

Table 23. WDFW Response to public comments received during public review of the Scatter Creek Wildlife Area Management Plan draft under the State Environmental Policy Act (SEPA) from May 8, 2020 until June 8, 2020 - DNS 20-023.

	Comment	WDFW Response
1.	<p>We use the Scatter Creek access site for exercising our dogs. It is a great resource to have this so close to the Olympia area. As I look at future plans for the site I would like to express a desire to have the cross fencing removed or at a minimum remove the bottom strands of barbed wire. Dogs and barbed wire are a bad combination. Hunting dogs and barbed wire are an even worse situation. Since the land is not grazed I don't see the need for the cross fence and definitely not a need for the barbed wire fencing. No issue and like the perimeter fencing. Thank you for this consideration.</p> <p>David Knutzen</p>	<p>The fence your referring to is on the boundary of WDFW owned and private property, currently we do not have the authority to remove the fence. If WDFW were to acquire the land then fence could be removed.</p>
2.	<p>WDFW is the primary state agency tasked with "preserving, protecting, and perpetuating fish, wildlife, and ecosystems". In the Scatter Creek Wildlife Area plan, please include a ban on all hunting, fishing, and trapping. This will force WDFW to do their stated mandate and save life on earth. D. Weinstein</p>	<p>Part of WDFW's mandate includes maximizing outdoor recreation and specifically makes reference to hunting and fishing. Hunting activities will continue to occur within the Scatter Creek Wildlife Area where identified as appropriate and beneficial to both the resource and the public. Additionally, hunters and fishers contribute greatly to conservation efforts as well.</p>
3.	<p>We are really excited and looking forward to hopefully getting some better kayak/canoe access to the Black River or improved/new trails that can be used as hiking/walking trails. We routinely use the Black River area and would support additional trails.</p> <p>One concern I have with the improved trails is to make sure we are able to keep it clean. I worry that with improved access we might see more trash that ends up in this ecosystem. Unfortunately, as we've been out lately, we keep seeing more trash being dumped along roads or dumped along trails or near the river banks. We do our part to pick up items as we can, but there is often too much for us to take.</p> <p>Anyways we are are excited to hear more details and hope to enjoy seeing any improvements made for better to the Black River area.</p> <p>Chad Flagg</p>	<p>Thank you for your interest in the Black River Unit, we will consider trail maintenance and upkeep as we improve trails on the unit.</p>
4.	<p>Hello... Don't know if this the proper way to submit suggestions, but here it goes. In the past, I've attended two planning meetings at the Swedish Hall in Rochester, and signed up as a volunteer both times.</p>	<p>We appreciate your interest in volunteering and glad you participated in our public meetings about this wildlife area. Your comments will be considered and incorporated, where feasible, in the management of recreation on the wildlife area units.</p>

	<p>For the last couple of years, I've been using the trails in Scatter Creek and would like to offer a few suggestions on ways to enhance recreational opportunities.</p> <p>1). Any possibility of enhancing the trails by widening the walking surface to accommodate two people walking side by side. As it is, the trails are not maintained, and grass and brush hinders using the trails after seasonal rains spur natural vegetation growth.</p> <p>2). I also like to see primitive 'hike in', (limited or no impact), sites for camping. There wouldn't need to be an open camp fires or potable water. Food preparation could be limited to freeze dried meals prepared over a pack stove and water provided by the individual. Pack it in, pack it out.</p> <p>I'm still available as a volunteer. I have two decades working on natural resources projects for the California Conservation Corps. Projects included; Fisheries Restoration, Trail Construction and Maintenance, Invasive Plant Management, and Fire Rehab. I've worked with numerous Non-Profits, Community Action Agencies, City, County, State, and Federal Agencies.</p> <p>Thanks for any considerations. Dan Owen</p>	
5.	<p>I am responding to the Scatter Creek Wildlife Area management plan...</p> <p>I use the main Scatter Creek release site located off of Case Road SE. I have owned a home in the Rochester area for the last 17 years, only just recently selling that home. During the time living in the Rochester area, I used this site often for wilderness walks and allowing my hunting dog breed to run. Since the sell of my home, I have continued the use of the area at least 3 times a week, but often more even this it is currently necessary for me to travel 15 miles (one way) to use the area. My biggest concern in the proposed management plan is that I heard multiple time during the presentation that there was plans to reduce off-leash use. This is one of the main reasons I love this area. It is one of the only local areas that allows a wilderness setting that you can take your dog so they can run/walk....OFF LEASH.</p> <p>There are numerous core users of the area that do the same. This is an amazing location that is enjoyed for the ability to exercise (walk or jog) in a natural setting but also allows dog owners to bring their dog and not worry with the need of using a leash. It is not overly</p>	<p>We appreciate your enthusiasm and use of the Scatter Creek Wildlife Area, we are continuing to balance endangered species needs with recreation use. Dogs on leash are required at certain times and areas.</p>

