wildlife movement. A landscape integrity corridor intersects with the proposed acquisition locations, and maps of this intersection show that if the areas were restored and properly managed they could be key building blocks for a permeable network of wildlife corridors (Figure 1). Through our Cascades to Olympics Program we have identified the area extending from just south of Grand Mound to just north of Scatter Creek as a potential “northern linkage” for wildlife to move to and from the Cascades and Olympics. The proposed acquisition sites sit within a corridor that converges with the “northern linkage”, crosses I-5 to the northwest and connects to corridors that eventually terminate in the Olympics. These linkages will not be functionally connected unless actions are taken to improve wildlife crossings on highways and to conserve and protect corridors in the area. This acquisition proposal presents an opportunity to restore and protect one such corridor, which could be a key stepping stone in a landscape-level network of wildlife corridors.

WDFW Centralia Mine Project Proposed Acquisition: Landscape Integrity Least-Cost Corridors

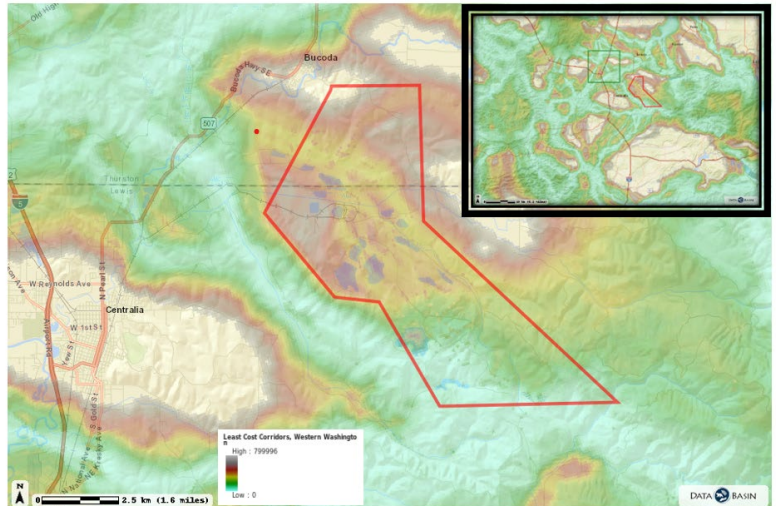


Figure 1. Red polygon represents a rough estimate of the mine acquisition location (not exact). Green Box in zoomed out view represents Conservation Northwest’s hypothesized “northern linkage”. Map shows landscape integrity “naturalness” Least-Cost Corridors, which are shown ranging from least-cost of movement (Electric Blue), to extremely high cost to movement (Dark Gray), and to the extreme of impermeable landscape (areas absent of a corridor). WDFW’s mine acquisition location could be restored and managed to increase the neighboring corridor or create a corridor of its own. *Note: model represents landscape integrity, which illustrates corridors of “natural” landscape not specific habitat for any given species, but may be used as a proxy for generalists. Map accessed From Data Basin Jan. 2021. Gallo, J.A., E.C. Butts, T.A. Miewald, K.A. Foster. 2019. Comparing and Combining Omniscap and Linkage Mapper Connectivity Analyses in Western Washington. Published by: Conservation Biology Institute, Corvallis, OR, <https://doi.org/10.6084/m9.figshare.8120924>*

Development and land use change have degraded or erased permeable large parcel corridors, and this acquisition can help reverse and mitigate some of those losses. We hope to see this proposal approved and the land managed, at least in part, as a segment of a wildlife corridor.

We are also excited about the opportunity for increased public use and access, via the new wildlife area. Increasing public access while managing the land for long-term sustainable use will increase opportunities for the community to engage with their public lands now and for future generations. Lastly, we applaud the economic benefits that this proposal could offer the local communities.

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Chehalis WLA Expansion Project



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A Washington State Chapter of the National Audubon Society
P.O. Box 2524, Olympia, WA 98507
(360) 352-7299 www.blackhills-audubon.org

Black Hills Audubon Society is a volunteer, non-profit organization of more than 1,300 members in Thurston, Mason, and Lewis Counties whose goals are to promote environmental education and protect our ecosystems for future generations.

February 5, 2021

To: Washington Department of Fish and Wildlife, Lands Division
From: Elizabeth Rodrick, Vice President, Black Hills Audubon Society
Subject: **Support for 2021 Land Acquisition Proposals**

These comments are submitted on behalf of Black Hills Audubon Society (BHAS). BHAS is a chapter of the National Audubon Society, representing Lewis, Mason and Thurston counties in the state of Washington. It is a volunteer-based, non-profit organization whose 1,300+ members share interests in birds and other wildlife, their habitats, and natural history. Our goals are to promote environmental education and recreation and to maintain and protect our ecosystems for future generations.

BHAS supports all of WDFW's proposed land acquisition projects for 2021 and especially those within our region listed below.

Lewis County – Centralia Mine Project:

Bill Shelmerdine, a BHAS member, has conducted Breeding Bird Surveys for the USGS Biological Survey Unit throughout the TransAlta Property since at least 2005. While the area has been significantly altered from mining, it is regularly used by numerous bird species, several of which are locally uncommon or even rare. Local birders have documented on eBird 146 species on one pond. The full property has many special habitat features, particularly the ponds and wetland complexes, and the potential for both riparian and grassland habitat restoration/improvement to benefit waterfowl, amphibians, mammals, reptiles, and fish.

WDFW is the best agency to oversee the final mine reclamation to restore fish and wildlife habitat and provide public access. Please ensure that the habitat restoration and enhancement benefits species of greatest conservation need, especially the threatened and endangered western pond turtle, Oregon spotted frog, and streaked horned lark.

Grays Harbor County – Chehalis Wildlife Area Expansion:

This is a BHAS favorite year-round birding area for both resident and migratory birds and expansion will increase its appeal. The extensive floodplain, riparian, and wetland habitats are noted as a hotspot on eBird with 175 bird species recorded.

Thank you for saving these important habitats and recreation areas for current and future generations!



