

COMMENTS RECEIVED ON WDFW'S DETERMINATION OF NON-SIGNIFICANCE  
#11073: COLOCKUM STRAY-TEKISON ROAD ABANDONMENT



FROM: Kittitas County Field & Stream Club Inc.

SUBJECT: Determination of Nonsignificance (DNS) on:  
WDFW STRAY GULTCH, TEKISON CREEK ROAD ABANDONMENT,  
COLOCKUM WILDLIFE AREA

TO: SEPA/NEPA Coordinator, WDFW Regulatory Services Section  
WDFW Director Anderson  
WDFW Reg 3 Director Tayer

DATE: 11/17/2011

The Kittitas County Field & Stream Club, Inc. of Ellensburg, Washington reviewed this DNS, the checklists and maps. We compared this information with our own historical photographs, statements of members and retired WDFW Employees, land owners near the area and the testimony and evaluation provided by Cruse & Associates, a Private Land Survey Company in Ellensburg, Wa. We are opposed to this DNS and abandonment for the following reasons.

1. Environmental Checklist #11. WDFW has already started the process and completed some work without the proper permits. (see attached photo #1)
2. The abandonment is stated to be needed to reduce vehicle traffic, reduce sediment and prevent erosion. WDFW employees have already caused more erosion and silt contamination to potential stream flow as a result of recent culvert work that was poorly done and not completed.
3. Cultural Resources are mentioned and a study from 15 years ago is referenced however no mention of distance or exact cultural resources are identified. If these cultural resources are so sensitive why did WDFW use a grader in recent work installing an ineffective culvert? See photo#2
4. WDFW has not conducted any recreational surveys to determine the extent of current usage. Existing usage is very minimal and the proposed actions to abandon the road, remove water bars, expand culvert

RESPONSE TO COMMENT:  
Lee Davis, Kittitas County Field and Stream Club

In 2006, when the KCFSC's representative on the Colockum CAG was Mr. Essman, he recommended; "Leave Tekison Creek Road open to the Creek in T20N, R22E Section33. Close Tekison Creek Road West of the Creek, but allow access to camp sites. Close Stray Gulch Road West of the camping area approximately ¼ mile from the Brewton Gulch intersection." The WDFW proposal is very similar to your 2006 recommendations.

1. Photo #1 that you supplied is located approximately 2.5 miles from the Stray Gulch/Tekison Project site, and is not part of the abandonment project. No maintenance work has been performed on the portions of the roads that are proposed for abandonment.
2. It is unclear what culvert work is being addressed here. WDFW has not installed or removed any culverts in the area of this proposal.
3. The cultural resource study was done in 2007, not 1997 as listed in the SEPA document. The results of these studies are not generally available to the public because of the possibility that artifacts could be damaged or

and rehab the area will in fact cause more silt and debris to run off into the existing seasonal streams than current use. Reseeding and planting will be ineffective as Shrub Steppe habitat is extremely slow to develop and the project proposed will require a multi-year rehabilitation program. That type of funding is not available.

5. WDFW does not own all the land in the application. Has Washington Department of Natural Resources or the Federal Bureau of Land Management been consulted in this and listed as co-applicants? No.
6. The following information was provided by Cruse & Associates:
  - a. The area marked in red (see attached map #3) is approximate location of the disturbed ground constituting the road bed typically several inches deep in silty, fine dust. It begins at the Tekison Creek crossing and the disturbed portion ended where the ridge on the south side of Dry Canyon turns rocky. There were numerous dips further up the road to attempt to direct water from the roadbed. (REFERENCING WDFW's RECENT ROAD WORK PRIOR TO APPLICATION OR REQUIRED HPA PERMITS)
  - b. Reviewing the maps, (WDFW provided in application) especially Final Stray Gulch-Tekison Road Abandonment, I've compared the maps with the County Assessor's Property Ownership Information. The White outline (32-20-22) shows up as BLM ownership. The Tan outline (30-20-22 and 6-19-22) shows as DNR ownership.
7. Kittitas County Field & Stream Club Members along with Surveyors from Cruse & Associates drove to the closed end of Stray Gulch and we disagree with the amount of sedimentation generated by the use of this track road. The public has made detours over time-through sage, scabrock and other common types of plants. We question the impact of these detours as justification for closure. We left Stray and drove down Tekison to the creek crossing. From the crossing south, recent road work was evident all the way to the south side of Dry Canyon where the silty soils comprising the road bed become rocky. The amount of dirt and silt in the air was incredible and observed from long distances as well as experienced up close (at several points I was unable to see the ground in front of the Jeep while driving into the wind). The amount of silt which will run off after a rain or snow melt will be incredible which seems contrary to WDFW goal of minimizing sedimentation.
8. DNS Checklist 5 c. – The intent of this project is to restore the site and prevent sediment delivery to fish bearing water.
  - a. We have not found or know of any current documentation or studies to indicate this is fish bearing water.

Sincerely,

Lee Davis, President  
Kittitas County Field & Stream Club

P.O. Box 522  
Ellensburg, WA 98926

removed. No grader work was done in the area of this proposal. In reference to your photo #2, there is no culvert at this location. The road in your photo was ditched in 2007 to drain water off the green dot road to keep this road open for public use.

4. WDFW has had an electronic car counter on the Stray Gulch Road to monitor motorized vehicle use. In addition, WDFW has conducted springtime aerial helicopter flights to monitor recreation and enforce the motorized vehicle rules of the green dot system. Multiple flights were conducted each year in 2007, 2008, 2009 and 2010. One flight was done in 2011. Minimal use does not justify maintaining a road adjacent to a stream and in a riparian zone. No culvert work or removal of water bars is proposed. Restoration of shrub-steppe habitat can be difficult and slow, but it is effective. Riparian vegetation will recover quickly after the road is closed. Once again, these streams are perennial in the reaches that are adjacent to this proposal.
5. As identified in the SEPA documents, this project occurs on WDFW, WA. Department of Natural Resources (WDNR) and U.S. Bureau of Land Management (USBLM) lands. WDFW manages the USBLM lands in the Colockum under a Cooperative Agreement in effect since 1955. The USBLM is fully aware of and supports this road abandonment project. The WDNR is also aware of this project and has given WDFW approval to proceed with it. The WDNR lands included in the Tekison and Stray Gulch project are slated to be transferred to WDFW as part of a major land exchange in the very near future.
6.
  - a. This comment refers to recent road maintenance work done by WDFW on the Little Brushy Road. This work is unrelated to the road abandonment project. The road work mentioned is at the nearest point 2.5 miles from the Tekison and Stray Gulch Road Abandonment Project, and extends to approximately 5 miles from the project site. This work was done to fill in large, deep ruts that formed during spring runoff in 2011, making this green dot road almost impassable to motor vehicles. Drainage structures (water bars) were placed in the road to direct water off the road to reduce water damage in the future. The entire length of graded road was then seeded with native grass seed. The seeding was done while the road was still dusty to incorporate the seed into the soil for better germination.
  - b. The maps included in the SEPA documents show the three agencies involved in different colors. Both the USBLM and the WDNR are aware of and support this project.

7. Numerous studies have shown the negative impact of stream-adjacent roads and sedimentation to aquatic life. In addition, the detours created by the public where these roads have been damaged by flooding or overtaken by riparian vegetation have long term impacts to the shrub-steppe vegetation. As pointed out in your letter, shrub steppe habitat is extremely slow to develop, and the impacts of off-road travel can last for years.
  
8. WDFW conducted an electroshocking fish survey in both creeks in 2010. Fish were document in both creeks. Fish collected were identified, measured for overall length and then fish were returned to the creek. Salmon and steelhead have also been documented in lower Tekison Creek, where the sediments are likely to end up.