	<p>crowded and dog owners are responsible users hunting of the area. Please reconsider the reduction of Off-leash use of this area.</p> <p>Thank you in advance for your consideration and review of my comments. Brenda Anderson</p>	
6.	<p>For the most part I like your plan because of the nature conservation. I do not like the hunting planned for the Scatter Creek Unit. I like to go there to take photos, hike, and enjoy nature.</p> <p>I would accept continued pheasant hunting because of its historical use there. However, that in itself has interfered with my enjoyment of the area because, even when being there at 7:30 am, I have been yelled at and told to get out by pheasant hunters. It was very unpleasant to walk back to the parking lot with a bunch of angry men with guns and I just don't go during pheasant season anymore.</p> <p>I would not like to see more hunting unless the hunting is during the exact same time as pheasant hunting.</p> <p>Any hunting using a rifle seems far too dangerous for that area and the amount of homes nearby. I also do not believe in any non-food hunting such as for coyote and cougar. So, my opinion is keep the pheasant hunting and only allow the other bird hunting if it falls during the same time as pheasant hunting. Don't allow non-bird hunting. Madeline McIntire</p>	<p>The Scatter Creek Unit was acquired for game species management and associated recreation activities including hunting. There is a firearm restriction on this unit limiting to shotgun only. No new types of hunting are proposed, and the existing hunting opportunities have long been established on this wildlife area unit.</p> <p>The other bird hunting referenced in the plan is not a new activity. It has been going on for years. The intent of the new management plan is to not increase hunting use, but rather to better identify safe and practical areas where hunting can occur.</p>
7.	<p>Here are my comments on the Scatter Creek Wildlife Area Proposed Management Plan. As a reminder, I've also attached a copy of our BCHW Scatter Creek Riders chapter's Wish List for horseback riders on the Scatter Creek Unit. I also am concerned about horseback riding on the Skookumchuk unit and will address that area.</p> <p>I reviewed the entire document, but focused my comments on Part II - Wildlife Area Management and Planning - Recreation - Wildlife</p>	<p>Thank you for your review and feedback. Other comments are noted and will be considered when improving horseback riding opportunities. Your comments regarding the Skookumchuk unit will be relayed to the landowner.</p>

	<p>Area goals, objectives and monitoring - Table 7, Goals 7 and 8, which appears to be where our Wish List is addressed to some extent. Overall, as I commented on at the virtual meeting in March, the plan is comprehensive from my point of view as a user and not an expert, and is an excellent document describing the Scatter Creek Wildlife Area Units history, habitats and wildlife.</p> <p>The Skookumchuk unit allows horseback riding, but is not regularly utilized by riders for several reasons:</p> <ul style="list-style-type: none"> • In the past, the private timber land across the street was accessed from the eastern parking lot at the Skookumchuk unit. However, approximately ten years ago it was logged and most trails were lost. However, many horseback riders also rode the Skookumchuk unit fields and enjoyed the experience. • Vandalism at the parking lot kept people away. • Due to the small size of the parking lots, users other than horseback riders, often blocked horse trailer rigs in preventing them from easily departing the parking lot. <p>If the vandalism and parking issues were resolved, horseback riders would be drawn back to this area.</p> <p>The Skookumchuck unit should be included wherever the Scatter Creek and Davis Creek units are mentioned in relation to horseback riding (e.g. improving facilities, evaluating units for new horseback riding opportunities, etc.).</p> <p>Joan Fleming</p>	
8.	<p>I did not expect to see horseback riding being included on the West Rocky Prairie unit, but I know riders who would like to horseback ride there and would be happy to see that happen. I see that Goal 7.K proposes that as a possibility and encourage that to be implemented.</p> <p>I did not find that Table 7 as mentioned above covered the horseback rider Wish List completely or in a clearly stated way,</p>	<p>See previous WAAC comments and responses. Other comments are noted and will be considered when improving horseback riding opportunities. Much of the “wish list” items have been consolidated in order to maintain brevity in the objective section. Parking area improvements off Case Rd are being addressed in conjunction with the construction of the new wildlife area headquarters. Due to regulatory hurdles with development and permanent impacts to critical habitat, gaining support and permits for improvements will be challenging, costly, and could take a good deal of time to accomplish. Nonetheless,</p>

	<p>except that parking lot improvements are mentioned in a general way. There is general language about designating, maintaining and adding trails to all the areas, but no specific mention of trail access for horseback riding.</p> <ul style="list-style-type: none"> • Evaluation of potential new opportunities for horseback riding is mentioned, but does not state that the ultimate goal is to expand opportunities for horseback riding. • There is no mention of adding a restroom to the North Wildlife area off Case Road. • Parking lot improvements and maintenance details as mentioned in our Wish List are not included. • The expansion of the parking lot at the South Wildlife area off Case Road is mentioned, but seems to imply that this might not happen due to the USFWS requirement for an HCP. <p>The table states that coordination with the community for stakeholder input should happen and that Backcountry Horseman was a key user group. The local contact for Back Country Horsemen of Washington (BCHW) should be the Scatter Creek Riders chapter, P. O. Box 1016, Rochester, WA - 98579. I am a member of this chapter.</p> <p>I am pleased that the horseback riding community is being seriously considered in this management plan for the next ten years. These trails are important to us because they give us more opportunities to recreate in the local community. When we are given multiple local choices for riding, we spread our use over more trails and that helps prevent overuse of individual trails. Having riding locations close to home prevents us from driving longer distances in order to recreate - thus saving fuel and wear and tear on our rigs.</p> <p>Thank you for the opportunity to comment on this management plan. Joan Fleming</p>	<p>objectives are set in this plan to work toward meeting several items on the wish list provided where feasible.</p>
9.	Hello and thank you for the opportunity to comment on the Scatter Creek Wildlife Area draft management plan.	Thank you for your support and comments.

