

Mount St Helens Wildlife Area SEPA Response Table (DNS 19-019) - March 7, 2019 through April 8, 2019

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	Comment	WDFW Response
1.	<p>I attended the State Environmental Policy Act (SEPA) meeting at the Ridgefield office of the WDFW Mount Saint Helens draft management plan on 07 March 2019. The overview was well done. I learned a lot and the displayed maps of the units discussed were excellent. Good meeting. Nice building. Nice people. Nice slides and maps.</p> <p>I am a volunteer with the Washington Trails Association and live in the Ridgefield area. Our group is one of 5 regions of the state for WTA and we service trails from the Gorge to US 12 and the coast to Yakima Nation. Mount Saint Helens Environs is of great interest to us. The opportunity to assist WDFW and other state land managers is of interest to the leadership of WTA. We like to build and enhance trails and find new land to explore. Most of us are wildlife observers.</p> <p>The SW regional manager of WTA's name and tile:</p> <p>Ryan Ojerio SW Washington Regional Manager Washington Trails Association (360) 722-2657 www.wta.org</p>	<p>Thank you for your comments.</p> <p>Thank you for the information, and we will look into the possibilities of partnering on future projects on the wildlife areas to enhance recreation.</p>
2.	<p>Hi, Daren, Lauri and Chad, was nice to talk with all of you at the Mt. St. Helens Wildlife management meeting and about volunteer opportunities with WDFW. Please add me to your lists so I can get your emails about the volunteer work that is coming up. As I told you I recently had surgery and at this time can't help out and it may be a couple months until I can help but would still like to know about what is going on so I can see what type of volunteer work is being done.</p> <p>Hope you all have a wonderful day,</p>	<p>Thank you for your interest and feedback. We have added you to the Mount St Helens Wildlife Area volunteer list.</p>

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	<p>Bill Murray</p>	
<p>3.</p>	<p>I have spoken to WDFW before about the signs on pretty much all WDFW land on the west side of the Cascades saying "no camping" while the WAC allows camping. I've asserted that in many instances, having sportsmen/women parked overnight or outdoor enthusiasts camping on the Mudflow or Hoffstadt Unit, for example, should be allowed and is proper in according to state law. The Draft St. Helens plan calls for a "camping Plan" but only one area currently allows camping (Merrill Lk).</p> <p>New issues make addressing camping more urgent. As a member of the Cowlitz county park board, I have become aware of a 9th circuit court ruling where homeless people must be allowed to camp on public land if there are no shelter spaces available. <i>Martin v. City of Boise</i>. Our park board has been updating regulations, and we were told by council that we COULD NOT have a no camping in parks ordinance unless we identified a county property with camping for the homeless. Currently the homeless must be allowed to stay overnight on any county park property, including "day use only" county parks.</p> <p>I don't know what this means for WDFW but it seems it could be that only homeless people could legally camp, while sportsmen/women could not on posted WDFW land. I know that much of the posting was to prevent homeless from camping/living on WDFW land, but now that appears that that attitude runs afoul of the ruling. The worst case, I believe, would be homeless people allowed to camp (per the ruling), and nobody else. Currently, the county must allow homeless people to camp at the fairgrounds parking lot, but a traveler stopping by with a motorhome cannot stay overnight in the parking lot. This makes no sense.</p>	<p>WDFW strives to provide compatible recreational opportunities while working to preserve, protect and perpetuate fish and wildlife and their habitats on department lands. WDFW land management staff must consider many factors when determining where camping is appropriate and manageable. Those factors include the level of public use, the number of different user groups and potential user conflicts, site and staffing capacity, species and habitats present, and acquisition and management funding sources.</p> <p>Multiple rules apply to the management of public use, including camping, on department lands. Rather than posting signs on all department lands as either open or closed to camping, all areas are open to camping unless signs state otherwise. Washington Administrative Code (WAC) 220-500-030 states that it is unlawful to use department lands in a manner or for a purpose contrary to signs or notices posted on those lands, waters, or access areas. Wherever WDFW determines that camping is allowed, WAC 220-500-100 specifically sets a 21-day limit within a 30-day period. Together these WACs address camping on department lands.</p> <p>WDFW will look to guidance from Washington State Office of the Attorney General regarding management of WDFW lands and the homeless.</p>

