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Comments: Comments on WildlifeClosure.pdf

Wildlife Closure.pdf does not provide information necessary for reviewers to assess the spatial, recreational and potential social impacts of this Environmental Analysis. It is well below quality expected from a U.S. Forest Service Environmental Analysis.

Wildlife Closure.pdf purportedly communicates information essential to understanding this EA. But it does not communicate enough. The Wildlife Closure Area must be more clearly defined. Cartography or illustration must be improved, and especially, boundary resolution must be refined.

This reviewer recommends the draft EA be suspended until an improved version of this important document is prepared.

Some Specific Criticisms.

-- From Earth Point Topo, this reviewer found a nearly identical topo map to the one used in Wildlife Closure.pdf. He adjusted scale to focus on specific features. He measured the distance between I-90 and the boundary running east/west down Keechelus Lake. The width of the closure area was within .008% of 1000'. Reviewer then scaled up the map to focus on Gold Creek where it enters the lake under I-90. He drew a line to approximate the width of the boundary line. It measured 109 feet, 10% the width of the 1000' Closure. This is not an acceptable level or resolution. It is impossible to see precisely the relationship between the closure line, lake margin and features like buildings and roads.

-- The WSDOT Hyak Maintenance Facility is located on the north shore of Keechelus Lake, adjacent to Hyak's sewage treatment plant. The boundary line passes under I-90, goes by WSDOT's facility, then east along the lake shore before veering out to the 1000' offset from I-90. Between the scale of the base topological map and width of the boundary, it is difficult to know the exact path followed by the boundary. This level of resolution is not acceptable for an EA package, wherein Wildlife Closure.pdf is essential to reviewers trying to understand the impact of this EA,

-- FS 4832 is east of- and parallels I-90 inland for slightly more the length of Keechelus Lake. It is a branch of the snowmobile trail system out of Gold Creek. It ends in section 14 at Kachess Lake Road (just opposite of Swamp Lake). The red boundary is visible on both sides of the road. What does that mean? A more refined illustration should show the actual relationship between road and and the 1000' boundary. The EA should make some effort to show the interaction between trails' 30' boundary and the edge of the 1000' boundary. Neither of these can be visualized using Wildlife Closure.pdf.

-- At exit 63 (Cabin Creek), an I-90 icon obscures the intersection where FS 4826 run north from I-90. (FS 4826 is the most heavily used trail at Cabin Creek Sno-Park.) Sno-Park trails west of the icon appear like an inflamed intestine. South of the I-90 intersection, the wide boundary line obscures edges of a multi-use trail out of the south parking lot. It also obscures boundaries of the parking lots.

Summary and Conclusions.

Many reviewers will assume Wildlife Closure.pdf is a accurate and interpret it as a truthful map. Actually it is an illustration, and is flagged as such. This flagging appears in the upper right-hand corner of the map where it says,

-- "This product is reproduced from information prepared by the USDA,Forest Service or from other suppliers.

The Forest Service cannot assure the reliability or suitability of this information for a particular purpose. The data and product accuracy may vary due to compilation from various sources, including modeling and interpretation, and may not meet National Map Accuracy Standards. This information may be updated, corrected or otherwise modified without notification.

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That the underlying illustration can change and any time is disturbing. There's no guarantee that the illustration in this EA will use the same base map as the one in the Final draft. All throughout, the EA should use a base map guaranteed to be consistent. This illustration doesn't meet that requirement.

The Forest Service is highly competent at cartography and illustration. Drawing boundary lines in an illustration meant to outline to-be closure areas may be reasonable. Obfuscating boundaries of existing recreation facilities with a map of such low resolution is not acceptable.

Forest Service claims the Wildlife Closure won't affect existing recreation areas. This reviewer disputes that claim. For example, this closure creates an inflexible boundary around the Cabin Creek winter trail system and its parking lots. This layer gives AMA managers another legal reason to deny improvements, such as parking lot expansion at Cabin Creek. Vagueness of Wildlife Closure.pdf plays against volunteers hoping to expand parking at Cabin Creek to match demand from population increases in greater Seattle and Kittitas County because they can't begin to understand the rules of the game.

This is not "no effect on any resource areas or developed recreational facilities such as open roads, trails, or campgrounds." (from I-90 SPE Wildlife Closure Area Draft EA_FONSI.pdf.) The wildlife boundary freeze-frames the existing footprint of recreation at Cabin Creek. This will, in turn, make skiing at Cabin Creek less attractive.

Final Conclusions: 1) Wildlife Closure.pdf is far below Forest Service communication standards for EA documentation; 2) the poor quality of this illustration strongly suggests this EA is being rushed towards approval; 3) in some areas, the illustration creates ambiguity, raising more questions than it answers; 4) this illustration is so grossly drawn that many reviewers cannot effectively comment on this EA.

Recommendation. Provide A more detailed illustration, or preferably a real map, should replace Wildlife Closures.pdf. This will require a weeks-long revision effort. Review of this DRAFT EA should be terminated until a legible map or illustration can be provided, at which time a new review process can start again with a 30 day review period.