I read through most of the document and was interested to learn about how the South Unit of the Grand Mound prairie had recovered from the 2017 fire. I visit Scatter Creek and West Rocky Creek every spring and was devastated when I heard about the fire. Over the last few years, I have been able to watch the area come back with the help of restoration work and was glad to hear that the butterfly recovery is still going strong.

One thing missing from the draft plan was information in the cultural resources section. It was very sad to see the historic house and barn lost in the fire. Since the Brewer House is so well documented, even down to photos of the wallpaper, I was hoping WDFW would propose constructing a replica of the house on the original site.

As to the management of these areas over the next decade:

I am glad to hear WDFW is on the verge of finally adding the leased area on the North Unit of Scatter Creek to the wildlife area. This is an amazing piece of land, with riparian creek habitat, intact oak forest, and some really neat bouldered prairie in the southwest corner of the property. It also has some wet swales where wet prairie species could be reintroduced.

Finally, any pieces of functioning prairie or oak woodland that WDFW can purchase to add to the mosaic of protected habitats, I would like to see the department pursue. Development pressure in Thurston County is going to close out those opportunities in the near future. Farther to the south, a large prairie and oak mosaic just to the north of the Mother Theresa monument would seem to be a good target for conservation that WDFW should look into.

The sheer amount of restoration work that I have witnessed (and occasionally aided with some Scotch broom pulling) over the last two decades on our state prairie habitats has been impressive and gratifying. The opportunity to partner with the Center for Lands Management and other restoration groups is great. I want these

The cultural resource appendix is included in the final plan to be placed on the agency's website. As of now, we have no firm plans to re-build and/or build a memorial structure at the location of the Miller Brewer House.

Thank you for your support in acquiring additional prairie habitat.

	<p>efforts to continue and for our South Sound prairies to thrive. Thank you, Kurt Wieland</p>	
10.	<p>I would like to see the phasing out of dog training on the Scatter Creek Case Road units. This activity is not conducive to the safety of prairie habitat and species, makes the area unusable to more passive recreation, and simply does not need to be conducted on one of Washington’s rarest habitats. I would like to see DFW purchase some nearby dry farmland habitat as a replacement that could be used year-round and get the dogs and crowds off the prairie. Pheasant release happens in the fall and isn’t as much of a problem since the flowers and songbirds are gone, but finding all the fluorescent skeet-shooting debris all over the prairie is disheartening and I would like to see that activity moved to less sensitive land as well. Kurt Wieland</p>	<p>Thank you for expressing your concerns surrounding dog training, pheasant hunting, and target shooting on the Scatter Creek Unit. This unit was acquired with grant funding specifically for game species management as well as the associated recreation activities. Dog training, competitive hunt dog trials, and upland bird hunting, will continue as a result. WDFW will continue to balance habitat, public use, and species needs at this multi-use and highly beneficial site.</p>
11.	<p>The addition of mature oak forests to the Davis Creek unit is exciting and I am hopeful DFW can get grant funds for this endeavor in the near future.</p> <p>I also visit the Glacial Heritage Park on Prairie Appreciation Day every year. As much as I like seeing this amazing place, I would prefer that access remain limited and gated and that DFW sell their 80-acre inholding to Thurston County and buy replacement prairie elsewhere. Unlike the other areas, Glacial Heritage does not have vandalism problems, and keeping it closed off makes sense to me.</p> <p>In the agonizingly protracted drama over West Rocky Prairie, I am encouraging DFW to remain steadfast in its efforts to purchase the remainder of this area from the Port of Tacoma. The Port’s scheme to sell this to a company that wants to turn this amazing place into a diesel truck and warehouse hub is truly ridiculous. The noise, lights, and human presence that would result from 6 million square feet of warehouse would completely ruin the rural character of West Rocky Prairie and make restoration of gray squirrels and enhancement of butterflies and spotted frogs on the adjacent state wildlife area impossible. In addition, purchasing this land would allow access from the gated road to the north of the wildlife area. The current south access is nice, but it is a long walk for many casual visitors to</p>	<p>Thank you for your support in acquiring additional prairie habitat. To the degree we can we will continue to pursue these acquisitions.</p> <p>Objective 9C addresses the future of the Glacial Heritage Unit – specifically to developing an agreement with the Center of Natural Lands Management or consider transfer of the unit by 2025.</p>

