

# Draft Blue Mountains Wildlife Areas Management Plan

SEPA Comment Period – January 30 – February 28, 2019

## COMMENTS & WDFW RESPONSE

Date & Source	Comment	WDFW Response
2/2/19 SEPA desk	<p>My name is Mark, and in the blue mountains I would like to see better wintering habitat for our deer and elk. Winter comes and the animals end up on farmers fields where they destroy crops or fields. Worse though is the tags that get issued to farmers to control the animals. This has decimated the elk population, with a hard winter the elk were forced low and had to forage on crops where the farmers then get to kill them. If there was better wintering ground for the animals maybe they wouldn't have to hit the farmers fields to stay alive. Feeding station in the blues like in Central Washington might work well too.</p> <p>- Mark Patras</p>	<p>These concerns are addressed in the Goals and Objectives Table of the plan. Goal 3.E contains measures to reduce human/wildlife conflicts. Goal 4.A includes measure for protecting wintering wildlife from human disturbance. We added two new objectives:</p> <p><i>3.F - Cultivate and plant several fields at Smoothing Iron Ridge to annual lure crops for elk to hold them on the wildlife area and off private property, and, 3.G - Initiate controlled burning projects to enhance forage for retaining elk on wildlife area land and off private property.</i></p> <p>WDFW does not have feeding stations in the Blue Mountains and does not plan to have them there.</p>
2/4/19 SEPA desk	<p>Until the Native American hunters are made to follow the seasons and rules, they will continue to wipe out all the trophy (and lesser) animals in the region. There needs to be legislative action to reconsider treaty rights, and WDFW, along with the other Western states' commissions, needs to lead the way. There's no way to recover from their disregard and abuse, if left unchecked. Keep counting the wolves accurately. Thanks. Kind Regards,</p> <p>- Vickie Crawford</p>	<p>These comments are outside of the scope of the Blue Mountains Wildlife Areas Management Plan. However, tribal hunting rights are a matter of federal law and cannot be modified by the State Legislature or the Fish and Wildlife Commission.</p>
2/10/19 SEPA desk	<p>Fish and game is worthless in the state of Washington. Elk are getting wiped out deer herds at all time low. Coyotes, cougars , and wolves , bears are out of control. Can't run dogs can't trap. Quotas are way to low for cats and bear which they can control but choose not to our fish and game does not back our wildlife or our hunters. You guys would fuck up a free meal and you did many times over. Moving to idaho thanks for nothing.</p> <p>-Jesse Ming</p>	<p>These comments are outside of the scope of the Blue Mountains Wildlife Areas Management Plan. They will be shared with the local biologists and forwarded to the Game Division.</p>
2/15/19 SEPA desk	<p>Blue Mountains Wildlife Areas DRAFT Management Plan Comments &amp; Suggestions 2-14-2019</p> <p>Page 28: Annually assess the opportunity to expand Green Gulch ATV access to archery and muzzleloader season, depending on the conditions (6.E). I am against this opportunity for expanding ATV access for archery &amp; muzzleloader season.</p> <p>Where there are few areas for ADA hunting opportunities, <b>I encourage you to instead open the area beyond the gate at the end of current ATV use during Oct. &amp; Nov to ADA hunting opportunities for all methods of weapon choices to the end of the road with key access to the gate.</b></p>	<p>WDFW is not in favor of expanding road access into archery and muzzleloading seasons due to fire concerns, and that objective has been removed from the plan. Archery season begins in early September and that is fire season. The public used to be stopped by a gate at 4.2 miles up the road. In 2018, WDFW moved the gate to 6.3 miles up the road allowing more motorized access during October and November. The end of the road is 10 miles in. ADA users along with other users have motorized access over the majority of the road while the remaining third of the road is non-motorized use for users desiring that type of experience.</p>

<p>A. Page 29, Map 2: The Parking at the Hay Barn at the beginning of Smoothing Iron RD is not listed on the map. Should be listed as Parking and Trailhead.</p> <p>B. Page 32, Map 3: This map and all other maps on subsequent pages have the roads such as Kelly Creek, Ayers Gulch, and Rock Pile Creek and many others listed as “Administrative Use Only”. I feel this is inaccurate and makes it appear that none of these roads can be used as recreation for non-motorized users. I suggest better wording would be “Administration &amp; non-motorized use”. This needs changed on all maps.</p> <p>C. Rock Pile and Halsey Rd Place should be marked with Hiking Symbol as trails leave these two places on the map.</p> <p>D. Page 40, Map 5, The new outhouse at the Autrey Campground is not listed. This also should be listed as a trailhead with the Hiking Symbol.</p> <p>E. Page 55, Map 9: W.T.Wooten should have Cummings Cr listed as a trailhead. There is also a short trail in the W.T.Wooten Campground that needs listed.