

July 21, 2012

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Mr. Zeigler:

We (Dennis and Arvilla Ohlde) are writing this letter to state our opposition to DNS #12-052 Whiskey Dick Road Improvement

I/we first heard about this project from another interested citizen in mid-April of 2012. I (Dennis Ohlde) wrote an email to Ms. Shana Winegeart on April 21, 2012 asking four (4) questions. Her return email to me answered only one question and I followed with one more attempt to seek an answer to my original inquiry. I received no further response from Ms. Winegeart. It is now apparent that there was a reason for the evasive response and perhaps I will now receive clarity through this process.

This Whiskey Dick Ridge road "improvement" project was/is undeniably linked to the Whiskey Dick Creek Road Abandonment pending project as stated in numerous documents.

The present separation of this project is being attempted by WDFW as a distraction from the truth. They cannot be separated or segregated as per what is in the best interest of environmental protection.

If WDFW claims that the ridge road "improvement" is intended to somehow mitigate the creek bottom road closure, this assertion is false. The truth is, there would be a net loss of legitimate dispersed recreation by eliminating motorized travel in the Whiskey Dick Creek bottom.

One of my (Dennis Ohlde) original questions for Ms. Winegeart was to ascertain the status of the Whiskey Dick Creek Road closure as per the agency following policy # 6012 regarding SEPA review of permanent road abandonment. I received no answer and re-affirmed that transparency is not a particularly dominate characteristic of the Region 3 WDFW management culture.

Every road in the Whiskey Dick/Quilomene falls into the same or similar category.

1. Directing any funds toward this project is an absolute waste of time and money.
2. Improving this road to increase motorized travel is in direct contrast to arguments made by WDFW for less motorized, elk disturbance, flora and fauna degradation etc. etc. etc. ---it is literally unbelievable that it is even being considered.
3. With the winter closure in effect, this road would only be open for nine months out of the year. Why was this road chosen for improvement when similar roads are open all year?
4. In order to justify "upgrading" this road, we assume that vehicle use "science" set the road apart as a priority for improvement. Is this data available?
5. This could be the most important element to show why this project should not continue. Road "improvements" that would make the eventual "footprint" at least 14' wide, requires regular maintenance. The scope of this cost into the future to maintain this road is totally unacceptable. Furthermore, common sense says that when this "improved" road inevitably is in need of repair WDFW will state the classic "budget crisis" or "lack of personnel and/or equipment" and the road will be closed to motorized traffic by design. The road as it now exists, has been traveled by motorized recreation for 75+ years. During this time it has never needed repair. Any closures

have occurred naturally because of weather or artificially by WDFW. When a road repair event occurs on the improved road for any reason the local land manager would then make a subjective decision to close the road under the veil of **DANGER**. All of this would then of course be labeled an **EMERGENCY** and public input would be conveniently disregarded. The road would then remain in a state of disrepair for months or years and only “authorized vehicles” would be allowed to travel on it. This eventuality is very realistic and it assumes we would entrust the present WDFW management with far more latitude than we are willing to allow them. They would essentially be able to do as they please to achieve their ultimate goal of closing ALL roads. Right now this road is OPEN, it is NOT DANGEROUS and it is AVAILABLE for motorized recreation if we choose. We are satisfied with it staying that way.

6. It is alleged by WDFW that Kittitas Field and Stream Club, the Rocky Mountain Elk Foundation, the Cattlemen’s Association and other members of the CAG are “partners” or in other ways culpable in this ill-fated adventure. We believe that the KCFSC and RMEF are specifically not supporting this project. We want to see letters of support or non-support that confirms or denies our assertion. We feel it is highly probable that CAG members in general expected this project to not be separated. We will be writing a letter to them sharing information that likely was not shown to them. They now deserve an extension to the SEPA reply that allows them time to respond to the new evidence.
 - a. We want to see proof that this project as described was vetted with the public as a separate, segregated and independent action/project from the Whiskey Dick Creek Road Closure segment.
7. The embellished narrative to “justify” this project when contrasted with the “narrative” to abandon a road e.g. Tekison/Stray Gulch, is counter intuitive. For example---we are supposed to believe that traditional, historic, motorized recreation travel is potentially damaging to archaeological sites but road grading and graveling by heavy equipment to make a new 12’ + road on Whiskey Dick Ridge is okay---and the Yakama Nation endorses it!?

