	Comment	WDFW Response
1.	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.	Thank you for your comments.
	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. The SW regional manager of WTA's name and tile:	Thank you for the information, and we will look into the possibilities of partnering on future projects on the wildlife areas to enhance recreation.
	Ryan Ojerio SW Washington Regional Manager	
	Washington Trails Association (360) 722-2657 www.wta.org	
2.	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.	Thank you for your interest and feedback. We have added you to the Mount St Helens Wildlife Area volunteer list.
	Hope you all have a wonderful day,	

May 28, 2019

May	28,	2019
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· · ·		
	Bill Murray	
3.	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). 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. Martin v. City of Boise. 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.	 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. 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.
	I don't know what this means for WDFW but is 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.	WDFW will look to guidance from Washington State Office of the Attorney General regarding management of WDFW lands and the homeless.

May 28, 2019 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". 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. Darcy Mitchem I have reviewed the Mount St Helens Wildlife Area draft Thank you for your comments. 4. management plan and wish to offer the following comments. WDFW has added an additional objective to increase interpretative As a hiker, birder and botanist, I am interested in the Mount St education opportunities on the wildlife area. Helens Wildlife Area from a non-consumptive recreation perspective. I have explored the Merrill Lake Unit on a field trip Tasks under this new objective will include: 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. - Provide signs and other interpretative information including length of trail, elevation gain and difficulty. Online provide maps and driving directions to trailhead. I knew that the Backcountry Horsemen of Washington had built an equestrian trail from the Kalama Horse Camp to Kalama Falls, - The current Merrill Lake Trail is managed by DNR. WDFW will but I could not find any information online or in guide books consider extending the DNR trail on Merrill Lake onto WDFW lands describing the trail, where to find the trailhead, length, difficulty, to create a loop that highlights the unit's unique features. etc. I decided to explore the Merrill Lake Unit from the gate at - Partner with Washington State Trails Association. 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. Goal 6 of the draft management plan states: Support and maintain appropriate recreation opportunities. The draft

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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.	
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	The plan will be edited and to provide consistency throughout the
Merrill Lake which is named the Merrill Lake Trail.	document the trail will be referred to as the Kalama Falls Trail.
www.dnr.wa.gov/MerrillLake	
Recommendations:	
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	Under goal 7, objective B in the plan we will consider adding a
Washington Trails Association and its vast volunteer trail	representative from the Washington Trails Association to the
maintenance operation to conduct additional trail planning, and	Wildlife Area Advisory Committee.
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.	

May	28, 2019	
	Properly designed, a trail will give people access along a route	
	with the least impact upon the environment. Susan Saul	
5.	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. Susan Saul	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.
6.	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. Thank you for this work and presentation. I will be glad to offer more if more details are needed. Roderick S. Hooker	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.
7.	Question B.3.a.2 of the SEPA checklist asks whether the project	All streambank protection and river channel stabilization projects do
	will require any work over, in, or adjacent to (within 200 feet) the described waters. The applicant answered N/A, yet the Mount St	go through the County, Corps, and Ecology permitting processes.

28, 2019	
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	WDFW will follow all guidelines as outlined by the permitting
project and development actions mentioned in this Mount St Helens Wildlife Area Draft Management Plan Proposal: Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be	agencies while conducting projects and working in and around aquatic habitats.
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.	
Any discharge of sediment-laden runoff of 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.	
Chris Montague-Breakwell, Department of Ecology	
Construction Stormwater General Permit: The following construction activities require coverage under the Construction Stormwater General Permit:	WDFW will follow all guidelines as outlined by the permitting agencies while conducting projects and working in and around aquatic habitats.
 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 Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or 	
	 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 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: 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. 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. Chris Montague-Breakwell, Department of Ecology Construction Stormwater General Permit: The following construction activities require coverage under the Construction Stormwater General Permit: 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

May 2	28, 2019	
	disturb one acre or more and discharge stormwater to surface	
	waters of the State.	
	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	
	3. Any size construction activity discharging stormwater to	
	waters of the State that Ecology:	
	a) Determines to be a significant contributor of pollutants to	
	waters of the State of Washington.	
	b) Reasonably expects to cause a violation of any water quality	
	standard.	
	Chris Montague-Breakwell, Department of Ecology	
10.	If there are known soil/ground water contaminants present on-	WDFW will follow all guidelines as outlined by the permitting
	site, additional information (including, but not limited to:	agencies while conducting projects and working in and around
	temporary erosion and sediment control plans; stormwater	aquatic habitats.
	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.	
	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.	
	Chris Montague-Breakwell, Department of Ecology	
11.	Pg 12 Success stories. Can we compare stream velocities from	The flow during the 1996 and 2016 flood events on the North Fork
	1996 to 2016 in the discussion of the stream bank stabilization	Toutle river were almost identical in cubic feet of water per second
		flowing down the river.

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	efforts so that the reader has a better understanding of relative flow and erosion risk? Patrick Miller	
12.	Pg 18. Incorporate statements about noxious weed control into management efforts. This might be covered elsewhere? Patrick Miller	WDFW controls noxious weeds on it lands and the species of weeds are listed in the weed management plan, Appendix B.
13.	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 tress to support raptors be included? 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.
14.	Pg 26 Merril lake. Maintain nesting habitat for Osprey. 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.
15.	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	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.
16.	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	 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. 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. 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.

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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
20.	Pg 54. Two Forks. Work with local groups to enhance waterfowl nesting via nest boxes and structures. Patrick Miller	dark goose population in the Lower Columbia River. 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

Townsend's solitaire, American dipper, red-breasted nuthatch, hairy woodpecker, golden-crowned kinglet, common raven, common goldeneye, and pine siskin.	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.
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.	
Arden Hagen, President	
Vancouver Audubon Society	



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300 711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

April 8, 2019

Lisa Wood, SEPA/NEPA Coordinator WA State Department of Fish and Wildlife Habitat Program, Protection Division PO Box 43200 Olympia, WA 98504-3200

Dear Lisa Wood:

Thank you for the opportunity to comment on the determination of nonsignificance for the Mount St Helens Wildlife Area Draft Management Plan Project (DNS 19-019). The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

SHORELANDS & ENVIRONMENTAL ASSISTANCE: Rebecca Rothwell (360) 407-7273

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 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.

WATER QUALITY/WATERSHED RESOURCES UNIT: Chris Montague-Breakwell (360) 407-6364

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:

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.

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.

Lisa Wood, SEPA/NEPA Coordinator April 8, 2019 Page 2

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

- 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 disturb one acre or more **and** discharge stormwater to surface waters of the State.
 - 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
- 3. Any size construction activity discharging stormwater to waters of the State that Ecology:
 - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
 - b) Reasonably expects to cause a violation of any water quality standard.

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.

You may apply online or obtain an application from Ecology's website at: <u>http://www.ecy.wa.gov/programs/wq/stormwater/construction/ - Application</u>. 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.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology Southwest Regional Office

(MLD:201901212)

cc: Rebecca Rothwell, SEA Chris Montague-Breakwell, WQ Lauri Vigue, WDFW (Contact)

From:	Susan Saul
To:	SEPADesk2 (DFW)
Subject:	Comment on SEPA No. 19019
Date:	Friday, March 15, 2019 11:09:32 PM

I have reviewed the Mount St Helens Wildlife Area draft management plan and wish to offer the following comments.

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.

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.

Goal 6 of the draft management plan states: Support and maintain appropriate recreation opportunities. The draft 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.

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

Recommendations:

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. Properly designed, a trail will give people access along a route with the least impact upon the environment.

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.

Sincerely,

Susan Saul 10102 NE 10th St Vancouver, WA 98664

From:	Roderick Hooker
То:	SEPADesk2 (DFW)
Subject:	Public Comment - Mt. St. Helens Wildlife Area Management Plan
Date:	Friday, March 8, 2019 7:24:22 AM

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.

I am a volunteer with the <u>Washington Trails Association</u> 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.

The SW regional manager of WTA's name and tile:

Ryan Ojerio SW Washington Regional Manager **Washington Trails Association** (360) 722-2657 <u>www.wta.org</u>

Washington Trails Association

Contact Us. Washington Trails Association 705 2nd Ave, Suite 300 Seattle, WA 98104 (206) 625-1367. Get Trail News Subscribe to our free email newsletter for hiking events, news, gear reviews and more. www.wta.org

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.

