

**DRAFT: SIMCOE MOUNTAINS UNIT MANAGEMENT PLAN**  
**ALL RECEIVED PUBLIC COMMENTS**  
*(From in person public meetings and on-line comments*  
*February 8 – February 27, 2023)*  
*with*  
**RESPONSES**  
*from*  
***Simcoe Coordinated Resource Management (CRM) Participants***

## **INTRODUCTION**

### **COMMENTS** from the 22 February **Toppenish** meeting:

- What are the measures to incorporate climate change? (Pg 8)  
 Page 8, 4<sup>th</sup> paragraph: Odd that for riparian enhancements, these are a "might include", but the next sentence states that habitat enhancements for terrestrial species are a "will include". So, is riparian not as much of a priority?

#### **Response:**

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| <ul style="list-style-type: none"> <li>➤ Climate change was considered in context of each chapter and objectives were developed accordingly.</li> <li>➤ “will include...”: “will” was changed to “may” in the draft plan.</li> </ul> |
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- 4<sup>th</sup> paragraph: "...This area protects critical habitat...": This is a strong statement. The document should explain what critical habitats have been identified...if not done so already.

#### **Response:**

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| <ul style="list-style-type: none"> <li>➤ The grant for acquiring the property was awarded from the “Critical Habitat” category, but in this instance the word “critical” was removed from the draft plan to avoid confusion with USFWS terminology, where “critical habitat” has a very specific and meaning.</li> </ul> |
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### **COMMENTS** from the 23 February **Goldendale** meeting:

- None

### **COMMENTS** from the February **online** visitors to the Draft Document:

- *Comment 1:*
- Thank you for the opportunity to comment on the Simcoe Mountains CRMP draft. While we support many aspects of the plan regarding their expected positive impacts on fish and wildlife, we are also deeply concerned about other aspects of the plan which we believe will inevitably result in habitat degradation, loss of diversity, and reduction in western gray squirrel populations.

**Response:**

➤ Thank you for your interest and for providing comments to the draft plan.

- *Comment 2:*
- Over the past five years, I have spent substantial volunteer time walking over the landscape of the Simcoe Mountains Unit of the Klickitat Wildlife Area, including 3-4 site visits each year. At the land manager's request, I have assisted in developing a plant list for the Simcoe Mountains Unit through the University of Washington's Rare Care community science program. I also have uploaded bird lists to eBird following my visits. Therefore, I have substantial knowledge and interest in the future management of this unit.

**Response:**

➤ Thank you for your interest and for providing comments to the draft plan.

- *Comment 3:*
- Thank you for the opportunity to comment on the Simcoe Mountains CRM draft. While we support many aspects of the plan regarding their expected positive impacts on fish and wildlife, we are also deeply concerned about other aspects of the plan which we believe will inevitably result in habitat degradation, loss of diversity, and reduction in western gray squirrel populations.

**Response:**

➤ Thank you for your interest and for providing comments to the draft plan.

- To our understanding, the Simcoe Mountains Wildlife Area purchase was pursued ~20 years ago, as a bit of mitigation when WDFW (particularly the Region Three Yakima office) actively supported the transfer of large swaths of public WADNR properties in Klickitat County to private timber companies in Yakima and Kittitas Counties. While the land exchange shored up conservation lands in central Washington, the effect was devastatingly negative in Klickitat County as timber harvest and development accelerated under corporate timber company interests.

**Response:**

➤ The current Simcoe Mountains Unit land acquisition is not related to any DNR land transfers.

- Under the proposed WDFW plan, the Simcoe Mountains Area will likely resemble DNR trust forest lands where timber harvest, road access, and cattle grazing are management priorities. These active management activities are detrimental to the state listed western gray squirrel, gray wolves, and species such as the white-headed woodpecker, who require large ponderosa pine trees. Cattle grazing, as has been demonstrated on the Yakama Firing Center property, results in heavy impacts to native grasses in a shrub-steppe environment without the native bunch grasses.

**Response:**

➤ The goal of forest management activities on the Simcoe Mountains Unit, under the umbrella of the WDFW Management Strategy for the Washington State Department of Fish and Wildlife's Forests, are to:

- Maintain and enhance wildlife habitat for multiple species, including those wildlife species listed above.
- Improve forest health, using management techniques to treat insect and/or disease outbreaks.
- Reduce the threat of catastrophic stand replacement fires.
- Move stands closer to the Historic Range of Variability (HRV).

## **FOREST MANAGEMENT PLAN**

**COMMENTS** from the 22 February **Toppenish** meeting:

- Is thinned wood used for stream enhancement projects? (Answer given: Yes, for both PCT & CT

**Response:**

- As is the case for both commercial and pre-commercial trees, source wood from thinning projects on WDFW Wildlife Areas may be donated to stream enhancement projects as needed or used for other projects.

- Page 11, 1<sup>st</sup> paragraph: Please note, this sentence does not limit management to western gray squirrel and Oregon white oak, but "including" them. Thus, other known PHS listed species that occur in the area (e.g., White-headed Woodpecker, Flammulated Owl, etc.,) should also be considered when planning forest management.

**Response:**

- Forested portions of WDFW Wildlife Areas are managed for multiple species, including those species considered to be Priority Habitat and Species (PHS).
- The draft has been changed to: "Any active management will consider strategies for Priority Habitats and Species (PHS)."

- Page 13, 1<sup>st</sup> line: What about the White-headed Woodpecker (WHWO), which is a PHS priority species, a candidate for listing, and a keystone species in eastern WA dry ponderosa pine forests? In addition, recent trends analysis show a ~25-30% decline in WHWO over the last 15 years (<https://science.ebird.org/en/status-and-trends/species/whhwoo/trends-map>). Targeted management for this species is long overdue and now is the time to start including it in landscape level management plans such as this. Other PHS listed species that you mention later in the document are also not mentioned here such as Burrowing Owl and Northern Goshawk. Mgmt goals for these species should be included if they are found to occur in the management area. That being said, the proposed leave tree guidelines of 20-35 trees/acre is much to low, depending on the diameter size of the leave trees, to meet the needs of the WHWO, Flammulated Owl, and other dry forest dependent PHS species.

**Response:**

- WDFW has adopted the Forest Restoration Pathway approach to vetting and moving forest management projects forward.
- This includes consultation with our regional management team, district team (including habitat and wildlife biologists), and partners outside of the agency. This process also includes consultation with CRM participants.
- Through the vetting process, we are able to identify PHS species that may currently or potentially use habitat created or improved with thinning projects.
- Participants in the Restoration Pathway process have the opportunity to comment on and add language to the proposed forest project prior to layout work beginning.
- The draft has been clarified.

- Page 14, 4<sup>th</sup> bullet: In order for leave trees to provide connectivity between nest tree patches, they need to have canopy connectivity. That should be explicitly stated here. As written, it appears as long as the tree is large and open grown) fit the bill. But, if squirrels need to cross open areas with out tree canopies to move through, that exposes them to increased risk of predation.

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.

- End of 2<sup>nd</sup> paragraph under “Oregon White Oak Mgt.,,” What if there is a mixed stand of conifer and oak that contains western gray squirrel nests? Will conifers still be targeted for removal? This needs to be clarified.

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.

- Last line: How will this be determined? Coring the trees, setting a diameter limit? Again, specifics are essential to evaluating management guidelines and goals.

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.

- Page 15, 2<sup>nd</sup> paragraph from bottom, last line: White-headed Woodpecker? Other species such as Northern Goshawk if present in area?

**Response:**

- The draft plan was changed to the following: PHS management recommendations for all PHS species and habitats will be considered.

- Last two lines: Please add information explaining what these metrics are with literature citations to back them up. HRV is used a lot, but is rarely if ever defined. Now is the opportunity to do that or earlier when HRV is first mentioned.

**Response:**

- Definition has been inserted in draft plan.
- There are several different definitions of Historical Range of Variability (HRV) but the following definition, found in Oxford Bibliographies, seems to define it quite well: Historical range of variability (HRV) describes the conditions of a natural

system prior to intensive human alteration of that system. In this context, a natural system can be an ecosystem or a particular component of an ecosystem.

- Targets identified in the forestry objectives reflect HRV.

- Page 16, middle paragraph: How can you accomplish this after stand replacing fire with few to any live trees? This doesn't make sense. If a stand replacing fire occurs, would it be salvage logged or would areas be left to provide habitat for post-fire dependent species like the Black-backed Woodpecker (also a PHS listed species)?

**Response:**

- Draft plan was changed with the following: "In the case of stand replacement fire, leave trees (primarily snags) would be retained in a similar manner (trees per acre and spatial arrangement) as would be retained in managing the stand for the HRV as part of the post-fire restoration strategy."

- Last paragraph: Strike the line "The complexity of...actual thinning operation."