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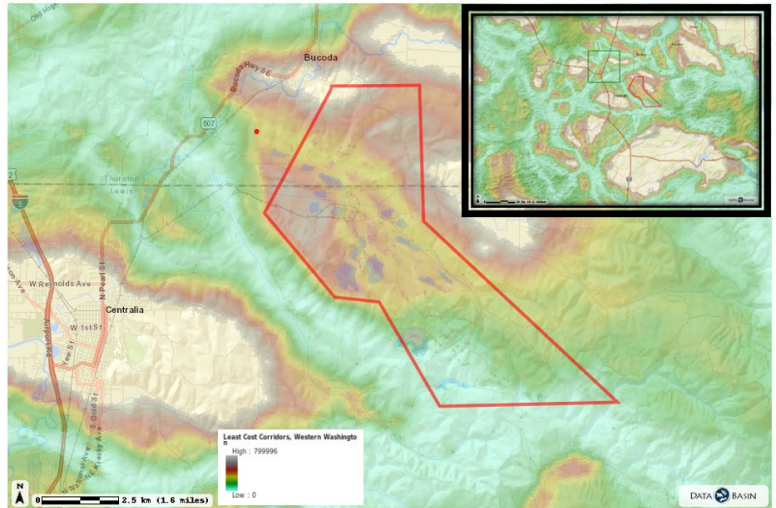


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GRAYS HARBOR
FARM BUREAU



Washington State
Dairy Federation

March 22, 2021

To: Larry Carpenter, Chair, Washington Department of Fish and Wildlife.
Kelly Susewind, Director, Washington Department of Fish and Wildlife.
Larry Phillips, Director Coastal District, Washington Department of Fish and Wildlife

From: Jay Gordon, Policy Director, Washington State Dairy Federation

RE: Chehalis Wildlife Area expansion proposal

We recently became aware of a proposal to expand the Chehalis Wildlife Area via the purchase of 367 farm in the Satsop area¹. Unfortunately, we were not aware of this proposal during the comment period, so we are asking the Commission and Department of Fish and Wildlife (DFW) to consider these comments and concerns before you take irreversible actions. These comments and concerns are directed at the areas under consideration in the Chehalis Wildlife Area Expansion proposal¹, labeled 'B' and 'C' in the map (attached).

We do not support the use of public funds for the sale of this property to the Department for the following reasons. The proposal to purchase this property raises numerous concerns, including:

- These farmlands currently support - via a lease agreement – one of the last dairy farms in Grays Harbor County. The dairy farmer reliant on these lands is a first-generation Mexican American farmer (and a fantastic farmer and individual).
- The Department has indicated - in statements and past leasing history on other DFW properties in Grays Harbor County - that they do not allow grazing or the use of manure-based fertilizers on DFW property. Quite simply, this purchase, with those prohibitions will leave this dairy farm in an impossible situation, surrounded by lands owned by the Department, unable to spread manure fertilizer. Even if the Department agreed to lease this property back to the current leaseholder, not being able to recycle manure back into crop production would put the current farm family in almost certain jeopardy of failure. Additionally, his current dairy land and buildings (the 20 or so acres he currently owns, surrounded by the prospective purchase area) would be massively devalued and dreams will be lost.
- The Department's long-standing objection and prohibitions on grazing and manure-based fertilizing is illogical. There is no question fields fertilized with manure are preferred by waterfowl, especially in

¹ https://wdfw.wa.gov/sites/default/files/2021-01/chehalis_wla_expansion.pdf


the late winter. There is no question prudent grazing plays a role in preventing loss of function and use of flood plain lands by waterfowl and amphibians. Please ask your DFW Oregon Spotted Frog Habitat specialists what their opinion is on grazing, last we heard they valued grazing as a tool to help amphibians. A prohibition on grazing is a recipe for encouraging functional wetland sterility that occurs with the takeover of reed canary grass.

- These soils are some of the finest farmlands in Grays Harbor County. Why and what do these prime farm fields and soils add or fulfill for the Department? DFW already reportedly owns 7450 acres in Grays Harbor County. Why do you need more? Why do you need prime farmlands with little to no wetlands or habitat not already protected by its current use as both active farmland and prime waterfowl use under its current management and use?
- This property has long history of being used by hunters and by waterfowl. This farm is one of a few that support massive flocks of geese and Trumpeter Swans. The property floods so it is not at risk of conversion, so once again what is gained by placing this into public ownership with public funds?
- Statements were made in a recent public presentation to Grays Harbor County commissioners inferring that the purchase would help prevent its conversion to houses. The property in question floods. There is literally no chance this land will be converted to housing.
- Additional statements by DFW staff indicated the focus within area “C” and “B” of the entire property is a small amount of land immediately adjacent to Newman Creek, a small tributary to the Chehalis. The Conservation Districts have offered the Conservation Reserve Enhancement Program (CREP) for many years. The CREP program – with landowner agreement - would address all the resource concerns on this small portion of the property quite adequately.
- The property contains several barns, a manure storage area, a manure lagoon, as well as five houses. It is an active, well managed dairy farm. Does the Department really want to be a dairy landlord? Maintaining five houses, numerous barns, and a dairy lagoon and all the accompanying equipment? The houses – especially - are key employee housing for the current dairy tenant. Housing is tight everywhere; Grays Harbor is no exception. Affordable housing is hard to find. Will the department want to maintain the current housing and barns on the property? A loss of that housing and infrastructure would create more challenges for the current dairy farmer and his employees and family.

Given all the above concerns, we ask you **do not** proceed further with the proposal to purchase this property. Landowners are free to offer property for sale, including to public agencies, but given this purchase is with public funds and/or will be held by your agency, at agency expense, to supposedly benefit the public and support the mission of the Department. We submit for reasons above, this property (areas “C” and “B”) falls far short of needing public protection; the proposal has a weak connection to the mission of DFW, especially given the current private stewardship is exceptional and other conservation programs such as CREP could address those limited areas of resource concern.

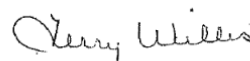
In short this is a poor, damaging, unnecessary use of public funds.

