

WDFW responses to public comments received during the public review of the Oak Creek Wildlife Area Management Plan draft under the State Environmental Policy Act (SEPA) from April 11, 2017 until May 11, 2017.

#	Comment	WDFW Response
1.	<p>I read on one of the documents, that there was a plan (or to develop a plan) "to reduce dispersed camping along riparian areas"</p> <p>I am NOT in favor of this. I am a hunter. It is one of the enjoyable things about going hunting in the 1st place (to be able to camp in smaller individual camp sites). Most of the camp sites have been used for MANY YEARS. Camping in large campgrounds with nearby neighbors is not my idea of going hunting.</p> <p>The hunting in this state is not what it once was, so many people have quit doing it, and kids are not being exposed to it... making everyone herd into organized camp grounds will only make that trend happen faster!</p> <p>That said - doing a little more large rock/cable boundaries might be fine, so that these smaller camping areas don't become larger and larger over the years. This does not mean that you should take away the larger "group" sites that Elk hunters use, where they can fit several camp trailers near each other (their friends).</p> <p>Summary - getting out in nature, needs to feel like nature - not like we went from one urban jungle to another paved urban jungle, on a smaller scale.</p> <p>Richard Worley</p>	<p>There are no plans to reduce dispersed camping in the plan. The plan does include a recommendation to incorporate barrier rock along banks of creeks in the implementation of future aquatic restoration projects. This will help prevent vehicles from driving right to the bank of the creek, protecting water quality and reducing other natural resource impacts.</p>
2.	<p>I find it appalling that we encounter "FEE AREAS" out in the wilderness, IE; I saw a sign like that at Raven's Roost, when I was up there for Elk season last year. We (the people of the state in general, and especially the hunter's/fisherman) have paid through taxes, licenses, and fees already! Quit trying to add a fee for every little thing or place people want to use! It's just not right...</p> <p>Richard Worley</p>	<p>The fee areas referenced in the comment are on National Forest land. Access to WDFW wildlife areas and water access sites require either a Vehicle Access Pass (VAP), which is complimentary with your hunting/fishing license, or a Discover Pass. Recreationists who don't buy fishing or hunting licenses need the Discover Pass to use WDFW lands.</p>
3.	<p>I am concerned that WDFW's Oak Creek Management Plan provides no stated accommodation for the William O Douglas</p>	<p>If the William O Douglas Trail Foundation (WOD) is interested in partnering with WDFW we would be happy to meet and talk about ideas.</p>

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	<p>Heritage Trail which runs from Cowiche Mill Road westward toward Rimrock Lake. I urge you to revise the plan so that safe, muscle-powered, recreational access along this important trail is assured. (The trail through this area crosses Sections 25, 26, 27, 35, and 36 in T14N, R16 E.) David Huycke</p>	<p>There has been no communication between the WOD Foundation and WDFW in recent years. The Box Canyon Trail was developed on the Cowiche Unit north of Cowiche Mill Road as a segment of the WOD. No trail has been approved south of Cowiche Mill Road as that area has the winter feed site and seasonal closures. Currently the WOD Trail website lists a section of trail on WDFW land following an old wagon road, WDFW asked that information to be removed from the website several years ago and reference to be changed to the Box Canyon Trail. The map showing the complete WOD Trail on the WOD website follows the correct route across the wildlife area.</p>
<p>4.</p>	<p>The SEPA DNS for the Oak Creek Wildlife Area Management Plan, and the Management Plan itself, both failed to include any information about significant historic, recreational, and cultural resources existing in Range 16 East, Township 14 North, Sections 25, 26, 27, 35, and 36.</p> <p>The William O. Douglas Heritage Trail follows the route of the historic Cowiche Valley Wagon Road and the ancient Native American primary travel corridor across the Cowiche Wildlife Area in Range 16, Township 14, located NORTH of Cowiche Mill Road. These historic and cultural resources are documented by state and federal agencies, and the trail sections physically exist on the ground and can also be seen on Google Earth imagery. See also information on the historic Cowiche Valley Wagon Road at http://www.williamodouglastrail.org/wagonroad.htm, which is derived from General Land Office surveys done in the 1880s.</p> <p>Also, there is a trailhead off Sunset Road at the Southeast corner of Section 25 that has been in public use for years to access the William O. Douglas Heritage Trail. This existing trail segment heads west from Sunset Road and exits the Cowiche Unit approximately 3.5 miles later at the West boundary line of Section 27. WDFW has previously written letters of support for</p>	<p>WDFW will not list specific cultural and historic sites in the WLA management plan, this information is provided in the WLA Cultural Resource Management Plans (under development) and will be released to the tribes and the Dept of Archaeology and Historic Preservation for review and comment.</p> <p>Additionally, specific project locations have not yet been developed, when these are developed, WDFW will conduct reviews to identify the impacts to cultural resources (if any) and consult with the tribes, DAHP and other interested parties as provided for under state and federal law and WDFW policy.</p> <p>If the William O Douglas Trail Foundation (WOD) is interested in partnering with WDFW we would be happy to meet and talk about ideas. There has been no communication between the WOD Foundation and WDFW in recent years. The current trail approved by WDFW as a segment of the WOD is the Box Canyon trail which starts at the main Cowiche Unit parking lot. WDFW asked several years ago that the trail following the old wagon route be removed from the WOD trail website and reference be changed to the Box Canyon Trail.</p>

