

WDFW Response to public comments received during public review of the Skagit Wildlife Area Management Plan Draft under the State Environmental Policy Act (SEPA) from March 20, 2024 until April 22, 2024 – DNS 24-015.

	Comment	WDFW Response
1	<p>In the Executive Summary and in the main text there is appropriate mention of the designation of Skagit Bay Important Bird Area (IBA), which includes large parts of Skagit Wildlife Area. National Audubon Society is the U.S. partner of BirdLife International for the Important Bird Area program. It should also be noted that another Important Bird Area – Samish/Padilla Bay - encompasses many WDFW acres that are part of Skagit Wildlife Area. This IBA was designated in 2012.<sup>3</sup> Skagit Audubon</p>	<p>Text in the plan has been updated to include in the Executive Summary and on page 19, “another Important Bird Area, Samish/Padilla Bays, is adjacent to or encompasses some portions of the Telegraph Slough, South Padilla Bay, Samish, and Samish River Units.</p>
2	<p>On page 20, the photo caption “Greater yellow legs” should be “Greater Yellowlegs”. Skagit Audubon</p>	<p>Corrected.</p>
3	<p>The page 90 photo of the Leque Island Unit appears to be from before the restoration project. A post-restoration picture would be more pertinent to the management plan. Skagit Audubon</p>	<p>The focus of this photo is on recreation activities, photographers, and not so much the restoration project. We have photos of pre-post restoration of Leque Island on page 17.</p>
4	<p>On p.109 under “C” there is the statement, “Samish Unit parking lot constructed (sic) will be completed fall 2023, implementation complete by 12/2024.”). This needs to be updated to reflect that construction of the parking lot did not begin in 2023. Skagit Audubon</p>	<p>The parking lot construction should occur in summer/fall of 2024.</p>
5	<p>Skagit Audubon Society appreciates all the work that has gone into preparing the Draft Skagit Wildlife Area Management Plan. It lays out an ambitious and thorough program. The plan is also a welcome compilation of detailed information on the various units of this diverse</p>	<p>Thank you for your support.</p>

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	wildlife area. We look forward to supporting the plan’s implementation and participating in whatever ways would be helpful. Skagit Audubon	
6	Maintain and enhance the public’s ability to walk to popular viewpoints. Use trail design to support visitation patterns favored by land managers. Identify places where trail connectivity and access can be improved. Washington Trails Assoc.	Trail use considerations will be evaluated during the development of the Skagit Wildlife Area Recreation plan.
7	If managers propose closing trails, consider the unintended consequences including how some visitors may be induced to travel off trail and the potential that users may be displaced into different areas to seek the type of experiences that led to the unsanctioned development of other trails. – Washington Trails Assoc.	Trails designated as “closed” on the wildlife area may be due to the trail being impacted by salmon recovery restoration projects, e.g., dike removal. Other times, trail closures are used as a management tool to address public safety issues (Samish River Unit – unit closed to non-hunting public seasonally), weed spraying timeframes and overall maintenance on the trails.
8	We recommend replacing the “# of trails closed” metric with a measurement that rates trails and other infrastructure based on a particular facility's role in driving or mitigating visitor impacts. – Washington Trails Assoc.	Objective 5E has been updated to include # of trails assessed, as closure is really a management option that may occur after assessment.
9	Integrate the agency’s direction that “conservation includes management of human use for public benefit and sustainable social and economic needs” with the strategy proposed in Goal 5, Draft Objective E. Washington Trails Assoc.	The Skagit Wildlife Area Management Plan is consistent with our Wildlife Area Planning Framework. The Framework is considered a guidance document for wildlife area plans.