**Response:**

- Duplicate sentence was removed from draft plan.

- Page 17, 3rd bullet: Won't this require marking of large, old oak trees for retention when an overstocked oak stand is thinned? Or will oak stands be harvested according to a prescription?

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.
- The oak retention strategy would include leaving all "commercial" size trees greater than 6" diameter at breast height (dbh).
- In general, the management strategy for oak thickets would be to reduce conifer encroachment

- 4<sup>th</sup> bullet: What does this mean? How big?

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.
- Diameter limits are on a unit-by-unit basis, depending upon current stand conditions and desired HRV stand characteristics.

- 6<sup>th</sup> bullet: What do you mean by "large diameter"? DBH size? If so, what is the minimum?

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.
- WDFW does not have a definition of “legacy” trees.
- DNR’s definition of a legacy tree is anything that is 180 years or older.
- The general strategy used to improve habitat and move the stand closer to the HRV, would be to remove small, suppressed trees and leave “larger” trees that are growing well.
- It is very hard to do that with a one size fits all diameter limit that would be applied to the entire Simcoe Mountains Unit.

- 8<sup>th</sup> bullet: How many per acre?

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.
- Forest Practice rules require retention of 2 wildlife reserve trees (snags) per acre.
- WDFW thinning prescriptions increase the number of wildlife reserve trees to 4 to 6 trees per acre, using natural snags first and supplementing with operator created short snags, designated during the layout process (see bullet 9).
- WDFW logging contract states that all snags shall be retained unless they pose a safety hazard as defined by state Labor and Industries (L & I) rules

- 9<sup>th</sup> bullet: This should be a minimum of 12 inch in diameter to meet the needs of all primary excavating woodpeckers, including the Northern Flicker, which rarely nests in snags less than 10 inch in diameter. Created short snags should also be a minimum of 10 ft in height and should be variable in height above that minimum. Furthermore, short snags should be created from any tree for cavity nesters when snags are deficient, regardless if there is a butt defect. This is no longer industrial forest land...but land for conservation of habitat. Finally, a minimum of 4/acre should be created in both ponderosa pine and Douglas-fir.

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.
- It is rare for short snags that are 10” dbh to be retained. However, that may be the case when a 10” dbh tree is the only tree available

- WDFW logging contract states that short snags shall be cut as high as safely possible with a minimum height of 12'.
  - Those trees with defects are obvious trees to leave as short snags. However, there may not be enough trees with defects to get to the desired goal of 4 to 6 trees per acre. In that case, trees without defects will be marked as short snags even though they have no visible defect.
  - WDFW leaves 4 to 6 wildlife reserve trees per acre.
- 11<sup>th</sup> bullet: Two trees is not a clump.
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| <b>Response:</b>  |
| <ul style="list-style-type: none"> <li>➤ Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.</li> <li>➤ For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.</li> <li>➤ In some cases, particularly on the edge of the forest as is the case on portions of the Simcoe Mountains Unit, a 2-tree clump may be all that is available.</li> </ul> |
- 12<sup>th</sup> and 13<sup>th</sup> bullets: How many per acre? Is there a target goal?
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| <b>Response:</b>   |
| <ul style="list-style-type: none"> <li>➤ Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.</li> <li>➤ For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.</li> <li>➤ The target goal is a moving target. In dry ponderosa pine, 1 clump for 2 to 3 acres may be enough. In wetter mixed conifer forests or protected draws, 1 clump per acre may be left. It all depends on stand conditions and tree availability.</li> </ul> |
- 14<sup>th</sup> bullet: This is unacceptable considering Forest Practice minimum is 10-inch dbh to qualify as a leave tree.
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|---|
| <b>Response:</b>  |
| <ul style="list-style-type: none"> <li>➤ Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.</li> <li>➤ For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.</li> <li>➤ The 8" dbh rule is an accepted standard as a merchantable tree. If there is a lone ponderosa pine that is 8" dbh, then most likely that tree will be left regardless of what Forest Practices defines as a leave tree.</li> <li>➤ In WDFW logging contract, a merchantable tree is defined as anything 6" dbh designated for removal that will make a 16' log to a 2" top diameter.</li> </ul> |
- 15<sup>th</sup> bullet: Should this be >24 inches dbh?

**Response:**

- Yes, thank you for catching that. The draft plan has been changed to greater than 24 inches dbh.

- 16<sup>th</sup> bullet: These may also be good candidates for creating short snags.

**Response:**

- Due to safety Labor and Industry Guidelines, this is not possible.

- Page 18, 3<sup>rd</sup> bullet: This doesn't seem a viable option considering you are already planning to thin stands to 25-35 trees/acre. What will be left to commercially thin in 25-40 years? If commercial thinning at a later date is your objective, than thinning to 45-55 trees/acre now and then thinning again later would be a better objective. (Isn't the goal to keep the trees left after a treatment to gain diameter and become the large, fire-resistant trees of historic conditions? I would think pre-commercial thinning and prescribed fire would be preferred to reduce stocking of seedlings/saplings.)

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.
- Ingrowth will occur, resulting in an increase in small diameter trees with ladder fuels from top to bottom. Left untreated, whether using thinning or prescribed fire or both, will result in stand conditions that will again put the stand at risk of a stand replacement fire.
- Thinning to 45-55 TPA now, when the site cannot support that many trees, will not meet HRV and stand resiliency objectives.
- Pre-commercial thinning (PCT) and prescribed fire will always be valuable tools in the foresters toolbox.

**COMMENTS** from the 23 February **Goldendale** meeting:

- None

**COMMENTS** from the February **online** visitors to the Draft Document:

- *Comment 4.*
- Page 15 says that Oregon White Oak, beyond the sapling stage, is highly resistant to fire. I would say highly resistant to light intensity fires. I did a Forest Plan for a landowner, just a couple of miles east of the property, a tract of over 2,000 acres. The Cleveland Fire in the 1990s burned through that property, and almost all of the Oregon White Oaks were killed back. Mature Oaks are mostly gone, with young Oak sprouts growing in clumps on the property. Ponderosa pine stands were affected, but stands are mostly intact.

**Response:**

- Removed the word "highly" in draft plan.

- Page 17, 3rd bullet from the bottom of the page says “In general, leave trees less than 24 inches dbh unless they pose a safety threat (e. g. tree is at risk of falling over a main line road) or they are a non-preferred species with preferred species surrounding (e.g., late seral grand fir surrounded by early seral ponderosa pine, western larch or Douglas fir). This strategy will create more resilient stands that are more likely to withstand the impacts of climate change.” I think you meant to say leave trees greater than 24 inches.

**Response:**

- Yes, thank you for catching that. The draft plan has been changed to greater than 24 inches dbh.

- Page 17, last bullet on page: typo on the last line, “fora” needs a space to be “for a”

**Response:**

- Yes, thank you for catching that. The draft plan has been changed to “for a”

- Page 11 alludes to “making the stands more resilient to insects, disease, and catastrophic fires”, yet the plan makes virtually no mention of forest insects and diseases. It would be valuable to note them. I realize that the objectives for managing this property are not to maximize timber production, and that many endemic levels of insect and diseases may be beneficial for forest and wildlife diversity.

**Response:**

- The plan does recognize the impacts from insects, disease outbreaks, and the risk of catastrophic fire.
- Specific concerns (bark beetles, root rot, suppressed trees, etc.) should be addressed in project prescriptions presented to the CRM and to WDFW staff during the Forest Restoration Pathway process.

- --Page 17 and 18 lists a number of considerations for determining which trees to favor in timber practices, and generally mentions other forest management practices (slashing, prescribed fire, thinning). It is probably too detailed for this plan, but an important consideration in these ponderosa pine stands is the extent and timing of activities, with the pine engraver beetle in mind. I am sure WDFW foresters are aware, I'll leave that up to you to determine if that level of detail needs to be in the plan. There is also no mention of reforestation, such as following wildfire.

**Response:**

- Each project is unique and will consider all ecological conservation and working lands parameters that includes internal and external review and vetting.
- For specific details on a project, there will be opportunity for public input through the CRM process, SEPA, WDFW Forest Restoration Pathway, and DNR Forest Practices.
- As a general rule, and a requirement by forest practice rules, WDFW plants trees on post-fire restoration projects.

- *Comment 5.*
- Oregon white oak arguably represents the most important wildlife habitat in the Simcoe Mountains area. We appreciate that WDFW plans to retain all white oak (except during

timber harvest operations), and we urge that all oaks should be retained. A former District Wildlife Biologist once stated, “Rock Creek represents the most important wildlife habitat in Klickitat County.”

**Response:**

- Forest management activities will be designed to maintain oak habitat by reducing conifer encroachment.