SPECIFIC TO THE COMMENTS STATED IN THE DNS:

A-7: Connected Projects: If we are to believe that these projects are legitimately separate, where do the 1.7-miles of “obliteration” of the steep upland connector road from the ridge to the creek come into play? We are demanding that this 1.7-miles of road NOT be OBLITERED or closed for motorized recreation travel under any circumstances as stated in public documents by WDFW as a part of the 4-miles of improvement of the Ridge Road!

A-9: Pending Approvals Affecting Project Property: The answer to this question is YES. This project is linked to the RCO approval of Whiskey Dick Creek Restoration 10-1352 which links the two actions as stated in the project description. WDFW is awaiting funding approval as an alternate project in the ranked list. This point is unavoidable in consideration of the continuation of this proposed joint project.

A-10: Permits: WDFW needs a Kittitas County Grading Permit, Vegetation Management Plan and they are required to follow the Critical Areas Ordinance.

A-11: Project Description: We want to note that WDFW states that they have successfully negotiated with the Yakama Nation to address impacts to documented archaeological cultural sites and the method for mitigation is the placement of a cover of geotextile and rock over fabric on the road. Please attach a copy of this agreement. We want a copy of the archaeological report, supported by the Yakama Tribe, as referenced in the DNS.

B-1e: Filling and Grading: In your description of excavating water bars and the subsequent placing of fill material on the road, does this eradication, under the guise of reparation, address or mitigate seasonal run-off of water over the roadway or points beyond?

Does your engineering technique of placement of imported crushed rock to cover muddy or dusty areas actually prevent sediment and siltation impacts? Please state examples of locations on the LT Murray where this has been done before. (As described in B-1h and restated in B-3/2c [*“Improving road drainage and preventing sediment runoff is the purpose of this project”*])

B-3a2: Work in Adjacent Waters: In your statement regarding proximity to the Whiskey Dick Creek you state that it is within 200’ of the Creek. The Whiskey Dick Ridge Road is not within 200’ of the creek; therefore as stated previously the Whiskey Dick Ridge Road Improvement is linked to the Whiskey Dick Creek Abandonment. If this project does in fact lie within 200’ of the Whiskey Dick Creek THEN this project does include the “obliteration of the 1.7 miles of the steep upland connector road?” We are opposed to this road “obliteration.”

B-3d: Measures RE: Water Impacts: Can we assume that in the long term appropriate engineering design methods are available to prevent siltation that will result in reducing stream erosion and road sediment problems in the future? Please describe. State examples for similar comparison.

B-4a: Plant Listing: Ms. Winegeart provides an extensive listing of plant life to be allegedly saved in the Whiskey Dick Creek Restoration project (RCO public document 10-1352). We want to see a list of native plants that will be “obliterated” by clearing a 14+’ swath across Whiskey Dick Ridge for four miles.

B-4b: Vegetation Impact: When heavy equipment including huge road graders and caterpillars clear a swath of 14’ for multiple miles of historic shrub-steppe vegetation, do you expect anybody with even layman’s common sense to believe that shrub-steppe and wildlife habitat of all phases and varieties will not be destroyed. This project must have a Vegetation/ Wildlife Management Restoration Plan that mitigates the impact to the natural environment

B-4c: ESA Plant Species: Ms. Winegeart provides an extensive listing of plant life to be allegedly saved in the Whiskey Dick Creek Restoration project (RCO public document 10-1352). We want to see a list of ESA listed plants that will be “obliterated” by clearing a 14+’ swath across Whiskey Dick Ridge for four miles.