Thank you for this work and presentation. I will be glad to offer more if more details are needed.

Rod...

Roderick S. Hooker

From:	Darcy Mitchem
То:	Dahmer, Paul A (DFW); Melinda.Posner@dfw.wa.gov; SEPADesk2 (DFW)
Subject:	Camping on WDFW lands/ St. Helens Wildlife Areas
Date:	Saturday, March 16, 2019 1:54:44 PM

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).

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. *Martin v. City of Boise.* 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.

I don't know what this means for WDFW but is 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.

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".

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.

Please include this note in official comments concerning the Mount St Helens Wildlife Area.

Sincerely, Darcy Mitchem Daren Hauswald Wildlife Area Manager WDFW 5525 11th St Ridgefield, WA 98642

Mr Hauswald

I have taken the opportunity to review the draft 2019 MSHWA Plan. I found the plan to be very comprehensive and a bit complex, guessing that is the nature of Wildlife Area plans these days. I focused my comments on those areas that I have some knowledge of their management and wildlife.

Some of my comments might already be addressed by the tables toward the end of the document, if so please forgive the duplication.

So, here are some specific observation and questions:

Pg 12 Success stories. Can we compare stream velocities from 1996 to 2016 in the discussion of the stream bank stabilization efforts so that the reader has a better understanding of relative flow and erosion risk ?

Pg 18. Incorporate statements about noxious weed control into management efforts. This might be covered elsewhere ?

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 tress to support raptors be included ?

Pg 26 Merril lake. Maintain nesting habitat for Osprey .

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.

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 ?

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.

Pg 39. White Island. Evaluate impacts of camping on white tailed deer and streaked horn larks on adjacent Brown Island.

Pg 42. Altoona . Mainatin eagle and other raptor perching sites in upland sites. Work with local groups to provide nesting structures for waterfowl and routine maintenance of same.

Pg 54. Two Forks. Work with local groups to enhance waterfowl nesting via nest boxes and structures.

Pg 57. Duck Lake. Explore options for holding water to provide nesting habitat for water fowl of all types and routine maintenance of same.

Pg 92. VERY unlikely that larks will occur on Fisher/Hump or Whites. Vegetation too dense and tree structure very conducive to lark predators.

Pg 98. Cn probably find a more up to date citation for deer weights, maybe Mule and Black tailed deer of North America ?

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.

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.

What is the next step in developing priorities and budgets ?

Thank you for the opportunity to comment on this plan. Please forward this document as appropriate.

Patrick J Miller

VANCOUVER AUDUBON SOCIETY

P.O. Box 1966 Vancouver, WA 98668-1966 www.vancouveraudubon.org



March 26, 2019

Daren Hauswald Mount St Helens Wildlife Area Manager 525 S 11th Street Ridgefield, WA 98642

Re: Mount St Helens Wildlife Area Draft Management Plan

We appreciate the Washington Department of Wildlife attempting to address climate change and identify opportunities to create climate resilience in this plan. However, the draft plan only addresses potential climate change impacts to fish, amphibians and mammals, but does not mention birds.

National Audubon Society scientists have used hundreds of thousands of citizen science observations and sophisticated climate models to predict how birds in the United States and Canada will react to climate change. The project defines the climate conditions that birds need to survive, then maps where those conditions will be found in the future as the Earth responds to increased greenhouse gasses. It is the broadest and most detailed study of its kind. Of the 588 North American bird species Audubon studied, more than half are likely to be in trouble in this century. For many species, the report has identified climate strongholds – geographic areas that will provide shelter against the onslaught of climate change – which should be priority areas for conservation.

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 pygmy owl, Townsend's solitaire, American dipper, red-breasted nuthatch, hairy woodpecker, golden-crowned kinglet, common raven, common goldeneye, and pine siskin.

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.

Dr. Trina Bayard, Director of Bird Conservation for Audubon Washington, can assist you in accessing and interpreting National Audubon Society's climate data. She can be contacted at 206-652-2444 x109.

Thank you for the opportunity to comment on the draft plan.

Sincerely,

1d-class

Arden Hagen President

Mt St Helens Wildlife Area Advisory Committee

WDFW- Southwest Region 5 Office * 5525 S. 11th Street Ridgefield, WA 98642 October 25, 2017 6:00-8:30 pm

FINAL AGENDA

6:00pm	Welcome and Introductions – Sandra Jonker	
	 Purpose of the meeting Roles and Expectations / Responsibilities – Lauri Vigue 	
6:15pm	Mt St Helens Wildlife Area Planning and Process – Lauri	
6:30pm	Overview of Mt St Helens WLA – Daren	
6:45pm	<u>Preliminary Issues List</u> – Daren	
	- Break if needed – Time TBD	
7:15pm	Discussion and Comments – Daren	
	 Collect input from advisory committee members Questions and concerns Additional public involvement opportunities 	
8:00pm	<u>Wrap-up</u> – Lauri – Public meeting – Next WAAC meeting	
8:30pm	Adjourn	

Mt St Helens Wildlife Area Advisory Committee Meeting

Final Meeting Notes

October 25, 2017 WDFW Region 5 Headquarters, Ridgefield 6:00-8:00 pm

<u>Attendees:</u>

WAAC Members present:

Carol Chandler, USFS Dan Howell, Rocky Mt Elk Foundation Darcy Michem, local community Mark Smith, neighbor

WAAC Members not present: Jim Anderson, Backcountry Horsemen Roger Wallis, local community Russ Kastberg, Audubon Angelica Velazques, Cowlitz County Weed Board

WDFW Staff: Daren Hauswald, Mt St Helens Wildlife Area Manager Sandra Jonker, Regional Program Manager Chad Wildermuth, Assistant Wildlife Area Manager Lauri Vigue, Project Manager Darric Lowrey, Scatter Creek/South Puget Sound/North Olympic Wildlife Areas Manager

Welcome and Introductions

Sandra Jonker, Region 5 Wildlife Program Manager welcomed everyone. Wildlife Area Advisory Committee (WAAC), *formerly* Citizen Advisory Group (CAG) members and WDFW staff introduced themselves. Lauri Vigue, Planning Project Manager, explained the focus of the meeting is to provide a description of WAAC roles, expectations and responsibilities, planning team responsibilities, decision making, discussion guidelines, overview of the wildlife area planning process, and timeline. Daren will provide a draft list of wildlife area issues developed by internal scoping and an overview of the wildlife area units.

Mt St Helens WLA Planning and Process

The primary purpose of this meeting is to introduce the wildlife area management planning process to this committee. The goal is to complete a wildlife area management plan for the Mt St Helens Wildlife Area in 2018. The agency mission and strategic plan were introduced. An overview of Mt St Helens WAAC roles and expectations, contributions and responsibilities were provided; as well as the planning team responsibilities. A summary of the purpose of the plan, Wildlife Area Management Planning Framework document and revised plan outline was provided.

The Mt St Helens WLA internal scoping meeting was held in September, the public meeting will be held on November 30th; and the first planning meeting it anticipated be held in December. WAAC members are highly encouraged to attend the public meetings.