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	<p>I suggest (if that isn't already being done) that WDFW consult with lawyers about the legality of the no camping policies and postings before the Final Mount St. Helens plan identifies most properties as "no camping".</p> <p>PS. If the WDFW policy is ok, please let me know. Perhaps, since the WAC allows camping, and people are only "not following posted signs" you are covered. Or maybe the policy only matters in an urban area.</p> <p>Darcy Mitchem</p>	
4.	<p>I have reviewed the Mount St Helens Wildlife Area draft management plan and wish to offer the following comments.</p> <p>As a hiker, birder and botanist, I am interested in the Mount St Helens Wildlife Area from a non-consumptive recreation perspective. I have explored the Merrill Lake Unit on a field trip with the Rocky Mountain Elk Foundation in 2012 and then again on my own in 2017 once I knew the unit was in public ownership.</p> <p>I knew that the Backcountry Horsemen of Washington had built an equestrian trail from the Kalama Horse Camp to Kalama Falls, but I could not find any information online or in guide books describing the trail, where to find the trailhead, length, difficulty, etc. I decided to explore the Merrill Lake Unit from the gate at the junction of Forest Road 81 and the former Weyerhaeuser 7500 Road, walking the road into the unit to see if I could find the features I had been shown on the RMEF field trip 5 years before. I hiked the length of the road across the unit, then took an unmarked trail that turned out to lead to Kalama Falls. I could not find my way back to the artesian springs flowing from lava tubes or the lava casts I had been shown on the RMEF field trip.</p> <p>Goal 6 of the draft management plan states: Support and maintain appropriate recreation opportunities. The draft</p>	<p>Thank you for your comments.</p> <p>WDFW has added an additional objective to increase interpretative education opportunities on the wildlife area.</p> <p>Tasks under this new objective will include:</p> <ul style="list-style-type: none"> - Provide signs and other interpretative information including length of trail, elevation gain and difficulty. Online provide maps and driving directions to trailhead. - The current Merrill Lake Trail is managed by DNR. WDFW will consider extending the DNR trail on Merrill Lake onto WDFW lands to create a loop that highlights the unit's unique features. - Partner with Washington State Trails Association.