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10	<p>The performance metric in draft objective E only mandates tracking the number of projects organized. WTA recommends that WDFW also tracks specific accomplishments and volunteer metrics such as hours of service and number of volunteers. WTA staff would welcome the opportunity to share what we have learned about measuring volunteer accomplishments with WDFW staff, if that would be useful. Washington Trails Assoc.</p>	<p>Volunteer tracking is currently being monitored by CERVIS, WDFW’s volunteer management platform.</p>
11	<p>The current task list should include actions related to volunteer coordination. Most volunteer partners will need more support from the agency than receiving “a list of priority activities on the wildlife area” (119). A plan for adding volunteer coordination capabilities should be added to this draft plan. Washington Trails Assoc.</p>	<p>WLA staff coordinates with the WDFW regional volunteer coordinator, building off the existing stakeholder list. This information will be added to the task list.</p>
12	<p>Thank you for including goal 9, which speaks to the importance of maintaining facilities and equipment. It is important to have well maintained facilities including signage. Currently this goal states a objective to “review and update information on the wildlife area webpages annually” (120). This objective could be more aspirational. We suggest that information should be reviewed quarterly if it is intended to be kept current online. Washington Trails Assoc.</p>	<p>The objective has been revised to include quarterly updates. In addition, the wildlife area website will be updated as needed to keep the public informed on emergent issues.</p>
13	<p>South Padilla Bay Unit: Discuss this planning effort with the Pacific Northwest National Scenic Trail (PNT) Administrator at the USDA Forest Service, Pacific Northwest Regional</p>	<p>The Bayshore Trail, located on the South Padilla Bay Unit, is outside the jurisdiction of the WLA. Skagit County manages the trail and Diking District #12 owns the trail. The focus of management on the South Padilla Bay Unit is</p>

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	<p>Office, and contact the Pacific Northwest Trail Association.</p> <ul style="list-style-type: none"> <li>- Consider ways to protect the scenic quality of the PNT. If future land acquisitions expand the South Padilla Bay Unit look at ways to increase the amount of the PNT permanently protected by WDFW ownership.</li> <li>- Work with the federal government to place standardized PNT signage along the trail.</li> <li>- Add the PNT to the Skagit Wildlife Management plan and classify hiking along this congressional designated trail as a key public use. Washington Trails Assoc.</li> </ul>	<p>seasonal wetlands and agriculture providing share crops for wintering waterfowl forage.</p>
14	<p>The draft plan lists the Sinclair island Unit as both having “limited recreation access” and being “closed for public use” (37). It is clear that access is difficult but it is not evident whether the public is allowed to visit this unit. Unless the resources at this location are highly sensitive, WTA supports public access to the site. Would it be possible to establish a Washington Water Trail site to provide the public a legal way to visit this unit? Washington Trails Assoc.</p>	<p>We clarified in the plan Sinclair Island Unit is close to public use due to safety concerns.</p>
15	<p>The Island Unit has 5.5 miles of trail along the outside of the unit. The management plan states that “the overall future of the trail is yet to be determined” (93). WTA is interested in how WDFW proposes to maintain, develop or decommission trails across the Skagit Wildlife Area. When will this trail be evaluated and how can members of the public provide input? Washington Trails Assoc.</p>	<p>The Island Unit trail will be decommissioned due to the restoration project. The unit will remain open for boat in public access only.</p>

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16	<p>Recent news has informed us that farmland in Washington state is being converted at an unprecedented rate. It is of utter importance that the wildlife area plan acknowledges the role that agriculture can play in building and maintaining habitat, but also that the wildlife plan does not threaten or result in any net loss of farmland. It is concerning to see the amount of land acquisition the Department wishes to complete, but we are also encouraged that consultation with the Ag community is included in the Plan's tasks.</p> <p>Washington State Senate Republican Caucus</p>	<p>WDFW is committed to managing agriculture lands for both commercial and wildlife values. Likely future acquisitions will include retention of agriculture lands to some degree. Currently we have a total of 585 acres of agriculture leases on the wildlife area.</p>
17	<p>Additionally, the SEPA checklist and the Plan both list restoring and improving habitat for Chinook and other salmonids, but it also emphasizes habitat for various bird populations. Some of those birds, particularly cormorants, enjoy salmonids. It's important that we protect the salmon smolt, both from birds and from other predators such as pinnipeds. There is no consideration of pinniped populations in the SEPA checklist or the Plan. They are a dangerous predator that may become a larger presence in the Skagit Wildlife Area and should be considered.</p> <p>Washington State Senate Republican Caucus</p>	<p>This topic is out of the scope of the management plan. If in the future management actions are needed, wildlife area staff would provide support.</p>
18	<p>As an Island County resident I believe that our coastline maintenance is of utmost priority for the state for both wildlife and human activity. However, my concern with this proposal is that construction efforts will diminish already sensitive habitats of many coastal species,</p>	<p>This comment refers to the Wiley Slough project. The dike structure at the Headquarters Unit is required to meet Corps of Engineers standards. We revegetate disturbed areas with native species wherever possible.</p>