Planning Timeline (estimated)

Mt St Helens WAAC	October - February 2018 – April 2018 (3 meetings)
1 st Public meeting	November 30, 2017
2nd Public meeting	March – April 2018
Planning meetings	December - February (~3-4 meetings)
Final Draft Plan	Late spring 2018

Wildlife Area Overview - Daren

Nellie Corser Unit: 59 acres; original purchase funded by Recreation Conservation Office (RCO) and donation; habitat includes: late successional forest. Key species: spotted owl, black-tailed deer, fisher, Cascade torrent salamander, western toad; suitable habitat – for northern goshawk and Larch Mountain salamander; recreation: hunting and hiking

Duck Lake: 39 acres; original purchase funded by Ducks Unlimited; habitat includes: wetlands and floodplain habitat along the E.F. Lewis River. Key species: Chinook, chum and steelhead, waterfowl, Oregon spotted frog suitable habitat; recreation – hunting

Two Forks: 49 acres; original purchase funded by RCO – Washington Wildlife Recreation Program (WWRP); habitat includes: mature riparian forest at the confluence of the N.F and E.F Lewis Rivers. Key species: Columbia white-tailed deer, wading birds, songbirds and black-tailed deer; recreation: hunting, wildlife viewing and fishing Cedar Creek: 127 acres; original purchase funded by USFWS Pittman Robertson, Wildlife Funds, donation; habitat includes: mixed forest and open pasture. Key species: band-tailed pigeons, black-tailed deer, western toad. Salmonids (coho, Chinook and steelhead); recreation: hunting

Jenny Creek: 20 acres, original purchase funded by USFWS Pittman Robertson, Wildlife Funds, donation; habitat includes: mixed forest and open pasture. Key species: band-tailed pigeons, black-tailed deer, western toad; recreation: hunting

Eagle Island: 279 acres, original purchase funded by Recreation Conservation Office – Salmon Funding Recovery Board, Aquatic Lands Enhancement Account (ALEA); habitat includes: mature riparian forest and salmonid habitat. Key species include: steelhead, chum, Chinook, waterfowl, black-tailed deer, band-tailed pigeon; recreation: hunting and fishing

Abernathy Creek: 138 acres; original purchase Cowlitz County transfer; habitat includes: riparian forest and salmonid habitat. Key species: Chinook, chum, steelhead, eagle, osprey, marbled murrelet, black-tailed deer; recreation: hunting and fishing

Nelson: 20 acres; original purchase Port of Kalama mitigation; habitat includes: wetland, floodplain habitat. Key species: waterfowl, eagle and osprey; recreation: hunting and wildlife viewing (only boat access)

Fisher Island: 257 acres; original purchase funded by Recreation Conservation Office, WWRP; habitat includes: forested floodplain. Key species: Columbia white-tailed deer, waterfowl; recreation: hunting and fishing

White Island: 130 acres; original purchase funded by Wildlife Funds; habitat includes: forested floodplain. Key species: Columbia white-tailed deer, waterfowl, songbirds; recreation: hunting and fishing

Altoona: 177 acres; original purchase funded by: USFWS – Coastal Wetland; Recreation Conservation Office – WWRP; habitat includes: mature spruce forest, floodplain habitat in Grays Bay. Key species: bald eagle, shorebirds, wading birds, shorebirds, waterfowl, elk, marbled murrelet; recreation: hunting, fishing, boating/boat launch and parking area

Carnine: 37 acres: original purchase donation; habitat includes: forest. Key species: black-tailed deer; recreation: none (land-locked unit surrounded by private residential)

Hall Road: 132 acres; original purchase funded by USFWS - Dingell Johnson; habitat includes: wetland, riparian and upland forest habitat located near Silver Lake. Key species include: waterfowl, black-tailed deer, bald eagle, osprey; recreation: hunting and fishing

Canal Road: 121 acres: original purchase funded by USFWS - Dingell Johnson; habitat includes: wetlands along Silver Lake; species include: waterfowl, bald eagle, osprey; recreation: hunting, fishing and boating

Gardner: 43 acres; original purchase funded by Recreation Conservation Office – Bonds; habitat includes: riparian and floodplain habitats along the N.F. Toutle River. Key species include: bald eagle, western toad; recreation: fishing, swimming and wildlife viewing

Hoffstadt: 3,816 acres; original purchase: state appropriation; habitat includes: old-growth forest, riparian habitat. Key species include: steelhead, coho, elk, black-tailed deer, bald eagle, fisher, waterfowl, ruffed and dusky grouse, spotted owl, amphibians; recreation: hunting and hiking (land-locked unit surrounded by Weyerhauser private forest)

Mt St Helens (Mud Flow): 2,744 acres; original purchase funded by Wildlife Funds, Recreation Conservation Office – WWRP, State appropriation; habitat includes: debris flow, salmon bearing streams, and wetlands. Key species include: large concentrations of winter elk, steelhead, coho, elk, black-tailed deer, bald eagle, fisher, red legged frog, western toad, northern spotted owl; recreation: Hunting, watchable wildlife, horseback riding

Merrill Lake: 1,452 acres, original purchased funded by Recreation Conservation Office – WWRP; habitat includes: old-growth forest, lodge pole pine, falls, shoreline and riparian, ancient lava flow. Key species include: elk, eagle, osprey, fisher, black-tailed deer, western toad, cascade torrent salamander, spotted owl, Larch Mountain and Van Dyke's salamanders, Townsend's big-eared bat, northern goshawk. Historic bull trout; recreation: Hunting, hiking, limited camping

Issues List - Daren

The internal scoping process identified the following preliminary issues that will be addressed in the new plan:

- Land locked units (Mud Flow and Carnine)
- Operations and maintenance (lack of funding)
- Road issues and access
- Hoffstadt land acquisition
- White Island Natural Area Preserve Management Plan
- Sediment Retention Structure
- Updated signage on wildlife area
- Encroachment private lands
- Shed antler hunting impacts

Potential Focal Species:

Elk Fisher and wolf expansion Columbia White-tailed deer Oregon spotted frog Waterfowl Band-tailed pigeon Yellow billed cuckoo Northern spotted owl Black-tailed deer Steelhead Chinook Coho Bull trout

Mt St Helens WLA WAAC Comments

Mark Smith: is interested in having a third WAAC meeting to discuss the public comments received and edits. Response: A third WAAC meeting will be setup after the all comments have been received and agency responses developed.

ACOE Sediment Structure – the WAAC is concerned with lack of wildlife mitigation for the original structure.

This will be a unique wildlife area plan because of the focal points of Mt St Helens and the Columbia River and the stakeholders involved (e.g. USACOE, USFS) and other interest groups; National Academy of Science research in the Monument and the challenges by the sediment retention structure.

Carol: How will the tribes be involved in this process? Response: The region will send out notice to the tribes in advance of the public meeting. It is up to the individual tribes on how they want to be involved in the process. Some will schedule meetings specifically with the region other prefer to submit comments. The draft plan will be sent to the tribes in advance of public review for their comments. Notices will be sent to the following tribes: Puyallup, Cowlitz and Yakama Nation.

Carol: Merrill Lake – USFS has been monitoring winter habitat for Townsend's big eared bats. They are known to winter in caves and fissures.

Darcy: Asked about the Cress Lake Access site near Kalama, and Green River Fish Hatchery. The Onieda access site is managed by the access program.

Carol: when evaluating lands for surplus, we need to make sure we weigh values (e.g. priority species) consistent with the mission and the legal requirements of the original purchase. In some cases, we need to ask the question, are we giving up providing public access for residential development? There should be mitigation funding opportunities available for ongoing operations and maintenance activities.

Access is important for the Mud Flow Unit. Purple martins are located on this unit.

Carol: Fishers are now present at Trout Lake and expanding.

Wolves have been documented on White Pass – Cowlitz Ranger District

Oregon spotted frog, does critical habitat include historic ranges? Which neotropical birds should be considered as part of this plan?

Regarding land trades, the funding strings may restrict donations and land transfers.

Carnine Unit is located near Castle Rock and Toutle Lake, a landlocked parcel. County put deeds on 2 easements, if we surplus this property it would go back to the family.

Hoffstadt Unit – Access is a big concern, public has to acquire a Weyerhauser permit to access, no easement or right-of-way. WDFW has administration access only. ACOE Draft EIS points to a interlocal agreement, it is the responsibility of the state and diking district to provide access. On the N.F. Toutle there is approximately 1,100 acres loss of habitat each year due to the sediment structure. Wildlife habitat and recreation impacts have not been mitigated. Legislatures have been contacted regarding this disconnect.

Other WAAC comments:

Promote education and scientific research

- Pacific NW laboratory look for opportunities and partnerships
- Benefits future generations
- Create recreational education projects

Include rare plants inventory and management

- Silver Lake has a bladderwort
- Lady slipper Hall Road

Develop a bird watching brochure for Silver Lake

Need additional operations and maintenance funding

Cowlitz County Comprehensive plan – joint WDFW and DNR recreation access plan in the Toutle Valley is being developed

The recreation emphasis has been on fishing and hunting, limited people support traditional recreation now. Over 5 million use fish and wildlife lands we need to find more created ways for funding, e.g. GoFundMe adopt an acre, web cam sponsors.

Hoffstadt acquisition -

Silver Lake RV Park partnership? Public/private partnerships in existing habitat areas/access school districts, comprehensive plan expansion, community forest south end of lake.