FROM: Kittitas County Field & Stream Club Inc.  
SUBJECT: Determination of Non significance (DNS) on:  
WDFW STRAY GULTCH, TEKISON CREEK ROAD ABANDONMENT,  
COLOCKUM WILDLIFE AREA

TO: Bob Zeigler  
SEPA Responsible Official  
WDFW Habitat Program  
600 Capitol Way N  
Olympia, WA 98501-1091

CC: SEPA/NEPA Coordinator, WDFW Regulatory Services Section  
WDFW Director Anderson  
WDFW Reg 3 Director Tayer  
WDFW Reg 3 Pete Lopushinsky  
Elizabeth Butler/RCFB Project Manager

DATE: 1//12012

The Kittitas County Field & Stream Club, Inc. of Ellensburg, Washington reviewed this DNS, RCO Application, JARPA, checklists and maps. We compared this information with our own photographs, aerial photography and conversations with independent archeologists, geologists and biologists.

We are opposed to and appeal this DNS and abandonment for the following reasons.

1. The State Environmental Policy Act (SEPA), chapter 43.21C RCW requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. The associated "Environmental Checklist" was not completed at the time of the application for RCO Grant Funding and awarded and agreement signed by RCO on 9 March 2010. The "Checklist" is dated as "Prepared" on 8/22/11 and signed by Ted Clausing/WDFW for Pete Lopushinsky/WDFW on 10/28/11. See page 13 of the Environmental Checklist attached as Item #1.
2. Environmental Checklist #11. WDFW had already started the process and completed some work believed to be without the proper permits. An HPA violation was reported in Dee 2011 and the outcome of an HPA violation investigation being conducted by WDFW Enforcement is pending.
3. ESA listed Species:

RESPONSE TO COMMENT LETTER:

Lee Davis, Kittitas County Field and Stream Club

1. SEPA is not a requirement to apply for grants, nor is it required by RCO prior to project funding decisions. Recognizing the controversial nature of access management decisions, WDFW initiated a SEPA process on this proposal to provide a more formal review and to allow for additional public involvement. RCO grants applications are only accepted every 2 years so they are often started early in a project timeline. Even if a project is successfully funded, the grant funding could be returned to RCO if WDFW decided not to go through with the project.

2. No construction work has started on this road abandonment project. Work completed thus far includes public involvement, planning and design, securing funding, and submitting SEPA. The area of the alleged HPA violation is not within the area of this proposal, nor is it related.

a. The project "Description" presented to the RCO (see attachment #2) states *"This project is part of a larger effort to improve water quality, reduce erosion, and improve fish passage."* DNS Checklist 5 d. dated " 2 Nov 2011" (see attachment#3) states - *"The intent of this project is to restore the site and prevent sediment delivery to fish bearing water"*. The JARPA Form completed and dated 7/15/2011 Section 6F

"Purpose of Project" states *"We need to abandon these roads to improve water quality and protect cultural resources"*. Neither stream is "perennial stream" as is indicated by WDFW in the RCO, JARP A and DNS applications. At best these are intermittent or even ephemeral. Both streams lack continuous interconnected year round flows to the Columbia River. Many parts of both streams dry up after the spring runoff.

b. Eric Anderson/WDFW and Jeff Tayer/WDFW both publicly stated that neither had seen any evidence of turbidity during their site visit when asked. In fact, the only study or documentation that was provided to the Kittitas County Field & Stream Club were the field notes of WDFW region 3 Biologist Eric Anderson dated 26 March 2010. Dated 16 days **AFTER** the RCO Grant was funded. His field notes (See attachment #4) indicate three locations were electro shock sampled and only one rainbow (122 MM or about 4.8 inches) was netted within the proposed road closure area. (See attachment #5 proposed road closure area map and a Google Earth image with GPS electro shocking locations ) These other two locations that were electro shocked are a few hundred feet before you reach the proposed road closure according to the maps presented to the Kittitas County Field and Stream Club on 7 Nov 2011. (See attachment #6) In Eric Anderson's E-mail to us he stated, in reference to his field notes, *"Appeared to be a healthy population of juvenile rainbow, probably a couple of age classes. A likely admixture of resident and anadromous forms."* It should be noted that he did not have any fish netted for genetic testing and that he stated he observed a healthy population. In my phone conversation with Eric Anderson he further relayed that he did not see any turbidity of the water and that the area is quite brushy and that the fish sampled appeared healthy. His field notes do not indicate any issues with either intermittent stream.

c. Neither intermittent stream has any documented ESA listed species as implied by WDFW within or in the vicinity of the project area. A Grant County PUD study notes that none of the tributaries tested within the Whiskey Dick, Quillomene areas contain trout/steelhead genetically consistent with ESA listed steelhead populations. Tekison was omitted as it was not even considered as a potential candidate stream for testing or considered to be a perennial stream within that region. SEE BELOW.  
*REFERENCE: FERC FEIS for the Priest Rapids Hydroelectric Project No. 2114, November, 2006*

3a. A perennial stream is defined as "a stream or river channel that has continuous flow in parts of its stream bed all year round during years of normal rainfall" (Meinzer, Oscar E. 1923. "Outline of groundwater hydrology, with definitions." Washington DC: US Geological Survey, p. 57. Water Supply Paper 494). Stray Gulch and Tekison Creeks both have year round flow and support fish populations in the portions that are adjacent to the proposed road abandonment. Continuous interconnection to the Columbia River is not necessary for the streams to be perennial or to support fish life.

3b. Erosion and sedimentation are most severe during and after major precipitation or snow melt events, which were not present during field visits. WDFW sampled fish populations in the perennial portions of both Stray Gulch and Tekison Creeks. A total of 18 fish were caught and released. These locations are immediately downstream of the problem road areas that have been eroded by water runoff. Since water and sediments flow downstream, so do the negative impacts.

3c. The conclusions of Grant County PUD study are not shared by WDFW or the National Marine Fisheries Service. Spawning steelhead have been documented in Tekison Creek, approximately 3 miles downstream from the project area. Chinook salmon are known to rear in the mouth of Tekison Creek. Eric Anderson, WDFW fish biologist located a steelhead redd in the lower section of Tekison Creek on 3/26/2010. On April 10, 2010 Mr. Ken Dubb photo documented the presence of adult steelhead spawning in Tekison Creek. In 2007, while conducting steelhead spawning ground surveys in Columbia River tributaries, WDFW field crews found a steelhead carcass in the lower portion of Tekison Creek (Baldwin, C. M. 2007. Steelhead spawning ground surveys, temperature, and discharge monitoring in small tributaries of the Columbia River Upper Middle Mainstem Subbasin, 2005-2007. WDFW). Quoting from the discussion section of the report, page 39: "Even with limited spawning use, juvenile salmonids are known to rear in all of these creeks. Additional anecdotal information exists regarding the presence of juvenile salmonids, apparently including Chinook, in Brushy Creek and Tekison Creek. The temperature and flow data collected in this study shows that there is perennial rearing habitat available in virtually all these creeks. Even those that go dry in stretches had isolated pools that were supporting juvenile salmonids." This project

<http://gcpud.org/naturalResources/shorelineManagement/priestRapidsProjectLicense.html>

*"In order to address possible spawning and rearing by steelhead in project tributaries, Grant PUD conducted an evaluation to determine whether the genetic structure of redband/rainbow trout populations in the Project area is indicative of pure, native trout populations or indicative of populations that have undergone introgression with hatchery rainbow trout or steelhead. Tissue samples from fish collected from seven different project tributaries (31) were evaluated using standard DNA analysis techniques (Dresser et al. 2003). The results of these analyses showed no genetic similarity to steelhead reference samples. These genetic data suggest that all tributary streams with the exception of Johnson Creek contain rainbow trout populations derived from known populations of hatchery rainbow trout (Dresser et al. 2003). Johnson Creek showed unique genetic characteristics not similar to known rainbow, redband or steelhead populations. " 31 Johnson, Skookumchuck, Whiskey Dick, Tarpiscan, Trinidad, Quilomene and Colockum Creeks; see Figure E4-J 0 in volume 3 of the license application for specific location of each of these tributaries. "*

d. The "Press Release Template" (See Attachment #7) states " These drainages are important habitats for steelhead, salmon, mule deer, etc " This statement is false and/or misleading. WDFW does not have ANY current reports, documents or scientific field notes or evidence confirming steelhead or salmon in either drainage within or in the vicinity of the project. The closest possible steelhead red was found over three miles away within the first half mile above the Columbia River in a connecting drainage.

e. Section 6 of the WWRP Scoring Criteria worksheet states (See Attachment #8) that " *Spawning surveys for steelhead trout and salmon were done in these creeks in 2005-2007, proving good data for future comparison.*" This information was requested at a December 2011 meeting with WDFW Ted Clausing and another December 2011 meeting with WDFW/Jeff Tayer. **To date this information has NOT been provided.**

Only the March 26, 2010 field notes of Eric Anderson/ WDFW have been provided.

f. JARPA Section K.(See Attachment #9) states that Upper Columbia Steelhead (spawning & rearing) and Chinook Salmon (rearing) are in the vicinity of the project area. This is false unless vicinity is to mean over three miles away in a lower connecting drainage.