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<p>management plan lists hiking as a recreational opportunity on the Merrill Lake Unit but hiking does not appear to be supported in any way, such as with on-site signs and online maps with trail information and directions.</p> <p>Further, the draft management plan names the trail as the Merrill Lake Trail although it does not go to Merrill Lake and creates confusion because Washington Department of Natural Resources already has a one-mile loop trail on the shore of Merrill Lake which is named the Merrill Lake Trail. www.dnr.wa.gov/MerrillLake</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. Change the name of the trail on the Merrill Lake Unit to something like the Kalama Falls Trail to distinguish it from DNR's Merrill Lake Trail and avoid confusion. 2. Provide on-site signs and online maps with trail information such as length, elevation gain and difficulty, driving directions to trailheads, etc. 3. Consider expanding the trail to create a loop that highlights unique features of the Merrill Lake Unit and provides a more interesting and satisfying recreation experience. 4. Implement Objective A of Goal 6 by partnering with the Washington Trails Association and its vast volunteer trail maintenance operation to conduct additional trail planning, and to build and maintain sustainable trails to established standards for approved recreation uses. Every choice that WDFW makes as a land manager about design, construction and maintenance of a trail will affect who will be able to use it and who will be discouraged from traveling on it or denied access altogether. 	<p>The plan will be edited and to provide consistency throughout the document the trail will be referred to as the Kalama Falls Trail.</p> <p>Under goal 7, objective B in the plan we will consider adding a representative from the Washington Trails Association to the Wildlife Area Advisory Committee.</p>
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	<p>Properly designed, a trail will give people access along a route with the least impact upon the environment.</p> <p>Susan Saul</p>	
5.	<p>On a separate topic, I also want to complement the WDFW for looking at opportunities to build resilience to climate change into the draft management plan. It is a challenging task to enhance the ability of ecosystems to adapt to changes, anticipate what might happen next, absorb climate shocks when they do occur and build capacity to recover. Climate resilience planning must prepare for both acute events, like floods and fires, and chronic events like changing snowpack and shifting wildlife populations. The National Audubon Society, in the broadest and most detailed study of its kind, has modeled what will happen with bird populations in the face of climate change. It predicts that shrinking and shifting ranges could imperil nearly half of U.S. bird species within this century. climate.audubon.org/ I recommend reviewing National Audubon Society’s climate initiative (www.audubon.org/conservation/climate-initiative#science) for suggestions regarding how the Mount St Helens Wildlife Area could build climate resilience such as through strategic land acquisitions.</p> <p>Susan Saul</p>	<p>Thank you for bringing to our attention the work the Audubon Society has done in modelling the effects of climate change on bird species. One of the criteria that WDFW recommends in acquiring new properties and developing new projects is how they will react to a changing climate and if they provide resiliency. WDFW will continue to account for climate change in management of its lands and species.</p>
6.	<p>I was especially interested in The Merrill Lake Unit and the Nellie Corser Unit. These seem like new opportunities for trail building or improvement. Once the snow goes I hope to visit these two areas.</p> <p>Thank you for this work and presentation. I will be glad to offer more if more details are needed.</p> <p>Roderick S. Hooker</p>	<p>Thank you for your comments. See comment # 4. The Merrill Lake and Nellie Corser units are great places to visit and view waterfalls. A partnership between WDFW and WTA could enhance access and visitation to the sites.</p>
7.	<p>Question B.3.a.2 of the SEPA checklist asks whether the project will require any work over, in, or adjacent to (within 200 feet) the described waters. The applicant answered N/A, yet the Mount St</p>	<p>All streambank protection and river channel stabilization projects do go through the County, Corps, and Ecology permitting processes.</p>

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	<p>Helens Wildlife Area Draft Management Plan describes potential streambank protection and river channel stabilization in the Mudflow Unit. This type of work will need to undergo county shoreline review in addition to Clean Water Act 404/401 permit review with the Corps and Ecology. Rebecca Rothwell, Department of Ecology</p>	
<p>8.</p>	<p>The following Water Quality Program comments apply to future project and development actions mentioned in this Mount St Helens Wildlife Area Draft Management Plan Proposal:</p> <p>Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.</p> <p>Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.</p> <p>Chris Montague-Breakwell, Department of Ecology</p>	<p>WDFW will follow all guidelines as outlined by the permitting agencies while conducting projects and working in and around aquatic habitats.</p>
<p>9.</p>	<p>Construction Stormwater General Permit: The following construction activities require coverage under the Construction Stormwater General Permit:</p> <ol style="list-style-type: none"> 1. Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State; and 2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately 	<p>WDFW will follow all guidelines as outlined by the permitting agencies while conducting projects and working in and around aquatic habitats.</p>

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	<p>disturb one acre or more and discharge stormwater to surface waters of the State.</p> <p>a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, and discharge to surface waters of the State; and</p> <p>3. Any size construction activity discharging stormwater to waters of the State that Ecology:</p> <p>a) Determines to be a significant contributor of pollutants to waters of the State of Washington.</p> <p>b) Reasonably expects to cause a violation of any water quality standard.</p> <p>Chris Montague-Breakwell, Department of Ecology</p>	
10.	<p>If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted.</p> <p>You may apply online or obtain an application from Ecology's website at: http://www.ecy.wa.gov/programs/wq/stormwater/construction/ - Application. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.</p> <p>Chris Montague-Breakwell, Department of Ecology</p>	<p>WDFW will follow all guidelines as outlined by the permitting agencies while conducting projects and working in and around aquatic habitats.</p>
11.	<p>Pg 12 Success stories. Can we compare stream velocities from 1996 to 2016 in the discussion of the stream bank stabilization</p>	<p>The flow during the 1996 and 2016 flood events on the North Fork Toutle river were almost identical in cubic feet of water per second flowing down the river.</p>