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	<p>the William O. Douglas Trail and acknowledged the Heritage Trail in previous planning documents and funding requests.</p> <p>The SEPA DNS should be withdrawn and a SEPA Mitigated DNS should be issued instead with specific mitigation measures to disclose and protect the documented historic, recreational, and cultural resources located north of Cowiche Mill Road. The Oak Creek Management Plan should be revised accordingly.</p> <p>William O. Douglas Trail Foundation</p>	
5.	<p>On behalf of the Washington Climbers Coalition (WCC) and the Access Fund, thank you for the opportunity to review and comment on the draft update of the Oak Creek Wildlife Area Management Plan. The WCC (www.washingtonclimbers.org) is a Washington non-profit organization whose mission is to make Washington a better place to climb through advocacy, stewardship, and education. The Access Fund (www.accessfund.org) is a national advocacy organization that keeps climbing areas open and conserves the climbing environment.</p> <p>As the draft plan identifies, there are a number of established and popular rock climbing areas within the Tieton River Canyon (Oak Creek Unit of the Wildlife Area). These include the Royal Columns, the Bend, Moon Rocks, the Chunkyard, the Oasis, and Rainbow Rocks, among other locations.</p> <p>Appendix A to the plan (Goals, Objectives, Performance Measures) addresses climbing twice under Goal 11, which is to “Support and maintain appropriate recreation opportunities.” First, the plan identifies an objective to “Maintain access [to] Tieton River rock climbing” with three tasks: 1) coordinate with the WCC to implement a 2017 REI grant for trail maintenance; 2) meet with user groups to develop trail maintenance projects;</p>	Thanks!

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	<p>and 3) perform trail maintenance as needed. Second, the plan identifies an objective to “Include climbing group representation on [Wildlife Area Advisory Committee] and partner on stewardship opportunities,” with one task: “Work with local users and Washington Climbers Coalition to identify potential members.”</p> <p>The WCC supports both of these objectives. As identified, the WCC has already secured grant funding for trail maintenance projects in 2017. This work is intended to mitigate erosion and concentrate climber impacts so that rock climbing remains a compatible use within the Wildlife Area. We also support adding a climbing representative to the Wildlife Area Advisory Committee. Climbers have been exploring the Tieton River area since at least the 1950s and are a major recreational user group within the Wildlife Area. We would appreciate adding our voice to the committee.</p> <p>Beyond the strictly climbing-related objectives, we also want to voice our support for the other principal goals of the plan, which focus primarily on maintaining, and ideally improving, the natural function of the area. For many climbers, the landscape and unique habitats of the Tieton River (including its Oregon white oak woodlands and ponderosa pine transition zones) are as much a draw to the area as the climbing. We want to continue enjoying a special place.</p> <p>Thank you again for the opportunity to comment on the draft Oak Creek Wildlife Area Management Plan. Andy Fitz, Washington Climbers Coalition</p>	
6.	<p>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</p>	<p>SEPA Q13A and 13B refer to identification of specific resources "at or near the [project] site". At this time, the management plan does not identify any specific projects or project sites as it is a planning document. WDFW will not list specific cultural and historic sites in the WLA</p>