4. The abandonment is stated to be needed to reduce vehicle traffic, reduce sediment and prevent erosion. WDFW employees have already caused more erosion and silt contamination to potential intermittent stream flow as a result of recent culvert work that was poorly done and not completed. Further, adding water barriers, large boulders, back

seeks to improve entire watershed health by addressing issues such as degraded riparian areas and degraded water quality. WDFW is obligated to protect native fish and fish-bearing waters, whether the fish species is ESA listed or not.

3d. Sedimentation impacts can easily extend downstream to the Columbia River.

3e. Please refer to Casey Baldwin's 2007 report as referenced above in 3c.

3f. Sedimentation impacts can easily extend downstream to the Columbia River. WDFW must manage the entire watershed and the downstream cumulative effects, not a single project site.

4. Water bars divert water out of the roadbed, reducing erosion and damage to the road. No "water barriers" are planned. Boulders and gates function to restrict vehicle access and associated impacts to streams and

fill, excavating for gates and other related proposed project work will in fact cause more damage to the area than vehicular traffic has in the last 60 years or more. We do not dispute that there is now a couple locations where traffic has been altered by recreationists but that has been to avoid the water during high spring runoff and another as a result of an ineffective culvert being put in place and allowing the water to find its own way back to the stream. Both instances are extremely minimal. In fact, if you examine aerial images from 1990 to current you will see that the roads are virtually UNCHANGED and that images indicate an increase in trees, vegetation and brush along the intermittent creeks in question.

#### 5. Cultural Resources:

a. The archaeological study conducted by Eastern Washington University in 2007 that was referenced in the RCO, JARPA and DNS was reviewed. Our conclusion is that WDFW is misinterpreting the study. We believe the study is being misinterpreted to say that the public will have an impact on the archaeological sensitive areas when the REAL result of the study was to "WARN" WDFW that their work during construction COULD harm the sites. It has nothing to do with whether the public continues to use the road or not in a traditional fashion.

b. WDFW has limited data (vehicle Counter) on stray Gulch road From Jan 30th 2011 to June 15th 2011 to determine the extent of recreational vehicular use. We have always contended that vehicle use is EXTREMELY limited and that the construction that has occurred to date has caused more harm to the area and potential sediment into the intermittent streams than 60 years of traffic could potentially be done. On Jan 5th 2011 WDFW Pete Lopushinsky finally made available the car counter data set just prior to this letter being sent. After analyzing the data I confirmed that there were 38 activations both into and out of Stray Gulch during the 6 months. That's only 69 vehicles. Average 11 per month. This does NOT equate to potential serious harm to an intermittent stream that as of yet does not have any confirmed ESA listed species.

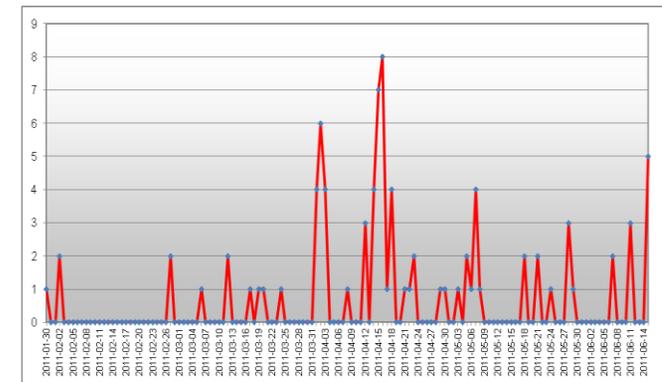
c. If you examine the cultural resource report and geological composition of this area you will note that vehicular traffic is less likely to cause erosion as the soils are highly compacted unless disturbed by equipment. This is one reason why WDFW has never maintained these roads in their nearly 100 year existence. There was no need as the soil is compacted. By attempting to abandon this road will cause more potential harm than leaving them open to the occasional turkey hunter or camper that will lose access to an area that has traditionally been in use for over three generations.

6. Kittitas County Field & Stream Club Members along with Surveyors from Cruse &

vegetation. Once vehicular traffic is stopped the roads will revegetate and erosion will be reduced over time. Continuous use creates continuous disturbance, whereas a single instance of disturbance to repair the site will have a single season of impact but with long-term benefits.

5a. WDFW commissioned the archeological study both to document the presence of important cultural resources and to avoid impacts to them during the implementation of this project.

5b. Please see WDFW analysis of the Stray Gulch car counter data below, recorded from January 30, 2011 to June 15, 2011. This analysis uses a 10 second filter to distinguish between vehicles and the data is divided by two to account for each vehicle entering and leaving this dead end road.



It is unclear how you (Davis) drew your conclusions, but WDFW used the Trafx data analysis software specific to these car counters. This analysis show a total of 88 vehicles, with peak use occurring in early and mid

Associates drove to the closed end of Stray Gulch and we disagree with the amount of sedimentation generated by the use of this track road. We left Stray and drove down Tekison to the creek crossing. From the crossing south, recent road work was evident all the way to the south side of Dry Canyon where the silty soils comprising the recently graded road bed become rocky. The amount of dirt and silt in the air was incredible and observed from long distances as well as experienced up close (at several points I was unable to see the ground in front of the Jeep while driving into the wind). The amount of silt which will run off after a rain or snow melt will be incredible which seems contrary to WDFW goal of minimizing sedimentation.

7. Simply, WDFW does not have any scientific evidence of ESA listed species protection within the vicinity of the project area. They do not have or a comprehensive study or even a snapshot view of the existing recreational and vehicle use that would justify these closures. The cultural resources are not in jeopardy under current use. In fact, closing these roads would provide potential unobservable theft of potential resources in these areas. For over 92 years the Kittitas County Field & Stream Club has supported scientific based conservation and land management. Hunting, fishing and general outdoor recreation is not just an occasional activity for our residents but more of a way of life.

Sincerely,

~~

Lee Davis, President  
Kittitas County Field & Stream Club  
P.O. Box 522  
Ellensburg, WA 98926

April, coinciding with the spring turkey hunting season in that area. This is also the time of year that spring runoff and flooding occur. Damage is not necessarily a function of number of vehicles but also of timing (spring – when roads are muddy, etc), and type of use (off road excursions to avoid wet spots, cutting riparian vegetation to keep road open). Few vehicles can create lasting impacts. The number of vehicles documented on the car counter seemed sufficient to create damage, but not so numerous that a closure would affect a large portion of recreationists.

There are over 100 miles of primitive roads open to motor vehicles on the Colockum Wildlife Area. WDFW is addressing roads that impact water quality and priority habitats. The 4.25 miles of the Stray Gulch and Tekison roads identified in this project are immediately adjacent to fish bearing streams (they run parallel and downhill next to these streams). These roads wind through riparian and shrub-steppe habitats, habitat types particularly valuable to eastern Washington fish and wildlife and listed as priority habitats by WDFW. In places, washouts created during spring runoff require vehicles to detour around them, and in others overgrown vegetation makes the roads almost impassable.

