

Dennis and Arvilla Ohlde,

Thank you for your comments regarding the Whiskey Dick Road Improvement Project SEPA. There seems to be some confusion between three different project proposals, which I would first like to clarify before answering the specific questions from your letter:

I. RCO grant – Whiskey Dick Creek Restoration – In 2010 I applied for an RCO grant to improve water retention and vegetation in Whiskey Dick Creek. It was not funded and is not currently being pursued. The grant is not related to the Whiskey Dick Ridge Road project.

II. Whiskey Dick Wildlife Area Road Management – When closure of the Creek Road was first proposed, the idea was taken to the Citizen Advisory Group (CAG) for review.

An excerpt from the 11-21-06 CAG meeting notes: *“Bill Essman expressed support for the proposed changes, but said he expected resistance by the public (regular users), particularly with regard to closures of portions of Quilomene Bay and Whiskey Dick Creek Roads.”*

Excerpt from the follow-up Bill Essman memo titled ROAD CLOSURES ON WDFW WHISKEY DICK, QUILOMENE, SKOOKUMCHUCK & COLOCKUM WLA’s: *“We support closure of the Whiskey Dick Creek Road from T17N;R21E;S12 to T17H;R22E;S4 (intersection with the Pump House Road), **IF IMPROVEMENTS ARE MADE TO THE RIDGE ROAD**”*

These two road projects were joined as a single proposal for the purpose of maintaining public access, as suggested by the CAG. However, improvement of the Ridge Road is not a mitigation measure related to closing the Creek Road (no mitigation is required) and either project can stand alone. The proposal to close the Creek Road and improve the Ridge Road has now been in the Wildlife Area Management Plan since 2006.

III. Whiskey Dick Ridge Road Improvement

In 2011, capital funds were allocated to “Improve Roads in the Whiskey Dick Wildlife Area” therefore the Whiskey Dick road project in the Management Plan was selected for implementation. However, a recent cooperative planning effort between WDFW and DNR has just begun to evaluate recreation management in the Naneum Basin and the Colockum, Quilomene, and Whiskey Dick wildlife areas. This process is currently underway, and incorporates input from a 15-member citizen panel including representatives from Rocky Mountain Elk Foundation (RMEF), Kittitas Field and Stream Club, Wenatchee Sportsmen, and numerous other recreational interest groups. WDFW opted to let the Whiskey Dick Creek Road closure decision be evaluated as part of the recreation planning process, but opted to move forward on the Whiskey Dick Ridge Road improvement since it would be a public benefit even if the Creek Road proposal was not implemented.

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 20 12. 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.

Please see page 1, Heading II

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.

Please see page 1, Heading II

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.

Please see page 1, Heading II

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.

Improvements to the Ridge Road are not proposed for the purpose of increasing traffic, but to apply allocated road improvement funding. The Ridge Road has several sections that are steeply out-sloped, and while the clay soils are navigable in dry conditions, they become dangerously slick when wet. The road will not be improved to a quality that will make it comfortable for sedans or RVs to travel, so an increase in non-traditional users is not expected, nor is it being promoted.

All roads cause some level of wildlife and/or habitat impacts. Land managers aim to locate roads in areas that cause the least amount of disturbance, while still allowing public access. The Whiskey Dick Ridge Road was selected for improvement based on its quality of being 1) the primary southern access into the Whiskey Dick Wildlife Area, 2) a direct tie to Kohler Spring, which is a popular destination for hunters and recreationists, and 3) a connective route to other Green Dot roads. The Ridge Road creates less wildlife/habitat impacts than the Creek Road, and even if the Creek Road project is not implemented, the Ridge Road would still need improvement.

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?

Please see page 1, Heading II.

This road was selected for improvement based on its quality of being a road that 1) is the primary southern access into the Whiskey Dick Wildlife Area, 2) ties in to Kohler Spring, which is a popular destination for hunters and recreationists, and 3) provides connectivity to other Green Dot roads.

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?

Please see page 1, Heading II.

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.

Please see page 1, Heading II.

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.

Please see page 1, Heading II and Heading III.

