

Stemilt-Squilchuck Recreation Plan SEPA Comments, Received April 19-May3

Only motorized users say “there’s no conflict between motorized and non-motorized users.”

Non-motorized users know better. The responsibility to avoid close encounters and collisions falls upon non-motorized recreationists. Motorized users move fast and don’t hear or see skiers until they’re in dangerously close proximity. There’s no fear atop a heavy machine, even sober. This is why backcountry skiers avoid areas popular with snowmobilers. Avoidance should not be mistaken for lack of interest or desire to recreate there. Make it safe and they will come.

I strongly encourage contiguous non-motorized zones with parking and hike-to access in the high-elevation areas, particularly in north facing basins.

I say this as someone who has done my share of both motorized and non-motorized winter backcountry recreation.

On the subject of target shooting, if this area is being developed for recreation, then **develop a shooting range** within it. I have loved target shooting all my life, but in this scenario I believe **unregulated shooting cannot be safe and should be discontinued there.**

Thanks for your attention. The overall plan looks great for new recreation opportunities for all in this handy area close to the city.

DO NOT SHUT DOWN ANY OF OUR ACCESS YOU LYING VIPERS.

I was deeply disappointed to learn that the recreation plan, as reported in the Wenatchee World, did not include Mountain Biking.

I hope this was an omission. If not what was the reasoning behind excluding it.

I think the best thing for the users of the Stemilt Squilchuck Recreation Plan is to leave all of the land open to all groups. This past winter was one of the best on record there was lots of snow for all to use, as I visited the basin I found skiers and snowmobilers in the same areas some slopes did not have a track on them, some had been skied some had snowmobile tracks so... I think there is no need to tell some they can't use the land they help pay for.

To Whom It May Concern,

I have read through the Draft Stemilt-Squilchuck Recreation Plan dated December 2018. I have the following comments:

1. While there is a brief discussion of project purpose, a good SEPA document presents Purpose and Need so that a reader can appreciate the imperatives that drive the current planning process. The Plan starts out with an account of previous land use efforts and then the report seems

to grow organically into a diffuse discussion of a large number of recreation issues without that overall guiding principle that would be provided by a Purpose and Need statement up front.

2. The Plan is not very clear with regard to the alternatives analysis process. The discussion of alternatives seems pretty limited. Perhaps the Plan should be re-organized to better present the alternatives considered and how each of them stacks up against a set of objective criteria.

3. In the SEPA Determination of Non-Significance, it is stated: *"While some of the recommendations aim to increase the amount of recreation access and infrastructure, these are crafted to encourage low impact recreation (generally non-motorized, occurring within impact buffers of existing infrastructure such as green-dot roads, located in areas of less importance to wildlife and away from critical areas, and incorporating season closures to protect wildlife, if appropriate)."* The way that I have interpreted the Plan is that the non-motorized parts of the plan (particularly for winter recreation) have been greatly minimized. So, I am not sure that the quoted statement is true.

4. Under Item 9 of the SEPA Checklist it is stated that *"There are two known proposals that will require governmental approval within the planning area, but both occur on private lands and will not affect plan implementation. The proposed expansion of Mission Ridge Ski Area in Section 19 and proposed orchard development in Section 16 are both major land conversion proposals that are pending."* It is my understanding that at least some of the Mission Ridge Ski Expansion will take place on State and Federal lands in addition to the private property they have purchased. Therefore, the Mission Ridge plan may, indeed, affect the plan implementation.

5. With regard to the audience for the Plan, I can appreciate local (Chelan County) recreational community's interest and relative primacy when considered Plan input. However, recreation in Chelan County, Mission Ridge, and even the surrounding areas subject to this plan are of concern to recreationalists residing outside of Chelan County. So, when writing a Plan for the Stemilt-Squilchuck Basin, the validity of the concerns of those of us who may live elsewhere but who often recreate in this area should be accounted for, if not least for the fact that much of the land is State-owned. In my own case, I do have a little skin in game, having grown up in Moses Lake and, thereby, spent a considerable amount of time then and since then up to the present, engaging in climbing, hiking, snowshoeing and skiing throughout Chelan County, including the Stemilt-Squilchuck Basin. I skied at Squilchuck before there was a Mission Ridge.