- Due to numerous environmental pressures and a reduction in protection protocol for western gray squirrels in logging and development activities, gray squirrel conservation in the Simcoes should be granted a much higher priority than the WDFW plan proposes. WDFW’s recently released Western Gray Squirrel Status Review describes a >21% loss of gray squirrel habitat in Klickitat County. The Simcoe Mountains Plan should commit to a no net loss of western gray squirrel habitat at a minimum, as well as describing plans to restore and enhance suitable habitat. We recommend that western gray squirrel surveys not only occur on a project by project basis, but rather initially in suitable habitat within the entire Simcoe CRMP boundaries. A landscape-wide survey will allow for better, more landscape-level planning. We also recommend a landscape level western gray squirrel conservation plan developed in coordination with the adjacent Yakama Nation lands.

**Response:**

- Forest management projects on WDFW Wildlife Areas, with a western gray squirrel presence, are surveyed for nests. This includes a pre-layout survey, pre-harvest survey and post-harvest survey. Nest trees are marked and the GPS points taken.
- PHS recommendations for WGS have not reduced protection protocols for WGS.

- We strongly support conifer thinning when white oaks are threatened by overtopping.

**Response:**

- This is part of WDFW’s white oak management strategy.

- We do not understand why WDFW would promote “overstory free stocking levels (20-30 trees per acre,” on post-harvest logging stands in gray squirrel habitat. The western gray squirrel is an arboreal creature that is usually found in mixed conifer stands with greater than 70% canopy closure. In the Status Review, WDFW emphasizes the importance of arboreal connectivity, and their recommended timber harvest prescriptions contrast starkly with those forest practice goals stated in the Simcoe Plan.

**Response:**

- One thing that is important to consider is that these 20 to 35 TPA are conifers.
- All hardwoods, including oak, are automatic leave trees.
- 70% canopy closure on dry forest types is not sustainable and is far outside of the Historic Range of Variability (HRV).
- The goals for forest management activities on the Wildlife Area include reducing stocking levels closer to the HRV.
- Forest management activities will accelerate the process of creating stand conditions that include retaining large, fire-resistant trees on the landscape.

- Previous western gray squirrel management recommendations, and on-the-ground implementation included 50' no cut nest buffers adjacent to 350' understory thinning, to allow for arboreal connectivity.

**Response:**

- The 50' no cut buffer all but eliminates the possibility of thinning and creates a 50' radius of small diameter ladder fuel trees.
- These small trees with ladder fuels greatly increase the potential for torching of the nest trees that we are trying to protect.
- A 25' no cut radius buffer around nest trees and a thinning from below strategy on trees for those trees at a 25' to 50' radius from the nest tree has been incorporated into WDFW squirrel management strategy.

- The Status Review is clear regarding negative logging impacts to western gray squirrels: “Logging often degrades Western Gray Squirrel habitat by destroying nests and potential nest sites, fragmenting the tree canopy that squirrels use for travel, and reducing or eliminating food sources (Vander Haegen and others 2004, Linders & Stinson 2007). Over-thinning reduces canopy closure, inhibiting arboreal travel and increasing exposure to predation.”

**Response:**

- This is not happening when nest trees are located in the project area and those nest trees are protected.
- Additionally, a 25' no cut radius buffer around nest trees and a thinning from below strategy on trees for those trees at a 25' to 50' radius from the nest tree has been incorporated into WDFW squirrel management strategy.
- WDFW is thinning to the Historic Range of Variability (HRV).
- Thinning to the HRV is thought to provide the most benefit to the greatest number of species.

- The Simcoe Plan includes variable density thinning. Post-logging surveys on the White River Wildlife Area in Oregon showed that invasive weeds and impregnable brush species appeared post-logging. However, when coupled with prescribed burning, the understory plant species were beneficial to many wildlife species including western gray squirrel.

**Response:**

- WDFW is thinning to the Historic Range of Variability (HRV).
- Thinning to the HRV is thought to provide the most benefit to the greatest number of species.
- There will always be the threat of invasives following a thinning operation.
- Restoration projects provide for seeding of abandoned roads and landings post-harvest. This seeding is with native grasses and forbs.
- Where possible, prescribed fire is used as a follow up treatment post-harvest.
- Prescribed fire may be limited by budget constraints, resource availability, and smoke management concerns.

- With decades of previous logging in the Simcoe Mountains area, we propose that logging occur only to release oaks and to remove conifer trees under 10" dbh to promote the enhancement of mature ponderosa pine and Douglas fir.

**Response:**

- Using this strategy, with an arbitrary diameter limit, will have very little impact on improving forest health, stand resiliency, and reducing the threat of catastrophic wildfire.
- This is even more of a concern in light of climate change expectations.

- Comment 6:*
- Page 11: The proposed East Cascades Oak-Ponderosa Pine overstory stocking of 20-30 trees/acre does not seem compatible to the role of this forest as western gray squirrel habitat. According to the Washington Department of Fish and Wildlife's website, "western gray squirrels require mature stands of trees with sufficient canopy cover to provide secure nest sites and allow for traveling about in trees. Conifer dominated stands of large diameter and mast-producing trees of pine and oak with interconnected crowns are particularly important in the life history of the western gray squirrel. Logging that removes the large mast-producing trees and results in evenly spaced trees with few or no canopy connections reduces habitat quality." In other places, I have read that they need habitat with greater than 70-percent canopy closure. I have seen western gray squirrels on every visit to the west (Box Canyon Road) end of the Simcoe Mountains Unit in the dense pine-oak woodland forests along the road before reaching the gate.

**Response:**

- 70% canopy closure on dry forest types is not sustainable and is far outside of the Historic Range of Variability (HRV).
- The goals for forest management activities on the Wildlife Area include reducing stocking levels closer to the HRV.
- Forest management activities will accelerate the process of creating stand conditions that include retaining large, fire-resistant trees on the landscape.

- Page 13: The western gray squirrel management strategy should give the species a higher priority than the plan proposes by conducting landscape level management planning. All suitable squirrel habitat should be survey and mapped, not just in locations where logging is proposed. The recovery objective for a total population of 3,300 adult western gray squirrels in the South Cascades Recovery Area requires more assertive management to establish a knowledge of the current population and extent of suitable habitat before making forest management plans.

**Response:**

- Current status review for WGS and is open for public comment.
- Addressing forest health concerns is a priority which will benefit WGS.

- Page 14: I generally support the Oregon white oak management strategy to remove encroaching conifers. There are some exceptionally big and old white oaks near the summit of Tumwater Butte.

**Response:**

- Thank you for your comment.

- Pages 19-21: Timber sale revenue should not be the driving factor for forest management decisions. The lands in the Simcoe Mountains Unit were purchased with Washington Wildlife and Recreation Program funds for the purposes of conservation and recreation, not to increase state-owned commercial forest land. This section seems to miss the point that this is a wildlife area rather than Washington Department of Natural Resources land whose mission is to generate revenue. If trees need to be cut for habitat purposes, that should be considered a management cost rather than a revenue opportunity. This section makes me uneasy that land managers will make decisions based on revenue generation rather than wildlife and habitat health. Again, with the western gray squirrel being proposed for uplisting to state endangered status, it is obvious that current voluntary management measures are failing and the squirrel's conservation needs to be given higher priority than commercial logging.

**Response:**

- Timber sale revenue is not the driving force for forest management activities on the Simcoe Mountains Unit or other Wildlife Areas.
- Habitat maintenance and/or improvement, forest health, stand resiliency, and reducing the threat of large scale stand replacement fires are the primary reasons for doing these treatments.
- Revenue from the sale of logs helps to offset costs but it is not the reason for doing the work.

- *Comment 7:*
- Oregon white oak arguably represents the most important wildlife habitat in the Simcoe Mountains area. We appreciate that WDFW plans to retain all white oak (p. 19) and we urge that all oaks should be retained, regardless of whether those trees interfere with logging operations...which seems counterproductive in a wildlife area. A former District Wildlife Biologist once stated, "Rock Creek represents the most important wildlife habitat in Klickitat County."

**Response:**

- Forest management activities will be designed to maintain oak habitat by reducing conifer encroachment.

- Due to numerous environmental pressures and a reduction in protection protocol for western gray squirrels in logging and develop activities, gray squirrel conservation in the Simcoes should be granted a much higher priority than the WDFW plan proposes. We recommend that western gray squirrel surveys not only occur on a project by project basis, but rather initially in suitable habitat within the entire Simcoe CRMP boundaries. A landscape-wide survey will allow for better, more landscape-level planning. We also recommend a landscape level plan developed in coordination with the adjacent Yakama Nation lands.

**Response:**

- Forest management projects on WDFW Wildlife Areas, with a western gray squirrel presence, are surveyed for nests. This includes a pre-layout survey, pre-harvest survey and post-harvest survey. Nest trees are marked and the gps points taken.
- PHS recommendations for WGS have not reduced protection protocols for WGS.

