



Washington Native Plant Society

Appreciate, Conserve, and Study Our Native Flora

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January 11, 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,

The Washington Native Plant Society appreciates the opportunity provided by Washington Department of Fish and Wildlife (WDFW) to comment on the proposal to restrict the use of motor vehicles within portions of the Whiskey Dick Winter Range during February, March, and April of 2014. Our organization supports the continuation of complete winter road closure in the Whiskey Dick Wildlife Area. We are concerned that the 2014 proposal increases motorized access beyond what has been allowed for the past 5 years and that the DNS and environmental checklist do not address this change. Our comments include additional information relevant to DNS 13-082 and the accompanying Environmental Checklist that we would like considered.

The Washington Native Plant Society (WNPS) promotes the appreciation and conservation of Washington's native plants and their habitats through study, education, and advocacy. Because remaining high quality shrub-steppe habitat is very rare in Washington, our organization emphasizes its conservation. We value qualitative as well as quantitative properties of the shrub-steppe, recognizing that damaged habitat is unlikely to ever be restored. We are pleased to see that the DNS recognizes that shrub-steppe is the dominant habitat in the Whiskey Dick Wildlife area and notes that protecting and restoring native plant communities is a management goal for the L.T. Murray/Quilomene/Whiskey Dick Wildlife Areas.

WNPS interest in the Whiskey Dick Wildlife Area is based on its history, which includes complete exclusion of domestic livestock since 1986. Between 2007 and 2009, members of WNPS made quantitative observations of vegetation richness and cover of the Whiskey Dick Wildlife Area. These observations revealed a rich diversity of native plants, and an extensive plant list for the area has been developed by our botanists. Partly as a result of our investigations, the WDFW established a moratorium on grazing in this area for at least 20 years.

The grazing history cited above makes the Whiskey Dick a valuable study site, which may be compared with nearby shrub-steppe areas recently and currently being grazed. The relative impacts of elk grazing alone, as compared with grazing by both elk and livestock, for example, might be studied.

WNPS is concerned that this proposal does not include any references, positive or negative, to impacts on the Threatened, Endangered, and Sensitive (TES) plant species and habitats within the Whiskey Dick Wildlife Area. As presented the proposal focuses on "increased protection and security for wintering big game" while providing "maximum recreational opportunities that are consistent with wildlife protection". WNPS supports the DNS conclusion that continuing the program of road closures in the area is justified by science. WNPS would like to see an acknowledgement that the decrease in protection (as compared to 2008-2013) provided by this proposal may negatively impact the area's native plants by decreasing the elk population, increasing erosion,

and increasing motorized access. Negative impacts to native plants, including TES species, is counter to the area’s management goals, research opportunities, and to recreational botanizing, an activity of high interest to our membership.

In order to adequately assess the consequences of this proposal the DNS process should acknowledge potential impacts of increased motorized access on TES plant species. To do so, these plants must be recognized in the environmental checklist (see Appendix). The management plan for native and TES plant species should recognize the importance of maintaining an elk population that supports environmental function as science increasingly supports a relationship between browsing and native vegetation patterns.

In summary:

- The DNS indicates a scientific basis for continuing winter road closures within the Whiskey Dick Wildlife Area.
- The DNS does not adequately assess the full impacts of the 2014 proposal. Instead of considering impacts in comparison to the practices of the last 5 years of complete road closure, impacts are considered on a historic practice of open roads. The DNS is based on an assumption that partial road closure will be no less beneficial than the complete road closures that have resulted in increased health of the elk population and beneficial consequences for nearby farmers.
- The DNS does not acknowledge potential impacts to native plants including impacts related to disturbance of the elk population, erosion, and a possible increase of unauthorized motorized access to the area’s native plants and plant communities.
- The Environmental Checklist should include the rare plant species and communities that are present.
- WNPS would like recognition of “botanizing” as a specific recreational activity (such as hiking or “shed antler hunting”) and an acknowledgement that, like hunting, botanizing is an activity that merits protection of public resources – in this case preservation of native plants.
- The short comment period over the holidays has been insufficient for adequate consideration of this proposal. Information provided by WDFW indicates that the decision to discontinue the area’s complete road closure was made in response to concerns of a limited group of stakeholders.