6. My greatest concern with the Plan is its relegation of non-motorized recreation to step-child status in the Plan. The El Sendero group made some constructive suggestions that would have addressed the burgeoning popularity of non-motorized recreation, but these seem to have been "voted" down. Is this really the process the County wants to emphasize in a SEPA document? SEPA relies on objective analysis of the issues. If you really want to take a straw poll, have you considered the fact that the numbers of non-motorized recreational users in the State (and probably Chelan County) stacks up favorably (i.e. there are more of us) than motorized recreational users? Taken together; hikers, climbers, snowshoers, skiers, mountain bikers, and stock riders outnumber ATVers, dirt bikers and snow machiners. A Recreation Plan that doesn't take the trend toward non-motorized recreation into account is not a good Plan. Within limits, there is room for everyone to enjoy designated areas for their respective activities both in the Stemilt-Squilchuck and elsewhere. But we all have to get squeezed a bit. I remember hiking in the Enchantments on weekends and not seeing another soul. I've had to get used to the loss of that wonderful luxury both in the Enchantments and throughout our "wilderness" regions. So, the motorized folks may have to suffer a little bit, too, along with the rest of us.

I hope you will consider my comments.

The idea of putting a shooting range in this area is absolutely Stupid. The animals have to have a place to survive. If you want a shooting range, put it where it will help keep the deer and elk out of the lower elevations. Section 10 would be a great place. If you put it in the middle of the basin it will drive the animals down into the orchards. Maybe STEMILT would give up some DNR land for it. Also we need a complete 5 year elk study for the present. Since the last study the Stemilt fruit co and Kyle Mathison have put up a deer fence subdividing this area. Without a EIS I might add. What effect has it had? What effect will these camping areas and developments have on the elk migrating and calving areas? You really need a full elk and wildlife study of the whole Stemilt basin

In review of the SEPA checklist for the Stemilt-Squilchuck recreation plan it should be noted that Wheeler Ridge, LLC currently has a proposal to convert 250 of the 640 acres of Section 17 (Township 21N; Range 20E) in the Stemilt basin from timber into an orchard development.

In 2018, the Washington Conservation Science Institute conducted a northern spotted owl Activity Center Assessment and subsequent surveys within section 17 per the U.S. Fish and Wildlife Services guidelines (USFWS 2012). No spotted owls were detected.

Also, Wheeler Ridge is not proposing recreational opportunities as an element of the orchard development project. If recreation will be contemplated in the future by recreational groups within section 17, SEPA compliance will be required by the proposing party.

After reading the SEPA checklist, I do not see the purpose of this plan at this time. The county says every action will require further environmental review. Any plan at all must consider connected actions that are under consideration within the planning area, namely the proposed expansion at Mission Ridge, Squilchuck development and the orchard proposed by Stemilt. You must consider cumulative effects of all development before implementing a recreation plan. Where is the comprehensive plan for this area? You are still allowing patchwork development with no plan in place and you want to plan for recreation without knowing what the future will be on lands within the affected area. You are doing malpractice, you are treating without diagnosis. I can see why the Stemilt Partnership feels betrayed and as if actions are being developed without their input (past Wenatchee World article). I feel betrayed as I did not know this recreation planning was taking place. Was there a public notice? I will be coming in to see.

What is needed is a Comprehensive Resource Management Plan for the entire area. The first obligation of caretaking these lands is to protect the biological diversity, genetic diversity and functional diversity of the affected area to ensure as much as humanly possible, a biologically healthy and sustainable ecosystem for all generations. This obligation includes protecting the ecological fertility and physical stability of the soil. The second obligation is to protect the storage and quality of the water that will be used by people and all organisms. The plan is obligated to consider logging, unauthorized off road use by vehicles and ALL possible future development within the affected Naneum Ridge to Columbia River planning area. It must consider cumulative effects of recent fire that have taken place to the south in the Naneum Basin (Swift Creek) and how future fire will be considered. How will logging affect this plan and vice versa.

First establish how the area will be policed and how values will be protected before adopting any recreation plan. I would like to see the county establish severe penalties for off road vehicle use. There needs to be investigations of any vehicle that is on county streets in the spring and that is covered in mud.

Any environmental analysis is a stand alone document, you can not say analysis will be done as plans are developed. So, far there is no complete environmental analysis for the affected area. You will need to develop a complete affected environment for the affected area and then analyse how this proposal fits into the overall plan.

Your SEPA checklist only mentions the presence of musk thistle when there are many noxious weeds present. You need to develop a complete listing of noxious weeds in the affected area and how they will be controlled. You do not list any special status plants that are found in the area, a complete analysis is required.