	<p>get to the prairie. The Port property continues to languish under a blanket of 10-foot-tall Scotch broom instead of being restored. Thurston County’s recent decision not to change the designation of this land sends a clear message to P of T that this development is not wanted by residents and planners in the county, and the Port needs to be encouraged to sell the land to DFW.</p> <p>Also not mentioned in the draft report that I could see was the plan to purchase the Alpaca Farm by Tenino. I assume this area would become part of the Scatter Creek Wildlife Area. I took a tour of the Colvin Ranch across the highway from the alpaca farm last year and was amazed at the beauty and habitat potential these two areas have. I hope DFW will continue its efforts to secure funding to purchase the entire farm—the gopher habitat, upland prairie, Oregon oak, wet prairie remnant, elk herd, and mixed mature forest of this property would make it a key link in keeping our prairie and surrounding lands functioning. In combination with large existing conservation easements to the south, the total habitat connectivity would be gigantic. Kurt Wieland</p>	
12.	<p>I was glad to hear a new headquarters is being constructed on Scatter Creek north unit. The vandalism of restrooms and broken glass in the parking lots could be greatly diminished by the presence of an office and personnel down there.</p> <p>I am supportive of plans to free up more oak trees from conifer incursion on Scatter Creek and West Rocky Prairie and the continued reintroduction of butterflies and future return of western gray squirrels to these areas. Related to this, the Scatter Creek units both have Douglas Fir and big-leaf maple habitat on their edges owned by Port Blakely. This edge forest should be purchased from the timber company to provide more refuge for the returning squirrels as well as protecting the scenery from future clear-cutting (which I am sure Port Blakely has planned). Kurt Wieland</p>	Comments noted.
13.	<p>WDFW needs to be very proactive in promoting fire-wise behavior around Scatter Creek. The 2017 fire was completely preventable, with a citizen creating sparks on a dry windy day. That human lives were not lost was very fortunate.</p>	<p>Objective 9A. addresses the development of a fire management plan for the wildlife area by 2021.</p> <p>Thank you for your comment. The billboard is on tribal property.</p>

	Perhaps out of the scope of this plan- I detest the gigantic billboard next to the North Unit. I would like this detriment to the scenery to be moved to a less intrusive location. From some areas on the unit, that thing is right in the way of the view of Mt. Rainier. Kurt Wieland	
14.	<p>Hello! I'd like to submit my comments for the Scatter creek management plan. I'll just run my suggestions/requests down in bullet form;</p> <p>- work with CNLM to do more seeding of Puget Balsam on the north unit of scatter creek, west rocky and glacial heritage. That is a huge nectar source for the Taylor's checkerspot, which is already known because thats why WDFW and USFWS released them on the south unit. I believe the TCB and balsam are intrinsically linked; you need balsam and host larval plants established before future reintroductions at those sites, or it won't work. – unknown</p>	Yes, you are correct that Puget balsamroot and associated host plants are important resources for Taylor's checkerspot and other Lepidoptera, balsamroot is both a nectar source and roost site. For this reason, it is a key component in our habitat requirements for Taylor's checkerspot reintroduction. Food and roost sites need to be established prior to reintroduction for best success. Puget balsamroot is used in restoration treatments at all sites mentioned and is added once areas have been sufficiently prepped using fire and herbicide. That said, it is a very slow growing species that is not well suited to all sites and which can take many years before it is large enough to become functional. In that time many individual plants succumb to mortality, so ensuring it occurs on these sites is easier said than done. But that doesn't keep us from trying as long as the funding is available.
15.	<p>-continue to work on purchasing the port of Tacoma land adjacent to West rocky prairie! That would be an amazing land acquisition, great for deer, elk and grouse. As would have been the Alpacas of America property...</p> <p>-continue oak woodland restoration and conifer removal at west rocky. Work with CNLM to seed species associated with oak woodland and Savannah (balsam, montaine prairie violet, nodding onion, small flowered trillium). Removal of reed canary grass along beaver creek and work to restore or recreate rare wet prairie habitat. Use girdled conifers for nest habitat for bluebirds and white breasted nuthatches Unknown</p>	Comments noted.
16.	<p>-manage upland portion of west rocky and Skookumchuck for ruffed grouse habitat (blackberry removal, planting of alders, laying down pea gravel to the roadbed). If the port of Tacoma land is picked up, this would be a great section for grouse; a young second gen forest. Unknown</p>	Comments noted.
17.	<p>- try to establish a safe target shooting area at West rocky prairie. Skookumchuck doesn't allow any target shooting, and scatter creek</p>	West Rocky Prairie was purchased in part with USFWS funding. USFWS does not allow a formal shooting range at West Rocky Prairie.

