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Michael Pectol, Project Manager  
US Army Corps of Engineers, Sacramento District  
Bountiful Regulatory Office  
533 West 2600 South, Suite 150  
Bountiful, Utah 84010  
By email to: Michael.A.Pectol@usace.army.mil

RE: SPK-2020-00588, Willow Lakes Holdings, LLC

Dear Mr. Pectol:

As a long-time resident of Logan, birder, paddler, and a citizen interested in protecting threatened species, I offer these comments regarding permit application SPK-2020-00588 made by Willow Lakes Holdings, LLC. I am concerned about damage to wetlands, increased flooding downstream, water quality, threatened species of plants, loss of habitat, and undermining the Logan River Conservation Action Plan.

### **Destroy Sensitive Wetlands**

Utah has already lost most of the wetlands that existed prior to settlement. Most of this loss has been caused by development for housing and commercial enterprises. The USACE has not been able to protect wetlands as they should, succumbing in some cases to political power of development interests. This must not be the case here. The permit application identifies 5.47 acres of wetlands and 3,987 linear feet and 1.95 acres of perennial stream channel to be dredged or filled. However, it appears that the extent of wetlands, particularly on the west side of the property, has been underestimated. Large portions of the property were not sampled during the wetland delineation despite several factors indicating that wetlands exist in those areas. Those indicators include NWI mapped wetlands, presence of wetland vegetation, topography, and saturated soils/standing water evident from aerial imagery over the last 15 years.

Furthermore, delineations that were conducted in May and June of 2020 must underestimate wetland extent because of two decades of extreme drought conditions.

### **Exacerbate Flooding**

I have seen the area of the proposed subdivision under water several times in the last forty years; indeed, I have paddled my canoe more than once into some of that area during high

spring runoff. If allowed to proceed, this project will have severe negative impacts on several aspects of our local environment.

This project, by filling floodplains, will only exacerbate flooding downstream. Drone recordings ([www.youtube.com/watch?v=YMzuNltyUeg#t=5.482027](http://www.youtube.com/watch?v=YMzuNltyUeg#t=5.482027)) show much of the area inundated during wet years, which will inevitably occur again. Further hardening of soils that will occur with development will only increase flooding elsewhere.

### **Degrade Water Quality**

Humans discard their waste into water bodies. Over the years I have retrieved many cubic meters of detritus—bottles, tires, trash, and myriad other items—left to float downstream in local rivers. Any project such as this will inevitably result in yet more garbage and pollution of the Logan River downstream.

Further, development will inevitably result in increased runoff laced with herbicides, motorboat residues, salt, chemicals to control moss and algae in the water ski ponds, etc., further polluting Cutler Reservoir that is already compromised by high phosphorus from a century of Logan City sewage discharge. Chemicals from the Willow Creek Subdivision will only make this worse.

### **Harm ULTS**

There are Ute ladies'-tresses (ULT) known to exist in the proposed project. ULTs are a threatened species under the Endangered Species Act and this project would further delay any possible delisting.

### **Harm Wildlife Habitat**

Birds, beaver, muskrat, and many other species of wildlife depend on wetlands and riparian habitat. Converting more of the riparian zone to housing, yards, water ski ponds, etc., will only eliminate more of a dramatically shrinking resource for wildlife.

### **Compromise Implementation of the Logan River Conservation Action Plan**

Many citizens have devoted hundreds and thousands of volunteer hours in collaborative efforts to protect the Logan River corridor. This development would undermine their and the City's work to maintain a healthy, viable environment that is increasingly critical to our quality of life.

### **Cumulative Impacts**

It is also likely that extension of 1400 West will make possible additional development of properties to the north of Willow Lakes which are likely to further damage wetlands and floodplain. As such, the developer should be required to consider these future losses as a cumulative impact.

Sincerely,