Coldwater Lake Science Learning Center – has partnerships/education opportunities

Include pika on species list - have been documented near the Forest Center

Sasquatch tags - marketing approach

Lack of designated and dispersed camping on the wildlife area

Non-traditional recreation (handicapped, ATV trails, viewing sites) – need education trails, small trails and parking lots.

Comments from Mark Smith, received in November 13, 2017 -

After taking time to review all information regarding the Mt St Helens Area Management Plan, I am concerned that the title of this plan is deceptive.

With 33 properties, that are not all directly linked to Mt St Helens Area, the GP National Forest, or show compatibility, leads me to be concerned that we will not be able to directly relate the needs of each area effectively.

I would like to suggest that we consider looking at dividing these units up into at least two more related groups, to be able to address there specific needs better. Example; areas along SR 504 are related, and share the similar needs and concerns of larger land units and access. In addition, smaller land unites have different concerns and needs to maintain, or consideration to eliminate some from WDFW management.

I feel that in order to create an effective plan, we need to create a more accurate scoping for these units. As they are presented now we are applying a very broad brush.

I feel if we keep going to create a plan that will truly allow the development of these areas to there strongest and best use, I feel we need to create a more pointed review process.

Thank you for taking the time to read my comments, I look forward working with all.

Stakeholders:

Lewis and Skamania County weed boards

Ducks Unlimited

County commissioners

Adjacent landowner/businesses

Uacolt Burn Sportsmen Club

Toutle School District

Mt St Helens Institute

University of Nottingham

Pacific Northwest Research Station (USFS)

Next steps:

- Public meeting November 30th Region 5 Headquarters, Ridgefield
- Planning team develops goals & objectives, draft plan in winter 2018
- WAAC review draft plan Spring 2018
- Public review draft in Summer 2018

Action items for the group

- Provide comments on the charter by July 14th
- Register as a volunteer



AGENDA

Mount St Helens Wildlife Area Advisory Committee

Washington Department of Fish and Wildlife Region 5 Headquarters

January 23, 2019

3:00 p.m. Welcome/Introductions - Sandra Jonker, Region 5 Wildlife **Program Manager** 3:10 p.m. Purpose and Meeting Format/Wildlife Area Planning Overview - Lauri Vigue, Project Manager Mount St Helens Wildlife Area Management Plan Highlights -Daren Hauswald **Objective Highlights – Daren** Wildlife Area Update WAAC Comments on Draft Plan 4:20 p.m. 5:20 p.m. Next Steps 5:30 p.m. Adjourn

Mount St Helens Wildlife Area Advisory Committee Meeting

Final Meeting Notes

January 23, 2019 Region 5 Headquarters - Ridgefield 3:00-5:30 pm

Attendees:

WAAC Members:

Dan Howell Darcy Mitchem Jim Andersen Roger Wallace Mark Smith

WDFW Staff:

Daren Hauswald Sandra Jonker Lauri Vigue

Welcome and Introductions (Sandra)

Sandra Jonker, Wildlife Region 5 Program Manger welcomed everyone. Lauri Vigue, Planning Project Manager, explained the focus of the meeting is to provide highlights of the wildlife area plan, wildlife area update, and the general timeline for completion of the document; and gather comments from the advisory committee on the draft management plan. The plan is consistent with the WDFW mission statement: To preserve, protect and perpetuate fish, wildlife and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities.

Mount St Helens WLA Draft Management Plan (Lauri and Daren)

The draft wildlife area management plan was sent to WAAC members and the tribes on Thursday, January 9th for review. Comments are due back to Lauri on January 25th.

Planning Timeline:

SEPA – 30 Day notice March

Public meeting March 7 (WDFW Region 5 Headquarters Ridgefield)

Final Management Plan May – June 2019

Lauri presented the vision for the wildlife area plan:

The vision of the Mount St Helens Wildlife Area is to maximize ecological integrity and social and biological values of the wildlife area and promote a variety of public recreational opportunities.

Daren provided highlights of the draft plan, including a presentation on the forest health activities that have occurred on the Hoffstadt and Merrill Lake units. The agency recently acquired the Toutle Green River Confluence lands (130 acres) which will be included in the WDFW hatchery complex some of which will be managed by the wildlife area. It is located near the Hoffstadt Unit. The Merrill Lake acquisition was completed with 170 acres purchased from Rocky Mountain Elk Foundation. It includes 30 acres of donated lands.

More than a dozen river stabilization structures were constructed or repaired on the Mudflow Unit in October/November. There will be one more phase of this project at the upper end of the property. The structures protect elk grazing habitat and provide salmon habitat.

Objective highlights from the plan include salmon restoration, Columbian white-tailed deer actions as they expand their range, and mineral spring enhancements for band-tailed pigeons.

The Hoffstadt Hills acquisition proposal was introduced into the WDFW lands acquisition approval process this past year. The project will apply for funding through the Recreation Conservation Office – Critical Habitat category funding. The project was also included under the capital budget under the Governor's budget for the ACOE fish collection upgrade (\$2.5 million).

WAAC Comments

Written comments were received from Darcy Mitchem and Mark Smith (see attached).

Additional comments:

Darcy has expertise in rare plant identification.

Consider developing a trail on the fish hatchery parcel and trails on Hoffstadt Unit.

Provide signage at access points, consider adopt an access program.

The focus of active management includes Merrill Lake and Hoffstadt units.

Work with DNR for trust land expertise

Seven units do not provide parking. Consider parking at Hoffstadt, SnowPark with DOT.

WAAC expansion: potential new members include Pat Miller (retired biologist), Mount St Helens Institute, National Monument (Amy Wilson), Weed Board, county, Department of Transportation.

It's a management challenge for WDFW to have several satellite units. The agency will consider trades with other agencies to increase efficiency.

Darcy Mitchem Comments received January 17, 2019

- The Draft Plan, in general, does a good job of describing the features, species, and overarching management goals of the Mount St. Helens Wildlife Area. The Draft plan, however, is light on specifics and projects, and provides less management detail and direction than the previous plans. The Draft plan seems to focus on existing conditions, not desired future conditions.
- 2. The Draft plan ignores significant Access needs, and even proposes actions to make public access *worse*. What happened to the agency emphasis, repeated over and over in public comment, for public access here, especially on the Mudflow/Hoffstadt Units?
 - The Draft plan only suggests LIMITING road use and Pg 75 has a measurement of performance for the Number of roads closed It proposes to manage roads only to minimize impacts on wildlife and makes no mention using roads for administration, access, or conversion of roads to trails.
 - Trail projects (pg 77) can only be initiated by partners. This is a step backwards from the previous plan's goals: 2006 plan Goal: Provide Public access, education, trails, viewing opportunities and reduce elk harassment.
 - There is No goal to provide legal access to WDFW lands (as has been the case since 2006 plan). Removal of this goal is another step backwards for public access. From previous plan: Strategy: Work with the Washington Department of Natural Resources, and WDFW's Real Estate, Game, and Fish programs and other groups and landowners to address the need for secure public access to public lands here including the wildlife area.
 - Instead of closing roads as an action item, consider converting to trails.
- 3. The maps should show all adjacent public landowners and land trust property. This gives a better understanding of the habitat, recreation, and connectivity potential of WDFW properties in relation to other protected and/or public lands.
 - The 800 acres of USACE adjacent to Hoffstadt along with new transfer from DOT at Mouth of Green River
 - Cowlitz County and Flood Control Dist. land adjacent to Canal Road properties (these provide parking and access)
 - Cowlitz County, Port, and Columbia Land Trust along Columbia River near Abernathy and Fisher Island. Lower Columbia designated Important Bird Area.
 - Cowlitz County parks land adjacent to Gardner Unit

- 4. I am glad to see the Draft plan consider a future camping plan. However, "Planning to plan" is a sure path to something never getting done. Camping needs a 2019 specific date of implementation. In the meantime, the Hoffstadt/Mudflow units should be re-open to dispersed camping, per state law. There is simply no justification for the blanket closure of camping here. Yes, on the smaller sites of 10-100 acres I can see a reason to prohibit camping, but this property contains 8,000 acres. The WAC already allows and regulates camping. There is no history of abuse by campers, the whole area lacks road access, the adjacent DNR lands are open to camping—with extensive vehicle access-- and they do not have a problem with it. The mudflow unit is already closed during the winter to all access and dogs are already not allowed. Hikers/bicyclists would have a three mile trek just to get there to camp, limiting the possibility of garbage dumping. What is the justification for banning dispersed camping here (besides the location on the West side of the Cascades)?
- Carnine Property should <u>not</u> be returned without replacement land along Silver Lake (see note **). It is incorrect to say the land has no public access. Replace that wording with "undeveloped easement access". The neighbors cannot prevent the WDFW from accessing it. File a court injunction if need be. Additionally, the land needs surveyed for rare plants, which are likely to occur there such as Calypso orchid and Western Wahoo.
- 6. The Nelson property probably has long term mitigation obligations but could be sent to the water access/fish side of WDFW.
- 7. Other possible species go consider: Mountain Goat (they are at Castle Lake!), Pika, freshwater mussels.