</p> <p>Page 75, Table 9, Facilities &amp; Parking, Asotin Cr has trailheads listed, while the other two do not, but there are trailheads that should be listed in Chief Joseph and 4-O. Chief Joseph: This is confusing “No public restrooms on the units; multiple restrooms” Please clarify! There are outhouses at Heller Bar Boat Ramp, camping location along the Grande Ronde River, and the parking site on Joseph Creek by the School House. W.T.Wooten should have Cummings Cr listed as a trailhead. Facilities and Parking needs to have consistency among all areas.</p> <p>Page 84, 4C: Supportive of statement here. Drones and electric operated means of travel (electric bikes as an example), other than ADA vehicles, should be added as not acceptable use.</p> <p>Page 85, Consider adding “4D” to clarify that roads and trails, marked as hiking on maps, are open to non-motorized use for hiking, horseback riding, and mountain bike, unless posted as closed.</p> <p>Page 86: 6C: “Inventory and assess ADA fishing and hunting opportunities biennially”: Where there are few areas for ADA hunting opportunities please make Green Gulch an ADA Hunting area. I encourage you to add the area beyond the gate at the end of current ATV use during Oct. &amp; Nov to ADA hunting opportunities for all methods of weapon choices to the</p>	<p><b>Comments A- E regarding maps are addressed by this response:</b> WDFW is in the process of updating facilities and trail information statewide for the new WDFW website at this time. Clarifying information about the comments has been added to the text of the Blue Mountains plan; however, the plan maps will not be edited at this time.</p> <p>Each unit description will say: <i>Please note that roads marked “Administrative Use Only” are closed to other motorized vehicles but are open for non-motorized recreation unless otherwise posted.</i></p> <p>The new vault toilet will be listed in the text of the 4-0 Ranch Unit description.</p> <p>Visitors can go up the old Cummings Creek Road, but it not a “designated trail”. Visitors must park at parking area across the road. While there are campgrounds on the wildlife area, it appears that this comment refers to the USFS Campground and the trail across the road.</p> <p>Information about restrooms at Chief Joseph has been corrected in the plan to say there are multiple restrooms along the Grande Ronde River.</p> <p>WDFW is developing a statewide recreation plan which plans to address electric bicycles and drones. Using unmanned aircraft to spot or hunt is unlawful according WAC 220-413-070.</p> <p>WDFW will clarify that administrative roads are available for non-motorized use.</p> <p>In the assessment for ADA opportunities, WDFW will assess Green Gulch. In 2018, WDFW moved the gate to 6.3 miles up the road allowing more ADA and motorized access during October and November. The gate was previously at 4.2 miles of the 10 mile road. ADA users along with other users have motorized access over the majority of the road while the</p>
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	<p>end of the road with key access to the gate at the end of current ATV use by the general public.</p> <p>Page 90, 7L: A map of all three areas needs to be produced listing the recreational opportunities available and amenities for the general public that is available free online that is updated bi-annually and can be printed electronically. A printed pamphlet is expensive and becomes obsolete in a very short time, plus access to a pamphlet can be difficult to obtain if you are not from the immediate area. Where would they be available if you did want a copy? Do not waste time and money producing a hard copy map!</p> <p>Page 91, 9a: Utilize grazing for fire control and improved forage for big game. Chief Joseph Area between the Snake River and Joseph Cr (Green Gulch Area) needs to be grazed to invigorate new growth in native bunch grass. This process was used for many years by Native Americans.</p> <p>Asotin Creek Area between Lick Fork and Asotin Creek on the ridge (Sourdough Area) needs to be grazed as well.</p> <p>Thanks for the opportunity to comment, - Rod Parks Clarkston, WA</p>	<p>remaining third of the road is non-motorized use for users desiring that type of experience.</p> <p>WDFW's new website (launched Spring 2019) have printable maps in the future.</p> <p>WDFW looked at grazing on the Chief Joseph WLA in the past in the area between the Snake River and Joseph Creek. WDFW does not have the fencing infrastructure to effectively graze these lands without harming sensitive riparian areas. The cost to install fencing for a grazing program far outweighs the benefits at this particular area. Controlled burning timed at proper times of the year is the preferred alternative WDFW is looking into for invigorating new growth in native bunch grass.</p>
<p>2/4 BM email</p>	<p>I again urge WDFW to consider reinstating the senior citizen antlerless hunt for whitetails in unit 181. The doe/fawn percentage of the population has been very high for several years. Last fall it was common to encounter antlerless whitetails there about once an hour while turkey or deer hunting.</p> <p>I am a bit selfish about this. At age 89 I no longer have the energy to do what is needed for a respectable job of buck hunting.</p> <p>-Roger Contor</p>	<p>These comments are outside of the scope of the Blue Mountains Wildlife Areas Management Plan. They will be shared with the local biologists and forwarded to the Game Division.</p>