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<p>cultural preservation:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>management plan, this information will be provided in the WLA Cultural Resource Management Plans (under development) and will be released to the tribes and the Dept of Archaeology and Historic Preservation for review and comment.</p> <p>Additionally, specific project locations have not yet been developed, when these are developed, WDFW will conduct reviews to identify the impacts to cultural resources (if any) and consult with the tribes, DAHP and other interested parties as provided for under state and federal law and WDFW policy.</p>
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	<p>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.</p> <p>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.</p> <p>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.</p> <p>Mark DeLeon</p>	
7.	<p>The Yakima Valley Audubon Society (YVAS) disagrees with the Determination on Non-Significance (DNS17-015) issued in regards to the 10-year Oak Creek Wildlife Area Management Plan. We believe the SEPA is inadequate because of a lack of "carrying capacity" analysis and the impacts from concentrating many elk at small feeding sites on the Oak Creek and Cowiche Units of the wildlife area. Study by your own agencies biologists</p>	<p>Management of the Yakima Elk herd including herd size objectives are covered in the Yakima Elk Herd Plan (link). Winter feed sites are an important management tool for the Yakima elk herd and have been used for decades, and are not considered a new management action to evaluate. The OCWA Management plan includes objectives for habitat management of the feed sites including weed control. Carrying capacity is a complicated concept that is seasonally and</p>

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	<p>and those of the US Forest Service on adjacent lands reveals both agencies concern with the obvious and measurable detrimental impacts to the environment of elk in the Yakima River Basin.</p> <p>YVAS strongly suggests WDFW issue a mitigated DNS after your agency completes a study of the detrimental effects of elk in the Oak Creek and Cowiche units. YVAS awaits the suggested mitigation actions your agency proposes to restore the ever-increasing areal extent of damaged and degraded habitats WDFW is entrusted to preserving in the Oak Creek Wildlife Area.</p> <p>Andy Stepniewski Yakima Valley Audubon Society Conservation Committee</p>	<p>annually dynamic across the landscape. Generally, small-scale seasonal concentrations of wildlife do not fit a carrying capacity model. We presume the reference to “study by your own agencies biologists” refers to the Yakima Elk Study (2003-2006). Data collected in that study showed pregnancy rates, body condition, and survival of elk in the Yakima herd to be indicative of a population that is not above carrying capacity. The USFS work referenced presumably includes the recent Northwest Science article that was largely a floristics study of non-wilderness habitats within the Naches Ranger District. Utilization rates were also measured in that work and were pretty consistent with data collected elsewhere in the west. These utilization rates were also the collective utilization of all herbivores at the sampled sites, not just elk. Other USFS work in the area published as a USFS Technical report by Beebe at el. using herbivory exclosures suggested negative impacts to soil from combined grazing by elk and cattle, but positive impacts where elk grazed, but cattle were excluded. The suggestion that elk in the Yakima basin have broad negative impacts to the environment are poorly supported by data.</p>
8.	<p>Excellent document</p> <ul style="list-style-type: none"> - In the plan you mention commercial opportunities what is that, logging? When adding acreage, how does that impact staffing? Under staffed law enforcement, why is there no added enforcement as acreage is added? - Signage and kiosk – why are public rules for conduct not also posted? - Mapping – would it not make sense to add location where people may encounter shooting – to enable them to stay safe? <p>Reduce – eliminate conflicts.</p> <p>Jim Lydigsen, National Rifle Association</p>	<p>Relative to commercial opportunities noted in the Forest Management section of the plan, commercial opportunities would be the harvest of merchantable timber.</p> <p>When WDFW acquires new lands that are added to the wildlife area, it is usually absorbed into the current budget and staffing. As budgets are developed each biennium staffing needs are reviewed and adjusted based on priorities and available funding. Enforcement follows a similar pattern of reviewing staffing needs and available funding.</p> <p>Wildlife area staff maintain signs and information across the wildlife area and post signs as needed including rules of conduct (litter, campfires, etc). Maintaining signs and other public information is a key priority and cost to operate and maintain recreation opportunities for the public. Unless posted otherwise, target shooting and hunting is not restricted across the wildlife area. WDFW supports a robust hunter education program, and expects those using firearms to be well trained and</p>