While we are concerned that WDFW has not allowed adequate time for appropriate communication with those who are interested in this issue, we appreciate this opportunity to work together for the benefit of Washington’s public lands and people.

WNPS commends WDFW’s vision of leaving “a legacy of healthy forests, clean water, thriving ecosystems, and a vibrant natural resource-based economy” and for its commitment to base decisions on science, data, and information.

Best regards,

Rebecca Chaney, Conservation Chair
Washington Native Plant Society

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Appendix

Rare plants found in or near the Naneum Ridge to Columbia River Recreation Area

Assembled by WNPS member Don Knoke

Source: Field Guide to the Rare Plants of Washington by Pam Camp and John Gamon
& David Giblin, Collections Manager of the University of Washington Herbarium

A large portion of the recreation planning area includes various shrub-steppe plant communities. In eastern Washington, more than half of the area originally occupied by native shrub-steppe vegetation has been converted to agriculture or development. What remains of the original shrub-steppe is highly fragmented, occurring as isolated remnants that will undoubtedly undergo further degradation and loss of function over time. Few large areas of protected shrub-steppe vegetation remain in eastern Washington. The planning area is one such area that provides large protection to these rare plants and plant communities as well as good quality habitat for various birds and wildlife. Many of the plants listed below can be found in this sensitive shrub-steppe vegetation. The planning area also includes portions of the Wenatchee Mountains. Botanists have long known that the Wenatchee Mountains are home to an unusually large number of endemic and rare plants.

Populations of several of these species are quite small and increasing human activity in previously undisturbed areas can have a detrimental impact on these sensitive plant and animal communities. In some cases a population could be extirpated by road building or off-road vehicles. All recreational activities need to be evaluated to ensure that the good quality shrub-steppe areas are maintained. It is also important to take in consideration the cumulative impacts of adding more recreational opportunities to the already sensitive native plants, birds and wildlife found throughout the planning area.

The plant list below includes plant species known to grow in or near the Naneum Ridge to Columbia River Recreation Area. Many of these plants are considered Critically Imperiled, Endangered, or Sensitive in Washington.

Critically Imperiled

- *Isoetes minima*
 - Small population not far from Colockum Road at higher elevation; grows in open, moist areas (from David Giblin)

Federal Endangered

- *Sidalcea oregano var. calva*
 - A few known populations in the northern part of the area; grows in moist meadows.

State Threatened

- *Delphinium viridescens*
 - Commonly found with the *Sidalcea oregano var. calva* in the northern part of the area; grows in moist meadows
- *Anemone nuttallianum*.
 - Known to grow near the northwest boundary of the area; grows in open, rocky areas.
- *Potentilla breweri*
 - Known to grow near the western boundary of the area; grows in open, mesic areas.

State Sensitive

- *Iliamna longisepala*
 - Known population in Brushy Canyon; grows in open, dry areas.
- *Nicotiana attenuata*
 - Known population in Whisky Dick Canyon; grows in open, dry, often disturbed areas.
- *Hackelia hispida*
 - Known population near the Columbia River in area; grows in open, dry, rocky areas.
- *Agoseris elata*
 - Known population in the northwest section of the area; grows in damp meadows.
- *Astragalus misellus var. pauper*
 - Known population in several locations in the area; grows in dry places.
- *Camissonia pygmaea*
 - Known populations near the Columbia River in the area; grows in sagebrush steppe.
- *Cryptantha leucophaea*
 - Known populations near the Columbia River in the area; grows on sandy soil.
- *Cryptantha scoparia*
 - Known populations not far from the Columbia River in the area (1200-2100 ft. elevation); grows on south-facing slopes.
- *Tauschia hooveri*
 - Known plants found throughout the area; rocky lithosol soils.
- *Pediocactus nigrispinus*
 - Known population in several locations in the area; rocky dry areas on ridge tops