5c. The soils along these roads are classified as gravelly sandy loams, and are highly susceptible to degradation due to disturbance. When roads run parallel and adjacent to creeks they collect and channel water which eventually finds its way back to the stream, along with sediment that has been picked up along the way. The lack of road maintenance over time was due to the remoteness of the site and lack of funds, not due to a belief that the roads were in good condition. Highly compacted soils impede the infiltration of surface water, causing it flow overland, concentrate, eroding the finer soils and leaving the rocks behind. The photo below indicates that this process is chronic in the project area.



Water Damage on Tekison Creek Road

Hunters and campers will still have access to these areas for recreation. Numerous motorized vehicle campsites are being retained in the lower sections of both project areas.

7. ESA species: Refer to 3c above.  
Vehicle Use: Refer to 5b above.

Letter received from W.R. Essman, January 3, 2012:

Bob Zeigler  
SEPA Responsible Official  
WDFW Habitat Program  
600 Capitol Way N  
Olympia, WA 98501-1091

I do not agree with the Tekison Creek/Stray Gulch road abandonment SEPA Check List or the DNS for the following reasons:

1. Both the SEPA Check List and the DNS have the wrong section for Tekison Creek Road. It should be section 6, not 33.
2. I know that Tekison and Stray Gulch streams are not perennial. Brewton Gulch and Stray Gulch flow into Tekison Creek. Shortly after they join they dry up. Only the lower one quarter mile up from the Columbia River has water year around (depending on the river level).
3. A WDFW fish biologist electoshocked Tekison and Stray Gulch on 03/26/10 in three locations. Only one was above the proposed closures and at that site only one 4.5 inch rainbow was collected. There have never been any documented ESA fish spawning more than one quarter mile up from the Columbia River.

<http://gcpud.org/naturalResources/shorelineManagement/priestRapidsProjectLicense.html>

Grant PUD's Final EIS issued by FERC notes that none of the tributaries within the Project contain trout/steelhead genetically consistent with ESA listed steelhead populations.

*"In order to address possible spawning and rearing by steelhead in project tributaries, Grant PUD conducted an evaluation to determine whether the genetic structure of redband/rainbow trout populations in the Project area is indicative of pure, native trout populations or indicative of populations that have undergone introgression with hatchery rainbow trout or steelhead. Tissue samples from fish collected from seven different project tributaries<sup>31</sup> were evaluated using standard DNA analysis techniques (Dresser et al. 2003). The results of these analyses showed no genetic similarity to steelhead reference samples. These genetic data suggest that all tributary streams with the exception of Johnson Creek contain rainbow trout populations derived from known populations of hatchery rainbow trout (Dresser et al. 2003). Johnson Creek showed unique genetic characteristics not similar to known rainbow, redband or steelhead*

RESPONSE TO COMMENT LETTER:

W.R. Essman

This proposal is consistent with the input you provided as KCFSC's representative on the Wildlife Area Citizens Advisory Group in 2006, where you expressed support for the proposed road changes and made these specific recommendations in a follow up document: "Leave Tekison Creek Road open to the Creek in T20N, R22E Section33. Close Tekison Creek Road West of the Creek, but allow access to camp sites. Close Stray Gulch Road West of camping area approximately ¼ mile from the Brewton Gulch intersection" (WDFW CAG Meeting Notes, 11/21/2006, and follow up document provided by W.R.Essman).

1. The SEPA and the DNS listed the sections correctly. Tekison Creek Road crosses sections 32 and 33, T.20N, R.22E. and Section 6, T.19N, R.22E. All of these sections were listed in the SEPA and DNS as this project involves all three sections. The maps included with the SEPA may have been confusing however, as several are shown. Please see the map below for clarification.



2. A perennial stream is defined as "a stream or river channel that has continuous flow in parts of it's stream bed all year round during years of normal rainfall" (Meinzer, Oscar E. 1923. "Outline of ground-water hydrology, with definitions." Washington, DC: US Geological Survey, p. 57. Water Supply Paper 494). Portions of both Tekison Creek and Stray Gulch are fed by springs that keep water flowing year-round.

*populations.*

31 Johnson, Skookumchuck, Whiskey Dick, Tarpiscan, Trinidad, Quilomene and Colockum Creeks; see Figure E4-10 in volume 3 of the license application for specific location of each of these tributaries."

You may have noticed that Tekison was not included in this study.

4. I do not believe that either of these roads adds unusual amounts of sediment to the streams. Except for one or two places, both roads are much higher than the stream beds and 25-150+ yards from the water.

Both of these roads are over 100 years old. WDFW has never done any maintenance on either of them. The roads were closed at their current locations in the early 1960's. There is no evidence that vehicles have driven past the closures or litter. There are several well used campsites on both roads above the proposed closures.

On December 3, 2011, Chuck and Lana Cruse and I drove both roads and photographed them at different locations. We took a GPS reading at each location where the photographs were taken. (Please take time to review the mailed Power Point.) We also observed a recent HPA Violation on Tekison Creek which I reported to WDFW enforcement.

On December 15, 2011, I was one of seven members of the Kittitas County Field & Stream Club that met with Ted Clausing and Pete Lopuchinsky. After two hours of discussion, Ted said that he hadn't changed his mind and wouldn't stop the process.

On December 27, 2011, Lee Davis and I met with Regional Director Jeff Tayer. We showed him the Power Point (gave him a copy) and discussed our concerns.

If these projects are approved, I would like to know what the appeal process is.

Sincerely,

W.R. Essman  
8770 Brick Mill Road  
Ellensburg, WA 98926  
509-968-4532  
[essman@fairpoint.net](mailto:essman@fairpoint.net)

WDFW staff visited Stray Gulch and Tekison Creek on August 27, 2009 to inspect the summertime water flows in these two streams. The high temperature that day was over 90 degrees F. Water was flowing in both creeks, along the entire length of the road abandonment project. While the lower portion of Tekison Creek normally dries up in the summer months as it approaches the Columbia River, the portions of Stray Gulch and Tekison Creek within the project area are perennial, supporting aquatic life and riparian habitats in this otherwise desert arid landscape. This illustrates why this unique area was chosen for improvements through road closures and habitat improvements.

3. The three sites chosen for electroshocking were within the perennial portions of each stream. The fish survey was done simply to determine the presence or absence of fish in these streams. A total of eighteen wild, juvenile rainbow trout (*Oncorhynchus mykiss*) ranging in size from 85-179 mm were captured, measured and returned to the stream. Rainbow trout found in this area represent an admixture of resident and anadromous life history forms. As you are probably aware, the anadromous life history form (steelhead) that inhabits this portion of the upper Columbia River is listed under the ESA as a "threatened species" and therefore requires a high level of protection (<http://www.nwr.noaa.gov/ESA-Salmon-Listings/Salmon-Populations/Steelhead/STUCR.cfm>.) Eric Anderson, the WDFW fish biologist you referred to located a steelhead redd in the lower section of Tekison Creek on 3/26/2010. On April 10, 2010 Mr. Ken Dubb photo documented the presence of adult steelhead spawning in Tekison Creek. In 2007, while conducting steelhead spawning ground surveys in Columbia River tributaries, WDFW field crews found a steelhead carcass in the lower portion of Tekison Creek (Baldwin, C. M. 2007. Steelhead spawning ground surveys, temperature, and discharge monitoring in small tributaries of the Columbia River Upper Middle Mainstem Subbasin, 2005-2007. WDFW). Quoting from the discussion section of the report, page 39: "Even with limited spawning use, juvenile salmonids are known to rear in all of these creeks. Additional anecdotal information exists regarding the presence of juvenile salmonids, apparently including Chinook, in Brushy Creek and Tekison Creek. The temperature and flow data collected in this study shows that there is perennial rearing habitat available in virtually all these creeks. Even those that go dry in stretches had isolated pools that were supporting juvenile salmonids." WDFW is obligated to protect native fish and fish-bearing waters, whether the fish species is ESA listed or not.
4. Please refer to the photo below, taken on 5/17/2011 by WDFW staff.