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		educated about safe practices, including being aware of their surroundings and hunting seasons.
9.	<p>Add solar panels on the center, this should reduce the cost of electricity.</p> <ul style="list-style-type: none"> - If possible add a camera, weather station, so the public can view the elk and get weather conditions. This would bring us into the 21st century and promote the area. - LED lighting inside - ADA upgrades - Work with Washington State Department of Transportation (WSDOT) for signage, "wildlife area ahead". Perhaps slow to 40 MPH at entrance and river trail parking area. Important!! <p>Jim Andrews, Oak Creek Center volunteer</p>	<p>A capital project request was submitted in 2014 for upgrades to the Visitor's Center, this included ADA and safety upgrades. Cameras and weather station could be added using grant funding.</p> <p>WDFW has been in communication with WSDOT about signs and safety near the wildlife area entrance. It has been several years since the last conversation. Touching base with them again would be a good idea.</p>
10.	<p>Utilize timber value to help pay for non-commercial and prescribed burning treatments.</p> <ul style="list-style-type: none"> - Explore expanding turkey population as an opportunity to provide more hunting. Turkey hunting is an excellent introductory experience for new hunters. Winter habitat forage will be important to achieve this goal. - Oregon white oaks goals and tasks seem more focused on protection than enhancement. How can you improve oak habitat? What treatments will enhance oak vigor, acorn production? Oak science day? Bring in experts to look at oak stands if you have knowledge gaps. - Utilize harvested timber as fish logs? Leave opportunity open in plan to push over whole trees <p>Mikal Moore, National Wild Turkey Federation</p>	<p>It is indeed the goal of any commercial timber harvest to utilize revenue to treat other areas that need restoration treatment but have no commercial value.</p> <p>Supplemental turkey releases are listed as an option in the current plan, and are included in the statewide Turkey Management Plan. The new wildlife area management plan incorporates management recommendations from other WDFW planning efforts (e.g. game management, etc.).</p> <p>Recently, Oak Creek Wildlife Area staff and other WDFW staff have been invited to participate in the newly created East Cascades Oak Partnership that consists of many agencies and private land managers to facilitate collaboration on restoring and enhancing oak habitats. It is the intent of the Oak Creek WLA to participate in this partnership to learn about best available science and seek grant funding for oak restoration work.</p> <p>The OCWA has already been utilizing timber from restoration projects to do stream restoration work. This will continue where opportunities arise.</p>
11.	- The 1400 Road is an amazing location for mountain biking	Oak Creek Wildlife Area has begun collaborative discussions with the

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	<p>trails. What Yakima lacks, is a decent shaded biking trail system. The terrain and vegetation are ideal for trails catering to all skill levels. It would also double as great hiking trails. There are great opportunities for scenic view “loops”.</p> <p>- The 1400 road grants easy access to build and maintain these types of recreational opportunities. These trails are typically low on environmental impact due to the use being human powered, and not motorized. These would create great wildlife viewing.</p> <p>Andy Mahre, local landowner</p>	<p>mountain bike community and the USFS, and are open to working with this user group to potentially identify and develop a trail. A viable proposal will have strong support by users and include a volunteer component for development and maintenance, and be consistent with agency dual mission of conservation and recreation.</p>
12.	<p>If this unit was purchased in 1942, Section 6 funds could not have been used as the ESA had not been established. Also, after an admittedly brief search, I could find no records for Oak Creek in the RO’s Section 6 files. (Page 12, general wildlife area information, acquisition date).</p> <p>David Leonard, USFWS</p>	<p>Additional acquisition dates will be added to this section. The Tieton Township was acquired using Section 6 funds and added to the existing Oak Creek Unit.</p>
13.	<p>These are activities that are generally prohibited on land purchased with Section 6 funds (Page 20, general wildlife area information, recreational).</p> <p>David Leonard, USFWS</p>	<p>Wording changed to motorized recreation.</p>
14.	<p>Wouldn’t it be straightforward to simply state here that these lands were purchased to benefit listed species and that is the primary goal of the land (as opposed to human recreation)? (Page 20, general wildlife area information, access.)</p> <p>David Leonard, USFWS</p>	<p>WDFW manages lands for multiple uses compatible with providing habitat for and management of listed species.</p>
15.	<p>See above. It appears that there is more human use of this Unit than the others. I understand that the checker-board nature of the parcel is likely a reason (in a perfect world WDFW and USFS could exchange sections to block up land to facilitate management). Never-the-less, ATV, Jeep, Motorcycle, and snowmobile use is inappropriate on this land given the understood objectives of the original project proposal. There is</p>	<p>Language updated in the plan. The unit and adjacent USFS lands contain motorized trails that are part of the USFS system. While a majority of the trails are on USFS land. In addition, the motorized trails have seasonal closures in the spring to reduce trail damage and erosion. In the winter the area is part of a groomed snowmobile trail system managed by WA State Parks.</p>