State of Washington

Department of Fish and Wildlife

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May 1, 2019

Mike Kaputa, Director Chelan County Natural Resources Department
Chelan County Natural Resources Department
411 Washington St., Suite 201
Wenatchee, WA 98801

Re: WDFW Recommendation of approval of the December 2018 draft Stemilt-Squilchuck Recreation Plan and support of the Compromise Alternative

Dear Mr. Kaputa:

Thank you for this additional opportunity to provide comments on the December 2018 Draft Stemilt-Squilchuck Recreation Plan (Plan). The Washington Department of Fish and Wildlife (WDFW) appreciates the amount of effort and dedication you and your staff, and the community have invested in this planning process. We believe that the planning process used was an outstanding example of a local focused collaborative effort to bring about the collective vision of your community, and we are proud to have been a participant in it.

We have reviewed this final draft plan and are satisfied that the concerns and recommendations brought forward by WDFW during previous draft reviews and comment periods have been addressed to our satisfaction. We also agree that this Plan will provide guidance and contains the appropriate recommendations for managing recreation in the basin in a manner that provides for the type of recreational opportunities desired by the community while also being protective of the shared values of wildlife, water, and natural resources.

With this letter, I wish to express my agency's support of this Plan and support adoption of the "*Compromise Alternative*". That said, we are remaining open to re-evaluation of any elements within the plan if, after public commenting has closed and comment review has taken place, there are identified compelling reasons for adjustments. We want to be respectful of all public interests in the SEPA process, including voices that may not have been heard in the initial planning process. And so WDFW recommends approval of the Plan by the Chelan County Board of County Commissioners (BOCC), pending SEPA.

Upon completion of SEPA and approval of the Plan by the Chelan BOCC, and then a subsequent review and consideration by Washington DNR and WDFW, our goal will be to formally adopt the Plan for implementation by our respective state agencies. Both agencies have conferred and agree that it actually is **not** an "attachment" to the existing WDFW Naneum Ridge to Columbia River Recreation and Access Plan (2015). Rather, this newer plan is simply a site-specific planning process which is complimentary to the 2015 *programmatic* plan. Subsequent planning processes were always intended to come *after* the Naneum plan was adopted, including for the

Stemilt and Squilchuck basins. This plan fits that intent. The new plan is in alignment and consistent with a whole suite of subsequent actions always intended to occur after the 2015 plan was adopted.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be "Jim Brown", with a stylized flourish at the end.

Jim Brown

WDFW Region 2 Regional Director

cc: Mike Livingston, WDFW Region 3 Regional Director
Larry Leach, WDNR SE Region Assistant Region Manager
Matt Monda, WDFW Region 2 Wildlife Program Manager
Scott McCorquodale, WDFW Region 3 Wildlife Program Manager
Carmen Andonaegui, WDFW Region 2 Habitat Program Manager
Ross Huffman, WDFW Region 3 Lands Operations Manager
Pete Lopushinsky, WDFW Colockum Wildlife Area Manager



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May 1, 2019

Mr. Mike Kaputa

411 Washington Street, Suite 201

Wenatchee, WA 98801

RE: Comment on SEPA file #201902145

Dear Mr. Kaputa:

Chelan County did a great job facilitating the completion of the Stemilt-Squilchuck recreation plan. The local community really wanted this opportunity to further shape the concepts originally laid out in the Naneum Ridge to Columbia River Recreation and Access Plan. Throughout the planning process there was an abundance of transparency in decision making. There were multiple user groups and stakeholders welcomed to participate on the planning committee. During a public information meeting; when there were gaps identified in the winter recreation analysis, additional time was added and more meetings scheduled to work through a compromise. Your staff should be recognized for the effort they put into this difficult task.

The Department of Natural Resources (DNR) provides recreation opportunities where such uses are compatible with the trust objectives. Trust Lands are publically owned and managed, but they are not public lands in the sense that we are accustomed to thinking of national parks, national forests, or many other types of public land. They are managed for clearly specified beneficiaries, principally the common schools. DNR is obligated to make the trust productive and to act with undivided loyalty to the beneficiary. The Naneum Ridge to Columbia River Recreation and Access Plan (Naneum Plan) outlined how the Department would provide these opportunities while meeting our trust mandate. The Stemilt-Squilchuck Recreation Plan helps localize and further refine some of the project actions listed of the Naneum Plan.

The non-project review form and the SEPA checklist reference incorporation and/or adoption into the Naneum Plan as an addendum. The DNR plans to incorporate the final Stemilt-Squilchuck plan into our implementation of project actions listed in the Naneum Plan. However, the Naneum Plan was developed with participation of all stakeholders impacted by the Naneum Plan's footprint. This includes many recreationalists, conservation organizations, and tribes who were not part of the Stemilt-Squilchuck plan process. We consider the Stemilt-Squilchuck plan complementary to the Naneum plan;



however we cannot incorporate via addendum, because of the limited focus and different level of public participation.