Additions to action Items:

- 1) In 2017 Cowlitz County completed its RCO grant eligible Parks, Recreation and Habitat Plan. Several projects include WDFW lands or priorities:
 - Create kayak/canoeing/sculling opportunities at Coal Creek Slough including improved launch facilities, restrooms, parking, and other required facilities.
 With partners, acquire legal access to the Toutle DNR forest and WDFW St.Helens Wildlife Area for public recreation and grant eligibility
 - Pursue creation Silver Lake Community Forest with the assistance of the Department of Natural Resources.
 - Be ready to act on opportunities for general shoreline acquisition.
 - Create kayak/canoeing/sculling opportunities at Silver Lake including improved launch, restrooms, parking, and other needed facilities. Improve fishing access at Silver Lake.
 - Pursue a joint DNR & WDFW recreation plan for Toutle Mountain to Toutle River Valley to include plans for future recreation such as horseback riding, mountain biking, motorized recreation, snowmobile trails, cross-country skiing and camping.
 - Adding support for such a recreation plan to this WDFW 10-year plan will improve chances of funding for such a measure (similar to Teanaway, Mt. Baker area etc)...
 - Habitat priorities for Cowlitz County include:
 - partnering with other agencies on projects, including acquisition and habitat improvements
 - focus on existing habitat areas

- o acquiring additional areas of shoreline for habitat and recreational access
- o pursuing a Community Forest along the south shore of Silver Lake
- 2) ** Instead of "giving up" the Carnine property because the family doesn't want you to own it, consider working on a trade with the family. That property and with timber is worth well over 1-million dollars on the open market. If the WDFW folds without a fight, the <u>public gets nothing</u> and wildlife gets nothing. Respect the donation with Linda Carnine's strong desire for a wildlife viewing area by facilitating a trade (perhaps with the help of a land trust like Ducks Unlimited/RMEF/Columbia Land trust). Have the family work with the trust to secure wetlands and shorelands along Silver Lake, which are high quality/high priority shorelines for public acquisition according to the Cowlitz Shoreline plan/Comprehensive plan/ & Habitat Plan. Some of this could even be filling inholding gaps in WDFW ownership (such as near Silver Lake dam). Working with these partners, return the Carnine land to the family in exchange for them financing a portion of replacement land (perhaps 50% of Fair Market Value of the Carnine property) which is then transferred to the WDFW. 500k would buy a lot of undevelopable wetland along Silver Lake. Win-win.
- 3) Consider a MOU for recreation & habitat management for the 800 acres of USACE land wedged between the Hoffstadt and Green River properties. The Fish and Wildlife Coordinating Act mitigation findings and suggestions to the Corps said that recreation and habitat should be focus on land impacted by SRS. Why not this land too? The WDFW could manage it for the Corps. Maybe they would even pay a little.
- 4) The Mudflow/Hoffstadt units need a title report. This has not been completed, and it was supposed to get done. See below excerpts from deed:

The property described above, comprising a total of approximately 321 acres, is generally outlined on the map which is attached this deed as Exhibit A. The parties to this deed intend to survey the South boundary of the Property, prepare a detailed legal description of the Property and certain of the easements appurtenant to it, and enter into a revised deed which will replace this deed.

TOGETHER WITH a sixty-foot wide non-exclusive easement for ingress and egress to such tract of land by the Grantee and its successors, assigns, agents, and contractors for administration, wildlife management, educational, and scientific purposes, from the relocated Spirit Lake Highway, SR 504, over Weyerhaeuser Road No. 3100.

The revised deed description was submitted, but no list of easements for any of the lands.

I have discovered that there are multiple State of Washington easements acquired by the DNR that could be used to access the Mudflow/Hoffstadt units. The WDFW may have "inherited" use of these easements when they acquired the property. **These units may not be landlocked after all**. The 2500, 2900, 3100, 2140 all have DNR easements on them from 1967. These easements do not restrict the

type of use. I have talked to DNR easement manager (and lawyer) Michael Kearney (360-902-2143) about these easements and he says it is possible that the WDFW has the use of these old easements if they acquired land that was once DNR or Weyerhaeuser. Use by the public right now of any of these easements is a "grey area" meaning Weyerhaeuser may not have the right to require permits for access via these roads.

Pursue this with the DNR....they are expecting your call.

Below is the **purpose** of the 1967 DNR/ Weyerhaeuser Green River Easement exchange. This easement is on roads like to 3100 that now intersect the wildlife area. Notice that this language is more wideopen than what the WDFW received on the 3100 road. This is a simple ingress/egress easement. The clause "now owned or hereafter acquired" could be significant since the state acquired land along these roads after 1967. The parties are Weyerhaeuser and the State of Washington.

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1. The easements are conveyed for the purposes of reconstruc-
tion; use and maintenance of said existing roads for the purpose
of providing access to and from lands now owned or hereafter acquired
by the parties hereto.
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Typos and corrections:

- ✓ Gardner Unit Map and table: Correction: Fiest Road does not provide road access to the Gardner Unit anymore, it ends at a cul-de-sac. Walk-in only. Services are provided by neighboring Harry Gardner Park (parking, restrooms, camping, water)
- ✓ Canal Road: neighboring Cowlitz County property provides parking area.
- ✓ Carnine Unit chart: change No Public Access to "undeveloped easement"
- ✓ Pg. 67 Typo Middle page "for and"

Review and Add to Bibliography:

2017 Cowlitz County Park, Recreation, and Habitat Plan https://destinyhosted.com/cowlidocs/2017/BOCC/20171219_629/9186_Cowlitz%20County%20 Parks%20FINAL%202017%20%28DEC%29.pdf

1984 Fish and Wildlife Coordinating Act Report https://usace.contentdm.oclc.org/digital/collection/p16021coll3/id/92/ January 29, 2019

Number	Comment	Response
1	The Draft plan seems to focus on existing conditions, not desired future conditions. Darcy Mitchum	See Goal 1, Objective A, ecological integrity baseline and associated goals for ecological systems of concern/priority systems will be established by 2023.
2	 The Draft plan only suggests LIMITING road use and Pg 75 has a measurement of performance for the Number of roads closed It proposes to manage roads only to minimize impacts on wildlife and makes no mention using roads for administration, access, or conversion of roads to trails. 	Bullet 1: The objective (3A) was revised to include closing roads is specific to motor vehicles only. Bullet 2: Objective 6A was revised to the following: participate in additional recreation planning and
	 Trail projects (pg 77) can only be initiated by partners. This is a step backwards from the previous plan's goals: 2006 plan Goal: Provide Public access, education, trails, viewing opportunities and reduce elk harassment. 	development projects with partners (activities include boating and trail development).
	• There is No goal to provide legal access to WDFW lands (as has been the case since 2006 plan). Removal of this goal is another step backwards for public access. From previous plan: Strategy: Work with the Washington Department of Natural Resources, and WDFW's Real Estate, Game, and Fish programs and other groups and landowners to address the need for secure public access to public lands here including the wildlife area.	Bullet 3: Although we do not include this goal in the current plan, WDFW lands are open for public access with the exception of areas closed to protect sensitive wildlife or limited access is due acquisition agreements.Bullet 4: See bullet 1 response.
	• Instead of closing roads as an action item, consider converting to trails.	
	Darcy Mitchum	
3	 The maps should show all adjacent public landowners and land trust property. This gives a better understanding of the habitat, recreation, and connectivity potential of WDFW properties in relation to other protected and/or public lands. The 800 acres of USACE adjacent to Hoffstadt along with new transfer from DOT at Mouth of Green River Cowlitz County and Flood Control Dist. land adjacent to Canal Road properties (these provide parking and access) 	Generally our maps are standardized for all wildlife area plans. We do not have consistent data layer information readily available from other sources (e.g. Land Trust, ACOE).
	 Cowlitz County, Port, and Columbia Land Trust along Columbia River near Abernathy and Fisher Island. Lower Columbia designated Important Bird Area. Cowlitz County parks land adjacent to Gardner Unit 	

