

David Knibb Comment

From: David Knibb <dknibb@mindspring.com>
Sent: Sunday, January 12, 2014 11:52 AM
To: SEPADesk2 (DFW)
Cc: Director (DFW); Ellison, Becki (PARKS); Schirato, Greg (DFW); Clausing, Ted A (DFW); Commission (DFW)
Subject: Whiskey Dick Wildlife Area Seasonal Road Closure

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:

I would like to comment on the proposal announced two days before Christmas to maintain a seasonal closure, but to open for motorized use during that closure one road through the Whiskey Dick Wildlife Area and Gingko Petrified Forest State Park. For the reasons explained below, you should keep all roads closed during the February-April period.

I do not live in Kittitas County, but I have hiked in this area, written about it, and am familiar with it. I suspect you are receiving numerous comments from local residents who would like to use this area for their own purposes. As a former Forest Service employee based on a rural ranger district, I know what those local pressures can be like. I hardly need to remind you that these are lands managed by the state for state purposes. I will rely upon your professionalism to manage these lands in the interest of the state.

It is important to put this proposal in context. From a wildlife perspective, these lands are unique. When officials evaluated the North Cascades as a potential grizzly bear recovery area, they were concerned that most snow-free spring range in the Cascades was also heavily used by humans. The Colockum Wildlife Area and the two wildlife areas adjoining it were the one exception. This was the only place in the Cascades where you still could walk from mountaintop to riverbank without crossing a highway or railroad. And it still is.

The Colockum was excluded from the grizzly bear recovery area, but Curt Smitch, who was then Fish and Wildlife Department director, assured state and federal land managers that “the way we manage the Colockum is consistent with the way we would manage for grizzly recovery.”

In short, this area offers the only spring range in the North and Central Cascades that is relatively free of human activity. Not only is this critical for elk, bighorn sheep, and other ungulates, but for a variety of other wildlife, including, potentially, grizzly bears.

As a former forester, I am certainly familiar with the concept of multiple use. But these lands were bought years ago and have been managed ever since primarily for wildlife. That should continue to be their primary use, and any other uses should be allowed only insofar as they do not compromise the use of these lands for wildlife.

With these general points in mind, let me mention six specifics.

1. The period from February 1 to April 30 is critical for wildlife. Scarce forage stresses ungulates. Pregnant elk cows are about to calve (starting mid-May). Whiskey Dick and Ginkgo State Park are among the few areas available to them that are relatively snow-free and disturbance-free. Hence, these areas are especially important to elk, mule deer, and the bighorn sheep I have observed there.

2. Motorized access during this period will reduce use of this area by wildlife. Studies show that elk are sensitive to the presence of motor vehicles. Per the 2013 study by Dr. Scott McCorquodale, "A Brief Review of the Scientific Literature on Elk, Roads, and Traffic", cited in your SEPA Checklist: "The scientific evidence is compelling that disturbance associated with traffic on open roads can strongly affect elk distribution and limit use of even highly preferred habitat near roads."

3. This scientific evidence supports your proposal to keep most roads in the area closed, but your proposal to open the road from Quilomene Ridge through Ginkgo State Park during the months of February through April flies in the face of this evidence.

4. Depending on the width of the disturbance zone created by opening this road, it could make most of the Whiskey Dick Wildlife Area "off limits" to elk during the critical Feb-April months. If elk were already in the area – as they likely would be because it is some of the best winter range -- they would move out when motor vehicles moved in. If they moved south, they could end up as road kill on the Vantage Highway or Interstate 90.

5. The proposal does not address how much your agency or the State Parks Department would patrol this area during the Feb-April period. Such patrols would be needed to keep vehicles from driving around gates to use other roads or to use the many unauthorized roads already created by users in this area. It is much easier to keep motorized traffic out of the area entirely during a seasonal closure than to confine that traffic to designated roads. Given the budget constraints on state agencies, you would be relying mostly on an "honor system" by users to stay on the right road. Most would comply, but those who do not could cause much damage.

6. Feb-April is the spring thaw when roads are soft. Allowing motorized use of any unpaved roads during that period will create ruts, bogs, user-created bypasses around bad spots, and erosion. The overall effect would be to widen the area impacted by the road.

Thank you for considering my comments. I support keeping all roads closed to motorized use in the Whiskey Dick winter range from Feb. 1 to April 30.

Regards

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