<p>2/4 BM email</p>	<p>Without getting into too much detail and beyond my personal knowledge of the areas of concern I offer the following comments:</p> <ol style="list-style-type: none"> <li>1. Continue active management of forested areas in all units to improve habitat and reduce catastrophic wildfire loss. I encourage both commercial and non-commercial thinning as proposed in the plan as well as controlled burning, given the historical role for fire in the ecology of these forests and the apparent success that I have seen in some areas to reduce fuel loads and alter species mix.</li> <li>2. Improved management of off-road activities. In my experience, the improper and illegal use of vehicles has caused more damage to meadows, fragile areas, and riparian areas than any other activity. In addition the improper use of these vehicles disturbs wildlife and reduces the enjoyment of other resources for members of the public.</li> <li>3. Excessive discharge of firearms is a nuisance to wildlife and others using a variety of resources in these areas.</li> </ol> <p>-Phillip Crawford</p>	<ol style="list-style-type: none"> <li>1. The Forest Management Plan covers forest management activities, which include those measures described in the comment.</li> <li>2. The plan address the control of off road activities in the Goals and Objectives Table, goal 4.C, to continue to limit off-road vehicle travel and in 6.D to reduce the number of ADA licensees taking motorized vehicles beyond where allowed.</li> <li>3. General Rules for Public Conduct on WDFW Lands covers firearms (WAC 220-500-140), which includes: no firearm discharge where and when posted; no discharge of firearms within 500 feet of a department designated campground; the department may designate locations and times for target practicing consistent with resource management or public safety concerns. WDFW will continue to evaluate and manage shooting in cooperation with the public.</li> </ol>

<p>2/4 BM email</p>	<p>Hello, My name is Randi Kyle. I live in Anatone Wa. In unit 172. The elk population is dwindling by the day due to the wolves. I hear them howling all the time after their kills. Your reports reflect we lost over a 1000 head of elk in the last 2 years but you implicated you do not know why, common sense seems to elude. I can go out and howl and they will answer back not rocket science. I was cleaning combines in the field this last summer and a big black male come running through the field. He watched for a minute and continued up towards timber area. It is only a matter of time until their rabies infected crap gets into our food chain and infects the livestock if feeder grain or humans if quality grain. Once again they were exterminated for a reason. Stupidity and greed has lead us back to where we are today. The whitetail buck population is also growing smaller by the day. They stay up in the snow too long and the wolves feast on them due to lack of ability to escape. Mt view unit 172 has become to human populated for any kind of hunting. Bullets flying everywhere and nobody is cautious. It is all posted no hunting and no trespassing besides. Only locals and family can hunt and they are breaking the laws because their property is posted no hunting. Getting drawn for a big bull tag or a cow tag is worthless no access and if there is access there are no animals because of cattle grazing or wolves have them running all the time. Bonasa breaks is a wolf sancutary. Used to see tons of elk from rattlesnake grade now you see one every once in awhile. Only the wolves are allowed to hunt it. Idaho, Montana, Wyoming and Colorado are seeing their herds destroyed by the wolves and big money is dictating. Ignorance and arrogance at its best. Then greed on the wildlife department's is unethical to have taken the wolf money to destroy all conservationist hopes of ever having prosperous hunting again. Seen several elk limping in this area as well. So either they have hoof rot from the free range cattle or the wolves are injuring them for a latter kill. This leads me to think that the wolves are spreading hoof rot by killing a sick beef and then attacking an elk and it spreads it into the herd. Could just be using same waterhole. Ranchers must do better with their livestock maintenance. Unfortunately times have changed and the wolf is destroying the eco. Humans are the new wolf. You have too many predators killing wildlife. Too much land has been taken away from the wildlife due to humans expansion. Then fencing them all in for the wolf to easily kill without prejudice. They pull the calves out of the womb. Once again it doesn't take rocket science to understand this will eliminate all your jobs. No game to hunt no money to pay your wages. Maybe it isnt a big issue since you accept the wolf money from the ignorant. You are ending your own careers by allowing these hybrid wolves into our state. I would think that you could see the end results but after seeing how and what they teach in college now it isnt hard to