4	I am glad to see the Draft plan consider a future camping plan. However, "Planning to plan" is a sure path to something never getting done. Camping needs a 2019 specific date of implementation. In the meantime, the Hoffstadt/Mudflow units should be re- open to dispersed camping, per state law. There is simply no justification for the blanket closure of camping here. Yes, on the smaller sites of 10-100 acres I can see a reason to prohibit camping, but this property contains 8,000 acres. The WAC already allows and regulates camping. There is no history of abuse by campers, the whole area lacks road access, the adjacent DNR lands are open to camping—with extensive vehicle access and they do not have a problem with it. The mudflow unit is already closed during the winter to all access and dogs are already not allowed. Hikers/bicyclists would have a three mile trek just to get there to camp, limiting the possibility of garbage dumping. What is the justification for banning dispersed camping here (besides the location on the West side of the Cascades)? Darcy Mitchum	Goal 6, objective D was revised.
5	Carnine Property should not be returned without replacement land along Silver Lake (see note **). It is incorrect to say the land has no public access. Replace that wording with "undeveloped easement access". The neighbors cannot prevent the WDFW from accessing it. File a court injunction if need be. Additionally, the land needs surveyed for rare plants, which are likely to occur there such as Calypso orchid and Western Wahoo. Darcy Mitchum	The unit description will be corrected to the following statement: access to the property via easement is in dispute. Goal 8, objective B will be revised to assess whether units on the wildlife area are potential candidates for land ownership opportunities (e.g. transfer or surplus).
6.	The Nelson property probably has long term mitigation obligations but could be sent to the water access/fish side of WDFW. Darcy Mitchum	The Nelson Unit is maintained by the Wildlife Program which includes water access lands and managers. The unit is managed for wetland habitat for fish and wildlife. The Fish Program does not manage department recreation land.
7	Other possible species go consider: Mountain Goat (they are at Castle Lake!), Pika, freshwater mussels. Darcy Mitchum	Pika and mollusks for SGCN species are listed in table 6. Mountain goat will be added to table 6.
8	 In 2017 Cowlitz County completed its RCO grant eligible Parks, Recreation and Habitat Plan. Several projects include WDFW lands or priorities: Create kayak/canoeing/sculling opportunities at Coal Creek Slough including improved launch facilities, restrooms, parking, and other required facilities. With partners, acquire legal access to the Toutle DNR forest and WDFW St. Helens Wildlife Area for public recreation and grant eligibility Pursue creation Silver Lake Community Forest with the assistance of the Department of Natural Resources. Be ready to act on opportunities for general shoreline acquisition. 	Goal 6, objective A was revised to include additional recreation planning nd development activities.

	 Create kayak/canoeing/sculling opportunities at Silver Lake including improved launch, restrooms, parking, and other needed facilities. Improve fishing access at Silver Lake. Pursue a joint DNR & WDFW recreation plan for Toutle Mountain to Toutle River Valley to include plans for future recreation such as horseback riding, mountain biking, motorized recreation, snowmobile trails, cross-country skiing and camping. Adding support for such a recreation plan to this WDFW 10-year plan will improve chances of funding for such a measure (similar to Teanaway, Mt. Baker area etc) Habitat priorities for Cowlitz County include: partnering with other agencies on projects, including acquisition and habitat improvements, focus on existing habitat areas, acquiring additional areas of shoreline for habitat and recreational access, pursuing a Community Forest along the south shore of Silver Lake Darcy Mitchum 	
9	Consider a MOU for recreation & habitat management for the 800 acres of USACE land wedged between the Hoffstadt and Green River properties. The Fish and Wildlife Coordinating Act mitigation findings and suggestions to the Corps said that recreation and habitat should be focus on land impacted by SRS. Why not this land too? The WDFW could manage it for the Corps. Maybe they would even pay a little. Darcy Mitchum	The majority of the 800 acres mentioned is open to the public and recreation. WDFW is working with the Corps to find additional lands to offset the impacts of the SRS.
10	I have discovered that there are multiple State of Washington easements acquired by the DNR that could be used to access the Mudflow/Hoffstadt units. The WDFW may have "inherited" use of these easements when they acquired the property. These units may not be landlocked after all. The 2500, 2900, 3100, 2140 all have DNR easements on them from 1967. These easements do not restrict the type of use. I have talked to DNR easement manager (and lawyer) Michael Kearney (360-902-2143) about these easements and he says it is possible that the WDFW has the use of these old easements if they acquired land that was once DNR or Weyerhaeuser. Use by the public right now of any of these easements is a "grey area" meaning Weyerhaeuser may not have the right to require permits for access via these roads. Pursue this with the DNRthey are expecting your call. Darcy Mitchum	WDFW Real Estate Services will look into these easements to see if they pertain to any of the access roads into the Mount St. Helens Wildlife Area.
11	Typo's and corrections: - Gardner Unit Map and table: Correction: Fiest Road does not provide road access to the Gardner Unit anymore, it ends at a cul-de-sac. Walk-in only. Services are provided by neighboring Harry Gardner Park (parking, restrooms, camping, water)	The maps and text will be corrected appropriately. The Carnine Unit description will be corrected to the following statement: access to the property via easement is in dispute.
	 Canal Road: neighboring Cowlitz County property provides parking area. Carnine Unit chart: change No Public Access to "undeveloped easement" Pg. 67 Typo Middle page "for and" 	
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1984 Fish and Wildlife Coordinating Act Report https://usace.contentdm.oclc.org/digital/collection/p16021coll3/id/92/ Darcy Mitchum	

Mount St Helens Wildlife Area Planning

Public Scoping Meeting WDFW Region 5 Headquarters 5525 S 11th Street Ridgefield, WA 98642 November 30, 2017

AGENDA

- 6:00 6:15 Welcome, Purpose, Introductions (Sandra Jonker) Meeting format/Agenda (Lauri Vigue)
- 6:15 6:45 Open House (Visit stations and share comments)
- 6:45-7:15 WDFW Staff Presentation
 - Planning process & timeline (Lauri Vigue)
 - Wildlife area highlights (Daren Hauswald)
 - Clarifying Q&A
- 7:15 8:00 Open House
- 8:30 Adjourn

Mount St Helens Wildlife Area Management Plan

Public Scoping Workshop Summary - Final

November 30, 2017

Introduction

The Washington State Department of Fish and Wildlife (WDFW) hosted a public scoping workshop on Thursday, November 30th, from 6:00 to 8:00 p.m. at the Region 5 Headquarters, Ridgefield. The purpose of the workshop was to share information about the wildlife area planning process and to solicit public and stakeholder input.

The workshop begins the planning process for developing a new Mount St Helens Wildlife Area Management Plan, one of 33 plans the department will revise every 10 years. The plans are updated every two years to reflect changes in landscape and management priorities; however, the larger plan efforts are more comprehensive and consider the status of wildlife species and their habitat, progress towards goals identified in earlier plans, and new wildlife area priorities. The plans will consider the interests and impacts of stakeholders and user groups; set goals for assessing and monitoring ecological integrity; outline forest management priorities; identify appropriate public use, recreation areas and facility improvements; as well as weed control practices and other operations and maintenance practices. Mt St Helen's current plan as developed in 2006, with subsequent updates, are available on the department website at http://wdfw.wa.gov/lands/wildlife_areas/management_plans/.

25 individuals attended and signed in at the workshop including interested parties from Clark, Cowlitz, Skamania County communities of Vancouver, Kelso, Washougal, Kalama, Toutle, Yacolt, Brush Prairie, Toledo, Carson and Battleground. Three individuals came from Portland and Beaverton, Oregon; and one from Seattle. Stakeholder groups included Sierra Club, Audubon, Vancouver Wildlife League, and Gifford Pinchot Accountability Group. Representatives from PacifiCorp and U.S. Forest Service attended the meeting. Several volunteers attended as well as a couple members of the Advisory Committee.