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	including shorebirds which are an often overlooked part of this areas tourism.	
19	I would like to see hunting access maintained and improved across the Skagit Wildlife area. This is one of the premier waterfowl grounds on the West side of WA.	We agree. The goal of this plan is to continue to provide waterfowl habitat and hunting opportunities on the wildlife area.
20	There are many different types of users - but there is very little reason for conflict between them. And they all have a common need - which is simply "Public Access". Any project which impacts public access for as long as the current project has been and will be is not taking that into proper perspective. In fact, if you think about the underlying premise for the existence of the WDFW - it is the basic reason for its existence. Yes, I understand that some impact to public access is required from time to time - and that if there is a long duration project that providing public access during the project will (may?) have to cost more either in direct monies or in the duration of the project ... so be it. It is why any project is being done - to provide both better habitat -and- public access. I/we don't expect 'uninterrupted access' - but we also don't expect extended zero or even limited access. I do not agree that -any- type of access has priority over any other - but, as I said in my opening sentence - there is no reason for any conflict. - Jim (who is a birder who co-exists with hunters without problem)	This comment applies to the Wiley Slough project. Construction delays and site conditions prevented public access.  Thank you for your comment.
21	The Skagit Wildlife Area's cornerstone is and has been public access for hunting. Hunting access and opportunity should be the priority in	We manage the wildlife area for all compatible uses consistent with our funding sources. The future recreation plan will address needs for balancing recreation uses across the wildlife area. Hunting will remain an important part of the plan.

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	any plan. I have been hunting there for 56 years, and my grandfather hunted the North Fork Access area when it was private property. Wildlife viewing, dog training, hiking, and other activities should be allowed but only secondary to hunting.	
22	We can't have a repeat of the 2023-2024 hunting season fiasco of little/ no access to the Skagit Wildlife due to construction closures. Not only is unfair to the hunting community but it impacts hunter safety as well. Without the ability to use the headquarters boat launch and forced to use the Conway launch, we had to double the time spent on the river in order to access traditional hunting areas. This extra time on the river( probably in the dark), increases the chances for trouble. Come on WDFW, keep your wildlife area open for hunting season	See comment #20.
23	Consider the benefit of areas for dogs to run free. Some area is beneficial for certain breeds to get the exercises of full running, leaping ditches, swimming, and such. It is common for this at the Samish unit. It used to be so at the Headquarters unit, but probably has become less appropriate as its use has changed. Point being, a variety of use-types for dogs is needed, and the preservation of the few "open" areas is valuable.	Objective #5B is to evaluate wildlife area units and create designated dog training areas where this designation would be compatible with management and habitat values. WDFW will work with the Skagit Wildlife Area Advisory Committee and members of the public on this topic.
24	I feel you should prioritize management for shorebirds. They are likely the most sensitive to climate change. Your plan should detail ways to manage for shorebirds, especially those shorebirds which forage on flooded fields, brackish and fresh water edges, and vegetated	We agree that shorebirds are an important part of this ecosystem. Our recent and planned changes around salmon and estuary restoration and waterfowl management are anticipated to improve conditions for shorebirds. We have expanded our discussion of shorebirds on pages 18, 20, and 141.

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	<p>fields. Major improvements in habitat suitability can be achieved through things like adjusting water depth to optimal levels through managed use of floodgates, and correctly timed mowing. These techniques can be very inexpensive to implement and can make huge differences. But it requires prioritization that appears distinctly missing in your management plan.</p> <p>Michael Hobbs</p>	
25	<p>All Concerned: I believe your initial comment, “We’ve really worked hard on this draft...” sums it up pretty well. WDFW, (appointed) commissioners, and those appointed to produce the plethora of technical documents, white papers, management regulations, AWA, copying what other states have done, while well meaning for the young pups so assigned (and not really read thoroughly by superiors, or WDFW commission members, have made it so, cumbersome and complicated that Washington sportsmen and sportswomen go into the field (confused really) NERVOUS and HESITANT that they are breaking a rule. I have a favorite rule, that I proved through my own failures. IF ITS NOT EASY, PEOPLE WILL NOT DO IT. Please make your rules and regulations simple, and people, families, will love you. Lew Kono Poulsbo</p>	<p>We do our best to provide clear information regarding rules on the wildlife area. Thank you for your comment.</p>
26	<p>In the local land use compliance section - Table 3, the shoreline designations listed for those areas in Skagit County are from our DRAFT SMP which has not been approved by Ecology or adopted at this time. Betsy Stevenson, Skagit County</p>	<p>Corrected.</p>