Thank you for your consideration.



Dan Wood, Executive Director

Washington State Dairy Federation



Terry Willis, President

Grays Harbor Farm Bureau

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Board of County Commissioners

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February 10, 2021

Washington Dept. of Fish and Wildlife
Real Estate Services
P.O. Box 43158
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Via email to lands@dfw.wa.gov

Re: Proposed Land Acquisition of TransAlta property in Lewis and Thurston counties

To Whom It May Concern:

On behalf of the citizens of Lewis County, the Lewis County Board of County Commissioners opposes the Department of Fish and Wildlife's proposed acquisition of 9,600 acres of reclaimed or to-be-reclaimed TransAlta mine property in Lewis and Thurston counties. Lewis County takes pride in its scenic landscape and wondrous natural resources. But, the proposed habitat conservation project upsets Lewis County's long- and carefully planned Growth Management balance between rural character and economic development. In subverting Lewis County's comprehensive plan, the proposed acquisition is not merely bad policy – it is unlawful.

The Washington Growth Management Act requires counties to adopt comprehensive plans for land use and economic development within their borders.¹ The Act significantly curtails rural counties' opportunity for economic infrastructure and expansion by prohibiting urban growth outside limited areas.² In exchange, it gives counties the right to make binding decisions concerning growth within their jurisdictions: state agencies are required to comply with county comprehensive plans and development regulations.³

A central portion of the proposed acquisition area is designated in Lewis County's adopted Comprehensive Plan as the Industrial Park at TransAlta (IPAT), an urban growth area

¹ RCW 36.70A.040-.070.
² RCW 36.70A.070(5)(b).
³ RCW 36.70A.103.

Erik Martin
County Manager

Sean Swope
First District

Lindsey R. Pollock, DVM
Second District

Gary Stamper
Third District

Rieva Lester
Clerk of the Board

allowing for major industrial development.⁴ This designation was pursuant to RCW 36.70A.368, a statute targeted toward TransAlta's reclaimed mine area. The statute provides that once such an area is designated, "it shall be considered an urban growth area retained for purposes of promoting major industrial activity."⁵ The development in the area must be major industrial—even commercial development is limited to require major industrial as the predominant use.⁶

Lewis County took up the statute's invitation 10 years ago, amending its comprehensive plan and adopting development regulations to create IPAT. The development regulations require that "a property designated in the comprehensive plan for a major industrial development on a reclaimed surface coal mine may only be used for the purposes listed in RCW 36.70A.368."⁷

The Department's proposed use for the acquired land is self-consciously *not* a use permitted by or consistent with the statute, Lewis County's comprehensive plan, or Lewis County's development regulations. The proposed use is a habitat preserve, specifically noting an intent to introduce threatened or endangered species. Please see the materials the Department displayed about the project, enclosed as Attachment A.

A habitat preserve is not a major industrial use, nor any of the other available uses for this land. Indeed, by creating sensitive habitat right next to an industrial area, it would render further industrial development of this land impossible. This would nullify 10 years' worth of Lewis County's planning and development efforts in this area.

Lewis County strives to promote "a diverse range of jobs in a variety of sectors...such as industry, tourism, recreation, agriculture, natural resources, and retailing." One of its primary economic development strategies is to support "the development of diversified industrial employment throughout Lewis County" as a means of increasing wages.⁸ As a rural county hosting national treasures such as Mount Rainier, Lewis County has engines for tourism and recreation. Its expansive timberlands and wandering rivers allow for natural resource jobs in mills and mines. Its productive soil supports blueberry and garlic farms and farmers, as well as smaller artisan farms. And its location on the Interstate 5 corridor supports retail such as the Centralia Outlets. But Lewis County lacks a major industrial anchor for employment, which might produce family-wage careers that would convince people to *stay in*, not merely visit, the county.

⁴ See the Land Use Element of Lewis County's adopted Comprehensive Plan at LU 3-5 and 12, available at <https://lewiscountywa.gov/departments/community-development/comprehensive-plan/>.

⁵ RCW 36.70A.368(1).

⁶ RCW 36.70A.368(4)(d).

⁷ LCC 17.20B.020, available at <https://www.codepublishing.com/WA/LewisCounty/#!/LewisCounty17/LewisCounty1720B.html>; see also LCC 17.20B.030(9) (enumerating the allowed uses more specifically).

⁸ See the Economic Development Element of Lewis County's adopted Comprehensive Plan at ED 9, available at <https://lewiscountywa.gov/departments/community-development/comprehensive-plan/>.

The Growth Management Act affords Lewis County the right to balance the protection of the environment and rural character with economic development through the decisions of locally elected county commissioners.⁹ Lewis County has made its decision about IPAT: it is for industrial development. The Department may not lawfully overturn that decision by acquiring the land for a habitat preserve.

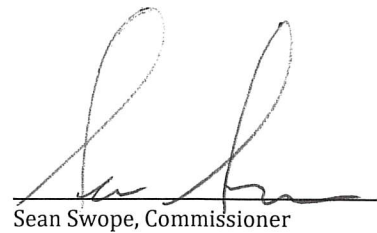
Accordingly, Lewis County opposes the proposed land acquisition. The Department should decline to carry out the project.



Gary Stamper, BOCC Chair



Lindsey R. Pollock, DVM, Vice Chair



Sean Swope, Commissioner

Enclosure: Attachment A - DFW description of proposed acquisition

⁹ RCW 36.70A.020.