understand why you don't. Wolves feed all day everyday. How is any wildlife to exist when they are fed upon daily. Once again common sense seems to elude. The ignorance and arrogance is amazing. Just open the borders for all illegals as well. Stupid is as stupid does. I apologize for my mean statements but im fed up with people who do not understand the eco. Once the wildlife is gone people will become the target of the wolf. If the herd gets to big you open more tags for the human wolves not bring in another predator that cannot be controlled due to its big donors. Lost 1000 head in 2 years so that means the remainder of the 4400 elk will be gone in less than 8 years. Best genetics in the state gone for ever due to people that live in an apartment. If you dont own property you dont get to vote. East coast idiots giving millions to destroy my states eco is bs.</p>	<p>These comments are outside of the scope of the Blue Mountains Wildlife Areas Management Plan. They will be shared with the local biologists and forwarded to the Game Division.</p>
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	<p>I have the same issues with indians. There are too many humans now and to allow them to net the rivers and destroy the runs and kill wildlife anyday everyday isnt acceptable. The genetics are being destroyed right in front of you and it is only money that matters. My ferrier is up full Indian and kills a big bull off mt misery every year during archery season with his whitemans magnum rifle in his 4x4 truck. If they want ancients rights then use your ancestors equipment. Once again another predator that follows no laws.</p> <p>I believe your jobs will turn into a bird watching crew if something isn't done soon about the wolf (illegals), sick livestock, tree huggers and indians destroying the eco.</p> <p>I normally see dozens of monster bulls this time of year in the breaks but have only seen two this year. Either the wolves have killed them or chased them completely out of the area.</p> <p>If you ever need more comments and thoughts just let me know.</p> <p>-Randi Kyle</p>	
<p>2/5 BM email</p>	<p>Ms. Wood,I have used these areas for more than 30 years.My parents live in the Anatone area so I consider myself a"Local".Back in the late 1970s there were a lot of Elk in the area.The WDFW in there infinite wisdom went to a Spike only Elk hunt unless you drew a special permit to harvest a branch antlered bull.That program is outdated and should be discontinued.You look at all of the states around us and they do not have this practice.We need to let the young elk grow up.We hunt these areas every year and there are multiple Big Bulls in these units.In these years I have been drawn one time for the coveted Big Bull tag.For the last two years I have not even seen a spike bill dead or alive.We have seen over 35 Big Bulls during the seasons in these units.Either change the spike only or give out more Big bull permits.Change it to 3 point or bigger like the deer hunting seasons.Give the young ones a chance to grow up.Now as far as the Wolf issue in these areas,I have never personally seen a Wolf up there.My parents have heard them and I have seen the tracks in the snow.I hope the WDFW are keeping a eye on this situation.I hope we do not have any packs in the area.Back to the Elk part of this letter,I was drawn for a late ML cow permit a couple of years ago over in the Cloverland area.</p> <p>We saw a herd of over 500 head of Elk coming up in the Farmers canola fields to eat.In that herd of elk we only seen 4 spikes.If the WDFW would give out more cow permits and do it for modern firearm maybe that would help the farmers keep more of there crop from getting destroyed.In closing I hope you guys change the spike only rules in this state because it has changed from the way it was back in the 1980s when they went to it.There are plenty of big bulls to do the breeding now, we need to let the young ones grow up. Thank You</p> <p>-Clyde (Clay) Hearne</p>	<p>These comments are outside of the scope of the Blue Mountains Wildlife Areas Management Plan. They will be shared with the local biologists and forwarded to the Game Division.</p>
<p>2/6 BM email</p>	<p>I really have a problem with the department spending so much time and money to "improve" trails. I don't think that many hikers would agree to the department improving trails to include a "bridge" over a small creek where a person was able to walk on the bigger rocks that had been placed there by nature. We don't want a paved trail to access a part of the world that is supposed to be isolated and kept as natural as possible.</p> <p>I think that if the department would clear the trails of fallen trees and rocks that have naturally fallen onto the trails that it would be enough to allow the hikers to utilize the trail system to access the area of their desire. I realize that some of the labor for building bridges over creeks and valleys is volunteer, but those volunteers could be doing other things that the department does not have the man power to do throughout the year. If I wanted modern facilities and pavement access to the remote areas that I enjoy "WALKING" to I would visit the states park systems.</p>	<p>The bridge over the creek was on another wildlife area unit and destined to be disposed of, so it was put to good use at the North Fork trailhead. There are no paved trails on the wildlife area nor are they proposed in the plan. "Trails" are basically old roads.</p> <p>WDFW lands support a variety of uses, including hunting, fishing, wildlife viewing, and enjoyment of nature and the outdoors. Wildlife areas are open those who purchase hunting and fishing licenses, as well as those who purchase a Discover Pass.</p>