- We do not understand why WDFW would promote “overstory free stocking levels (20-30 trees per acre, “on post-harvest logging stands in gray squirrel habitat. The western gray squirrel is an arboreal creature that is usually found in mixed conifer stands with greater than 70% canopy closure.

**Response:**

- One thing that is important to consider is that these 20 to 35 TPA are conifers.
- All hardwoods, including oak, are automatic leave trees.
- 70% canopy closure on dry forest types is not sustainable and is far outside of the Historic Range of Variability (HRV).
- The goals for forest management activities on the Wildlife Area include reducing stocking levels closer to the HRV.
- Forest management activities will accelerate the process of creating stand conditions that include retaining large, fire-resistant trees on the landscape.

- p.13. What is the extent of the proposed “no-cut inner western gray squirrel nest zone”? Previous western gray squirrel management recommendations, implemented in 2000, included 50’ no cut nest buffers adjacent to 350’ understory thinning, to allow for arboreal connectivity.

**Response:**

- The 50’ no cut buffer all but eliminates the possibility of thinning and creates a 50’ radius of small diameter ladder fuel trees.
- These small trees with ladder fuels greatly increase the potential for torching of the nest trees that we are trying to protect.
- A 25’ no cut radius buffer around nest trees and a thinning from below strategy on trees for those trees at a 25’ to 50’ radius from the nest tree has been incorporated into the WDFW squirrel management strategy.

- We strongly support conifer thinning when white oaks are threatened by overtopping.

**Response:**

- This is part of WDFW’s white oak management strategy.

- (p.13, 15) The plan includes variable density thinning, which has its drawbacks. Post-logging surveys on the White River Wildlife Area in Oregon showed that invasive weeds and impregnable brush species appeared and thrived post-logging. When coupled with prescribed burning, the understory plant species were beneficial to many wildlife species including western gray squirrel.

**Response:**

- There will always be the threat of invasives following a thinning operation.

- Restoration projects provide for seeding of abandoned roads and landings post-harvest. This seeding is with native grasses and forbs.
- With decades of previous logging in the Simcoe Mountains area, we propose only logging to release oaks and to remove conifer trees under 10" dbh to promote the enhancement of mature ponderosa pine and Douglas fir.

**Response:**

- Using this strategy with an arbitrary diameter limit, will have very little impact on improving forest health, stand resiliency, and reducing the threat of catastrophic wildfire.
- This is even more of a concern in light of climate change expectations.

## RANGE MANAGEMENT

**COMMENTS** from the 22 February **Toppenish** meeting:

- Maps of grazing permits.

**Response:**

- Grazing is currently permitted on all of the Simcoe Mountains Unit except Township 5 Range 18 Section 15.
- “Allotment” maps are included with specific grazing management plans and permits.
- WDFW does not typically include allotment maps in its Wildlife Area plans.

- “No T&E plant species...” is this still true. Consult Rare Plant Society’s survey data.

**Response:**

- WDFW relies on Natural Heritage Program information.
- Language has been added to the draft plan about documentation of rare plant species from Native Plant Society and Rare Care.
- The individual grazing management plans associated with the actual grazing permits do recognize that a number of rare plants have been documented either on or near the permit. Based on the ecology of these species, impacts from grazing seem unlikely.
- WDFW will attempt to ascertain the latest rare plant information and reconcile its records and welcomes continued effort to document rare plant species.

- More balanced discussion of grazing (pros and cons).

**Response:**

- The draft plan cites several scientific articles that report specific types of resource damage arising from inappropriately managed grazing.
- The draft plan literature review has been amended to include additional language, citations, and details about the types of risk associated with poor grazing practices.

- Possible effects on floral/nectar resources for insects.

**Response:**

- These effects are not often known in great detail, but most grazing utilization observed by WDFW staff is of perennial grasses.
- Nevertheless, WDFW land management staff have been working to better understand pollinator resources, and the draft plan has been modified to include language on these resources.
- Another commenter provided a link to a new publication on bumble bees. The draft plan should mention bumble bees and other insects too and language has been updated in the draft plan to reflect that.

- Page 26, “Literature Review:” Why not a literature review like this for the Forest Management section? This would be beneficial to describe the HRV of that is repeatedly mentioned but no background is given as to what that is.

**Response:**

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| ➤ HRV has been defined in the Forestry Chapter. |
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**COMMENTS from the 23 February Goldendale meeting:**

- Ongoing grazing important for land management & for the local community.

**Response:**

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| ➤ The draft plan includes managed grazing as an important activity on the Simcoe Mountains Unit. |
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- Water quality monitoring? (temperature, sediment, etc....).

**Response:**

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| ➤ Water quality monitoring is important, however, resources for this activity are not always available.  |
| ➤ WDFW believes that grazing management likely has a negligible effect on water quality in this watershed for several reasons: 1) scientific literature suggests that roads are the dominant contributor of mobilized sediment in grazed watersheds; 2) most livestock use of the property occurs after seasonal streams have already run dry for the year; and 3) riparian areas and draw bottoms typically have steep gradients, well-armored (rocky) substrates, and frequent steep and narrow stream profiles. These factors tend to discourage livestock overuse and limit the effects of that use that does occur. |
| ➤ Riparian areas on the Simcoe Mountain Unit are not characterized by the fine-textured, low-gradient soils that support robust hydric vegetation elsewhere in Washington, Oregon, and beyond.   |

**COMMENTS from the February online visitors to the Draft Document:**

- *Comment 8:*
- Thank you for the opportunity to comment. I am a resident of Washington State and a private land owner in Klickitat county. The Simcoe Mountain Unit is a great example of the Public Benefit of the Washington Wildlife and Recreation Program (WWRP) for the state, it's people and wildlife. One of the core principles of WWRP funding is that riparian areas need to be protected to allow our endangered wildlife species to thrive. The draft management plan for this new WDFW unit should be amended to prohibit grazing. Especially, around the critical springs, intermittent waterways and potentially fish bearing areas within the unit.

**Response:**

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| ➤ WWRP funding made WDFW's acquisition of the property possible.  |
| ➤ WWRP was informed of the grazing management prior to any funding awards and is consistent with the WWRP program and review.   |
| ➤ WDFW's mission is to preserve, protect, and perpetuate fish, wildlife and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities. |

- The primary purpose of WDFW lands is the preservation, protection, perpetuation, and management of fish and wildlife and their habitats.
- WDFW lands also may include fishing, hunting, fish and wildlife appreciation, and other outdoor recreational opportunities when compatible with healthy and diverse fish and wildlife populations according to WAC 220-500-010.
- WDFW does not permit grazing unless it is consistent with WDFW's mission and risks to wildlife and habitat can be safely managed.
- Where these conditions are met, grazing may be permitted as a tool to achieve one or more of the following four roles: to manage vegetation and habitat to provide food and cover for wildlife, to enhance recreational opportunity, to improve habitat conservation across multiple ownerships on landscape scales through coordinated resource management, and to protect community character.

- Per the WWRP program, conserving land along our waterways protects important habitat and helps keep our rivers healthy, clean, and more resilient to drought. Riparian Protection projects conserve and restore fresh and saltwater habitat while protecting fish habitat. In doing so, the grants help provide our families, farms, and fisheries with clean water across the state. Thousands of dollars were raised to procure this land for the public and for wildlife and the proposed management plan does not enhance the habitat from a grazing perspective. It proposes that we allow continued grazing on this property (i.e. maintain the status quo). Ranchers will be able to continue to use this now public land and continue to graze it for a tiny sum that will provide negligible financial benefit to the WDFW. The ranchers are also given free access to the springs in the area to water their cattle and save money so they don't have to bring in their own water for their herd. The damage that this decision will do on future generations of wildlife isn't adequately accounted for or addressed in this plan.

**Response:**

- Following WDFW's acquisition of the property, WDFW examined the grazing leases issued by Western Pacific Timber to the lessees.
- Where changes were necessary to align WDFW-issued permits with its mission, they were made, including a reduction in allowed grazing intensity in some areas.
- WDFW does not manage grazing as a means of generating revenue, but instead as a means of managing vegetation and thus habitat.
- Each time WDFW renews a grazing permit, an environmental review is conducted to evaluate impacts to riparian and other resources. Issues that are identified are discussed and a plan for correction is developed.
- The draft plan cites multiple scientific studies reporting risks to riparian area resources where grazing has been improperly managed. This type of grazing is not proposed.
- Grazing is also not required to protect the area against wildfire. There are many other techniques that can be used and the deer and elk in this area have shown that they can also help keep plant growth in check as this is an important area for their winter range.