Attachment A

**Department of Fish and Wildlife
Description of Proposed Acquisition**

Thurston & Lewis
Counties

Centralia Mine Project



Project Highlights

- Up to 9,800 acres
- Multi-phased project of donation and acquisition of the Centralia Mine
- Diverse array of habitats that already exist at the site
- Property will form a new wildlife area close to urban centers allowing users to connect with diverse nature
- Current habitat supports a variety of fish and wildlife including elk, deer, salmon, warmwater fish, and many others
- Rare opportunity to manage a landscape that allows room for creation or restoration of high-quality wildlife habitats such as wetlands and grasslands to benefit waterfowl, amphibians, mammals, reptiles, and fish.
- Potential to provide habitat for threatened or endangered species, including the western pond turtle, Oregon spotted frog, and streaked horned lark
- Adding public lands to the region would benefit the local economy as well as public access
- Supported by TransAlta USA, Rocky Mountain Elk Foundation



A Washington State Chapter of the National Audubon Society
P.O. Box 2524, Olympia, WA 98507
(360) 352-7299 www.blackhills-audubon.org

Black Hills Audubon Society is a volunteer, non-profit organization of more than 1,300 members in Thurston, Mason, and Lewis Counties whose goals are to promote environmental education and protect our ecosystems for future generations.

February 5, 2021

To: Washington Department of Fish and Wildlife, Lands Division
From: Elizabeth Rodrick, Vice President, Black Hills Audubon Society
Subject: **Support for 2021 Land Acquisition Proposals**

These comments are submitted on behalf of Black Hills Audubon Society (BHAS). BHAS is a chapter of the National Audubon Society, representing Lewis, Mason and Thurston counties in the state of Washington. It is a volunteer-based, non-profit organization whose 1,300+ members share interests in birds and other wildlife, their habitats, and natural history. Our goals are to promote environmental education and recreation and to maintain and protect our ecosystems for future generations.

BHAS supports all of WDFW's proposed land acquisition projects for 2021 and especially those within our region listed below.

Lewis County – Centralia Mine Project:

Bill Shelmerdine, a BHAS member, has conducted Breeding Bird Surveys for the USGS Biological Survey Unit throughout the TransAlta Property since at least 2005. While the area has been significantly altered from mining, it is regularly used by numerous bird species, several of which are locally uncommon or even rare. Local birders have documented on eBird 146 species on one pond. The full property has many special habitat features, particularly the ponds and wetland complexes, and the potential for both riparian and grassland habitat restoration/improvement to benefit waterfowl, amphibians, mammals, reptiles, and fish.

WDFW is the best agency to oversee the final mine reclamation to restore fish and wildlife habitat and provide public access. Please ensure that the habitat restoration and enhancement benefits species of greatest conservation need, especially the threatened and endangered western pond turtle, Oregon spotted frog, and streaked horned lark.

Grays Harbor County – Chehalis Wildlife Area Expansion:

This is a BHAS favorite year-round birding area for both resident and migratory birds and expansion will increase its appeal. The extensive floodplain, riparian, and wetland habitats are noted as a hotspot on eBird with 175 bird species recorded.

Thank you for saving these important habitats and recreation areas for current and future generations!



Real Estate Services
Department of Fish and Wildlife
PO Box 43158
Olympia, WA 98504

Feb 12, 2021

Re: Letter of Support for the Proposed Centralia Mine Property Acquisitions

To Whom It May Concern,

As President of the Woodland Trail Greenway Association, I offer our enthusiastic support for the proposed acquisition of the Centralia Mine Property site by the Washington State Department of Fish and Wildlife.

The mission the Woodland Trail Greenway Association is to advocate for and partner in the development of a publicly - owned multiuse trails and greenways in southwest Washington.

Further, we believe that trails connect communities.

We view this proposed acquisition is a strategic opportunity for the State to secure critical land and habitat under public ownership. This acquisition would benefit our communities by preserving diverse natural habitat among growing communities in southwest Washington.

Importantly, this acquisition would then allow for planning of a non - motorized public access trail on this site that would provide ease of public access *and* would close a remaining critical gap of a cross State bike and pedestrian interconnected trail network.

Thank you for the opportunity to provide public comment.

Sincerely,

Jack Horton

Jack Horton, President

Woodland Trail Greenway Association

info@wtga.org

360-789-0944

PO Box 7054 Olympia, WA 98507



February 12, 2021

To: Washington Department of Fish and Wildlife
Real Estate Services

RE: Centralia Mine Acquisition


Ducks Unlimited, Inc. (DU) supports the efforts by Washington Department of Fish and Wildlife (WDFW) to acquire the Centralia Coal Mine property currently owned by TransAlta. Located along the Hanaford Valley watershed in Lewis and Thurston Counties, this 9,600-acre property offers a significantly unique opportunity to protect and enhance wetlands and watershed health in area that has been impacted by commercial mining operations since 1971.

This acquisition poses a rare opportunity to acquire land from a corporate partner that is committed to protecting the environment and implementing a mine reclamation process with a variety of land uses including working agricultural lands, forestlands, recreational lands, and wildlife habitats. Active mining operations on the property were halted in 2006, and an array of habitats including wetlands, wet meadows, streams, and ponds currently exists. With compliance and reclamation activities required through the decommissioning process, this property has the potential to provide profound benefits to many wildlife species including salmon, steelhead, Roosevelt elk, black-tailed deer, waterfowl, and songbirds, as well as several species with listed sensitivities such as Oregon Spotted Frog and Western Pond Turtle.

In addition to benefitting wildlife through reclamation and management, this property can also provide benefits to Washingtonians including those in local cities and communities. Wetlands and bordering uplands are one of the most cost-effective solutions for improving water quality, recharging aquifers, and sustaining groundwater supplies. Located within the Chehalis River watershed, a property of this size can make a significant impact for improving watershed health and resiliency. While the ecosystem services provided by wetlands are notable, recreational properties can also provide benefits to local economies. According to a 2015 Economic Analysis by the Washington Recreation and Conservation Office, recreational expenditures within the State annually exceed \$20 Billion. Eco-tourism, public recreation, and natural resource management are job creators for people of all races and educational backgrounds. DU appreciates the opportunities that this property could provide to access and recreation, particularly waterfowl hunting which has limited options for public access in this portion of the state.

Ducks Unlimited supports WDFW's interest to enhance wildlife habitat and increase public recreation in this region of Washington, and encourages considerations to create positive economic benefits to the residents and visitors of Lewis and Thurston Counties.

