

Comment from Kittitas Audubon

From: Jim Briggs <jbriggs@fairpoint.net>
Sent: Thursday, January 09, 2014 10:19 AM
To: SEPADesk2 (DFW)
Cc: Director (DFW); Ellison, Becki (PARKS); Schirato, Greg (DFW); Clausing, Ted A (DFW); Commission (DFW)
Subject: DNS 13-082: WHISKEY DICK WILDLIFE AREA SEASONAL ROAD CLOSURE

January 9, 2014

Bob Zeigler
SEPA/NEPA Coordinator, WDFW Regulatory Services Section
SEPADesk2@dfw.wa.gov

RE: DNS 13-082: WHISKEY DICK WILDLIFE AREA SEASONAL ROAD CLOSURE

Dear Mr. Zeigler:

Kittitas Audubon submits the following comments on the DNS 13-082: WHISKEY DICK WILDLIFE AREA SEASONAL ROAD CLOSURE. Previously, Kittitas Audubon submitted comments to the Naneum Ridge to Columbia River Recreation Plan of which the Whiskey Dick Wildlife Area is a part. In those comments, Kittitas Audubon expressed support for maintaining the closure of the Whiskey Dick winter range to motorized access from Feb. 1 to April 30. We would like to reiterate that position in the comments submitted to this SEPA.

The proposal for changing the closure to motorized access on all roads in the winter range to opening one through road from the Quilomene Ridge Road to Gingko State Park is not justified by the accompanying SEPA Checklist. Neither is a persuasive rationale provided in the summary or Checklist why this road should be opened during the closure to motorized access now as a change from the management action of the last five years. The Checklist does, however, provide clear evidence and support based on science why motorized access on roads in the winter range should be prohibited during Feb. 1 through April 30. To highlight the science-based information in the Checklist:

- 1) WDFW personnel have conducted a multi-year study of elk movements by tracking collared elk and determined the use of the winter range and migration patterns to and from it. The winter range provides a low elevation, relatively snow-free area for forage habitat for elk that are now excluded by agriculture and development from former winter range in the valley bottom.
- 2) WDFW's own elk and deer specialist, Dr. Scott McCorquodale, concluded from the data on elk condition from the multi-year study that the Colockum and Yakima elk were in marginal physical condition in mid to late winter, coinciding with the Feb. 1 to April 30 closure to motorized access. He also reviewed the published scientific research on the response of elk associated to traffic on open roads. Some of those studies found that elk altered their habitat use in response to the disturbance from motorized use of roads and determined the distances to which elk moved away from roads. During critical winter months when forage is scarce and body condition of the Colockum elk is marginal as Dr. McCorquodale concluded, the

elk will be unnecessarily stressed and expend energy reserves to move away from a road open through the winter range.

- 3) Conversely, the multi-year study by WDFW field staff of the Colockum elk herd (2008-2012) showed that elk became less sensitive to road proximity after motorized access was prohibited. Currently, the seasonal restriction of motorized vehicles from Feb. 1 to April 30 on the winter range combined with other management strategies have resulted in decreased numbers of complaints from private landowners about elk damage to hay and crops. This result demonstrates the effectiveness of this management strategy that benefits local landowners as it was intended.
- 4) Furthermore, WDFW contracted a public opinion survey in 2008 that showed that a majority of hunters (74% to 84%) strongly support road closures during critical periods to maintain healthy game populations. In fact, the closure implemented on the Whiskey Dick winter range is very short compared to other closure areas and is only a closure to motorized access—walking and horse riding is not restricted during the closure period as it is on other winter closure areas.

A disturbing element of this proposal to open a through road is the inclusion of a stretch of almost three miles of road through Gingko State Park lands. This would appear to require some acknowledgement in the SEPA that State Parks has agreed to this action. Recognizing that Washington State Parks is operating under severe budget constraints, requiring the Park to open a road that currently has a locked gate is an imposition and lacks consideration of that agency's management policies. There are archaeological resources as well as petrified wood at Gingko State Park in the area along the road that are vulnerable to theft or damage. Washington State Parks is understaffed and underfunded for monitoring and protecting those resources, particularly during the winter. Keeping the road closed to all but permit holders and administrative use may be the only means the Park has to ensure that protection at this time.

Monitoring and enforcement capability by WDFW is addressed inadequately in the SEPA for the proposed open road as well. It is known from the multi-year Colockum elk study that the voluntary road closures during the Feb. 1 to April 30 are ignored now by some drivers and would be so for the road to be opened by this proposal. The SEPA does not identify new funding and increased enforcement staff and monitoring frequency that would be required to implement the closure.

The degradation of terrestrial and aquatic habitats due to erosion and widening of the road bed from driving on this primitive, nonstandard road during the wet months of the year may conflict with the Habitat Conservation Plan (HCP) objectives for listed species in the area that WDFW is developing with the U.S. Fish and Wildlife Service (USFWS). The SEPA summary and Checklist make no mention of the restrictions that the USFWS may require on management actions that may preclude continuous use of this road.

The "Determination of Nonsignificance" made in this SEPA is inconsistent with and contradicted by the facts and science presented in the SEPA Checklist. No compelling rationale or justification for opening a through road from the Quilomene Ridge Road to Gingko State Park

during the winter closure from Feb. 1 to April 30 is provided in the SEPA summary or Checklist. The SEPA Checklist does provide the facts and science that support maintaining the closure to all motorized access on the Whiskey Dick winter range over its entire area for the period from Feb. 1 to April 30 as has been done for the last five years. No change from that strategy is warranted or supported.

Finally, it is worth commenting that the posting of this SEPA over an extended holiday period is likely to limit comments, some that might oppose the determination of nonsignificance. Since the overall Naneum Ridge to Columbia River Recreation Plan is also addressing the winter range options and scheduled to conclude by summer 2014, it seems contrived to rush to establish a different management strategy for this season. The closure can and should be maintained as it has been for the previous five years. There may or may not be a different management strategy when the Recreation Plan concludes.

Kittitas Audubon would like to reiterate once more our support for prohibiting motorized access to all roads in the Whiskey Dick winter range from Feb. 1 to April 30.

Sincerely,

Kittitas Audubon Board of Directors
Jim Briggs, President
P.O. Box 1443
Ellensburg, WA 98926

C: Phil Anderson, Director WDFW, director@dfw.wa.gov
Washington State Parks Commission, Commission@parks.wa.gov
Greg Schirato, Dep. Dir. Wildlife Program, Greg.Schirato@dfw.wa.gov
Ted Clausing, Regional Wildlife Manager, Ted.Clausing.@dfw.wa.gov
WDFW Commission, commission@dfw.wa.gov