This photo shows water running down a lengthy portion of the Stray Gulch Road, well within the proposed closure area.



Water flowing down Stray Gulch Road, May 17, 2011

Research studies have overwhelmingly shown the negative impacts of stream-adjacent roads to aquatic life. Primitive, unmaintained roads such as these can channel water down the road, carrying sediments back to the stream. The photo below shows a portion of the Tekison Creek Road, after high-flow events have removed substantial amounts of soil.



Water damage on Tekison Creek Road

In this project, WDFW is proposing to close approximately 4.25 miles of primitive, dead-end, stream-adjacent parallel roads in a wildlife area that contains over 100 miles of roads open to motorized vehicle use. Perennial streams and riparian habitats are very limited on the Colockum, yet they support a disproportionately high number of fish and wildlife species. Given WDFW's mandate to protect, restore and enhance fish and wildlife and their habitats, closing these roads and improving habitats is justified.

Thank you for the information you provided during the December 15, 2011 meeting. At that time, since the comment period was still open, it would have been inappropriate to terminate the project.

2619 Willowdale Road  
Ellensburg, WA 98926

Pete Lopushinsky  
Washington Dept. of Fish and Wildlife  
Colockum Wildlife Area  
9002 Tarpiscan Rd.  
Malaga, WA 98828

Dear Mr. Lopushinsky:

I am writing this letter to oppose the "WDFW Stray Gulch, Tekison Creek Road Abandonment, Colockum Wildlife Area" proposal. As a person who spends an average of 2 days a week recreating in the Colockum, Quilomene, or Whiskey Dick wildlife areas I do not want the Tekison Creek or Stray Gulch roads abandoned.

In the Colockum Wildlife Area Management Plan (section 1.4 Colockum Wildlife Area Goals) is "provide diverse public opportunities to encounter, utilize, and appreciate wildlife and wild areas." As a law abiding citizen I am finding it more and more difficult to access public lands, ironically at the same time we are required to purchase the Discovery Pass . The Discover Pass website claims that "When you buy the Discover Pass, you are helping to keep these wonderful outdoor opportunities open and accessible to the public." It does not feel that way.

I also note that the 2010 Colockum Wildlife Management Plan Update lists a 2009 Performance Measurement as "Continue the process to address stream adjacent roads in Stray Gulch and Tekison Creek." Next the plan lists Status of Performance Measurement as "Issue discussed in CAG and public meetings." I question when and where these public meetings were held and how they were advertised to the public.

I urge you to do three things.

1. Do not abandon Stray Gulch and Tekison Creek roads.
2. Elevate the importance of the public's right to use state lands for recreation in all your actions.
3. Involve the public in your decision making process so agency actions do not appear to be dictatorial.

I appreciate opportunities to be involved. Please contact me if you need additional information.

Sincerely,  
Lana Thomas Cruse

RESPONSE TO COMMENT LETTER:

Lana Thomas Cruse

The Stray Gulch and Tekison Creek Road issues have been included in the Colockum Wildlife Area Plan since 2006, and included in Colockum Wildlife Area Management Plan Updates in 2007, 2008, 2009 and 2010 ([http://wdfw.wa.gov/lands/wildlife\\_areas/management\\_plans/](http://wdfw.wa.gov/lands/wildlife_areas/management_plans/)). Public meetings were held in Ellensburg on August 25, 2009, Selah on August 26, 2009 and in Wenatchee on August 27, 2009 to discuss road management issues and these roads were specifically discussed. These meetings were announced on August 20, 2009 in a WDFW News Release. Citizen Advisory Group meetings have been held in Ellensburg and Malaga to discuss wildlife area issues, including these roads. These roads were also posted in October 2010 to notify frequent users of the area to possible road management changes.

December 1, 2011

Phil Anderson, Director WDFW  
600 Capitol Way N.  
Olympia, WA 98501

Dear Director Anderson,

After several years as a member of the public attempting to participate in policy decisions with Washington Department of Fish & Wildlife staff I am asking for your assistance.

I retired after twenty five years with Washington State University Extension, an organization that values public participation, input, and involvement. In the last few years I have attended four WDFW meetings and this is my third letter to your organization, all related to public access to public lands. What I have experienced with WDFW has been a pattern of setting policy without holding public meetings, not advertising opportunities for input or meetings in a way that the public hears about the meeting, not advertising the meeting well in advance so the public can be involved, and not including opportunities for input at some of these meetings. Staff appear to have already made their decision, therefore not listening for new information and other points of view. The prevailing attitude seems to be "we'll do as we damn well please."

My most recent involvement has been in relation to the "WDFW Stray Gulch, Tekison Creek Road Abandonment, Colockum Wildlife Area Proposal". I submitted a letter to Pete Lopushinsky and Bob Zeigler on November 17, 2011. Following that, I observed a meeting with representatives from Kittitas County Field & Stream Club, Pete Lopushinsky and Ted Clausing on December 15, 2011. Six representatives from the Field & Stream club were present in addition to me. Those present were: Lee Davis (Field & Stream president), Dave Duncan, Bill Essman, Aaron Kuntz, Chuck Cruse, and Dennis Ohlde. Those six individuals represented a variety of expertises. All have long histories of WDFW support, concerns about stewardship of wildlife and wildlife lands, and the public's right to access public lands. The Field & Stream group was well prepared with a power point presentation, asked questions, and disputed much of WDFW's rationale for abandoning the roads. Mr. Lopushinsky and Mr. Clausing had no prepared materials for the group. Mr. Clausing did promise to send the group copies of road counter data, fish data, and paperwork about the 2007 ford around Tekison culvert. After much discussion, Mr. Clausing stated he had not changed his mind and that he still had the same issues.

I can only speak for myself, but this two hour meeting (plus all the preparation time) felt like a waste of our time. We were on our own time, not paid to prepare and be at this meeting. I expected staff to at least say thank you for your input, you have brought up some valid information that we need to take into consideration.

RESPONSE TO COMMENT LETTER:

Lana Thomas Cruse

Thank you for your letter (January 5, 2012) regarding the importance of public input and the recent Washington Department of Fish and Wildlife (WDFW) meeting on the Stray Gulch and Tekison Creek road abandonment proposal. Director Anderson and WDFW staff shares your value for public involvement and collaborative decision making processes. WDFW has yet to decide on the future management for Stray Gulch and Tekison Creek Roads, because the public process is ongoing.

The public process for this proposal started more than six years ago when the Colockum Elk Herd Plan (2006) and the Colockum Wildlife Area Plan (2006) were under review. In addition to the public meetings for the Colockum plans, the Stray Gulch and Tekison Creek proposal was also discussed with the Wenatchee Sportsmen's Association, the Kittitas County Big Game Management Roundtable, the Wildlife Area Citizens Advisory Group, and at three public meetings during August 2009.

Recognizing the controversial nature of access management decisions, WDFW also initiated a State Environmental Policy Act (SEPA) process, for a more formal review, on November 3, 2011. SEPA is not required for a project of this scope, but WDFW chose to use it to allow for additional public involvement. To ensure that the public had ample opportunities to consider the project and to provide input, the comment deadline (which is usually only 14 days) was extended three times before finally closing on January 6.

The meeting that you attended on December 15 was requested by Mr. Ohlde and Mr. Essman to discuss the SEPA checklist and comments that they had submitted. The timing of the meeting was intended to provide for an exchange of information about the proposal and related comments that WDFW had already received and to allow time for additional review and feedback from the public prior to January 6. Since the comment period was still open and no agency decision had been made, WDFW's staff was not in a position to negotiate with your group or to withdraw the proposal.