B-4d: Preserve/Enhance Vegetation: We will need to see proof that “willows, rose, hawthorne and serviceberry” are native vegetation and have a chance to survive in this ridge-top shrub-steppe environment.

B-5a & b: Animals & Threatened/Listed: When we review the narrative Ms. Winegeart uses to describe species in general in the Whiskey Dick Wildlife Area that will allegedly be saved by road abandonment vs. the ridge top where she essentially wants to bulldoze a new road, the contrast is frankly remarkable. It is too lengthy to address here but we would recommend that you consider this a classic example of what we call “fiction writing to meet the needs of the project or document.” In that document Ms Winegeart speaks in broad generalities of species of special status that live in the general area, not making a distinction for creek bottom or ridge tops. We find it fascinating that when she wants to clear a broad swath to make a new road on this project, these species are no longer embellished. This is what we call fantasy science written to achieve an intended goal oriented outcome.¹

B-5b: Fish: We want to review valid documents of truth showing that trout and steelhead are on or near the Whiskey Dick Ridge Road.

¹ RCO Project 10-1352 project narrative #4-paragraph 1: Species or Communities with Special Status in the Whiskey Dick Wildlife Area.

B-5d: Measures to Preserve and Enhance Wildlife: Making this road “more desirable to drive” is not our goal. By this statement, WDFW is saying that a road made “more desirable to drive” does not have an impact to wildlife, but will “enhance and preserve”. Interesting!

B-8a: Current Use of WA: This statement is somewhat refreshing. We need to remind Ms. Winegeart that wildlife- oriented recreation as stated by Ms. Kuykendall includes motorized recreation.

B-8l: Compatible with existing /projected land uses/plans: This reference in the Whiskey Dick Wildlife Area Plan is another example that shows this project is linked with the Whiskey Dick Creek Road Abandonment.

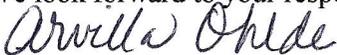
B-12a: Recreation Opportunities in vicinity: This description is incomplete and not inclusive of the identified existing uses of dispersed recreation. As per WDFW Environmental Assessment² the document describes recreation uses to include: “day uses, such as walking, hiking, wildlife viewing, hunting, bicycling, horseback riding, and driving on open roads” and further, “The WDFW Wildlife Areas fill a special niche for state tourism and play an important role as places for outdoor recreation, providing excellent hunting, fishing, hiking, camping, wildlife viewing, biking, horseback riding, sightseeing wildflower observations, cross country skiing, motorized vehicles, dog trials and shooting ranges, etc.” and “WDFW primarily provides opportunities for dispersed recreation activities. Most parcels are forest or shrub-steppe in character.” As per the referenced WDFW document these existing recreation opportunities must be listed in the DNS to be complete.

B-13-c: Historic/Cultural Preservation: The statement regarding location of the project improvements is that it will be on “previously disturbed sites, such as roadbeds or directly adjacent to the roads”. In 13-b it was stated that this area has “identified culturally important sites throughout the project area.” If the road improvement project does not proceed, would motorized recreation on the Whiskey Dick Ridge Road ultimately be identified for closure because of cultural disturbance from historical use of the traditional road?

14-f: Transportation/vehicular trips per day: No new traffic!? This will increase traffic, including motor homes, campers and tour buses, similar to NW Trek and WDFW can be the tour guide! ---COME ‘N’ COUNT THE ELK! The Kittitas County Visitor Bureau tri-fold colored brochures will match the Wind-Tower Brochures and traffic will increase 100-fold. If you doubt what we are saying then you need to complete a traffic study before you consider offering a prize to the #80,000 visitor!

All of the foregoing points, when reviewed in total should stand as clear evidence that this project should not proceed forward. However, we want to single out one very important point for your summary consideration. The whole project (Whiskey Dick Ridge and Whiskey Dick Creek Road) is to be considered under one SEPA action. We are hereby challenging the segmentation of the larger action (or project) into segments. This is not allowed under SEPA.

We look forward to your response.



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² Draft Environmental Assessment WDFW Land Exchange Project-Phase 2