	<p>is shotgun only. I can understand for rifle, but It is silly I can't sight in my bow at either of these places, with hundreds of acres of open space. West rocky is the only other option for target shooting, but there is no earthen backstop (other than the mounds lol KIDDING)</p> <p>- Update website to inform prospective hunters that scatter creek is shotgun only. I was thinking about taking my. 22 to rabbit hunt this year, or maybe go for deer with my bow along the north unit of the creek, but only the signage at the site tells that both units are shotgun only (which I didn't know until I stopped there last week). Unknown</p>	<p>Archery is covered in the new target shooting rules and archery hunting is allowed at the Scatter creek Unit. Refer to the draft target shooting rules and hunting regulations (https://wdfw.wa.gov/about/wdfw-lands/recreation-planning/rule-development/target-shooting). We have not assessed target shooting on West Rocky Prairie. Under the established rules, dispersed target shooting may be allowed.</p>
18.	<p>potential wet prairie restoration opportunity at Skookumchuck. The presence of Oregon iris and the small patches of camas I saw on a walk last week near the barn tells me that it was previously a wet prairie habitat, that is now being choked out by the tall grass cultivated for the release of pheasants. Also observed puget blue butterflies at Skookumchuck during this walk.</p> <p>-since glacial heritage cannot be hunted, continue to restore habitat for streaked horned lark, western bluebird, and TCB. Apparently mazama pocket gophers do not do well to transplanting according to USFWS, otherwise I'd say do that as well (still baffles me there are no MPGs past the black river at glacial or mima)</p> <p>-continue scotch broom removal efforts at all sites Unknown</p>	<p>Prairie restoration not a focus on the Skookumchuck unit per Wildlife Habitat Management Program plan. WDFW will make recommendations to TransAlta when the management plan is up for renewal. The Primary objective on this unit is to provide forage and cover for elk.</p> <p>Other comments noted.</p>
19.	<p>-continue efforts to establish Golden Paintbrush populations at all applicable sites, as it is an endangered species and also a larval and nectar host for TCBs</p> <p>- increase prescribed burns at north and south units of scatter creek, Skookumchuck, glacial (duh) and west rocky prairie. The prairie forb diversity on the north unit is dramatically lower than the south unit, and the balsam near the cemetery are getting overtaken by scotch broom and woody shrubs. Unknown</p>	<p>The WDFW is working with USFWS to develop guidance on which sites are appropriate for establishing golden paintbrush, a federally threatened species. While some work suggests this species may have value for the endangered Taylor's checkerspot butterfly, observations of field use in the wild in Washington is so far quite limited, although that work is ongoing. In contrast, Harsh paintbrush is well established as an oviposition and larval host for Taylor's checkerspot butterfly, which is heavily used by wild populations historically and at present. Unfortunately, because there is potential for these two paintbrush species to hybridize, the decisions about what to put where must be made carefully and coordinated with all potential partners to ensure sufficient recovery opportunity and long-term conservation of both species.</p>

While WDFW is generally in agreement that some of these sites would benefit from increasing prescribed burns, this is a matter that must consider many factors including timing, weather conditions, burn objectives, desired fire return intervals, and the cost/benefit of burning. Some sites (e.g., Scatter Creek south tract) are challenging to burn because they require specific wind directions in addition to other atmospheric conditions on the day of the burn, with all of this limited to the burn window after September 15th, unless a burn exemption can be obtained from DNR. In addition, burn size may be limited due to funding for follow up treatments (herbicide, seeds, and plugs) as well as the need to consider the location of and impacts on the many rare species that occur on WDFW lands.

Prescribed fire at the Skookumchuck unit can occur if the landowner is willing and if it meets objectives within the associated Wildlife Habitat Management Program plan.

Scatter Creek north tract has large areas to the east where prairie forb diversity has degraded and has been managed more for recreation. These stretches have gotten less restoration focus than the western portion of the north tract where many unique plants and sensitive features occur. Prescribed burns were not carried out in 2017 and 2019 for various extenuating circumstances, and some of the intervening years have seen burns conducted under less than ideal conditions. Scatter Creek north tract will always present logistical hurdles for prescribed fire with it's proximity to I-5 and a restrictive burn window, but the plan is to continue to burn, restore and increase the native plant populations. A prescribed burn occurred nearby the cemetery in 2019. The south tract in general is regularly mowed and scotch broom and other brush are cut. The future intention is to reduce shrubs and brush along Case Road for better wildfire prevention and increased prairie vegetation richness.

Unfortunately, the 2017 wildfire at Scatter Creek's south tract has significantly impacted our ability to maintain and restore other portions of this unit and others due to limited resources. The WDFW will be developing a restoration plan for these sites in fall 2020 that should prioritize key management actions and impart a better understanding of the resources required for suitable management of these important sites.

		In contrast to the other sites, burning at Glacial Heritage has been widespread and relatively frequent such that increased burning there is likely to negatively impact Lepidoptera and increase exotic vegetation through an overabundance of open ground where weed seed germinates readily. In addition, excessive burning can lead to drying of the soil which can then inhibit survival of the native plants we're trying to restore. For Taylor's checkerspot, Glacial Heritage would most benefit from increases in the amount of host plant and tall forbs that would provide larval food and roost sites; efforts to restore these species have been ongoing for decades but have proved difficult due to the poor soils that predominate across large portions of the site.
20.	Prior to the approval of any increased recreational activity on the wildlife area, there should be a comprehensive conservation review. Questions to be answered include: Are PHS recommendations consistent with current management? How can the department conserve various SGCN tied specifically to the ecological systems of concern on the wildlife area, such as the Oregon vesper sparrow? What needs to occur to do that? Where specifically will the various species be conserved and recovered? Recreation and species impact review cannot be piecemealed, issue by issue, by passive action or inaction, portion of site by portion of site, in the absence of conservation guidance and a framework designed for successful conservation and recovery. Dave Hays	On Page 44 of the draft Scatter Creek Wildlife Area Management Plan is a statement of how to balance recreational use with wildlife / habitat protection. The statement refers to a Statewide Recreational Strategy under development. The plan says that the issues of how to guide and balance recreation with wildlife and habitat will be addressed in the Recreation Strategy once that's developed. Thus, the agency will include staff from the Diversity Division on the group overseeing the development of the strategy to ensure the best tools are being used to guide decisions that require balancing recreation with species needs (e.g., PHS, SWAP).
21.	...there is no objective to improve quality of the prairie ecological systems of concern (outside logging trees to create more prairie), even though the department is currently undertaking that at the present time.. and there should be an objective reflecting current work. Dave Hays	An objective has been added to reflect goals for improving the quality of prairie habitat.
22.	..grassland bird conservation, including restoration of habitat, is not specifically mentioned. Why not, especially with the decline of the Oregon vesper sparrow and grasslands the primary habitat of the species? (There are Oregon vesper sparrow currently visiting the wildlife area but there are no objectives for the Oregon vesper sparrow in the plan). That's an example, one of many reasons why it is important to have an objective relative to improve the ecological system. Dave Hays	An objective was added to the management plan that includes Oregon vesper sparrow conservation.
23.	Recreation has a significant impact on ground nesting birds like the Oregon vesper sparrow. Recreation appears (but not studied) to have a current significant impact on SGCN butterflies like the	There are a variety of tools that wildlife area managers refer to for identifying the location of places where conservation of a certain species should be a priority. A couple such tools are our WSDM and PHS databases, each of which