**Response:**

- The draft plan does not claim that grazing is required to “protect” the area from fire.
- Light-to-moderate grazing may offer modest benefits in the form of reduced fire severity under particular circumstances as outlined in WDFW’s Grazing Guidance and Grazing Management Tools found at [Grazing on WDFW Lands | Washington Department of Fish & Wildlife](#). This type of grazing need not interfere with winter range.

- As the status of the western grey-squirrel is being re-evaluated for more severe listing (from threatened to endangered), WDFW needs to remove the cattle from this area and try to revitalize the ecological health of this new public land treasure.

**Response:**

- WDFW has not seen scientific studies concluding that livestock grazing threatens western gray squirrel (WGS) populations.
- WDFW’s Western Gray Squirrel Recovery plan identifies several points relevant to this comment: 1) little to no research has addressed the effect of grazing on WGS; 2) heavy historical livestock grazing has been associated with soil disturbance and conifer recruitment in the past; 3) fire exclusion and subsequent (severe) fire can have negative consequences for WGS; and 4) livestock grazing could reduce fine fuels that might help carry fire.
- WDFW has recently surveyed 3 forested areas that are within a 41-year-old grazing permit area on the Soda Springs Unit and hundreds of WGS nests within these units were found. There is no evidence that WDFW’s grazing program is affecting WGS.
- WDFW does not propose to exclude fire through livestock grazing.
- It is possible that some reduction in fire severity could result from livestock grazing, but this effect would be modest due to the light-to-moderate grazing intensity allowed in the grazing management plans.
- Additionally, WDFW notes that grazing is permitted elsewhere on the Klickitat Wildlife Area and there have not been indications of negative effects on WGS in those areas.

- The WDFW should show leadership in this area to protect the game and non-game species as more and more of the county is being broken up by private landowners and habitat continues to degrade due to the lack of water in the area. As the county becomes dryer and dryer, the limited supply of water in this area will be ever more critical. Free range cattle have been proven to have dire consequences to riparian areas in countless studies.

**Response:**

- Following WDFW’s acquisition of the property, WDFW examined the grazing leases issued by Western Pacific Timber to the lessees.
- Where changes were necessary to align WDFW-issued permits with its mission, they were made, including a reduction in allowed grazing intensity in some areas.

- WDFW does not manage grazing as a means of generating revenue, but instead as a means of managing vegetation and thus habitat.
  - The draft plan cites multiple scientific studies reporting risks to riparian area resources where grazing has been improperly managed. This type of grazing is not proposed.
- If the plan is allowed to move forward as is, then the conditions of WWRP program grantees will have to be revisited. The wildlife and local ecosystem should not be out-prioritized by ranching interests when they are clearly at counter to the mission of the program (and WDFW). I hope the grazing aspects of this plan can be changed, even if it increases costs for fencing. The existing grazing leases in the area number in the 1,000's of acres, but our wildlife has precious few acres of untrammeled habitat.
- Thank you for your time and consideration.
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| <b>Response:</b>   |
| <ul style="list-style-type: none"> <li>➤ CRM believes that scientific literature and its own experience indicate that 1) livestock grazing is a highly variable practice with highly variable outcomes depending on how it is managed, and 2) that properly managed grazing is consistent with wildlife habitat and maintaining ecological integrity.</li> <li>➤ The purpose of the acquisition and the goals for the Simcoe Mountains Unit include long-term protection of riparian and upland fish and wildlife habitat that provide connectivity from the upper Rock Creek watershed to the Columbia River, within a working lands framework of compatible grazing and forestry.</li> <li>➤ Objectives Statement for the Simcoe Mountains Unit management plan: <ul style="list-style-type: none"> <li>○ <i>“Collaborative management, habitat stewardship, and conservation for multiple uses – cultural, recreation, working lands, fish and wildlife.”</i></li> </ul> </li> <li>➤ WWRP was informed of the grazing management prior to any funding awards and is consistent with the WWRP program and review.</li> </ul> |

- *Comment 9:*
- With pending up-listing of the western gray squirrel to state endangered status, it seems imperative that the Simcoe Mountains Plan be amended to insure western gray squirrel conservation measures are prioritized, because as currently written, other proposed practices such as logging, lack of riparian protection, and potentially grazing, are given equal merit. Additionally, there is no discussion on confirmed rare plants within the project area. Under the currently proposed WDFW plan, the Simcoe Mountains Area will likely resemble DNR trust forest lands where timber harvest, road access, and cattle grazing are shared landscape features. These active management activities are detrimental to the state listed western gray squirrel, gray wolves, and species such as the white-headed woodpecker, who require large ponderosa pine trees. Cattle grazing, as has been demonstrated on shrub-steppe lands such as the Yakama Firing Center property, negatively results in heavy impacts steppe habitat and those wildlife species dependent on native grasses, as well as riparian areas.

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| <b>Response:</b>  |
| <ul style="list-style-type: none"> <li>➤ The comment that cattle grazing is “detrimental” to WGS, gray wolves, and white-headed woodpeckers is not supported with scientific evidence.</li> </ul> |

- Literature on white-headed woodpeckers notes that grazing is a historical land use in the ponderosa pine systems inhabited by white-headed woodpeckers, but research on direct effects – in particular, the direct effects of light-to-moderate later-season grazing occurring on the property – is lacking.
- Large differences in grazing management (and thus grazing outcomes) are a possibility.
- While WDFW is not familiar with the particular circumstances alluded to on the Yakima Training Center, WDFW acknowledges widespread adverse riparian impacts due to historical grazing practices in the western United States, which WDFW believes highlights the need for carefully managed grazing informed by regular monitoring.
- Grazing leading to negative “heavy” impacts is contrary to WDFW’s experience with other grazing permits as well as numerous scientific articles that make clear distinctions between managed grazing and (heavy) unmanaged grazing.
- WDFW relies on Natural Heritage Program information.
- Language has been added to the draft plan about documentation of rare plant species from Native Plant Society and Rare Care.
- The individual grazing management plans associated with the actual grazing permits do recognize that a number of rare plants have been documented either on or near the permit. Based on the ecology of these species, impacts from grazing seem unlikely.
- WDFW will attempt to ascertain the latest rare plant information and reconcile its records and welcomes continued effort to document rare plant species.

- The most contentious and controversial part of the Simcoe Mountain CRMP involves allowing cattle grazing. While the plan only touted the positive impacts of grazing, research has also shown the negative aspects, which are many.

**Response:**

- The draft plan cites several scientific articles that report specific types of resource damage arising from inappropriately managed grazing.
- The draft plan literature review has been amended to include additional language, citations, and details about the types of risk associated with poor grazing practices.

- We have already addressed our concerns with wolves and roads. Wolves have been removed from ranching areas by WDFW personnel when there are wolf-cow conflicts. Wolf recovery in Washington will depend on not only increased population numbers, but also geographic distribution. With only two confirmed wolves in Klickitat County and none reported west of Klickitat County, WDFW should strive to increase geographic wolf distribution by closing roads and limiting cattle grazing in the Simcoes until wolf populations are fully recovered.

**Response:**

- WDFW manages wolves consistent with its Wolf Management Plan, its Wolf-Livestock Interaction Protocol, and applicable state and federal law.
- WDFW’s wolf numbers show that overall population numbers have been increasing in an uninterrupted fashion since wolves recolonized the state

- Individual grazing permits have a number of default measures designed to minimize the risk of wolf-livestock conflicts.
- Another reason to ban cattle within the CRMA is supported by the quote on page 35. “Soil disturbance promotes invasive weeds and annual grasses.”
- |  |
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| <b>Response:</b>   |
| <ul style="list-style-type: none"> <li>➤ The plan stated “Excessive soil disturbance...”</li> <li>➤ Scientific literature does show an association between soil disturbance and invasive weeds. Some of these articles identify biological soil crust as one factor that discourages weed invasion.</li> <li>➤ WDFW monitors grazing utilization and biological soil crust cover (among other indicators) on the Simcoe Mountains Unit.</li> <li>➤ Many areas appear to not be grazed at all in a given year, and in any case measured biological soil crust is not decreasing.</li> <li>➤ The plan does not assert that livestock grazing increases habitat resilience to climate change. But neither does WDFW find that there are indications that grazing, as currently managed on the Simcoe Mountains Unit, is reducing habitat resilience to climate change.</li> </ul> |
- We have also mentioned the negative impact cows have on grass dependent native birds, and if Mill Ranch Springs is not fenced, cows may also cause damage to that riparian area. One does not make habitats more resilient to climate change via grazing. The Simcoe Mountains, as an integral part of the Klickitat Wildlife Area, should be managed for wildlife as its main priority. While the draft management plan states that wildlife concerns are a priority, the bulk of the narrative contradicts those aims.
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| <b>Response:</b>  |
| <ul style="list-style-type: none"> <li>➤ Grazing management is a highly variable activity with highly variable outcomes.</li> <li>➤ WDFW believes that the draft plan and CRM process demonstrate that the Simcoe Mountains Unit will be managed consistent with WDFW’s conservation mission.</li> <li>➤ If the commenters intended to refer to Milk Ranch Spring, that area is being monitored to ensure that seasonal use remains within prescribed limits.</li> <li>➤ If necessary, a particular permit’s grazing management plan will be changed in order to achieve this.</li> </ul> |
- *Comment 10:*
- Pages 25-27. The Range Management section only acknowledges and cites literature that supports the positive impacts of livestock grazing. There are many negative impacts in the literature, too. Tribal representatives are correct to be concerned about impacts to shallow-soiled and rocky areas since these were the locations where we found Allium, Lewisia and Lomatium species during our plant surveys.
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| <b>Response:</b>   |
| <ul style="list-style-type: none"> <li>➤ The draft plan cites several scientific articles that report specific types of resource damage arising from inappropriately managed grazing.</li> <li>➤ The draft plan literature review has been amended to include additional language, citations, and details about the types of risk associated with poor grazing practices.</li> </ul> |