Workshop Format

The workshop was designed in a combination open house/presentation format. Individual maps of each of the eighteen wildlife area's units were posted, and participants were encouraged to share specific and general feedback after the presentation and at the map locations.

Staff presentation

Sandra Jonker, Region 5 Wildlife Program Manager, welcomed everyone and introduced WDFW employees. Lauri Vigue, project lead planner, gave an overview of the workshop format and reviewed the agenda topics. Other WDFW participants included:

- Daren Hauswald, Mt St Helens Wildlife Area Manager
- Chad Wildermuth, Mt St Helens Assistant, Wildlife Area Manager
- Eric Holman, Wildlife District Biologist
- George Fornes, Habitat Program
- Brad Rhoden, Enforcement
- Lauri Vigue, Project Manager

- Alejandro Orizola, Real Estate
- Darric Lowery, South Puget Sound Wildlife Area Manager
- Shane Belson, Water Access Coordinator

Public scoping will include SEPA, shared agency priorities, collecting input and reporting in the plan. Lauri noted multiple methods for providing comments including flip charts notes, filling out the comment card, writing on the unit maps provided, speaking with staff and sending email comments directly to lauri.vigue@dfw.wa.gov

Lauri Vigue reviewed the department's overall process for updating all state wildlife area plans. The Mount St Helens Wildlife Area Advisory Committee met on October 25th. She noted the following new topics the plan will consider including:

- Wildlife Area Ecological Integrity Monitoring
- Forest Management
- Recreation Management
- Expanded public outreach including public workshops, information materials and Wildlife Area Advisory Committee meetings

Lauri summarized timeline for the Mount St Helens WLA plan; staff expects a draft plan by spring, 2018; and public review draft by fall 2018. Daren Hauswald, wildlife area manager for Mount St Helens Wildlife Area, provided an overview of each of the 18 units describing the current objectives, recreation and original funding source:

Nellie Corser Unit:

59 acres of late successional forest and waterfalls; species include: spotted owl, black-tailed deer, fisher, Larch Mountain salamander, western toad, northern goshawk, Cascade torrent salamander

Current Objectives: Managed as a late successional forest

Recreation: Hunting and hiking

Original funding Source: Recreation Conservation Office, donation

Duck Lake Unit:

Overview: 39 acres of wetlands and floodplain habitat along the E.F. Lewis River; species include: Chinook, chum and steelhead, waterfowl, Oregon spotted frog (suitable habitat)

Current Objectives: Managed for waterfowl habitat

Recreation: Hunting

Original funding Source: Ducks Unlimited

Two Forks Unit:

Overview: 49 acres of mature riparian forest habitat at the confluence of the N.F. and E.F. Lewis Rivers; species include: Columbia white-tailed deer, wading birds, songbirds and black-tailed deer.

Current Objectives: Managed for riparian habitat

Recreation: Hunting, wildlife viewing and fishing

Original funding Source: Recreation Conservation Office - WWRP

Cedar Creek and Jenny Creek Units:

Overview: Cedar Creek – 127 acres; Jenny Creek 20 acres. Both units have mixed forest and open pasture. Species include: band-tailed pigeons, black-tailed deer, western toad. Salmonids (coho, Chinook and steelhead) occur on the Cedar Creek unit.

Current Objectives: Managed for band-tailed pigeon habitat

Recreation: Hunting

Original funding Source: USFWS – Pittman and Robertson, Wildlife Funds, donation

Eagle Island Unit:

Overview: 279 acres of mature riparian forest, salmonid habitat; species include: steelhead, chum, Chinook, waterfowl, black-tailed deer, band-tailed pigeon

Current Objectives: Managed for riparian and forested floodplain habitat

Recreation: Hunting, fishing

Original funding Source: Recreation Conservation Office – Salmon Funding Recovery Board, Aquatic Lands Enhancement Account

Nelson Unit:

Overview: 20 acres of wetland, floodplain habitat; species include: waterfowl, eagle, osprey

Current Objectives: Managed for waterfowl production

Recreation: Hunting and wildlife viewing (only boat access)

Original funding Source: Port of Kalama mitigation

Fisher Island Unit:

Overview: 257 acres of forested floodplain; species include: Columbia white-tailed deer, waterfowl Current Objectives: Managed for forested floodplain and waterfowl production Recreation: Hunting, fishing Original funding Source: Recreation Conservation Office, WWRP

Abernathy Creek Unit:

Overview: 138 acres of riparian forest, salmonid habitat; species include: Chinook, chum, steelhead, eagle, osprey, marbled murrelet, black-tailed deer Current Objectives: Managed for riparian and upland forest habitat Recreation: Hunting and fishing Original funding Source: Cowlitz County transfer

White Island Unit:

Overview: 130 acres of forested floodplain; species include: Columbia white-tailed deer, waterfowl, songbirds Current Objectives: Managed as a Natural Area Preserve Recreation: Hunting, fishing Original funding Source: Wildlife Funds

Altoona Unit:

Overview: 177 acres of mature spruce forest, floodplain habitat in Grays Bay. Species include: bald eagle, shorebirds, wading birds, waterfowl, elk, marbled murrelet

Current Objectives: Managed for forest, bald eagle habitat, waterfowl production and recreation

Recreation: Hunting, fishing, boating/boat launch and parking area

Original funding Source: USFWS – Coastal Wetland; Recreation Conservation Office - WWRP

Carnine Unit:

Overview: 37 acres of forest habitat; species include: black-tailed deer Current Objectives: Managed as forest habitat Recreation: none Funding Source: Donation

Hall Road Unit:

Overview: 132 acres of wetland, riparian and upland forest habitat located near Silver Lake; species include: waterfowl, black-tailed deer, bald eagle, osprey

Current Objectives: Managed for riparian forest, waterfowl and big game habitats

Recreation: Hunting and fishing

Original funding Source: USFWS - Dingell Johnson

Canal Road (Silver Lake) Unit:

Overview: 121 acres of wetlands along Silver Lake; species include: waterfowl, bald eagle, osprey

Current Objectives: Managed for waterfowl production

Recreation: Hunting, fishing and boating

Original funding Source: USFWS - Dingell Johnson

Gardner Unit:

Overview: 43 acres of riparian and floodplain habitats along the N.F. Toutle River; species include: bald eagle, western toad

Current Objectives: Managed for riparian and floodplain

Recreation: Fishing and wildlife viewing

Original funding Source: Recreation Conservation Office - Bonds

Hoffstadt Unit:

Overview: 3,816 acres of old-growth forest, riparian habitat; species include: steelhead, coho, elk, black-tailed deer, bald eagle, fisher, waterfowl, ruffed and dusky grouse, spotted owl, amphibians

Current Objectives: Managed for elk habitat and salmon restoration

Recreation: Hunting and hiking

Original funding Source: State appropriation

Mud Flow Unit:

Overview: 2,744 acres of Mt St Helens debris flow, high concentrations of wintering elk, salmon bearing streams, and wetlands. Species include: steelhead, coho, elk, black-tailed deer, bald eagle, fisher, red legged frog, western toad, northern spotted owl

Current objectives: Managed for wintering elk habitat and salmon recovery

Recreation: Hunting, watchable wildlife, horseback riding

Original funding Source: Wildlife Funds, Recreation Conservation Office – WWRP, State appropriation

Merrill Lake Unit:

Overview: 1,453 acres of old-growth forest, lodge pole pine, falls, shoreline and riparian, ancient lava flow. Species include: elk, eagle, osprey, fisher, black-tailed deer, western toad, cascade torrent salamander, spotted owl, Larch Mountain and Van Dyke's salamanders, Townsend's big-eared bat, northern goshawk. Historic bull trout.

Current Objectives: Managed for elk habitat, riparian and old-growth forest

Recreation: Hunting, hiking, limited camping

Original funding Source: Recreation Conservation Office – WWRP

General Comments and Questions at Stations

Habitat and Restoration

- Manage invasive species very important
- Landscape scale diversity management; not just WDFW lands
- Merrill Lake diversity of species and ecosystems

Mount St Helens Wildlife Area Management Plan Public Scoping Workshop Summary November 30, 2017

• Canal Road restoration to native species, mitigation recipient site?

Wildlife Area Management

- Mitigation for Sediment Retention Structure raises
- A volunteer participates in work parties on the Mud Flow unit. He described tree planting, and mentioned that he is in favor of the wood structures that have been placed.