For an organization to have public support and trust, opportunities for public input (in written or public meeting form) must be of high importance and well executed. The goal should be to utilize public input in WDFW decision making. Presently it appears that public input is something WDFW staff feels is unimportant but required on the paperwork (merely another box that must be checked).

As the Director you provide strategic direction and operational oversight for WDFW employees throughout the state. I am asking you to elevate the importance of public participation throughout your organization. I look forward to your response and working with you in the future to address this issue. Please contact me at the address listed above, by phone 509-925-1936, or email [cnlcruse1@fairpoint.net](mailto:cnlcruse1@fairpoint.net). Thank you for your assistance.

Sincerely,

Lana Thomas Cruse

From: Dale Bambrick [mailto:dale.bambrick@noaa.gov]  
Sent: Friday, January 06, 2012 10:13 AM  
To: SEPADesk (DFW)  
Subject: Colockum Stray-Tekison Road Abandonment

Dear Mr. Zeigler: I am writing to convey my enthusiastic support for implementing the subject road closure project as proposed. As you are no doubt aware, most of the watersheds within the Colockum Region, including those with the Colockum Wildlife Area, are dominated by high densities of poorly located and un-maintained, native-surface roads. These roads appear to be counter productive to nearly every purpose that WDFW wildlife areas are intended to serve: they reduce habitat suitability for nearly all species of fish and wildlife, they degrade water quality, they reduce public enjoyment of the natural environment, and fixing them robs funds that could be put to projects that benefit fish and wildlife. In addition, the subject roads likely deplete (or eliminate) summer base flows by facilitating the rapid runoff of precipitation and snow melt and by discouraging the creation of beaver dams.

There are several relatively local examples where perennial flow has been restored to once intermittent shrub-steppe streams by altering grazing practices and closing roads. The subject road closure will compliment nicely the WDFW efforts in the last dozen or so years to better manage grazing across the Colockum wildlife area. No doubt some will argue that since the streams within the proposed road closure area go dry in most summers there is no productive ecological purpose for road closure. This is a short-sighted view. As noted previously, closing these roads will encourage beaver to recolonize these areas which may in turn restore perennial flow but at a minimum would form pools that would sustain fish and wildlife throughout the summer. Upper Columbia River steelhead, which are listed as threatened under the ESA, presently utilize all the accessible reaches of streams in the Colockum with sufficient flows to support them. While surveys of the area are not complete, we do know that juvenile UCR steelhead rear and overwinter in streams and stream reaches that later run dry within the Wildlife Area. It is likely that juvenile steelhead seasonally occupy significant portions of Tekison Creek and that use will likely increase commensurate with the flow and habitat improvements that will follow road closure.

Thank you in advance for considering these comments. Please let me know if I can provide further information.

RESPONSE TO COMMENTS:

Dale Bambrick, NOAA National Marine Fisheries Service

Thank you for your comments. We appreciate the work you do at NOAA Fish and your support for this project and concur that road closures of riparian roads would benefit watershed health and the stream's steelhead resources.

November 11, 2011

Pete Lopushinky  
Washington Department of Fish and Wildlife  
Colokum Wildlife Area  
9002 Tarpiscan Road  
Malaga, WA. 98828

RE: DNS WDFW Stray Gultch, Tekison Creek Road Abandonment, Colockum Wildlife Area

I want to go on record as adamantly opposed to the proposed Stray Gultch and Tekison Creek road closures.

The rationale cited in the description of proposal could literally be applied to every square yard of existing green dot roads in the entire LT Murray, Quilomene, Whisky Dick and Clockum Wildlife Area.

Therefore, it is imperative that further analysis and more important, face-to-face discussion occurs between WDFW and parties in opposition such as myself.

WDFW's rationale is not very persuasive as presented and I have not been adequately persuaded that these closures are necessary. The truth is.....they are unnecessary.

This closure proposal is quite frankly one more example of an evolution of road closures that have become part of a *misguided culture of land management* by WDFW.

The only "abandonment" necessary, is for WDFW to abandon this incessant pursuit of preventing the public from entering their lands for legitimate and lawful recreation. This recreation includes accessing our land by driving on our roads.

I want an open public forum on this issue with all culpable managers. There has not been an adequate public process and I expect this action to be put on hold immediately.

One of the issues most upsetting to me is that I have made it very clear that I expect to be a party of record on all issues in this area involving particularly road closure proposals. I found out about this by pure accident and I am going to assume that I was intentionally disregarded. Any discord by me regarding this can only be mitigated if I am assured that there will be a thorough and open vetting by the public before any further action is taken.

I am here to tell you that there is a "determination of **significance**" when you have members of the public who passionately use this area for their prime recreation and have not weighed in on your decision.

I can be contacted at one of the following:  
Dennis Ohlde, 15191 E. SR 106, Belfair, WA.98528  
360-731-2099 (cell)  
360-275-3409 (home)

Sincerely,

  
Dennis Ohlde

Cc: Greg Shirato, WDFW  
Ted Clausen, WDFW  
Bob Zeigler, WDFW  
Kittitas Field and Stream Club

RECEIVED  
NOV 14 2011  
HABITAT PROGRAM

RESPONSE TO COMMENTS:

Dennis Ohlde

Thank you for your written comments regarding the Stray Gulch and Tekison Creek Road Abandonment Project on the Colockum Wildlife Area.

WDFW has been working to identify and remove fish passage blockages, prevent or limit sediment delivery to fish-bearing waters and correct drainage problems on roads. This is very similar to the RMAP (Road Maintenance and Abandonment Plan) work being done in the forested areas of the wildlife area.

This project has been included in the Colockum Wildlife Area Management Plan (2006) and has been included in the 2007, 2008, 2009 and 2010 Management Plan Updates. All of these documents are available on the WDFW website ([http://wdfw.wa.gov/lands/wildlife\\_areas/management\\_plans/](http://wdfw.wa.gov/lands/wildlife_areas/management_plans/)). Public meetings were held in Ellensburg on August 25, 2009, Selah on August 26, 2009 and in Wenatchee on August 27, 2009 to discuss road management issues and these roads were specifically discussed. These meetings were announced on August 20, 2009 in a WDFW News Release. Citizen Advisory Group meetings have been held in Ellensburg and Malaga to discuss wildlife area issues, including these roads. These roads were also posted in October 2010 to notify frequent users of the area to possible road management changes.

The normal comment period under the SEPA process is two weeks. WDFW extended the comment period for this project to 9 weeks to allow additional opportunity for input.

Friday, December 23, 2011

Dennis Ohlde

15191 E. SR 106

Belfair, WA. 98528

Friday, December 23, 2011

Dennis Ohlde  
15191 E. SR 106  
Belfair, W A. 98528

Mr. Bob Zeigler  
SEPA/NEPA A Coordinator, WDFW Regulatory Services Section  
600 Capital Way North  
Olympia, WA. 98501-1091

SEPAdesk2(a),dfw.wa.gov

RE: WDFW STRAY GULCH, TEKISON CREEK ROAD ABANDONMENT,  
COLOCKUM WILDLIFE AREA DNR #11-073

Mr. Zeigler:

I want to take this opportunity to formally submit my appeal for you to deny #11-073: Colockum Stray-Tekison Road Abandonment-Kittitas County, signed 11-3-11. This effort being made by WDFW to close these roads to motorized traffic has been based on fiction writing orchestrated toward achieving the results they desire. The goal orientated fantasy science being utilized is part of a larger relentless pursuit by WDFW to diminish or eliminate motorized access to public land.

**In fact, some recent road closures in Kittitas County have been done with total deception and without disclosure to obvious constituents. The signs presently posted on these roads forbidding motorized travel are illegal.**

I asked for and attended a meeting on December 16, 2011 with WDFW employees Ted Clausing and Pete Lopushinsky. There were several other members of the public in attendance including Kittitas Field and Stream Club President, Lee Davis. This meeting was requested after an extension of the SEPA comment period was approved. The purpose of the meeting was for us to show evidence as to why Stray Gulch and Tekison Roads should not be abandoned as well as to seek enlightenment and clarity from WDFW as to why they say the proposed project is necessary.