- The plan also does not address Tumwater Corral Spring. I have visited it several times during plant surveys. The spring appears to at one time had a developed livestock water system but that is now in disrepair and livestock are free to wade around in the spring, which has been severely degraded. The meadow next to the spring has been planted in non-native turf grass that encourages livestock to camp out at the spring rather than spreading over the landscape to graze. There is not any evidence of a corral that may have once existed here. I recommend that this spring be fenced and livestock access to water be better managed.

**Response:**

- The section containing Tumwater Corral Spring (Section 15) is not currently permitted for grazing.
- WDFW is aware that unpermitted grazing has occurred in this area.
- Fencing was constructed around this section in 2022 to control cattle access, shown in the plan's Infrastructure chapter.

There also are areas of shrub-steppe, consisting of antelope bitterbrush and stiff sagebrush, that have not been addressed in this plan.

**Response:**

- Language has been added to the draft plan about documentation of rare plant species from Native Plant Society and Rare Care.
- WDFW will attempt to ascertain the latest rare plant information and reconcile its records and welcomes continued effort to document rare plant species.

- Page 25: The statement that “no federal or state sensitive plant species are known from the Simcoe Mountains Unit” is not correct. I have been part of a group of volunteers developing the plant list for the Simcoe Mountains Unit and I know that we have found and reported at least four rare plant species, along with GPS coordinates, to both the Klickitat Wildlife Area manager and the Washington Natural Heritage Program (through the University of Washington's Rare Care Program). The rare plant species we have identified include:

- Bolander's linanthus (*Leptosiphon bolanderi*)
- Baker's hawksbeard (*Crepis bakeri*)
- Dwarf rush (*Juncus hemiendytus*)
- Redblack rockcress (*Boechera atrorubens*)

The draft management plan should be corrected and conservation of these species should be addressed, including impacts of forest management and livestock grazing on their persistence and recovery.

**Response:**

- The draft plan states: “*According to current spatial data from the DNR's Washington Natural Heritage Program, no federal or state sensitive plant species are known from the Simcoe Mountains Unit.*”
- WDFW relies on Natural Heritage Program information.
- Language has been added to the draft plan about documentation of rare plant species from Native Plant Society and Rare Care.

- The individual grazing management plans associated with the actual grazing permits do recognize that a number of rare plants have been documented either on or near the permit. Based on the ecology of these species, impacts from grazing seem unlikely.
- Some staff records of rare species on the property are not fully consistent with the list provided by this commenter. WDFW will attempt to ascertain the latest information and reconcile its records and welcomes continued effort to document rare plant species

- *Comment 11:*
- The most contentious and controversial part of the Simcoe Mountain CRMP involves allowing cattle grazing. While the plan only touted the positive impacts of grazing, research has also shown the negative aspects, which are many.

**Response:**

- The draft plan cites several scientific articles that report specific types of resource damage arising from inappropriately managed grazing.
- The draft plan literature review has been amended to include additional language, citations, and details about the types of risk associated with poor grazing practices.

- We have already addressed our concerns with wolves and roads. Wolves have been removed from ranching areas by WDFW personnel when there are wolf-cow conflicts. Wolf recovery in Washington will depend on not only increased population numbers, but also geographic distribution. With only two confirmed wolves in Klickitat County and none reported west of Klickitat County, WDFW should strive to increase geographic wolf distribution by closing roads and limiting cattle grazing in the Simcoes until wolf populations are fully recovered.

**Response:**

- WDFW manages wolves consistent with its Wolf Management Plan, its Wolf-Livestock Interaction Protocol, and applicable state and federal law.
- WDFW's wolf numbers show that overall population numbers have been increasing in an uninterrupted fashion since wolves recolonized the state.
- Individual grazing permits have a number of default measures designed to minimize the risk of wolf-livestock conflicts.

- Another reason to ban cattle within the CRMA is supported by the quote on page 35. "Soil disturbance promotes invasive weeds and annual grasses."

**Response:**

- The plan stated "Excessive soil disturbance..."
- Scientific literature does show an association between soil disturbance and invasive weeds. Some of these articles identify biological soil crust as one factor that discourages weed invasion.
- WDFW monitors grazing utilization and biological soil crust cover (among other indicators) on the Simcoe Mountains Unit.

- Many areas appear to not be grazed at all in a given year, and in any case measured biological soil crust is not decreasing.
- The plan does not assert that livestock grazing increases habitat resilience to climate change. But neither does WDFW find that there are indications that grazing, as currently managed on the Simcoe Mountains Unit, is reducing habitat resilience to climate change.

- We have also mentioned the negative impact cows have on grass dependent native birds, and if Mill Ranch Springs is not fenced, cows may also cause damage to that riparian area. One does not make habitats more resilient to climate change via grazing. The Simcoe Mountains, as an integral part of the Klickitat Wildlife Area, should be managed for wildlife as its main priority. While the draft management plan states that wildlife concerns are a priority, the bulk of the narrative contradicts those aims.

**Response:**

- Grazing management is a highly variable activity with highly variable outcomes.
- WDFW believes that the draft plan and CRM process demonstrate that the Simcoe Mountains Unit will be managed consistent with WDFW's conservation mission.
- If the commenters intended to refer to Milk Ranch Spring, that area is being monitored to ensure that seasonal use remains within prescribed limits.
- If necessary, a particular permit's grazing management plan will be changed in order to achieve this.

- *Comment 12:*
- As far as we can determine, the WDFW grazing allotments are being grazed properly without too many visible impacts to the landscape. Adjacent BLM lands appear to be more heavily grazed and tend to have more weedy species, some of which could potentially exacerbate wildland fires. Fortunately, we have yet to see the presence of cereal rye, tall oatgrass and rush skeletonweed which are rapidly taking over wildlands at lower elevations, and which provide thatch which potentially could exacerbate future fire danger.

**Response:**

- WDFW has reached a similar conclusion about WDFW-managed grazing permits.
- Scientific literature has identified strong links between fire and some invasive species.

- *Comment 13:*
- Thank you for taking care of the land. Really appreciate the emphasize on the health of the oak forest. The management plan looks pretty good, but I am very skeptical about the claims that cattle grazing increases plant diversity and ecosystem health. In my experience cattle grazing often creates a landscape that looks like it got nuked and the only diversity has been an increase in invasive species like cheat grass. Please do what you can to protect sensitive wetland areas from cattle.

**Response:**

- The citation on diversity was referring to habitat diversity.
- Language in the draft plan has been clarified.

- A landscape that looks “nuked” conflicts with not only WDFW’s conservation mission but also the draft management plan, and grazing management would be changed if this were to occur.

- *Comment 14:*
- Please do not allow any commercial use of these lands, especially livestock grazing.

**Response:**

- WAC Chapter 220-500 allows for a variety of commercial uses on WDFW-managed land, including livestock grazing, under certain conditions.

## ***WILDLIFE AND HABITAT MANAGEMENT***

### ***COMMENTS*** from the 22 February **Toppenish** meeting:

- Page 31, last paragraph, lines 5 and 6: A PHS listed species not mentioned earlier (northern goshawk). A PHS listed species not mentioned earlier (burrowing owl). PHS listed species (white-headed woodpeckers). Also a PHS listed species (sharp tailed snakes).

#### ***Response:***

- All PHS species and habitats are considered when conducting management activities.

- Page 34, 2<sup>nd</sup> paragraph, line “white-headed woodpeckers...upper drainage.” Here, you acknowledge that WHWO occur in the management area. Thus, as a PHS listed species and a candidate for listing, you should include it in your management goals as you do for western gray squirrel and Oregon white oak.

#### ***Response:***

- The plan states that many bird species are associated with habitat *types* present on the Unit. WDFW does not know about presence or location of WHWO and therefore they would fall under the management goal of inventory of species.  
Language was changed in draft plan.