Recreation

- Secure public access to Hoffstadt Hills Unit Rd 3100 acquire land, easement or exchange
- Include horseback riding into Merrill Lake
- What are the dog rules? Provide clear information
- Acquire more hunting areas
- Negotiate with Weyerhaeuser for free hunting access and others
- Need clarity and consistency regarding camping. Need review of the rules for consistency.
- Joint WDFW/DNR recreation plan for Mud Flow Unit
- One woman lives near the Gardner unit. She enjoys hiking on the unit and taking her dog for walks there. Said she saw a cougar on the unit once.

Fish and Wildlife

- Include mountain goats in the list of species managed for on the St. Helens WLA.
- Acid mine drainage in the Green River (Charlotte Persons, Willapa Hills Audubon) o Reported seeing discoloration
- Access to PHS data (George to send links to online viewer)
- She would like to have the streaked horned lark map that Eric had made
- Participates in Christmas Bird Count, mentioned streaked horned lark, marbled murrelet, and norther spotted owl
- Fisher Island are wakes from boat traffic affecting the streaked horned lark habitat?
- What is at the south end of Merrill Lake, and are there any plans to protect it?
 - o Daren explained how we do not own those lands but if they came up for sale we would look into their purchase.
- One individual reported seeing horned larks near Johnson Ridge Observatory, and asked whether they could be streaked horned larks (not likely)

Other topics per Eric:

Huge frustration with Weyerhaeuser Huge frustration with Elk Hoof Disease Frustration at the lower St. Helens Elk Population Frustration with too many predators Positive responses to the mountain goats on and near Mt. St. Helens Positive responses to the proposal to offer hunts on the St. Helens goats A desire to fix a goofed up GMU boundary Report of a lark on Mt. St. Helens A desire to reconfigure GMU 556 to exclude the public land part

Mount St Helens Wildlife Area Management Plan Public Scoping Workshop Summary November 30, 2017 Some positive responses about the deer population

Frustration and confusion about WDFW's lack of action in purchasing the "High Lakes" Frustration about WDFW Enforcement taking money from Weyerhaeuser for patrols of their fee-hunt areas

Additional Comments Received

I attended the WDFW Mt. St. Helens Wildlife Management Area public planning meeting last night and just want to give you a quick update on the comments I made.

1. I expressed in the planning process they need to evaluate the surrounding existing habitats to ensure there is a balance of habitats on and off the management area so that the management area habitat could be best balanced for the maximum number of species over the long term. It might or might not be part of the alternative to modify the management area habitat to best serve the species that are under represented in the area.

2. I pointed out that on all the Management Sites hunting and hiking was the priority value and direction. While these are important uses other values should be identified that could be managed for without conflicting with the primary use. This could create a more stable habitat and provide more opportunity for the management lands.

3. I had a long discussion with the WDFW staff on making sure the management sites needed to be managed for all species management to insure habitat for non-game species and species of concern are identified or developed.

4. On some of the management sites Noxious Weeds are an issue or becoming an issue and an aggressive control program should be developed.

Just thought you might want my input on the Mt. St Helens Wildlife Management Area planning effort. Tom Linde

Comment Sheet from Tom Linde: 1. What interests you about the Mt St Helens Wildlife Area? Habitat protection, development and all species management. 2. Units visited/season: Cedar Creek/Jenny Creek – Summer Abernathy Creek – Summer Hoffstadt – Spring, Summer Merrill Lake - Summer 3. Recreation Activities: Cedar/Jenny Creek – wildlife viewing Abernathy Creek – fishing and wildlife viewing Hoffstadt – wildlife viewing and hiking Merrill Lake – fishing

Mount St Helens Wildlife Area Management Plan Public Scoping Workshop Summary November 30, 2017 8 4. What particular wildlife and/or fish species, and/or habitats are you most interested in or concerned about? All species, all habitats.

5. What changes or improvements would you like to see on the wildlife area? 1) control of invasive/noxious weeds on all. 2) Provide by modification habitats of concern.

6. What land management activities are you most interested in or concerned about? Habitat maintenance and modification to provide for all species management.

7. Provide any additional feedback:

I have a concern; my input was not valued. The WDFW employee at the habitat/restoration station did not record any of my input or concerns on the flip chart while I was there.

I attended the meeting about the Mount St. Helens Wildlife Area plan on Nov. 30 and here are a few thoughts and suggestions.

I am a retired reporter for the Longview Daily News, and I used to report quite a bit on the Mudflow and Hoffstadt units. I think these are the most familiar parts of the Mount St. Helens Wildlife Area to most people. I have spent quite a few enjoyable days walking or mountain biking through the area, either for stories or recreation. The last time I went there, I visited two mid-sized lakes I only knew about because a WDFW employee took me there years ago.

In general, I think WDFW should focus more on recreation on its wildlife areas, and on wildlife-watching and other forms of "non-consumptive" use rather than hunting. Consider that about 95 percent of the population does NOT hunt and research indicates that younger people are not taking up this activity. The department needs to build relationships with these non-hunting folks to help with funding and support in general, just as the U.S. Forest Service has gradually shifted its focus from timber production to recreation.

I understand that wildlife areas are primarily to provide habitat, but they can also be valuable areas for public recreation. This is particularly an issue with the Mudflow and Hoffstadt units since Weyerhaeuser has enacted a fee access system for its lands in the Toutle River valley.

Weyco is apparently still allowing free public non-motorized access to these units on its 3100 road, but the company could change this policy. I urge WDFW to secure permanent public access by acquiring land from Weyco, either through a purchase or trade of DNR lands. Sondra Jonker told me WDFW is working toward this.

As far as I know, there is no direct public access to the Hoffstadt unit.

Merrill Lake Unit – I'm glad WDFW was able to purchase these. Once upon a time, anyone could drive to Kalama Falls on Weyerhaeuser roads so it's nice to be able to go there again, on foot, bike or horse. There's a pretty good trail into this area from the Kalama Horse Camp that someone (possibly horse riders) has built. I would suggest trying to spread the word about this area.

Two Forks Unit – I learned about this through my former job, so one day a few years ago I explored it. I found a faint trail that was overgrown, and I couldn't fight my way through brush to the Lewis River. It could be a nice little area for recreation.

Nellie Courser – I'd never heard of this unit until the meeting. I will try to visit soon! Mount St Helens Wildlife Area Management Plan Public Scoping Workshop Summary November 30, 2017 Thanks for the opportunity to comment. Please keep me informed about this process.

Tom Paulu

To: Washington Fish and Wildlife From: Donna Ruelas-Semasko Re: Comment on Mt. St. Helen's Management Plan and other wildlife areas

Subject: Packgoat use

I have been a packgoat enthusiast for over 25 years now. I was happy to see that there is a possibility of increasing recreation for the public in the Mt. St. Helen's areas during certain times of the year. We use packgoats for hiking as it allows us to get to places without leaving a trace on the land nor any intrusion to the local wildlife. My husband has a bad back and bad knees which cause issues for him in hiking and backpacking, and I have two replaced knees, so both of us need the extra help when we backpack and hike. Indeed packgoats are the easiest and less impacting of all packstock which includes horseback riding. Packgoats do not smell, they are not loud, they do not leave their hiking partner's side, and should never be thought to be the same as a herd of goats. We as packgoat enthusiasts make sure our packgoats never cause issues in the wilderness, not getting lost, not intruding on wildlife, not intruding on the environment and thus being an acceptable packstock animal for use in many areas. We volunteer our time in packing in backcountry ranger supplies, helping man fire towers, and helping with trail maintenance, all with the use of our packgoats.

My comment is simple, please keep packgoats in mind when designing management plans for your wildlife areas such that you might include us/packgoat enthusiasts in your decisions for recreational use. We are more than happy to answer any questions you might have concerning packgoats. I would also be happy to be part of your advisory committee, if an opening arises in the future.

Thank you for your time,

Donna Ruelas-Semasko **Edelweiss Acres Evergreen Packgoat Club**

Meeting Materials

The following meeting materials are attached:

- Agenda
- . Mt St Helens Wildlife Area Management Plan Fact Sheet
- Comment card
- News release

Mount St Helens Wildlife Area Management Plan Public Scoping Workshop Summary November 30, 2017 10