Thank you for the opportunity to participate in this planning process and to comment on the SEPA and Non-project Review Form. As the finalization of this plan comes to fruition we look forward to the adoption of this plan as localized guidance with stakeholder support. Local user groups will be instrumental in implementation of the two complementary plans. We understand the final look may change pending the finalization of the SEPA process combined with the public process associated with the approval of the Chelan County Board of County Commissioners. Our hope is that the hard work of the planning committee stands on its merits, and together, we can move from planning to implementation.

Sincerely,

A handwritten signature in blue ink that reads "Larry Leach". The signature is fluid and cursive, with the first name "Larry" and last name "Leach" clearly distinguishable.

Larry Leach

State Lands Assistant Region Manager

Southeast Region

WA Department of Natural Resources



May 2, 2019

Mike Kaputa
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NR.StemiltRecSEPA@CO.CHELAN.WA.US

RE: Stemilt-Squilchuck Recreation Plan SEPA

Dear Mr. Kaputa,

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Stemilt-Squilchuck Recreation Plan.

RMEF is a national nonprofit organization with more than 234,000 members (nearly 16,000 in Washington) and a mission to ensure the future of elk, other wildlife, their habitat and our hunting heritage. RMEF's members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk.

Since its creation in 1984, RMEF has permanently protected and enhanced more than 7.4 million acres of North America's most vital habitat for elk and other wildlife, including nearly 500,000 acres in Washington. In 2014, RMEF worked with federal, state, and Chelan County partners to complete a 4,000+ acre acquisition within the Stemilt Basin. The property was conveyed to Chelan County and Washington Department of Fish & Wildlife (WDFW) and is managed to protect migrating elk and mule deer (along with many other species), conserve the unique blend of agricultural and conservation use of the watershed, and protect historical public recreational uses. We have a deep interest in ensuring the future success of this property and the surrounding landscape.

RMEF supports many of the proposed guidelines within Zone 1 of the proposed Recreation Plan where high concentrations of critical elk habitat occur, as shown by WDFW. Of priority should be maintaining public access by improving the Green Dot Road system and increasing compliance. Any new road or trail development should be in consultation with relevant partners and should follow USFS travel management plans and WDFW management plans.

While much of the critical elk habitat occurs in Zones 1 and 3, RMEF emphasizes the need to consider impacts of development in Zone 2 to neighboring areas in Zones 1 and 3. Just to the east of Zone 2 are critical wildlife areas, owned by Chelan County and managed in partnership with WDFW and neighboring properties within the Colockum Wildlife Area. Expansion and/or increased recreational activities within Zone 2 would impact the critical habitat areas identified



by WDFW. For example, expansion of, and increased activities associated with, the proposed Mission Ridge Ski Area would have significant adverse impacts to wildlife and the landscape. RMEF provided a comment letter regarding the Mission Ridge expansion (Chelan County File #MPR2018-128) highlighting concerns over impacts to elk and other wildlife and the use of an outdated Environmental Impact Statement (30+ years old) to assess those impacts. At a minimum, seasonal closures should be considered in Zone 2 during the summer if trails are located in elk calving areas.

In addition, proposed development in Zone 2 should consider impacts to the priority mule deer migration corridor as identified in WDFW's State Action Plan in response to the Department of Interior Secretarial Order on protecting big game corridors and winter range (SO3362). This priority corridor runs through Zone 2. A top threat to the state's largest migratory mule deer herd (estimated at 47,000 animals) is the growing use and distribution of motorized and non-motorized use with increasing disturbance on winter ranges. RMEF recommends close collaboration with WDFW and other partners to avoid additional impacts to this important mule deer corridor and winter range.

RMEF supports recommendations by WDFW, Wenatchee Sportsmen's Association, and others to limit recreational trail development and new motorized route development in Zone 3. The proposed hard closure of non-green dot roads off of Pole Flats Road and seasonal closure of Pole Flats Road (open for hunting) would ensure critical elk calving areas are protected. WDFW recommends additional seasonal closures if increased recreation-related wildlife disturbance occurs as a result of recreation plan developments. WDFW does not support designated trail development in Zone 3 (other than a north-south trail as per Naneum Plan), due to its high value as core summer elk habitat. RMEF encourages maintenance of the undeveloped area east of Mission Ridge and north of Naneum Ridge (west of groomed snowmobile trails and green dot roads) by leaving the area primitive and open to non-motorized use.

RMEF appreciates the collaborative nature in which this plan was developed and recommends continued partner communication as plan components are implemented. RMEF recommends completion of a Plan-wide habitat and road inventory and assessment to determine appropriate trail locations to minimize impacts to natural resources.

Sincerely,



Blake L. Henning
Chief Conservation Officer