Respectfully,


Jeffrey McCreary
Director of Operation



Washington Department of Fish & Wildlife
Real estate Services
P.O. Box 43158
Olympia, WA 98504

February 1st, 2021

Dear WDFW Lands Staff:

Conservation Northwest is thrilled to support the Washington Department of Fish & Wildlife's 2021 land acquisition priorities. In particular, three of the proposals would have strong benefits for the wildlife and habitat within some of our priority program areas.

Chehalis Wildlife Area Expansion

Conservation Northwest fully supports the extension and further acquisition of key parcels expanding the Chehalis Wildlife Area. Key habitat for semiaquatic and aquatic species will be protected, which consists of 1,504 acres of wetland, floodplain, aquatic, and riparian habitats. Importantly, the Chehalis River and its tributaries like the Satsop create a network of riparian corridors throughout the basin, connecting the basin to important upland habitats. These networks are not just utilized by species that are associated with riparian or riverine habitats, but they are also used by a suite of non-habitat associated species as well, which use them for pathways of movement throughout the landscape. This particular acquisition not only excites us because of its location within our Cascades to Olympics Program, but also for its potential to create linkages and strengthen networks of riparian corridors in the region.

Furthermore, Conservation Northwest recognizes the potential for the Satsop River and its connected network of riparian corridors to act as pathways into the Olympics. Hwy 12 crosses over the Satsop River creating a narrow bottleneck through which species must cross to move out of, or into, the basin. In fact, Conservation Northwest is trying to find ways remove invasive plant species from under the bridge, plants that may prohibit movement for some species. This acquisition will help protect parts of the Satsop River corridor and parts of the Chehalis River corridor, enhancing a riparian network that will make our work at the Satsop even more advantageous for wildlife movement in and out of the area. All of these factors make the Chehalis Wildlife Area expansion an exciting proposal for our Cascades to Olympics program, and we are supportive of an acquisition that includes engagement with nearby landowners to support the needs of the local community.

Centralia Mine Project

We strongly support this extremely exciting proposal, as it offers a suite of benefits to wildlife and the community. With restoration and better management, this area could boast high-quality wetland and grassland habitats, which could provide much needed critical habitat for threatened

and endangered species. Furthermore, it is already home to important local populations of fish and wildlife. Interestingly, the proposed parcels have the potential to be part of a key corridor for wildlife movement. A landscape integrity corridor intersects with the proposed acquisition locations, and maps of this intersection show that if the areas were restored and properly managed they could be key building blocks for a permeable network of wildlife corridors (Figure 1). Through our Cascades to Olympics Program we have identified the area extending from just south of Grand Mound to just north of Scatter Creek as a potential “northern linkage” for wildlife to move to and from the Cascades and Olympics. The proposed acquisition sites sit within a corridor that converges with the “northern linkage”, crosses I-5 to the northwest and connects to corridors that eventually terminate in the Olympics. These linkages will not be functionally connected unless actions are taken to improve wildlife crossings on highways and to conserve and protect corridors in the area. This acquisition proposal presents an opportunity to restore and protect one such corridor, which could be a key stepping stone in a landscape-level network of wildlife corridors.

WDFW Centralia Mine Project Proposed Acquisition: Landscape Integrity Least-Cost Corridors

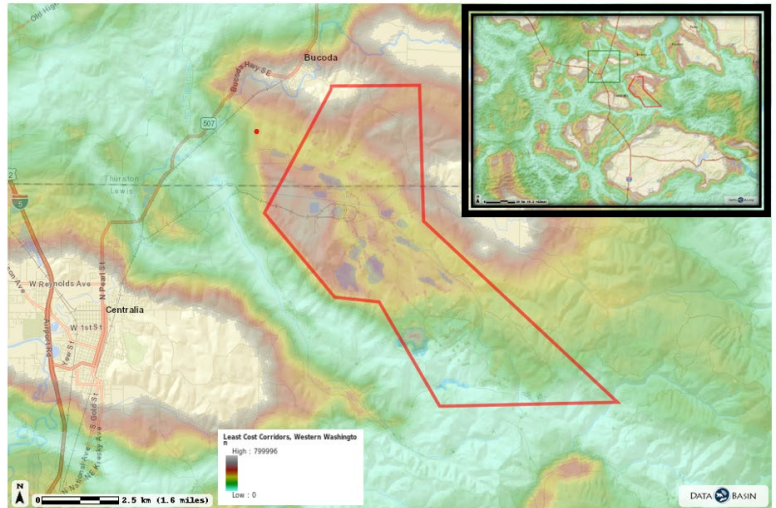


Figure 1. Red polygon represents a rough estimate of the mine acquisition location (not exact). Green Box in zoomed out view represents Conservation Northwest’s hypothesized “northern linkage”. Map shows landscape integrity “naturalness” Least-Cost Corridors, which are shown ranging from least-cost of movement (Electric Blue), to extremely high cost to movement (Dark Gray), and to the extreme of impermeable landscape (areas absent of a corridor). WDFW’s mine acquisition location could be restored and managed to increase the neighboring corridor or create a corridor of its own. *Note: model represents landscape integrity, which illustrates corridors of “natural” landscape not specific habitat for any given species, but may be used as a proxy for generalists. Map accessed From Data Basin Jan. 2021. Gallo, J.A., E.C. Butts, T.A. Miewald, K.A. Foster. 2019. Comparing and Combining Omniscap and Linkage Mapper Connectivity Analyses in Western Washington. Published by: Conservation Biology Institute, Corvallis, OR, <https://doi.org/10.6084/m9.figshare.8120924>*

Development and land use change have degraded or erased permeable large parcel corridors, and this acquisition can help reverse and mitigate some of those losses. We hope to see this proposal approved and the land managed, at least in part, as a segment of a wildlife corridor.

We are also excited about the opportunity for increased public use and access, via the new wildlife area. Increasing public access while managing the land for long-term sustainable use will increase opportunities for the community to engage with their public lands now and for future generations. Lastly, we applaud the economic benefits that this proposal could offer the local communities.