We presented an impressive Power Point (you will receive a copy from another appellant) along with an aerial photo showing corresponding way-points. The Power Point was enhanced and followed by discussion of historical use of the area and the importance of recreation. We also suggested that the project as described is not justifiable

when compared to recreation lost. We recommended that WDFW resources should be used elsewhere.

Although the motorized access for recreation to this area is sporadic, occasional, and seasonal, it is nevertheless very important for those of us who enjoy it.

Ted Clausing knew that this meeting was planned and prescribed for a purpose. He set one rule for us to follow and that was to contain the meeting around the Stray- Tekison Road Closures. We followed that rule but Clausing didn't. He showed a list of WDFW land acquisitions on a chalk board that he must have hoped would mitigate our opposition to the closures. It doesn't. We expect to be addressing future road closures proposals in those areas as well.

Clausing provided no handouts, photos, copies of studies or any meaningful, professional analysis or discussion. This is a perfect example of why constituents in particular have become so frustrated and disenchanted with WDFW in the past several years.

This meeting was frankly a waste of time especially when I asked Clausing if he was the "decision maker" as to whether this project proceeds further. He said he wasn't going to change his mind and that we should go to the Regional Director, Jeff Tayer for an answer to that question. It is obvious that he intentionally sent us on an administrative "goose chase" to further confound the issue by imposing another layer of bureaucracy. Clausing knows that the Regional Director is not in the line of authority for any program in the Region, including lands. Except for what we presented, this meeting was void of any transparency or disclosure of any information for me (and you) to determine if this application contains reality or abstract reality. I am now more than ever convinced, it is the latter.

Here are specific points for you to consider:

- When we asked Ted Clausing if there are any anadromous fish in these streams he said "there are fish but no verified anadromous fish." Once again he provided no documents regarding the presence of fish ...period! If there is no **proof** of at least steelhead being present, the SEPA checklist as well as the RCO grant application are erroneous and **should be voided**.

Note: Reo Project Grant Application, Question #1 paragraph 3: *"Federally endangered upper Columbia Steelhead have been found in the lower reaches of Tekison Creek and young Chinook Salmon have been documented there as well"*.

- One of the slides presented in our Power Point presentation shows recent heavy equipment work in the stream-bed of Tekison Creek. If this work was conducted

This meeting was requested by Mr. Ohlde to present information to WDFW.

Thank you for the information you provided during the December 15, 2011 meeting. However, since the SEPA comment period was still open for all interested parties to comment on the proposal, it would have been inappropriate for WDFW staff to cancel this project as you requested.

The three sites chosen for electroshocking were within the perennial portions of each stream. The fish survey was done simply to determine the presence or absence of fish in these streams. A total of eighteen wild, juvenile rainbow trout (*Oncorhynchus mykiss*) ranging in size from 85-179 mm were captured, measured and returned to the stream. Rainbow trout found in this area represent an admixture of resident and anadromous life history forms. As you are probably aware, the anadromous life history form (steelhead) that inhabits this portion of the upper Columbia River is listed under the ESA as a "threatened species" and therefore requires a high level of protection (<http://www.nwr.noaa.gov/ESA-Salmon-Listings/Salmon-Populations/Steelhead/STUCR.cfm>.)

by WDFW either without an HPA or in violation of the provisions of an HPA, the application and RCO grant should be immediately **voided**. [see Reo WWRP Project Agreement-Rf'O #08-1528R Section H: "*COMPLIANCE WITH APPLICABLE STATUTES, RULES AND RCFB-SRFB POLICIES: "sponsor shall comply with, all applicable state and federal laws and regulations, Including Chapter 79A.15 RCW, Chapter 286 WAC"*]

- My interpretation of the archeological determination stated in the RCO grant application is that it was focused on pending construction to be done by WDFW with heavy equipment. [see Reo WWRP Project Agreement-Rf.O #08-1528R Section 10] The "study" did not address any concern for historical, present or future ordinary use of the road by motorized recreational travel. This contradiction is evident in the DNS vs. the RCO grant project summary. It is clear that an intentional manipulation of the "scientific" analysis has occurred in an effort to achieve the 2 ultimate goal of closing the roads. This is a reason by itself to **void** the application.

Note: The "study" was done by student archeologists. Do they have certified credentials?

- There is no location on Stray Gulch or Tekison roads where "water runs down the road" at any time of the year. In fact, the creek bed is dry most of the year. The allegation by WDFW that "water runs down the road" needs to be proven. If not, this application must be **voided**.

- There is a reference in the RCO (#08-1528R) project grant Question 4 paragraph 4 regarding a description of grazing being a degrading activity yet the document also states there has been no grazing in the area for 30 years. This is just one more example of fiction writing, embellishment and propaganda.

- For the purpose of recreation, Stray Gulch and Tekison Roads (to the upper ends of the roads) are destinations in themselves for the purpose of hunting, camping, wildlife viewing and exploring. Without the ability to drive up these canyons as a destination adventure, the journey to get there would be less appealing. Therefore, it's not just 1.7-miles and 2.5-miles of road respectively that are closed, it is the miles of recreation negatively effected in total that must be considered. This is the reality of why many of us are so passionate about this issue. The impact to my personal tranquility and peace of mind as it effects my recreation is not considered or measurable unless I express it. This is the essence of why I expect WDFW to recognize and respect my recreation and work for it on my behalf. Traditional camping use in this area will also be impacted by over 75% by closing motorized access to camp sites.

Eric Anderson, a WDFW fish biologist located a steelhead redd in the lower section of Tekison Creek on 3/26/2010. On April 10, 2010 Mr. Ken Dubb photo documented the presence of adult steelhead spawning in Tekison Creek. In 2007, while conducting steelhead spawning ground surveys in Columbia River tributaries, WDFW field crews found a steelhead carcass in the lower portion of Tekison Creek (Baldwin, C. M. 2007. Steelhead spawning ground surveys, temperature, and discharge monitoring in small tributaries of the Columbia River Upper Middle Mainstem Subbasin, 2005-2007. WDFW). Quoting from the discussion section of the report, page 39: "Even with limited spawning use, juvenile salmonids are known to rear in all of these creeks. Additional anecdotal information exists regarding the presence of juvenile salmonids, apparently including Chinook, in Brushy Creek and Tekison Creek. The temperature and flow data collected in this study shows that there is perennial rearing habitat available in virtually all these creeks. Even those that go dry in stretches had isolated pools that were supporting juvenile salmonids." WDFW is obligated to protect native fish and fish-bearing waters, whether the fish species is ESA listed or not.

This comment refers to road maintenance work done by WDFW 2.5 miles away from the road abandonment project. This work is not part of this project.

The principal investigator for the WDFW-commissioned archaeological study was Stan Gough, director of Archaeological and Historical Services, Eastern Washington University. It was done both to document the presence or absence of important cultural resources and to avoid impact to them during the implementation of this project.

Please see the photograph below, clearly showing water running down the Stray Gulch Road in May 17, 2011.



Water flowing down Stray Gulch Road, May 17, 2011.

• On July 1, 2011 the Washington State Legislature approved the implementation of the **Discover** Pass. The Legislature strongly asserted their expectation that the public was to receive tangible and enhanced recreation for the fee required. When the public pays a fee they expect to get a benefit back. Diminished recreation by way of these ill-advised road closure proposals and the elimination of a viable recreation is not within the spirit of what the Legislature intended. You should ask the Legislature if they agree with us.

WDFW is vested in recreation by way of its **Governance Themes** document and the **Discover** Pass. It is required and unavoidable that each and every WDFW employee must understand that it is part of their job to protect recreation whether they like it or not. The loss of recreation element must be addressed in your determination. Allowing staff to masquerade this point by saying that walk-in recreation is allowed, simply does not mitigate the greater loss.