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	<p>efforts so that the reader has a better understanding of relative flow and erosion risk? Patrick Miller</p>	
12.	<p>Pg 18. Incorporate statements about noxious weed control into management efforts. This might be covered elsewhere? Patrick Miller</p>	<p>WDFW controls noxious weeds on its lands and the species of weeds are listed in the weed management plan, Appendix B.</p>
13.	<p>Pg 22 Hoffstadt. Historically an eagle nest was present in this section, might be gone now. Could some statement about maintaining large conifers or other trees to support raptors be included? Patrick Miller</p>	<p>The various units of the Mt. St. Helens Wildlife Area will be managed for a variety of forest conditions depending on location. This will include management designed to maintain and improve conditions for species that favor older forest stands, i.e. birds of prey.</p>
14.	<p>Pg 26 Merrill lake. Maintain nesting habitat for Osprey. Patrick Miller</p>	<p>The various units of the Mt. St. Helens Wildlife Area will be managed for a variety of forest conditions depending on location. This will include management designed to maintain and improve conditions for species that favor older forest stands, i.e. birds of prey.</p>
15.	<p>Pg 30 and 31. Silver lake units. Maintain roosting habitat for raptors, especially bald eagles. RLC of nesting eagles on south side of Silver lake. Patrick Miller</p>	<p>The various units of the Mt. St. Helens Wildlife Area will be managed for a variety of forest conditions depending on location. This will include management designed to maintain and improve conditions for species that favor older forest stands, i.e. birds of prey.</p>
16.	<p>Pg 35. Fisher Island Include statements on maintaining and enhancing bald eagle and great blue heron nesting habitat on Fisher Island. Develop strategy to increase forage for deer on Fisher Island by treating reed canary grass and replanting with palatable forage. Develop grant funding to create hunting blinds in bay between Fish and Hump islands. If WDFW now owns Hump Island, can they have an influence on how, when and where dredge materials are deposited? Include requirements to revegetate with native plants? Patrick Miller</p>	<p>The various units of the Mt. St. Helens Wildlife Area will be managed for a variety of forest conditions depending on location. This will include management designed to maintain and improve conditions for species that favor older forest stands, i.e. birds of prey.</p> <p>Objective 4E includes implementing recommendations from the Population and Habitat Viability Assessment for the Columbian White-tailed deer, which may include actions on Fisher Island.</p> <p>The placement of a traditional hunting blinds in the bay between Hump and Fisher could be feasible, however the logistics of transporting material to the area could be quite difficult and expensive. WDFW encourages the use of native vegetation to create hunting blinds on agency lands.</p>

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		Objective 1H was added to the management plan, addressing the following: WDFW will work with the USACE to make the placement of dredge material as beneficial and least impactful as possible to fish and wildlife, should the need arise that additional material needs to be placed on the island.
17.	Pg 37, Abernathy creek. Historic bald eagle nest in uplands east of Abernathy creek road. Maintain forest practices that allow trees to function as nest and perching sites. Patrick Miller	The various units of the Mt. St. Helens Wildlife Area will be managed for a variety of forest conditions depending on location. This will include management designed to maintain and improve conditions for species that favor older forest stands, i.e. birds of prey.
18.	Pg 39. White Island. Evaluate impacts of camping on white tailed deer and streaked horn larks on adjacent Brown Island. Patrick Miller	Comment noted. Note that the camping on White Island likely occurs below the extent of WDFW ownership. Also, studying the impact of camping on White Island as it relates to larks on Brown Island is beyond the scope of this planning effort.
19.	Pg 42. Altoona. Maintain eagle and other raptor perching sites in upland sites. Work with local groups to provide nesting structures for waterfowl and routine maintenance of same. Patrick Miller	The various units of the Mt. St. Helens Wildlife Area will be managed for a variety of forest conditions depending on location. This will include management designed to maintain and improve conditions for species that favor older forest stands, i.e. birds of prey. Wildlife Area staff and District Wildlife Biologist will evaluate the need for waterfowl nesting structures, as there is likely enough natural structures in the area, and whether or not goose nesting platforms would become an issue in trying to manage the resident dark goose population in the Lower Columbia River.
20.	Pg 54. Two Forks. Work with local groups to enhance waterfowl nesting via nest boxes and structures. Patrick Miller	Due to the Two Forks Unit regularly flooding during nesting season, the area would not be a good place to provide nesting structures as most years they would likely be under water and unsuccessful. There is also likely enough natural cavities in the mature cottonwood trees on the site that artificial nesting structures would not be needed for the small numbers of cavity nesting ducks that may be in the area.
21.	Pg 57. Duck Lake. Explore options for holding water to provide nesting habitat for water fowl of all types and routine maintenance of same. Patrick Miller	In District 9 and don't know if this sort of thing is possible here. The adjoining properties around the Duck Lake Unit have had several projects completed on them to enhance salmonid habitat on the floodplain of the East Fork Lewis River, which has made the site

