

Wood, Lisa A (DFW)

From: Mark DeLeon <markfdeleon@gmail.com>
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To: SEPADesk2 (DFW)
Subject: Comment on SEPA No. 17015

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I have read closely the non-project SEPA checklist and the attendant document "Oak Creek Wildlife Area Management Plan" (draft 2017), and I respectfully offer the following comments directed to SEPA Checklist Question 13 Historic and cultural preservation:

Questions 13A and 13B asks simple presence/absence questions; to paraphrase: are there any significant archaeological or historical sites recorded in the geographic boundaries of the document, and what is the relevant literature. Neither question was answered and the SEPA checklist is incomplete until revised.

A basic literature review should have been conducted for the planning area in order to answer Questions 13A & 13B. Presumably, the SEPA checklist is unanswered because the associated Oak Creek plan is silent regarding historic and cultural resources. The plan, however, is not totally silent about cultural resources albeit addressed elsewhere in the SEPA checklist Question 8c (Land and Shoreline Use) where a "hay barn and historic grain silo" is identified in the Cowiche Unit.

Question 13C similarly remains unanswered, therefore SEPA No. 17015 is incomplete. Question 13C addresses a significant resource concern bearing on potential impacts to cultural resources. The Oak Creek Plan provides a framework for a range of on-the-ground actions, which, though individually small scale, nevertheless covers an implementation period of ten years where the potential to effect a sizable proportion of the planning area may be severe. Impacts must be identified as such in the plan, no matter how small-scale or insignificant they may appear to the analyst, and assessed as to effects or impacts to cultural resources.

For example, the Yakima Herald Republic newspaper on May 1, 2017 featured the elk antler harvest where 150-200 people literally swarm the management area yearly seeking shed antlers. People hunting for shed antlers presents a concentrated risk to inadvertent damage to archaeological sites, especially artifacts and cultural features. Another example of unevaluated impacts to archaeological sites are the unnatural, concentrated herding of elk at and along supplemental feeding developments.

Revising SEPA No. 17015 to address Question 13 should not involve a major investment of time and resources. There is a body of cultural resource studies bearing on the Oak Creek planning area undertaken over the past couple of decades by WDFW itself, among other neighbors such as the Forest Service, Nature Conservancy, WashDOT, Bureau of Reclamation and BPA, to name a few. Most notably, the Mid-Columbia Fisheries Enhancement Group prepared SEPA 17-018 for Oak Creek Habitat, an area otherwise covered by the planning document, which appears to competently address the SEPA checklist in a thorough manner, including a professionally prepared cultural resource report. The background information in that report, authored by Christopher Landreau, could well stand for much of the Oak Creek Plan SEPA 17-015.

In summary, SEPA 17015 is incomplete because the associated Oak Creek Wildlife Area Management Plan does not provide the information needed to satisfy the SEPA process.

Thank you for the opportunity to comment.

Sincerely,

Mark DeLeon