	<p>I pay enough in hunting and fishing fees “EVERY” year that I think that some of us that do utilize the remote trail systems, would have a more powerful say in how our money is being spent.</p> <p>I am hearing more and more avid hunters and fisherman stating that they are no longer going to spend their hard earned money for Washington states licenses. That they are going out of state where they have a lot better chance of harvesting a fish or animal and have a more enjoyable time of doing it without all of the rules and regulations that they have to follow in this state.</p> <p>I have hunted out of state and may do so in the near future for the same reasons. I believe that if the WDFW keeps going in the direction that they have been going in the last 10 years or so, that there will be enough of us license buying residents, not purchasing the licenses and tags the department depends on for funding, you will have to find another source of funding for your existence as a department.</p> <p>We, the hunters and fisherman, are getting pretty tired of people that do not hunt or fish mandating changes in our way of life. -Bob Dennis</p>	<p>The Goals and Objectives Table does include some items related to trails (7.A and 7.B) to connect and improve and maintain trails, not to pave them.</p> <p>The Goals and Objectives Table also lists various actions under goal 6: Provide and improve opportunities for hunting and fishing. People who do not hunt must purchase a Discover Pass to access WDFW lands.</p>
<p>2/6 BM email</p>	<p>I only see the 2 pages??? This didn't seem to give any specific details to read and comment. -Audrey Eaton</p>	<p>The SEPA page has quite a few documents listed. The first does say it is the plan, but it is really the SEPA determination. The actual plan is the third bullet.</p>
<p>2/13 BM email</p>	<p>Just wanted to reach out and give my support for the management plan. Specifically interested in the fisheries, and I think the watershed habitat restoration and forest management will be great for conservation and species recovery. Thank you for putting in all the hard work! -Drew Stang</p>	<p>Thank you.</p>
<p>2/13/19 SEPA desk</p>	<p>Letter from CTR to SEPA desk: RE: DNS 19-004: Blue Mountain Wildlife Areas Management Plan Dear Lisa Wood: We have received the Washington Department of Fish and Wildlife's (WDFW's) Determination of Nonsignificance (DNS) regarding the proposed Blue Mountains Wildlife Areas Management Plan, along with the SEPA Checklist for the project and associated maps. Please be advised that your proposed undertaking lies within the traditional territories of the Confederated Tribes of the Colville Reservation (Colville Confederated Tribes [CCT]), which is governed by the Colville Business Council (CBC). The CBC has delegated to the Tribal Historic Preservation Officer (THPO) the responsibility of representing the CCT with regard to cultural resources management issues throughout the traditional territories of all of the constituent tribes under Resolution 1996-29. This area includes parts of eastern Washington, northeastern Oregon, the Palus (Palouse) territory in Idaho, and south central British Columbia.  We concur with the issuance of the DNS, provided WDFW conducts a cultural review for each constituent project once specific project locations have been identified, as indicated in Item 13 of the SEPA Checklist.</p>	<p>Thank you. WDFW will conduct a cultural review for each constituent project once specific project locations have been identified.</p>

	<p>Thank you for consulting with the Confederated Tribes of the Colville Reservation. Please note that these comments are based on information available to us at the time of the project review. We reserve the right to revise our comments as information becomes available. If you have any questions or concerns, please contact Dr. Karen Capuder at (509) 634-2876 or karen.capuder@colvilletribes.com. If you wish to speak with me, contact me at (509) 634-2695.</p> <p>Guy Moura, Tribal historic Preservation Officer - Confederated Tribes of the Colville</p>	
2/15/19 Staff email	<p>Would you please forward this to the lead for WDFW for updating/revising the Blue Mts. Wildlife Area, please? This report came out recently and adds emphasis for maintaining riparian areas both on and off the Wildlife Areas in eastern WA.</p> <p>Thanks -Glen Mendel</p> <p>[Attachment: STUDY IDENTIFIES RIVERSIDE ROUTES IN NORTHWEST MOST IMPORTANT FOR ANIMALS NAVIGATING CLIMATE CHANGE Posted on Friday, February 15, 2019 (PST) (The study was published in PLOS ON The study was published in PLOS ONE.E.) Highlighted text</p>	The importance of riparian areas for wildlife in the face of climate change have been added to the text of the plan.