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		wetter during high flow events. Options that would hold more water during low flow periods and throughout the summer on the unit for waterfowl would also create fish entrapment and stranding issues for ESA-listed salmon stocks, making any water impoundment project very unlikely to be completed.
22.	Pg 92. VERY unlikely that larks will occur on Fisher/Hump or Whites. Vegetation too dense and tree structure very conducive to lark predators. Patrick Miller	It is possible that larks could sometimes visit the shorelines of any of these islands. Depending on future dredge material management, Fisher Island could conceivably be used by larks for foraging or resting.
23.	Pg 98. Cn probably find a more up to date citation for deer weights, maybe Mule and Black tailed deer of North America? Patrick Miller	A newer citation not needed. Deer sizes presumably haven't changed since this study was completed and information is locally relevant.
24.	Pg 101. Lack of high quality forage was also likely the reason the deer did not establish themselves on Fisher Island. Columbian white tailed deer are well accustomed to damp/wet environments. Forage on adjacent Willow Grove was more likely what attracted them off Fisher and Hump. Patrick Miller	Thank you for your comments.
25.	A last thought. The plan might be hard for the lay reader to totally comprehend and understand. You did a great job of suggesting that they might focus on part 1 and if they want more detail to continue to parts 2 and 3. Patrick Miller	The plan is a large document and sections could be misunderstood to those that may not unfamiliar with the area.
26.	What is the next step in developing priorities and budgets? Patrick Miller	Wildlife Area Staff and Regional Wildlife Managers are always considering projects and seeking funding sources to get them accomplished.
27.	The six page handwritten letter received by Mr. Zitt focused on general dissatisfaction with WDFW Game management, our system for allocating Special Hunt Permits. D. Zitt Woodland, WA	The letter was provided to WDFW prior to the March 21, 2019 public meeting. None of the input provided in the letter is relevant to the wildlife area planning process. The letter has been provided to WDFW Game Management Staff for their consideration.
28.	The draft plan only addresses potential climate change impacts to fish, amphibians, and mammals but does not mention birds. Among the bird species at risk in the Mount St Helens Wildlife Area are bald eagle, northern shoveler, osprey, ruffed grouse, rufous hummingbird, northern spotted owl, northern pigmy owl,	Thank you for your comments. Table 10 in the management plan includes information from WDFW's State Wildlife Action Plan, and includes a list of Species of Greatest Conservation Need (SGCN), with a moderate-high vulnerability rank in Washington state. SGCN birds associated with

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	<p>Townsend's solitaire, American dipper, red-breasted nuthatch, hairy woodpecker, golden-crowned kinglet, common raven, common goldeneye, and pine siskin.</p> <p>We recommend that you review the National Audubon Society's Climate Report (climate.audubon.org) and incorporate its data and recommendations into your management plan.</p> <p>Arden Hagen, President Vancouver Audubon Society</p>	<p>Mount St Helens Wildlife Area did not meet this criteria, and it does not imply birds would not be ultimately evaluated. Climate change resilience will also be part of the implementation of the wildlife area management plan.</p>
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