

ATTACHMENT 12



May 2, 2019

Mike Kaputa
Director, Chelan County Natural Resources
411 Washington Street, Suite 201
Wenatchee, WA 98801
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