

Bridgerland Audubon Society's Comments on
Willow Lakes Holdings permit application SPK-
2020-00588

April 16, 2022

Michael Pectol, Project Manager
US Army Corps of Engineers, Sacramento District
Bountiful Regulatory Office
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Dear Mr. Pectol;

Thank you for the opportunity to comment on permit application SPK-2020-00588 made by Willow Lakes Holdings to develop a private waterski park and housing subdivision in Cache Valley, Utah.

As you know, since the 1700s the U.S. has lost over 53% of its wetlands, mostly in small increments (Johnston, 1994). Bridgerland Audubon is concerned that the proposed Willow Lakes development would represent yet another incremental loss of wetlands in an important floodplain bordering the Logan River in Cache Valley.

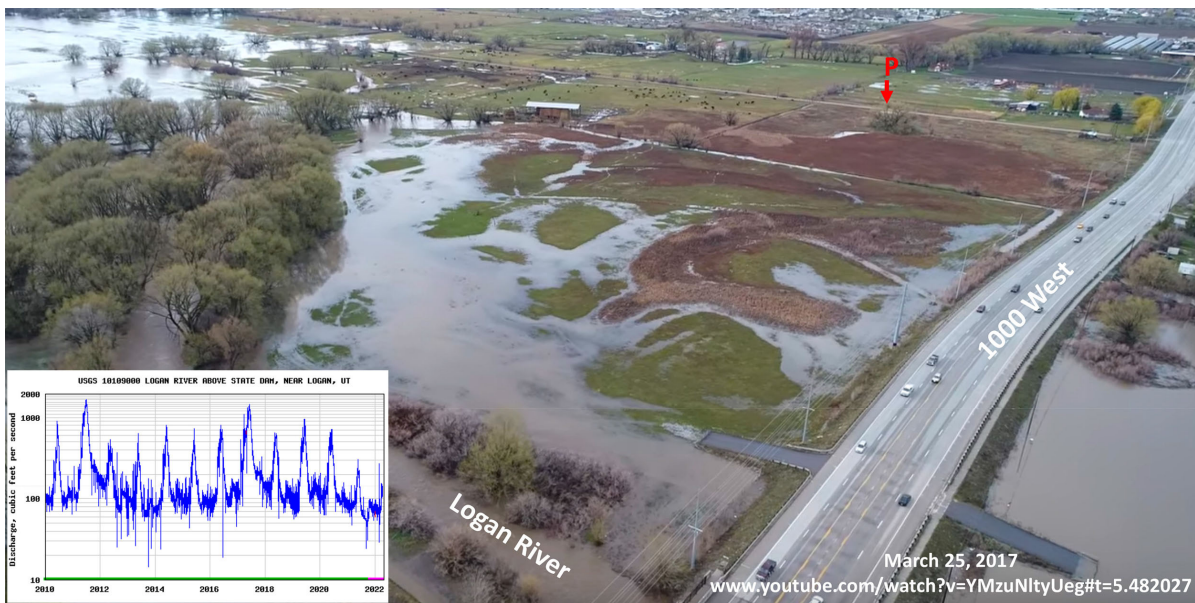


Figure 1. A March 25th, 2017, flood covering parts of the lands proposed for development. The inset shows Logan River discharges from 2010 to present, showing that the 2017 flood was not unusual and that the developer's wetland surveys were done during very dry years. The red "P" shows a photo spot shown in Figure 2.

Hydrology and wetland delineation —The area proposed for development is within the Logan River floodplain and likely floods at 10–20-year intervals (Figure 1). The drone imagery shown in Figure 1 was taken when the Logan River was flowing at 800 ft³/sec. Note that within the last 11 years, flows have exceeded 1400 ft³/sec. on two occasions, so the flood shown is not an unusual event. The plans we have seen do not include flood-control prevention, so it is probable that the housing development could suffer considerable damage in the event of a major flood. Additionally, if fill and diking were used to help prevent this, the floodplain wetlands would no longer help buffer the flood and other structures upstream and downstream might be damaged.

According to the developers, the proposed development would dredge or fill 5.47 acres of wetlands and 3,987 linear feet/1.95 acres of stream channel, but we believe this amount is underestimated. First, the wetland delineations were done in May of 2020 and 2021 which were moderate to extreme drought years (see inset Fig. 1), so the surveys would not likely have captured hydrated soils. For example, standing water was present in a view from site “P” in Fig. 2, and this water is also visible at this spot in the video link shown in Fig. 1. This area is not indicated as a wetland site provided by the developers. Although standing water on any one date does not necessarily indicate the area should be delineated as a wetland, it is cause for concern that the surveys done during drought conditions did not capture all of the wetlands.