	<p>Mardon skipper. Where specifically, on the wildlife area, will the conservation of these species occur for the long term? It can't be done everywhere, so where will it occur? If we are going to improve recreational opportunities, how will that be done and provide habitat for the SGCN? This is a difficult but important area. Enforcement of current rules could provide conservation benefits. Current spring closures are not followed by some, especially on evenings and weekends, and even a low level of human disturbance may adversely affect ground nesting birds. It is critical that areas for conservation of Oregon vesper sparrow be identified. Dave Hays</p>	<p>shows all known locations of diversity species, particularly PHS/SGCN species. Because the known locations in WSDM and PHS are almost always incomplete, there needs to be another way to locate broader areas of potential habitat. One such tool is our SWAP, and specifically the information in SWAP that connects ecological systems to species of greatest conservation need. This is a useful tool because it not only allows us to see where species have been observed, but also can help us identify places where species could occur because the right habitat occurs in the place. Though taken together, these two pieces of information can help to narrow down where added protection is needed (e.g., from incompatible uses such as certain types of recreation), like all tools they are imperfect and cannot provide a perfect answer. To address that, the results of any analysis using these types of tools then should go through review by local species and habitat experts to make sure the right places were captured and to adjust when they're not. An objective to the WLA plan has been added reflecting the comments received.</p>
24.	<p>The Mardon skipper is nearly extirpated on the Scatter Creek units. These are the only known populations in the Puget trough outside of Joint Base Lewis McChord. What do we need to bring this species back? Actions to recover this species need to be taken, and specific objectives to recover Mardon skipper, an endangered species, should be included in the plan beyond the catch basin objective currently written for all of the SGCN butterflies. One objective, clearly is to identify, outline, and take appropriate management actions to increase populations of Mardon skipper. Dave Hays</p>	<p>Your comments will be considered and an objective focusing on the Mardon skipper will be added to the plan.</p>
25.	<p>Again, no new recreational expansion should occur until a comprehensive recreation and conservation review across all units is conducted and an objective for that review should be included in the plan. I cannot emphasize this point enough: WDFW cannot advertise and draw the public, under any circumstances, to places where it knows adverse impacts to endangered species occur under current management, without a clearly articulated conservation strategy. Dave Hays</p>	<p>See comments above (#20, 23) – An objective was added to designate areas critical for the protection of sensitive habitat from recreation use on the wildlife area prior to or during the development of the recreation plan for the wildlife area.</p>
26.	<p>Rare plant conservation is part of good stewardship of WDFWs wildlife areas. Their protection is a component of good stewardship. However, they cannot be protected without intent. That includes identification and use of species information in management activities like the planned logging, herbicide application, and recreation. The recent logging action at the south</p>	<p>A plant protection objective has been added to the plan and the wildlife area manager will consider your comments and recommendations provided.</p>

	<p>unit of Scatter Creek was much needed and has the potential for great benefit, but it destroyed an important area of Mardon skipper habitat, and adversely affected rare plants. Any future logging must be conducted with care that greatly exceeds past efforts. Examples of increased care include a compliance officer present each day.</p> <p>Rare plant objectives should include rare plant surveys prior to management actions like logging, development of rare plant databases, and rare plant conservation actions within the conservation of the ecological systems of concern. Strategies should be coordinated with DNR natural heritage, but land management actions are the responsibility of WDFW. The absence of rare plant surveys is no excuse for damage and elimination, and damaging actions only lower the view of WDFW as caretakers of public land. Dave Hays</p>	
27.	<p>What can be called Willamette Valley wet prairie is extremely hard to discern, and perhaps a hopeless accounting task, but it is very small. The wildlife area is recognized as having some of the best remaining examples of this ecological system. It is difficult and impossible to protect high quality native habitat from activities that disturb, degrade and destroy it with signs that say please pick up after yourself and stay on the trails, but that is the challenge inherent in managing rare ecological systems and endangered species. There has to be more. This includes not only the comprehensive conservation review, but (as examples) objectives and actions like the purchase of appropriate equipment for land managers, increased enforcement, restrictions on the use of tractors and heavy equipment, improved public education, development of site docents, area exclusion fencing, and improved guidance to recreational groups. Current scotch broom control is not conducted during times of the year it has been documented to be most successful, leading to inefficient use of funds and occasional impacts to habitat. I understand issues of staffing and equipment, but this needs to be rectified.</p> <p>Dave Hays</p>	<p>Your valid comments will be considered and incorporated, where feasible, in the management of the wildlife area units.</p>
28.	<p>If contamination is suspected, discovered, or occurs during the proposed SEPA action, testing of the potentially contaminated</p>	<p>Relevant regulations will be followed. Comments noted.</p>