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27	<p>The fish-distribution maps in this plan only show presence in the Skagit, Samish, and Sauk Rivers. Publishing these maps could be confusing to the public since they omit all other fish-bearing streams in the map extent. Betsy Stevenson, Skagit County</p>	<p>The following information will be added to the plan, page 143, contact WDFW for the most recent distribution information, the Salmonscape link has been provided: <a href="https://apps.wdfw.wa.gov/salmonscape/map.html">https://apps.wdfw.wa.gov/salmonscape/map.html</a>.</p>
28	<p>Overall, the management plan presents well and is well written. Our Natural Resources team looks forward to having the final plan available as a great reference document. Betsy Stevenson, Skagit County</p>	<p>Thank you for your compliment.</p>
29	<p>I have reviewed the WDFW draft Skagit Wildlife Area 10 year plan, and have several suggestions from the perspective of a bird and wildlife photographer. I regularly visit many Skagit Wildlife Areas (on foot and by kayak), and have done so for the last 15 to 20 years. Here are several improvements that could be made for birders and wildlife photographers:</p> <p>Provide permanent and dedicated blinds for bird and wildlife viewing (vs. hunting) at popular viewing locations; for example:</p> <ul style="list-style-type: none"> <li>a. Headquarters unit,</li> <li>b. North Fork access area,</li> <li>c. Samish unit (i.e., West 90),</li> <li>d. Samish River unit (SW corner, so as to not disturb hunters)</li> </ul> <p>Keith Williamson</p>	<p>Headquarters unit has the only “wildlife viewing” blind.</p> <p>WDFW staff are eager to work with Skagit Audubon and the Skagit Wildlife Area Advisory Committee to improve wildlife viewing on the wildlife area (objective 5A).</p>
30	<p>Provide adequate parking areas at two key locations for bird and wildlife viewing: North Fork access area (i.e., end of Rawlins Road), Samish River unit (particularly its west side).</p>	<p>North Fork access, we do not own the property on Rawlins Rd. Additional property in this area would need to be acquired to provide parking.</p>

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	Keith Williamson	Regarding the Samish River Unit we have a Recreation Conservation Office, State Lands Development grant in hand to provide parking should be improved by the summer/fall of 2024.
31	To help pay for these blinds and parking areas, find some way to solicit funds from the (large and growing) birding and wildlife photography communities.  Keith Williamson	This comment is beyond the scope of this plan. Birders are encouraged to purchase Duck Stamp/ federal migratory bird permit.
32	Provide a hand launch capability (e.g., kayak launch) at either: Jensen access location in Skagit Farm unit, and/or North Fork access area (i.e., end of Rawlins Road).  Keith Williamson	The North Fork Access Area has no onsite parking to support a designated hand launch. Jensen Access Area has designated parking and a launch site. We do not own the dike on Jensen Access Area and are not able to make improvements.
33	I have concerns on proposals to change Johnson/DeBay’s Slough Unit. Over the years I have seen it as an important night roost for trumpeter and tundra swans, which is excellent as that was its intent when purchased. Now there is a consideration to change the area..possibly to accommodate young salmon. The waters are too warm for salmon! If the areas is opened up to cool waters it will impact not only the swans but other fish and wildlife that already exists. It would impact a local dairy farm (swans are somewhat dairy dependent) that is next to the reserve by requiring a buffer. Our local farmers should not be impacted.. and should a buffer ever be required than compensation would be needed. There are many great projects happening for salmon restoration but DeBay’s really needs to be	A feasibility study is a process that assesses whether habitat restoration is possible and beneficial at a given location. In this case, WDFW is looking not only the impacts to juvenile salmon, but also the impacts to swans and other species who currently use this site. We hope that the feasibility study will give us information about what actions can be taken on WDFW lands to make ecosystem processes more functional and improve habitat. Once the feasibility study is completed, management actions will be assessed at that time. The property was purchased to serve as a night roost for swans, and that important feature will be heavily weighted in the decision-making process. WDFW will work with the local community and neighbors to understand their concerns and suggestions prior to implementation and strive to prevent any negative impacts to neighboring properties.

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	maintained for all waterfowl and stay a safe night roost. Kim Cashon Smith	
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