3/24/19 Staff email	<p>USFWS Comments on Blue Mountain Wildlife Areas Draft Management Plan</p> <p>In general, the USFWS supports components of the Blue Mountain Wildlife Areas Draft Management Plan. In particular, we support the aquatic, riparian, and upland habitat restoration activities that are described in the plan. We support the goal 1 “Maintain or improve the ecological integrity of priority ecological systems and sites”. Specific comments are listed below.</p> <ul style="list-style-type: none"> <li>• It is unclear how and whether grazing units overlap documented or potential Spalding’s catchfly (<i>Silene spaldingii</i>). The USFWS recommends monitoring the threatened plant in the documented locations on Asotin WLA, and in any future documented locations. If grazing or other activities impact the plant, we recommend implementing measures to avoid or minimize those impacts.</li> <li>• The USFWS supports surveys of all WLA lands for Spalding’s catchfly and other rare plants (Table 10 Goal 1.C.). Spalding’s catchfly can be dormant some years, and multiple surveys in potential habitat may be needed.</li> <li>• The USFWS supports the following management activities for the Asotin Creek Unit (First described on p.27 in Plan) <ul style="list-style-type: none"> <li>- Conduct an assessment of native prairie habitat by 2022, and by 2024 develop a strategy or plan to protect and restore native prairie habitat (Table 10 1.B).</li> <li>- Develop plan to survey entire wildlife area for rare plants by 2024 (Table 10 1.C).</li> <li>- Develop plan to conserve federally threatened Spalding’s catchfly (<i>Silene spaldingii</i>) (Table 10 1.D).</li> </ul> </li> </ul>	Wildlife area managers monitor <i>S. spaldingii</i> where it is documented in Asotin Creek, and will monitor any new locations where it is found. There is only one known area where <i>S. spaldingii</i> is present that has an active grazing lease in the Blue Mountains - the Weatherly Unit of the Asotin Creek Wildlife Area. There are 10-12 plants at that site. WDFW will monitor these areas for potential impacts on the species, and if needed implement measures to minimize or remove risk to <i>S. spaldingii</i> from grazing activities.