Additionally, Areas 38 and 40 in Figure 7 of their application show areas of “temporary wetland impacts”. However, should the development be permitted, these

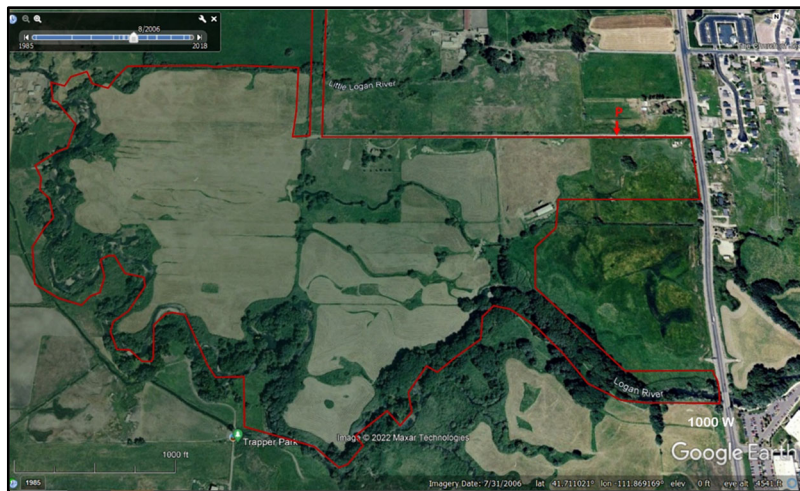


Figure 2. Above: Development area overlain on a 2006 Google Earth map of the area. Below: Photo of standing water on a portion of the property looking South from the northern boundary of the proposed development. This area is not shown as a wetland in the developer’s plans. The photo was taken April 16, 2022 from spot marked “P” in the upper satellite imagery.

delineated wetlands would become part of a waterski lake that will have minimal, if any, value for plants or wildlife.

Mitigation plans for the wetlands that would be destroyed are not given in the proposal, a serious oversight.

Wildlife & plant habitat — The property proposed for development has a large breeding population of Bobolink, a Wildlife Species of Concern that is on the Utah Division of Wildlife Resources' Sensitive Species List. Changes to the Willow Lakes floodplain may well cause Bobolinks to be extirpated from the area. Additionally, two federally listed threatened



Figure 3. Left - Bobolink, *Dolichonyx oryzivorus*. Right - Ute lady's tresses, *Spiranthes diluvialis*.

species have also been sighted on the property, Western Yellow-billed Cuckoo (*Coccyzus americanus*)², and Northern Leopard Frog (*Lithobates pipiens*)³. Finally, a Federally Threatened orchid, Ute lady's tresses, occurs in the proposed development area. Dredging, fill and modification of the floodplain's hydrology may well impact these species. More information is needed on how the developers would protect these organisms.

The proposed lakes may also impact water quality of the adjoining Logan River. The plan does not clearly lay out how water will be exchanged between the dredged lakes and the river. Runoff from the surrounding homes and condominiums would likely reach the lakes, bringing in nutrients and toxins. If this is exchanged with the Logan River, it could impact the trout present in the system and add to eutrophication problems downstream in Cutler Reservoir. Speedboat motors would likely keep the 15' deep lakes mixed during the summer, limiting anoxic conditions. However, this would not likely occur during spring, summer and definitely in the winter when the lakes would be ice covered. It is likely that if fish were stocked in the lakes that winter-kill would prohibit carry-over to the spring.

Planning process — Logan City and the Logan River Task Force have worked for years on a plan to protect the river. If the waterski development were built, it would negatively impact much of the [Conservation Action Plan](#) that has been developed to protect and enhance the social and ecological benefits of the river.

The developers state that the project will provide affordable housing for the city, but this claim is dubious. According to their website, prices for lots alone are listed from \$200,000-\$400,000—hardly affordable housing. In their development plan (Figure 8) the developers list housing development in three stages, but the condominiums, which would presumably provide the more affordable housing, is not even given a stage, so it is problematic when, or if, these would be built. Owners of million-dollar homes bordering the ski lakes may well protest if low-cost housing was proposed in the future. If

indeed, the developers want to provide low-cost housing, they should build it prior to development of the elite housing.

In summary, we are concerned that the proposed development will negatively impact floodplain function, damage critical habitat for species that are threatened or species of concern, and impact water quality of the Logan River. Given these concerns, we request that the Corps reject the application until the public's concerns are addressed.

Respectfully submitted,



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Bridgerland Audubon Society

Cc: Hilary Shughart, President, Bridgerland Audubon Society; Bryan Dixon, Bridgerland Audubon

References

- ¹ [Johnston, C.A. 1994. Cumulative impacts to wetlands. Wetlands 14\(1\), 49-55.](#)
- ² [Rare bird sightings in Utah](#)
- ³ [Environmental concerns over planned Cache Valley subdivision. Utah Public Radio](#)



Beautiful wetlands on the Willow Lakes Property.
Photo taken from 1000 W looking south-west towards the Wellsville Mountains.