### ***COMMENTS*** from the 23 February **Goldendale** meeting:

- Suckerfish used to show up in Rock Creek around February and now they do not (been at least 15 years)

#### ***Response:***

- Fish are covered in the Hydrology chapter.  
➤ Thank you for your comment.

### ***COMMENTS*** from the February **online** visitors to the Draft Document:

- *Comment 15:*
- Page 34 The Invasive Plants section seems pretty brief to me. My understanding has always been that it's best to first keep weeds out, as most are really difficult to eradicate. Why no mention of ensuring that logging equipment is clean before being used on the property? That and other ground-disturbing activities make for excellent chances to get weeds established where they did not occur previously.

#### ***Response:***

- The weed management plan for the KWA, which is linked in this document, has more specifics. On a project-to -project basis, efforts will be implemented to prevent new weed infestations.

- *Comment 16:*
- I was at the Toppenish meeting and shared some comments with staff and on the whiteboards that night. I just saw an announcement that this publication is available:

Strategy to Protect State and Federally Recognized Bumble Bee Species of Conservation Concern in Washington State. [https://xerces.org/sites/default/files/publications/22-035\\_01\\_0.pdf](https://xerces.org/sites/default/files/publications/22-035_01_0.pdf) Just eyeballing the map, it looks like the Simcoe Mountains Unit is in an area of High Priority for the Conservation of Imperiled Bumble Bees in Washington State. This publication has conservation recommendations that are relevant to the unit management plan.

**Response:**

- Thank you for a link to this new publication. Yes, the Plan should mention bumble bees and other insects too. They are considered wildlife and therefore included in the inventory in Goal 4. Language has been updated in the draft plan.

- *Comment 17:*
- Mountain lions should be managed as a protected species on the Simcoe CRMA, rather than a game species. With the biologically indefensible removal of 27 cougars (at this writing) by WDFW's sponsored Klickitat County Posse, mountain lions should have a small refugia area in Klickitat County to serve as the vital role as key ecological forest species.

**Response:**

- Mountain lions are classified as a game species and managed under the Game Management Plan, which is linked in this Plan.

- *Comment 18:*
- (p.33) Mountain lions should be managed as a protected species on the Simcoe CRMA, rather than a game species. With the absolutely unnecessary removal of 27 cougars (as this writing) by WDFW's sponsored Klickitat County Posse, mountain lions should have a small refugia area in Klickitat County to serve as the vital role as key ecological forest species.

**Response:**

- Mountain lions are classified as a game species and managed under the Game Management Plan, which is linked in this Plan.

- *Comment 19:*
- I and my small team have been conducting plant and animal surveys within the Simcoe Mountains Unit of the Klickitat Wildlife Area since the first days that it became public (WDFW) property. Much of the unit consists of decent natural quality grasslands, forestlands and scablands. Rare plants that have been identified on the property include *Boechera atrorubens* (state sensitive), *Crepis bakeri* (state sensitive), *Juncus hemiendytus* var. *hemiendytus* (state threatened), *Leptosiphon bolanderi* (WA sensitive), *Trichostemma oblongum* (Washington sensitive) and *Zeltnera muhlenbergii* (Washington sensitive). Rare plant locations and an updated general plant survey have been provided to the Klickitat Wildlife Area manager and also sent to Washington Rare Care, which provides the data to appropriate state and federal agencies as well as the scabland habitats across the unit while the threatened *Juncus* occurs in vernal moist swales and along the more natural vegetation of some of the vernal streams where thick stands of bulbous blue grass or other weedy annuals have yet to invade. So far we have yet to find several other rare

species that occur on adjacent public properties and may be present on this unit. Bird surveys have been conducted in conjunction with each plant survey visit, and these have been posted online at eBird. It should be noted that the Rock Creek drainage is an important migratory route for numerous bird species. Butterfly resources show that the upper Rock Creek area is likewise a refugia for a number of butterflies unique to the state. We have done some preliminary listing of butterflies observed during our visits, but it would be prudent to have dedicated lepidopterists visit the area to more properly document what can be found on the property. During our visits, we have also seen a number of western gray squirrels as well as sleeping and nesting platforms.

**Response:**

- We are incredibly grateful for your survey efforts and data sharing, especially with our inventory efforts in Goal 4.
- DNR Natural Heritage Program is responsible for documentation of rare plants, but WDFW Wildlife Area Staff also keeps records for individual Units.
- Additional language has been included in the draft plan.

## ***RECREATION MANAGEMENT***

***COMMENTS*** from the 22 February **Toppenish** meeting:

- Snowmobiles along Yakama Nation Boundary and up – not allowed.  

<b>Response:</b>
➤ WDFW does not allow snowmobile use. Noted for further discussion with Enforcement.
- Include Yakama Nation Treaty Rights – Rec, hunting, fishing, gathering, cultural, values; Yakama Nation pop small compared to general public → smaller take  

<b>Response:</b>
➤ Included language in the draft plan.
- Access for Yakama Nation for all values – gates (mechanism to get the access).  

<b>Response:</b>
➤ Currently the Unit is open for non-motorized access. Further discussion with Yakama Nation regarding gates.
- Yakama Nation does not support e-bike use on non-motorized
  - Rd hunting
  - Poaching
  - Quicker, faster
  - Silent

<b>Response:</b>
➤ Thank you for comment. Currently the situation will remain status quo, unless law changes.
- Yakama Nation Cultural is everything
  - hunting, fishing (access)
  - rec
  - sites
  - gathering
  - etc.

<b>Response:</b>
➤ Included language in the draft plan.
- Glad acquired: but need Yakama Nation consideration  
 WDFW help educate the public with Yakama Nation values, treaty, etc., – respectful of Yakama Nation  

<b>Response:</b>
➤ Included language in the draft plan and is also part of the CRM process.

***COMMENTS*** from the 23 February **Goldendale** meeting:

- How will the traffic parking along Box Canyon Road be managed?

**Response:**

- The public can park on WDFW property adjacent to Box Canyon Road where parking conditions can be met.

- How will signage of camping regulations be handled? (to maintain 1,000' minimum distance from adjacent private landowners, and 200' distance perennial water)?

**Response:**

- Once the draft plan is approved, signs will need to be posted to provide the information to visitors.

How will the need for sanitation facilities be dealt with?

**Response:**

- WDFW will likely place portable toilets somewhere near the main parking areas.

- Currently there isn't adequate parking to accommodate opening this area to the regular deer hunting season.

**Response:**

- The Simcoe Unit is a work in progress. If more parking is needed, WDFW will look at options for meeting the need.

- Will there be a WDFW rep available on site to facilitate a smooth opening weekend of deer hunting season – and ensure neighboring landowners are not trespassed upon?

Thank you.

**Response:**

- WDFW Enforcement and Wildlife Area staff do spend time on this Unit and other units during the opening weekend of deer season, but we are limited in staff capacity. WDFW Enforcement can be contacted at any time for reporting of any violations.

**COMMENTS** from the February **online** visitors to the Draft Document:

- *Comment 20:*
- Sorry I missed the meeting. I am an enrolled member of the Yakama Nation and quite interested in traditional food gathering in this area. Please keep me informed.

**Response:**

- Thank you for your interest and your information noted.

- *Comment 21:*
- Roads and Wolves...With the recent confirmation of a pair of wolves in Klickitat County, it is incumbent on the Simcoe Plan to offer full protection to the federally listed species, especially as Klickitat County wages a war on predatory wildlife species. A primary way to insure wolf protection is to close roads in areas where deer/elk migrate or congregate, and to impose temporary road closures when wolves are confirmed. We recommend additional roads be closed within the CRMP area. We are grateful to WDFW for banning ATVs, dirt bikes and snowmobiles within the Simcoe Mountains area.

**Response:**

➤ There is currently no motorized access within the Unit.

- *Comment 22:*
- Page 36: I support the Recreation Management decision to keep the Simcoe Mountains Unit non-motorized.

**Response:**

➤ Thank you for your comment.

- *Comment 23:*
- We are grateful to WDFW for banning ATVs, dirt bikes and snowmobiles within the Simcoe Mountains area. (p. 39)

**Response:**

➤ Thank you for your comment.

- *Comment 24:*
- We have noted an increase in the number of people camping along Box Canyon Road the past 2 years. Part of this is long term hunter camps during turkey or big game seasons. During the spring of 2022, we noted numerous tent and camper-van campers camping along that road by hikers and mountain bikers who predominantly are riding the roads, though we have seen some bike tracks off-road. It may be prudent to better sign trailheads about appropriate bike usage on this unit as people discover that they can bike the roads all day long. Gates between grazing units and between WDFW/BLM properties may need signage to remind recreationists to close gates and prevent cattle inadvertently moving between units. We did note that some of the barb wire fence gates were hard to open and close properly. So far, we have not noted e-bikes in the area, though I'd guess they will be there as that mode of recreation becomes more popular.