	<p>media must be conducted. If contamination of soil or groundwater is readily apparent, or is revealed by testing, Ecology must be notified. Contact the Environmental Report Tracking System Coordinator for the Southwest Regional Office. Dept of Ecology</p>	
29.	<p>Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.</p> <p>Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.</p> <p>Construction Stormwater General Permit: The following construction activities require coverage under the Construction Stormwater General Permit:</p> <ol style="list-style-type: none"> 1. Clearing, grading and/or excavation that results in the disturbance of one or more acres and discharges stormwater to surface waters of the State; and 2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more and discharge stormwater to surface waters of the State. <ol style="list-style-type: none"> 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 <p>Ecology:</p> <ol style="list-style-type: none"> a) Determines to be a significant contributor of pollutants to waters of the State of Washington. 	<p>Erosion control measures will be implemented, and necessary permits acquired prior to construction. Comments noted.</p>

	<p>b) Reasonably expects to cause a violation of any water quality standard.</p> <p>If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted.</p> <p>Additionally, sites that discharge to segments of waterbodies listed as impaired by the State of Washington under Section 303(d) of the Clean Water Act for turbidity, fine sediment, high pH, or phosphorous, or to waterbodies covered by a TMDL may need to meet additional sampling and record keeping requirements. See condition S8 of the Construction Stormwater General Permit for a description of these requirements. To see if your site discharges to a TMDL or 303(d)-listed waterbody, use Ecology's Water Quality Atlas at: https://fortress.wa.gov/ecy/waterqualityatlas/StartPage.aspx. Dept of Ecology.</p>	
30.	<p>Only a few days ago as I exercised my bird dog on the Case Road section I observed two posted signs that read "State Game Land, Do Not Enter." A now-deceased former Dept. of Game assistant director and close friend pointedly informed me that the Scatter Creek properties were originally purchased with hunter license funds.</p> <p>In my past few years' year-round experience in those properties, and in the Pt. Blakely and DNR lands between Case and Littlerock Roads, I observe that hunting and dog training are incrementally being curtailed and reduced. I have no argument with restoration of the prairie mounds areas, or protection of rare plants, gophers and butterflies. I appreciate those efforts. But I wonder if people opposed to hunting or those who are non-hunters can appreciate</p>	<p>Thank you for expressing your concerns. The Scatter Creek unit is open to the public, but not to motorized vehicles. This unit was acquired for game species management and associated recreation activities including hunting. Hunting and related outdoor sports will continue. The wildlife area manger will look for the signs you mentioned and make corrections.</p>

<p>the original purchasers of that land and remain in approval of the legal hunting uses of the properties.</p> <p>Twenty years ago I did hunt pheasants from 2-4PM on Sundays with an aged dog for a time, but I do not choose to hunt birds there regularly because of the crowds and potential dangers.</p> <p>In summary, this is a reminder that hunters bought that land and have first right to it, and a cautionary note to the nice-sounding, but ultimately exclusionary results of multiple use.</p> <p>Joseph Jauquet</p>	
<p>31. Thank you for the opportunity to provide comments on the Scatter Creek Management Plan. I am a general public recreational user at the Scatter Creek Wildlife Unit, where I hike/walk weekly. In the past when my dog was younger, would regularly walk with my dog off-leash there (on-leash during the posted nesting bird season). I have been using the Scatter Creek Unit over the past 15+ years. The Scatter Creek Unit is a beautiful prairie and my comments are on that Unit.</p> <p>I support the overall plan to improve and restore the prairie, oak woodland, wetlands and other habitats. I especially appreciate the proposed work to improve habitats for Western Gray Squirrel and prairie butterflies. That is exciting and challenging conservation work! I look forward to the re-introduction of the Western Gray Squirrel, having never seen one in the wild.</p> <p>Clearly the biggest future challenges and potential conflicts facing these Units are the increasing recreational use by our growing population. Balancing those needs is a difficult task and I appreciate WDFW trying to address those in this updated management plan. An increased presence of WDFW on all the Units will help greatly in addressing problems if additional funding occurs to support staffing.</p> <p><u>Comments on Table 7 Scatter Creek Wildlife Area goals, objectives and performance measures:</u></p>	<p>Thank you for your comments, they will be considered and incorporated where feasible. WDFW wildlife area staff do not want to overlook and user/stakeholders.</p> <p>Currently we do not have any designated “friends” group on the wildlife area units, this is a good idea to help connect with all user groups.</p> <p>The objective to “Provide education and outreach material to the public to reduce pets off leash by 2021” is targeted to reduce observed habitat impacts, species conflicts, and observance of non-compliance with posted rules. This objective may take several forms and will be implemented as needed. The Scatter Creek Unit will remain a multiuse site, but some areas may be restricted to some user groups during particular times of the year or only in designated areas.</p>

Page 63-64, 7J: **Horse trails clearly marked at Scatter Creek.** This needs to happen very soon. In the past few weeks since Scatter Creek Unit has re-opened following the closure for the Covid-19 pandemic, I have observed both riders (4 horses & riders galloping about) and sign of horses (hoof prints, manure) on every trail in the North Unit, except the leased area. Riders are ignoring the boundary limits on their riding area. This was occurring during this last winter; I emailed the Area Manager with my concerns at that time. In addition to signage, additional outreach to the horse riding community is needed to help educate their members.