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	<p>a growing body of literature that indicates that even passive recreation affects the behavior and demography of wildlife. The only mentions of human use from the original proposals is “The area supports Northern Spotted Owl, prime big game range, and substantial public recreational benefits.” So this level of use comes as a surprise. Camping and vehicle traffic increases the risk of wildfire, which is specifically mentioned in the proposal – “This project accomplishes both threat reduction strategies [for NSO].....reducing the incidence of human-caused ignitions,”. (Page 21, first paragraph.)</p> <p>David Leonard, USFWS</p>	<p>Additionally, as part of a public process, WDFW closed and abandoned 14 miles of roads in this unit and many miles of user built motorized trails after acquisition.</p>
16.	<p>Proposal states that the project would “enable agencies to better control road density”. (Page 36, last paragraph). David Leonard, USFWS</p>	<p>Text has been updated. Since acquisition WDFW has implemented a road management plan on the Rock Creek Unit, where 14 miles of road and numerous miles of user built motorized trails were closed and abandoned.</p>
17.	<p>Compatible with snow mobiles? David Leonard, USFWS</p>	<p>Text updated. Important winter range for this species occurs on south facing slopes, mostly at elevations lower than on the Rock Creek unit.</p>
18.	<p>Perhaps they can shift (over time) the motorized (ATV, motorcycle, snowmobile) use of the area to mountain bike in the summer and cross country skiing in the winter. Still provides that public access, but in a less impactful way to the local wildlife. (Page 62 first paragraph). Sarah Hall, USFWS</p>	<p>WDFW manages lands for multiple uses compatible with providing habitat for and management of listed species.</p>
19.	<p>Thank you for the opportunity to comment on the proposed draft for the Oak Creek and Cowiche Units. I would like to make my comments in regards to recreation, specifically mountain biking. As a founding member of Single Track Alliance of Yakima, I have invested countless hours of my time in advocating for trail access. We have been fortunate enough to establish a trail head at Rocky Top, on the north side of Cowiche Mountain. Mostly we build and maintain mountain bike trails. We have come to learn that our mountain bike trails</p>	<p>There are currently no restrictions to mountain bike use on established roads within the Cowiche Unit except for a seasonal closure to protect wintering wildlife. However, the construction of new trails would require agency approval to ensure that they harmonize with the agency mission, policy, and procedures. Unauthorized trail construction is prohibited. Furthermore, to gain proper authorization, organized user groups should demonstrate their ability to conduct trail maintenance activities.</p>

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<p>are loved by hikers and trail runners also. Our trails improve with use and require little maintenance. Because they are laid out sensibly they erode minimally. We've found that trails which erode or damage the landscape significantly have nothing to do with the user and has everything to do with the layout.</p> <p>Since mountain bikes do not destroy trails and erode terrain, the only reason I can see for restricting access to mountain bikers in the Cowiche Unit is for wildlife movement. I would argue for seasonal closures over blanket restrictions. Seasonal closures seem like the community minded and sensible path to take over restricting access. It is not hard to look at other areas around the west where mountain bikes and conservation co-exist. Seasonal closures are a realistic and inclusive approach.</p> <p>The Cowiche Unit is essential to the idea of connecting the Cowiche Canyon trail, Rocky Top, and Snow Mountain Ranch with the Oak Creek Unit and also the Ahtanum State Forest, not to mention the National Forest. A trail system of this caliber would not be a spiderweb of trails in tight proximity. It would be in essence an isolated, well traveled animal trail which humans used occasionally.</p> <p>Please consider an inclusive approach which takes into consideration the community of mountain bikers who feel at home in nature and don't leave a trace on the landscape.</p> <p>Thanks,</p> <p>Will Hollingbery Single Track Alliance of Yakima</p>	
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