Chester Butte



The Chester Butte proposed acquisition, although recently burned, has historically been considered excellent existing and potential habitat for the endangered pygmy rabbit, the endangered sharp-tailed grouse, Washington ground squirrel, and ever dwindling numbers of sage grouse in Douglas County and our state. Grasses are expected to return to this property naturally in the next year or two or with some limited restoration activities. Sagebrush so necessary for pygmy rabbits and sage grouse will take longer to recover but once grasses return, it should provide excellent sharp-tailed grouse habitat and potential LEK locations. Prior to burning, at least one known sage grouse LEK existed on this property. In addition, once grasses return it will have benefits to other shrub-steppe species such as mule deer and numerous song birds. Therefore, Conservation Northwest highly supports the proposal to acquire this property from a willing landowner for the protection and beneficial use by wildlife.

We would like to thank WDFW for the opportunity to comment on these important property acquisition proposals.

Brian Stewart, M.E.S.
Cascades to Olympics Program Coordinator
Conservation Northwest

Jay Kehne
Sagelands Program Lead
Conservation Northwest

Web and email

conservationnw.org
facebook.com/ConservationNW
info@conservationnw.org

Seattle headquarters

1829 10th Ave W, Suite B
Seattle, WA 98119
206.675.9747
206.675.1007 (fax)



ForeverGreen Trails

Connecting Pierce County Communities with Trails

Executive Officers

Terry Reid
President

Alan Carter Mortimer
V.P./Secretary

Dr. Jane Moore
Treasurer

Board Members

Rob Buck
Mary Dodsworth
Eric Guenther
Roxanne Miles
Bob Myrick
Shawn Phelps

Advisory Board

Chris Beale
Gary Cooper
Sarah Harris
Megan Jendrick
Chip Jenkins
Kirk Kirkland
Terry Lee
Kim Oman
Barbara Skinner
Shon Sylvia
Robert Thoms
George Walk

Staff

Larry Leveen
Executive Director

February 2, 2021

Real Estate Services
Washington Department of Fish and Wildlife
PO Box 43158
Olympia, WA 98504

To Whom it May Concern:

I am writing on behalf of ForeverGreen Trails, a south sound trail advocacy nonprofit organization. Although based in Pierce County, we work closely with trail advocates and planners in King, Thurston, Lewis, and Pacific counties in a coalition to connect the Palouse to Cascades Trail and the Willapa Hills Trail (both owned by the Washington State Parks and Recreation Commission) to form a Cross-State Trail (see attached).

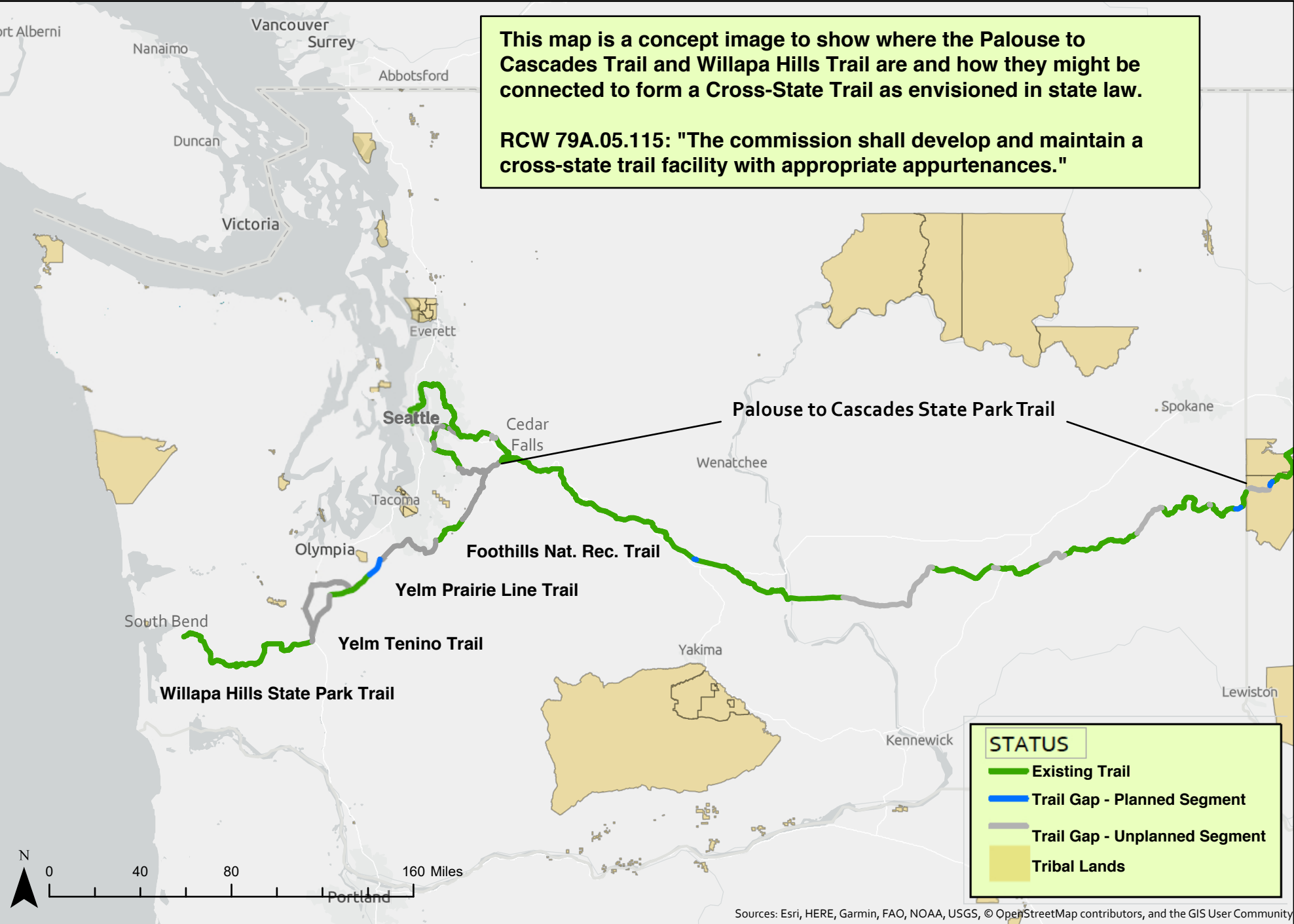
We are very supportive of the proposed acquisition of the Centralia Mine Project properties and would like to engage your Department in discussions about providing non-motorized active recreation and mobility access to and through the property. We are in a position to assist Fish and Wildlife in acquiring grant funds for acquisition of these properties. We have extensive experience supporting such applications and are able to mobilize a broad array of recreation, health, and economic development stakeholders for this purpose. Additionally, nonprofit organizations like ours have access to certain grant sources that your Department does not. Please contact us to discuss a partnership to benefit active recreation, habitat restoration, and economic development for this area.