**Response:**

➤ Once the draft plan is approved, signs will need to be posted to provide the information to visitors.

- The Simcoe Mountains Unit of the Klickitat Wildlife Area is quite the pretty, near natural quality habitat that can provide a near wilderness experience for a wide variety of users. It will be important to plan for increased recreational use as people discover the area.

**Response:**

➤ The adaptive management part of the plan to address emergent needs.

- *Comment 25:*
- Here are two comments regarding the fishing at two lakes in Klickitat County. 1) I suggest that the Mary Hill pond be planted for a winter fishery. At present the lake is stocked in March, but an earlier planting should provide excellent fishing from Nov. - Spring. I notice that Horsethief Lake was planted in Feb. Why? The lake is closed until April. Perhaps in the future those plants can be rescheduled for the Mary Hill Pond, a much more easily accessed opportunity than Horsethief.

**Response:**

➤ These comments are not applicable to the Simcoe Unit.

- *Comment 26:*
- Also, please do not allow any motorized vehicles INCLUDING e-bikes. Thanks again. (oh and btw, this area is used by backcountry skiers as well as other activities mentioned in the plan).

**Response:**

- There is currently no motorized access within the Unit.  
 ➤ Currently the e-bike situation will remain status quo, unless law changes.

- *Comment 27:*
- Page 37, A fast-growing recreational pursuit seems to be the use of Drones. I found a WAC (220-413-070) noting that it is illegal to use a drone for the purpose of hunting, has there been other thought about restrictions, such as during spring nesting season? That is probably being addressed state-wide, but it came to mind. Why not include it under “other uses” on page 39?

**Response:**

- Correct. Please see WDFW's 10-year Recreation Strategy (Deliverable 4.15 on page 58) to see what the Department has planned statewide for regulations on drones. Since these regulations have not been proposed or approved, they have not been included in this plan.

- Page 39 discusses target shooting, and links to the WDFW website about this practice. Even though that website notes that trees should not be used as targets, I would encourage mention of that specifically in this plan – particularly since timber management is one of the objectives of the plan.

**Response:**

- Printed infographic signs regarding the target shooting rules will be posted on the Simcoe Mountains Unit.

- Overall, I found the plan to be well-done and comprehensive, an excellent product. I recall when the Game Management Unit east of Highway 97 had virtually no land open for public hunting, so this property is quite valuable in my mind, and kudos to all who made it possible.

**Response:**

- Thank you for your comment.

## **HYDROLOGY**

**COMMENTS** from the 22 February **Toppenish** meeting:

- This was public meeting – not consultation  
Rock Creek is tributary for Rock Creek Longhouse; important for tree species, animals (deer), Eagles, and resident fish as well as steelhead. Each year the stream dries up due to water withdrawal. Water quality used to be excellent quality for Natives that used to live along Creek (drinkable). Roads and sediment has degraded the waterways. Streams and roads should be classified. Any new roads (planned) must be reviewed as to type and use.

**Response:**

- Yes, thank you for your comment.

Fish surveys are important to livelihood and subsistence.

**Response:**

- Yes, thank you for your comment.

BMP's need enforcement, not just a list

**Response:**

- Best management Practices (BMP) will be implemented in conjunction with individual projects.

Cultural Resource is a way of Yakama people. Archaeology is physical finds discovery-The End

**Response:**

- Included in introduction in draft plan.

**COMMENTS** from the 23 February **Goldendale** meeting:

- None

**COMMENTS** from the February **online** visitors to the Draft Document:

- Comment 28:  
Fish Resources - It doesn't appear that many riparian areas exist within the planning area. For those waters within the CRMP, we ask that WDFW riparian buffers as shown in WDFW's Riparian Areas Guidelines PHS document be followed.

**Response:**

- Checked draft for current PHS guidelines.

- We wonder whether the Mill Ranch spring is fenced to exclude cattle?

**Response:**

- Milk Ranch Spring is not currently fence, but this is a proposed project to accomplish that.

- *Comment 29:*
- It doesn't appear that many riparian areas exist within the planning area. For those waters within the CRMP, we ask that WDFW riparian buffers as shown in WDFW's Riparian Areas Guidelines PHS document be followed.

**Response:**

➤ Checked draft for current PHS guidelines

- We wonder whether the Mill Ranch spring is fenced to exclude cattle?

**Response:**

➤ Milk Ranch Spring is not currently fence, but this is a proposed project to accomplish that.

- *Comment 30:*

- As noted above, the drainages within the Simcoe Mountains Unit are important north-south migratory paths for wildlife. Likewise, the area provides wildlife movement between the moister western portion of the area and the drier areas to the east. With Western Pacific Timber selling off their lands, the eventual building of homes or vacation cabins and fencing of these private lands will restrict migratory routes, and they will increase the chance of wildfire events. Where possible, it would be feasible for the state to continue purchase of adjacent lands as well as some inholdings to maintain migratory routes as well as increase lands available for hunting, other forms of recreation, and grazing. Purchase of land including perennial streams (the major tributaries of Rock Creek) would also help maintain stream flow to help salmonids further downstream.

**Response:**

➤ The original concept was to purchase the WPT ownership East of 97 in this area. We have pursued the available opportunities.

- The only other thing I can think of management wise would be that one of the vernal stream drainages towards the west end of the unit is severely downcut. It might be interesting to see some beaver dam analogs placed in the drainage to begin raising the stream bed back up to the existing canyon level, thus helping distribute water throughout that canyon, raising the water table, and providing green vegetation for a longer period into the summer for both cattle and native herbivores.

**Response:**

➤ Thank you for your recommendation.

## CULTURAL RESOURCES

COMMENTS from the 22 February **Toppenish** meeting:

- None

COMMENTS from the 23 February **Goldendale** meeting:

- None

COMMENTS from the February **online** visitors to the Draft Document:

- *Comment 31:*
- Page 47, Discovery of human remains - I think this looks good, but if it has not, I would make sure Law Enforcement (Klickitat County Sheriff) reviews. #2 under this section mentions the Operations Supervisor establishing a boundary. I would emphasize up front letting Law Enforcement know – they may want something different from an evidence standpoint.

**Response:**

➤ Will follow up with Enforcement.

- *Comment 32:*
- We have noted some large stands of native onions (*Allium sp.*) and desertparsleys (*Lomatium sp.*) which might be of interest to local native American populations, although we don't know which species they prefer.

**Response:**

➤ Thank you for the information.

## ***INFRASTRUCTURE AND MAINTENANCE***

### ***COMMENTS*** from the 22 February **Toppenish** meeting:

- Page 52, next to last paragraph: Please ensure that signs and pamphlets state it is illegal to cut down standing dead and live trees, as firewood cutting is a big problem on other WDFW managed lands in eastern WA and it impacts habitat for cavity-using species.

<b><i>Response:</i></b>
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- |  |
|--|
| ➤ WDFW acknowledges the problem and is working on options to resolve, such as signs, fencing, etc. |
|--|

### ***COMMENTS*** from the 23 February **Goldendale** meeting:

- None

### ***COMMENTS*** from the February **online** visitors to the Draft Document:

- *Comment 33:*
- p. 53: With the recent confirmation of a pair of wolves in Klickitat County, it is incumbent on the Simcoe Plan to offer full protection to the federally listed species, especially as the Klickitat County Sheriff wages a war on predatory wildlife species. A primary way to insure wolf protection is to close roads in areas where deer/elk migrate or congregate, and to impose temporary road closures when wolves are confirmed. We recommend additional roads be closed within the CRMP area.

<b><i>Response:</i></b>
-------------------------

- |  |
|--|
| ➤ The Simcoe Mountains Unit is not open to motorized access. |
|--|

## ***REFERENCES***

### ***COMMENTS*** from the 22 February **Toppenish** meeting:

- None

### ***COMMENTS*** from the 23 February **Goldendale** meeting:

- None

### ***COMMENTS*** from the February **online** visitors to the Draft Document:

- None

## APPENDICES

**COMMENTS** from the 22 February **Toppenish** meeting:

- Appendix A, page 1, last under “Tasks:” I commend this action and hope it gets implemented!

<b>Response:</b>
➤ Thank you for your comment.

- Page 2, last under “Objective” (A. Assess...) I can't find this in the document. Please include it so we can see what species are targeted for inventory surveys.

<b>Response:</b>
➤ The objective in the draft plan was clarified and reworded to: “Assess occupancy of wildlife species in the Unit”

**COMMENTS** from the 23 February **Goldendale** meeting:

- None

**COMMENTS** from the February **online** visitors to the Draft Document:

- None