	<ul style="list-style-type: none"> <li>• Table 10 in the plan lists goals and objectives. Comments below are relevant to that table. <ul style="list-style-type: none"> <li>- Objective 1D expects development of a plan to conserve Spalding’s catchfly on Asotin Creek WLA. If the plant is found on other wildlife areas, the conservation plan should be expanded to include the new areas.</li>   <li>- Objective 1G, Implement Weed Management Plan annually. Where weeds are managed in or near Spalding’s catchfly habitat, implement measures to avoid or minimize effects on the plant. Implement measures to avoid or minimize impacts to listed fish species, including bull trout.</li>   <li>- Objective 3J. Continue fish monitoring/tagging efforts on the Tucannon River and Asotin Creek. It is unclear what species are monitored or tagged. If efforts include bull trout, or bull trout are caught during the efforts, please report this information to the USFWS Eastern Washington Field Office to better understand life history and distribution of bull trout in the area.</li> </ul> </li> </ul> <p>-USFWS</p>	<p>WDFW will add that the plan will include any area on the wildlife areas where <i>S. spaldingii</i> is found.</p> <p>WDFW follows BPA’s guidelines and best management practices for the timing of weed control activities at or near <i>S. spaldingii</i> habitat, and use only BPA listed herbicides. Should <i>S. spaldingii</i> be found at other locations on the wildlife area, we would take the appropriate action and use best management practices for protecting <i>Silene</i> and being able to maintain some of our weed control.</p> <p>WDFW will continue to monitor steelhead, spring Chinook and bull trout in the Tucannon River, as well as steelhead and bull trout in Asotin Creek. We run smolt traps and adult traps in Asotin Creek and the Tucannon River focused on steelhead and Chinook monitoring, but also include monitoring of bull trout. We have coordinated with Erin Kuttle in the USFWS Eastern Washington Field Office on these efforts, and will continue to share information with them.</p>
<p>3/15/19 Letter to staff</p>	<p>The plan includes a management objective to annually assess the opportunity to expand the Green Gulch ATV access to archery and muzzleloader season depending on conditions. In the Plan, the access route is associated with the Asotin Creek Unit, however, according to the WDFW’s Game Management Unit Map, the Green Gulch ATV access route is located in GMU 186 in the Chief Joseph Unit. Without rationale and additional information about impacts to plants and wildlife, the Tribe is reluctant to support expansion of the Green Gulch ATV access to archery and muzzleloader season. The Tribe looks forward to continued coordination and communication about this proposed expansion during the Plan’s implementation.</p> <p>The Tribe also recommends the following additions to the Plan:</p> <p>Intergovernmental Objectives:</p> <ul style="list-style-type: none"> <li>- Work with the Tribe to ensure the Plan’s management objectives of fish and wildlife are achieved while providing opportunities for the exercise of Treaty reserved rights</li> <li>- Protect tribal treaty rights and carefully evaluate and consider impacts to traditional hunting and gathering sites</li> <li>- Discuss mutual concerns for wildlife resources with the Tribe</li> </ul>	<p>The location of the Green Gulch ATV access will be corrected in the plan. WDFW does not intend to expand ATV access any further than we did in 2018 due to wildfire risks. Public access was formerly limited by a gate 4.2 miles up the Green Gulch road. In 2018, WDFW moved the gate to 6.3 miles up the road allowing more motorized access, but only during October and November. The end of the road is 10 miles in. Motorized use is confined to the existing roadbed. Off-road travel is prohibited and WDFW’s experience is that there are very few instances where illegal activity has occurred. The objective referencing the annual assessment has been dropped from the plan.</p> <p>WDFW honors and respects Tribal treaty reserved rights, and will take into consideration traditional hunting and gathering sites in any actions. WDFW appreciates the opportunity to discuss mutual concerns with the Nez Perce Tribe. We have added a new goal and associated objectives to the plan which speaks to maintaining productive and positive working relationships with tribes.</p>



	<ul style="list-style-type: none"> <li>- Evaluate necessity of rodenticides and other pesticides (e.g. herbicides and insecticides) on management areas and evaluate impacts and threats to non-target species, such as birds and pollinators.</li>   <li>- Evaluate the compatibility of livestock grazing, agricultural production, recreation, and weed management with ecological integrity and special status species and habitats.</li> </ul> <p>Shannon F. Wheeler, Chairman, Nez Perce Tribe</p>	<p>The wildlife area rarely uses rodenticide and pesticides, and has and will continue to explore alternatives.</p> <p>The goals of weed control on WDFW lands are to maintain or improve the habitat for fish and wildlife, provide good stewardship, protect adjacent lands and meet legal obligation of Chapter 17.10 RCW Noxious Weeds. WDFW employs Integrated Pest Management, which includes prevention and assessment of the most effective method of controls. WDFW works on a regional scale to find solutions to collective weed control problems.</p> <p>WDFW considers the ecological integrity of the land for any management activity, as well as the special status of species and habitats. All grazing permits include specific protective measures, and monitoring so that ecological integrity is not compromised. Agricultural leases include protective measures and best management practices. Recreational activities on the wildlife area tend to be dispersed, and no major new recreation is planned. Any improvements or new recreation opportunity will take ecological integrity into consideration. One of the goals of weed management is to improve the ecological integrity of the land.</p>
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