Thank you for your consideration,

Larry Leveen

Executive Director

Washington Cross-State Trail - Draft Concept Map



February 12, 2021

Washington Department of Fish and Wildlife
Real Estate Services
P.O. Box 43158
Olympia, WA 98504
Via email to lands@dfw.wa.gov

To Whom It May Concern:

On behalf of our constituents, neighbors, friends and family members, we vehemently oppose the Washington Department of Fish and Wildlife's proposed acquisition of 9,600 acres of TransAlta land in Lewis and Thurston counties.

This proposed land transfer would have long-lasting detrimental effects that would stifle any real possibility of developing infrastructure in that northern section of Lewis County, crippling economic growth across the entire county and placing an unfair tax burden on property owners across the region.

When TransAlta's coal mine operations came to a screeching halt in 2006 – leaving hundreds unemployed – the one glimmer of hope was that the former mine property could one day be used for other industrial activity.

To help offset the devastating loss of jobs and tax revenue, the county, state Legislature, governor, TransAlta and others partnered together to create the Industrial Park at TransAlta (IPAT). The main purpose of IPAT was to encourage major industrial development in the former mine site to help replace the family-wage jobs and tax revenue lost when the mine closed.

Transferring the land to WDFW control would strip us of that possibility, turning that once-promising future into further economic defeat.

The WDFW has indicated it would use the TransAlta property – which includes roughly 200 acres owned by IPAT – “to provide public access for recreation and benefit fish and wildlife conservation.”

The WDFW further states that "some portions of the property have the potential to provide habitat for threatened or endangered species, including the western pond turtle, Oregon spotted frog, and streaked horned lark." Those statements are not in line with the intended use of the land: major industrial development.

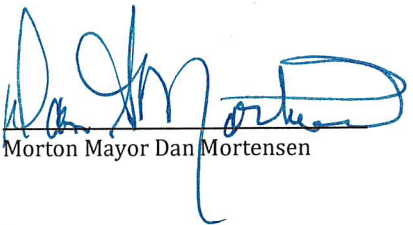
With Bonneville Power Administration lines and a natural gas line nearby, the site is prime for development. And its location - halfway between Seattle and Portland - makes it even more desirable. The site is poised to draw future industrial partners to Lewis County, creating new family-wage jobs and improving our tax base.

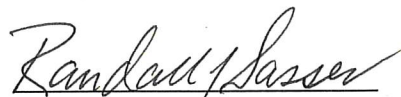
Allowing the WDFW to move forward with its proposed acquisition would place a chokehold on the site's future. We urge you to abandon this plan and allow the land to be used as intended: for industrial use.

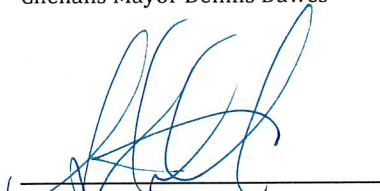
Respectfully,

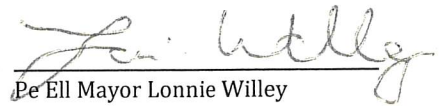
(Submitting own letter)
Centralia Mayor Sue Luond

(Submitting own letter)
Chehalis Mayor Dennis Dawes

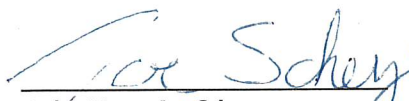

Morton Mayor Dan Mortensen


Mossyrock Mayor Randall Sasser


NapaVine Mayor Shawn O'Neill


Pe Ell Mayor Lonnie Willey


Toledo Mayor Steve Dobosh


Vader Mayor Joe Schey


Winlock Mayor Brandon Svenson

CITY OF CHEHALIS

350 N. Market Boulevard, Room 101
Chehalis, Washington 98532
www.ci.chehalis.wa.us
(360) 345-1042



February 24, 2021

Washington Department of Fish and Wildlife
Kessina Lee
5525 S. 11th Street
Ridgefield, WA 98642
Via email to: teamridgefield@dfw.wa.gov

Subject: Concern Regarding WDFW Acquisition of TransAlta Land

Dear Kessina Lee,

The Chehalis City Council has been asked by Lewis County to submit a letter outlining their position on the potential land acquisition by WDFW from Trans Alta. As of this writing, the City of Chehalis has some serious concerns should this transaction occur, which are outlined below.

First, there is a significant portion of land that would be removed from the property tax rolls that will shift the tax burden to the remaining property owners. Like most communities, Lewis County can ill afford to lose property tax revenue. This will trickle down and possibly have an effect on the Riverside Fire Authority and Centralia School District (along with other junior taxing districts) when they place funding measures on future ballots.

Second, this is a significant amount of property that will be removed from potential future economic development. It's true some property has been made available for IPAT, which has yet to land a client, once the property is transferred, it's gone forever should the economic development change as some companies look to get out of certain areas in the current political climate.

Third, the introduction of endangered species to this area is concerning. It's well documented how potential development is stopped dead in its tracks when an endangered species is discovered. If the species were to be introduced to this area, how would it affect the lands contiguous to the property involved, or that of lands nearby?

Fourth, agreements may be made to facilitate this transaction. If so, there must be legal safeguards to assure that they will be honored by all parties now and in the future.

While the property involved is not in the immediate vicinity of the city of Chehalis, what does or doesn't happen on the land impacts Lewis County, including the City of Chehalis and all of Lewis County. When the mine was at its peak of operations, it created significant indirect benefits to our citizens.