While you are considering these basic points of my appeal, I will be following the money. Ted Clausing verified that all of the revenue generated from the Wild Horse Wind towers built on WDFW land is dedicated to the Wildlife Area. When I asked him a serious question about how much money the wind towers make, he answered by saying "it depends on how much the wind blows." I grew up in Ellensburg and I know the wind blows a lot. Does wind velocity really determine the amount of revenue received by WDFW from PSE? My instinct suggests that the wind towers provide a lot of money for WDFW .including an occasional surplus.

3

One of my many questions for RCO will be "Did WDFW come to you and ask for grant money for a project they could fund by themselves"?

I believe you too will find numerous contradictions between the statement in the grant application, the SEPA review and **reality**. I am therefore basing my appeal on the necessity to expose an incredibly incompetent rendering of the process. As you develop your final analysis, you must get past the smoke screen.

If all of the alleged science, archeological findings and statements in the SEPA are true and correct and not intentionally manipulated or embellished then I expect all parties involved would agree to submit to a formal deposition or be willing to sign a certified affidavit for the record. This needs to be facilitated prior to any conclusion of this appeal that favors WDFW.

I admit it is difficult for me to wrap my mind around the fact that you regulate and monitor from within the agency. Be that as it may, I guess you are also responsible for

There are more than 100 miles of primitive road open to motorized recreation on the Colockum Wildlife Area. It is approximately a two hour drive on very primitive roads just to reach the start of the road abandonment project. Numerous campsites will still be available for vehicle camping. Many people also enjoy recreational access and activities that are not tied to motorized vehicles.

Under the proposal, this portion of the Colockum Wildlife Area will remain open for recreation and will be enhanced for non-motorized forms of recreation. Proper land management requires a balance of resource protection and recreational opportunities. WDFW staff are well aware of the tradeoffs inherent in the agency's mission.

Only 9 turbines of the Wild Horse Wind Farm are located on WDFW property. The lease payments to WDFW are calculated as a percentage of power production for those 9 turbines. Revenues to WDFW do increase during years with more wind.

Grants from RCO and other sources are necessary for many of WDFW's acquisition, develop and restoration activities.

the agency's errors, omissions and exaggerations. Any of these should deem their SEPA application and their RCO project agreement **invalid**.

Please explain to me the next steps in this process and where I can continue to be involved to insure that this project is stopped and never again sees the light of day. I anxiously await your findings and response.

Sincerely,

Dennis Ohlde

~

Cc: Nate Pamplin, Wildlife Program Assistant Director [nathan.pamplin@dfw.wa.gov](mailto:nathan.pamplin@dfw.wa.gov)

Greg Shirato, [greg.shirato@dfw.wa.gov](mailto:greg.shirato@dfw.wa.gov)

Jennifer Quan, [Jennifer.quan@dfw.wa.gov](mailto:Jennifer.quan@dfw.wa.gov)

Ted Clausing, [ted.clausing@dfw.wa.gov](mailto:ted.clausing@dfw.wa.gov)

Pete Lopushinsky, Colokum Wildlife Area, [lopuspl@dfw.wa.gov](mailto:lopuspl@dfw.wa.gov)

Judy Warnick, 13th District House of Representatives

Kim Sellers, RCO Project Manager #08-1528R, [kim.sellers@rco.wa.gov](mailto:kim.sellers@rco.wa.gov)

Washingtonians for Wildlife Conservation

December 1, 2011

In the grand scheme of things a closure of less than four miles of road in an area of nearly 100,000 acres with hundreds of miles of wandering primitive roads would be rather insignificant especially considering the negative impacts of leaving the roads open.

These roads were created ages ago when motorized traffic (or any traffic for that matter) was less in one month than on an average weekend now. No considerations were made for resource impact or costs to maintain. With increased vehicle usage and the unsavory tendency of humans to make their own trails when roads are damaged old road usage decisions need to be reconsidered.

Reading the SEPA it is clear that some of the campgrounds will remain open although if the roads are closed campers will be required to hike not drive to a few of them. I really do not see an issue with this. Surely if one desire to camp in such a primitive area then walking a few extra paces to assure no one will drive though your camp should be an asset.

Blocking roads to prevent the spread of weeds in the riparian areas is definitely a good decision. Having been on the Douglas County Weed Task Force for many years and an advocate for weed management before that I know the main area of weed dispersal is along roads. Dragging weeds along on the undercarriage of vehicles and then driving across streams where seeds drop off and float can spread noxious weeds for miles downstream.

I also know from personal experience that motorized access creates problems with rare plants. As an expert on the *Pediocactus nigrispinus* that grow in the Colockum I have seen habitat has been damaged and plants removed. I have no doubt that this would extend to archaeologically sensitive areas as well. As a matter of fact archaeological experts such as Fred Blackburn, a noted historian of the Four Corners area and former BLM Grand Gulch employee says he's watched a number of sites across Utah go "from pristine to devastated" due to motorized access. I realize he is speaking about Utah but I believe the same is true here. If closing a few miles of road will help protect archaeological sites from damage whether intended or unintended then it should be done.

How much access is enough? One of the usually backlashes on road closures is what about people that cannot hike in, the old, the infirmed, the lazy. These roads have been open for decades it seems those that wanted to drive them either have or should have by now and let's face it we cannot always go everywhere we would like to. It is not realistic. If two old roads that have and will continue to create damage to the land, artifacts, water, fish and waste scarce public funds to repair after each rain if left open can be close to protect the afore mentioned then the decision is an easy one.

Dixie Dringman  
6551 Keane Grade

RESPONSE TO COMMENT LETTER

Dixie Dringman

Thank you for your support. It is our intention to address problem roads that impact important habitats and water quality while maintaining motorized access to the majority of the wildlife area.

Correct. Numerous campsites will remain open to motorized vehicle camping, both on Stray Gulch and Tekison Creek, just prior to where the closures begin. It will still be an approximately 2 hour drive on very rough, primitive roads to reach the vehicle campsites and the start of this road abandonment project.

Rock Island WA 98850

Gimlin Comment on 11-073 Colockum Road Abandonment DNS

[warren.gimlin@charter.net](mailto:warren.gimlin@charter.net)

Tue 11/29/2011 2:40 AM

#11-073 DNS: Colockum Stray-Tekison Road Abandonment - Kittitas County

Gentlemen,

I am against abandoning these roads as they are the only access to this good hunting area for persons with disabilities. there is no other way for myself or any other disabled persons to get into this area to hunt deer, elk or turkey.

Warren D. Gimlin

RESPONSE TO COMMENT EMAIL:

Warren D. Gimlin

Thank you for your comment. WDFW strives to balance public access for fish and wildlife-oriented recreation with protection of habitats.

01/04/2012 1:37 PM

Bob,

Thank you for the extended opportunity to comment on the Determination of Non Significance for the Colockum Road Abandonment. It is Trout Unlimited's belief that the seasonal road closure and abandonment of appropriate roads is the correct action taken to protect our elk, environment and the private lands in this region. As the study has proven the road closures in this area only benefit our publicly owned elk. It has been our experience and science has also proven that healthy ungulate populations and best hunting opportunities happen in "roadless" areas. Therefore we support the continued seasonal road closures and road abandonment.

We, being motorized sportsmen also recognize the need for motorized access, where appropriate. We drive into these areas to hunt and understand that maintained roads are necessary but when these routes become unnecessary, damaging, dangerous and duplicative we support the states efforts to close these roads. We also understand the idea of "greater good" and here the greater good for Washington's wildlife and its sportsmen is the closure of these roads. There are other simple ways to access this area and these roads are no longer needed.

Thank you again for this opportunity.

**Gregg Bafundo**

Washington Field Coordinator

Sportsmen's Conservation Project

206.276.4843

[gbafundo@tu.org](mailto:gbafundo@tu.org)

Thank you for your support. We agree that roads are necessary for reasonable public access.

--	--

--	--

--	--