In 2011, capital funds were allocated to “Improve Roads in the Whiskey Dick Wildlife Area” therefore the Whiskey Dick road project identified in the Wildlife Area Management Plan was selected for implementation. However, a recent cooperative planning effort has just begun to evaluate recreation management in the Naneum Basin and the Colockum, Quilomene, and Whiskey Dick wildlife areas. This process is currently underway, and incorporates input from a 15-member citizen panel including members from Rocky Mountain Elk Foundation (RMEF), Kittitas Field and Stream Club, Wenatchee Sportsmen, and numerous other recreational interest groups. WDFW opted to let the Whiskey Dick Creek Road closure decision be evaluated as part of the recreation planning process, but opted to move forward with improving the Whiskey Dick Ridge Road since it would be a public benefit even if the Creek Road project was not implemented.

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!?
- The project will not entail construction of a new road – the road already exists.

The cultural resource site identified for protection with rock and fabric is an existing site not located on the Ridge Road. It was located during a previous project’s survey, and with this capital funding WDFW felt protecting this site was the right thing to do. The intent is to protect the site by armoring it with rock so the road can stay open.

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!

The Creek Road aspect of the project was removed, but the SEPA language was not updated to correctly reflect this change in scope. The Ridge Road SEPA document will be updated to reflect that only improvements to the Ridge Road are part of the project.

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.

See page 1, Heading I.

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

All required documentation will be in place prior to starting work.

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.

The cultural resource site identified for protection with rock and fabric is an existing site not located on the Ridge Road. It was located during a previous project's survey, and with this capital funding WDFW felt protecting this site was the right thing to do. The intent is to protect the cultural resource site by armoring it with rock so the road can stay open.

Due to the sensitive nature of cultural resource sites, archaeological reports are not open to public review.

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"*])

Use of water bars to manage run-off water is a commonly applied Best Management Practice (BMP), and has been implemented in numerous RMAP projects, grant projects, and road maintenance projects throughout the L.T. Murray Wildlife Area. Water bars direct water off the road prism to reduce pooling and rilling.

In places where water may have pooled in the past, a water bar will be installed to direct water off the road. In areas with sufficient soil, the site may be covered with crushed rock to armor the new construction and reduce dust. The three fords up Parke Creek were recently armored for similar reasons.

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."

The Ridge Road improvement project extends from the ridge top down to within 100' of the eastern end of the Creek Road (near the intersection with Cayuse Road). The project will stop within 100' of the Creek Road, but will not entail work on the Creek Road.

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.

No erosion or sediment delivery to streams is expected on this project.

See response to B-1e above.

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.

A "14+' swath across Whiskey Dick Ridge for four miles" is not proposed.

Please see page 1, Heading I

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

Road work that would “clear a swath of 14’ for multiple miles” is not proposed. The road already exists, and planned improvements are not expected to cause significant changes to its appearance on the landscape.

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 10-13 52). 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.

A “14+’ swath across Whiskey Dick Ridge for four miles” is not proposed.
Please see page 1, Heading I

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.

Please see page 4, subsection A-7

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

See page 1, Heading I.

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.

Please see page 4, subsection A-7

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!

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All roads cause some level of wildlife and/or habitat impacts. Land managers aim to locate roads in areas that cause the least amount of disturbance, while still allowing public access. The Whiskey Dick Ridge Road was selected for improvement based on its quality of being 1) the primary southern access into the Whiskey Dick Wildlife Area, 2) a direct tie to Kohler Spring, which is a popular destination for hunters and recreationists, and 3) a connective route to other Green Dot roads. The Ridge Road creates less wildlife/habitat impacts than the Creek Road, and even if the Creek Road project is not implemented, the Ridge Road would still need improvement.

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

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.

Thank you for your comment

B-81: 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.

Please see page 1, Heading II

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.

It is not disputed that numerous recreational activities occur on the landscape. An exhaustive list is not required since the proposed action will not detract from these recreational uses, but will enable them to continue in a safe manner.

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?

No

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!

Improvements to the Ridge Road are not proposed for the purpose of increasing traffic, but to apply allocated road improvement funding. The road will not be improved to a quality that will make it comfortable for sedans or RVs to travel, so an increase in non-traditional users is not expected, nor is it being promoted.

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.

Please see page 1, Heading II

² Draft Environmental Assessment WDFW Land Exchange Project-Phase 2