Should this transaction take place, any negative effects from the concerns outlined above would also have an indirect impact on our citizens.

We ask that our concerns be reviewed and addressed and that a complete dialog be conducted with Lewis County representatives. The City of Chehalis appreciates what Trans Alta has contributed to our area and would like to see this matter resolved in a way that benefits all parties now and in the decades to come.

Sincerely,



Dennis L. Dawes
Mayor



March 12, 2021

Washington State Department of Fish and Wildlife

Real Estate Services

PO Box 43158

Olympia, WA 98504

Via email to Lands@dfw.wa.gov

RE: Transfer of 9,600 acres of TransAlta Land in Lewis and Thurston Counties to The
Washington State Department of Fish and Wildlife

To whom it may concern,

I, Susan F. Luond, as Mayor of the City of Centralia, am writing to express my interest and concern on behalf of the City of Centralia, its council members and citizens regarding the Washington State Department of Fish and Wildlife's potential acquisition of 9,600 acres of TransAlta land in Lewis and Thurston Counties.

TransAlta has been a valued member of our community for many years. TransAlta has contributed to our community as a significant employer, a taxpayer and through many local partnerships that have truly benefited our community. We appreciate that history of that partnership.

At the time that the State of Washington and TransAlta came to an agreement regarding the shutdown of the company's coal operations, the parties also agreed to establish an Industrial Park at TransAlta (IPAT). Said agreement was agreed upon by Lewis County, the state legislature, the Governor, TransAlta and others. The main purpose of IPAT was to encourage major industrial development on the former mine site to help replace the family-wage jobs and tax revenue lost when the mine closed.

The decision on how to use the 9,600 acres will shape our community for decades to come. While it is privately owned, it is rare that a community has such a large area of land that is truly at a crossroads for future use. Any decision will affect our local tax revenues and will determine what type of asset and community resource this is. We encourage TransAlta and the State to engage in a robust community outreach effort to have informed discussions about what the highest and best use of this land is – for our community and for TransAlta, the current owner. We would like to see all possible options explored so that any decision made is based on data about the land's potential for commercial use, as a natural resource, as a community amenity or other possible avenues. We would like to be an active partner in determining how this resource will be used.

118 W. Maple
P.O. Box 609
Centralia, Washington 98531-0609

Ownership by the Washington State Department of Fish and Wildlife not only removes this property from tax roles, but will require use of tax dollars to maintain. Furthermore, the Washington State Department of Fish and Wildlife is looking to potentially provide habitat for threatened or endangered species, including the western pond turtle, Oregon spotted frog and streaked horned lark. Lewis County has already suffered a great economic loss due to the Spotted Owl controversy in the 1990s. Most people are not excited to go through that again, especially when the endangered species would be introduced into Lewis County and not native.

Thank you for your information to date and please do not hesitate to contact our City Manager, Robert Hill, who will keep the council informed.

Respectfully,

A handwritten signature in blue ink that reads "Susan F Luond". The signature is written in a cursive style.

Susan F Luond

Mayor, City of Centralia

cc: Cody Duncan, TransAlta

Sean Swope, Lewis County Commissioner



Lewis County Prosecuting Attorney's Office

345 W. Main Street, 2nd Floor
Chehalis, WA 98532
Phone: (360) 740-1240
Fax: (360) 740-1497
TDD: (360) 740-1480

February 12, 2021

Real Estate Services
PO Box 43158
Olympia, WA 98504

Re: TransAlta

For decades, TransAlta has been a valued community partner. By providing generations of family-wage jobs, community-based grants, and charitable giving, TransAlta has been a driving force behind Centralia and Lewis County's stability and success as a whole. When the State of Washington and TransAlta announced the shuttering of TransAlta's coal operations in Centralia, many in the community and around the State feared the worse.

However, both the State of Washington and TransAlta, working cooperatively, took positive and substantial steps to protect Lewis County and ensure its economic viability for generations to come. We need to look no further than RCW 36.70A.368. Referred to by some as the TransAlta Transition Act, the State of Washington, in a bipartisan effort, took positive steps to preserve the land for industrial use. Thus helping ensure the negative impacts of the impending TransAlta departure were minimized.

Now, steps are being taken to undermine that work by both TransAlta and the State of Washington. TransAlta, through a representative, actually laughed at the idea of the designated industrial land being a "viable location." With another representative indicating it would take millions of dollars to make the land useable. In short, there appears to have never been any intention of creating a viable industrial area to help fill the void left by TransAlta. Moreover, it appears TransAlta's move may avoid costly reclamation steps that would normally be required.

The proposed transfer of TransAlta land to the Department of Fish and Wildlife (Department) will have a devastating and lasting impact on Lewis County citizens and their economic futures. Even if transferred to the Department, the land *must* remain earmarked for industrial use. There is little doubt the Department will not seek to fulfill the designated use for that land and attract industry to Lewis County. The plan to introduce endangered species into the land surrounding any remaining industrial land would provide the death knell for any future industry in that area.

It is the Mission of the Lewis County Prosecutor's Office to zealously seek justice in all criminal matters, consistently promote public confidence in the legal system, and diligently represent county government while adhering to the highest ethical and moral standards.

While parks and natural areas are vital to our community and our State, that is not the TransAlta property's designated use. With over \$8 million invested in the industrial areas already designated, Lewis County, in reliance of the TransAlta Transition Act, is heavily committed to ensuring the area's success, as designated, for industrial purposes. Lewis County continues to suffer the loss of revenue and tax dollars due to state and federal involvement in Lewis County land and timber issues. Simply put, Lewis County cannot afford the State's help in land designated for industrial use.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Meyer', with a large, stylized flourish at the end.

JONATHAN L. MEYER
Prosecuting Attorney

JLM/bsb

It is the Mission of the Lewis County Prosecutor's Office to zealously seek justice in all criminal matters, consistently promote public confidence in the legal system, and diligently represent county government while adhering to the highest ethical and moral standards.