Page 66, 8B: **Stakeholder participation and engagement.** In addition to the key user groups of backcountry horseman, field trial community, hunting related groups, local chamber of commerce or community organizations, don't overlook the difficult task of reaching out to the frequent, numerous but unorganized users (I observe a steady stream of hikers, dog walkers, runners and family groups in my weekly+ visits). Please continue the postings on the bulletin boards in the parking lots (where I saw notice of this comment period) and consider additional posting at trail entrances, similar to the signage used when herbicides are applied, to notify users of upcoming or proposed management actions. Additionally, are there Friends Groups for any of the Units that could assist in engaging these "unorganized" users through periodic onsite use surveys on certain days of the year? I'm concerned that a considerable number of user/stakeholders are overlooked.

Page 69, 11E: **"Provide education and outreach material to the public to reduce pets off leash by 2021?"** What is the context for this goal? I could not find any detail on it in the draft plan. Is this an issue with unleashed dogs during the bird nesting period? Is this a change in management planning to eliminate the dog walkers at the Scatter Creek Unit? Is this a needed change for the reintroduction of the Western Gray Squirrel? Please provide more information on this proposed action. The text in the draft plan includes the "?", suggesting this is a question to be determined yet. Kate Benkert

<p>32.</p>	<p>A section of Scatter Creek itself dries up and goes underground during the summer. From my observations over the years from the access point to Scatter Creek in the leased portion of the North Tract, it has generally dried up by late May - June and surface flows return in the late fall (November/December) after the initial rainfalls and recharge of the shallow aquifer. In 2019 the Creek was dry by mid-April (earliest I've observed) and water did not resurface until January 2020. A long dry spell! This week (June 1 - 6), Scatter Creek at the North Tract access point dried up and the ponded area (see Page 47) in the South Tract of Scatter Creek Unit was as low as I have ever seen it (photo below; June 5 2020).</p>  <p>Are there upstream surface or ground water withdrawals of Scatter Creek that are reducing base flows and may affect future management of the wetland and fishery resources? Are the fluctuating dates for water disappearance and return in Scatter Creek becoming more variable due to warming climate, droughts, and more changing rain patterns? Does WDFW have water flow monitoring at Scatter Creek Unit to track changes? I appreciate the Section of the Management Plan integrating climate change into management for prairie species and the ponds for Oregon Spotted</p>	<p>Long dry periods for Scatter Creek does present increase challenges for the aquatic resources and habitat management. Ground water withdrawals as well as surface and ground-to-surface inputs do occur upstream of the Scatter Creek Wildlife Area Unit. These do have an influence of flow regimes. As does both climate changes and presence or absence of beavers. WDFW does not conduct formal water flow monitoring at the Scatter Creek Unit. We will consider your recommendation.</p>
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	<p>Frog, but there is nothing addressing the flows in Scatter Creek. Additional focus on what is happening with flows in Scatter Creek is recommended. Kate Benkert</p>	
33.	<p>Page 22: Wildlife viewing is not listed in recreational opportunities, yet page 23 states "...this is an excellent birding area...." Places to go on the WDFW website indicates that wildlife viewing is available on the Davis Creek Unit. Table 6 (page 50) of the plan indicates wildlife viewing is a recreational opportunity.</p> <p>Typo: Table 7, page 59, item 3.B – "Morning Dove" should be "Mourning Dove."</p> <p>Denis DeSilvis, Washington Diversity Council</p>	<p>Thank you for your comment. The plan has been updated.</p>
34.	<p>Errors in waterfowl breeding season vs winter migration designation: Table 10, page 85 (A cursory check of the breeding atlas for Washington birds indicates significant errors in this table.)</p> <ul style="list-style-type: none"> - American wigeon is listed as using wildlife area during the breeding season, yet not using the area during winter migration. The opposite is more factual: American wigeon do not breed in this area and are a common winter resident. - Scaup (assume both lesser scaup and greater scaup) may be found in this area in the winter, but do not breed here. - Ring-necked duck do not breed in this area. - Bufflehead do not breed in this area. - Common merganser do breed in the area, but are also found here during the winter. <p>Missing information: Both Table 20 and Appendix G are not in the available draft.</p> <p>Denis DeSilvis, Washington Diversity Council</p>	<p>WDFW has conducted multiple aerial surveys of ducks in the Chehalis Valley during the breeding season (April/early May) since 2010. Wigeon, scaup, bufflehead and ring-necked ducks have all appeared during some of those surveys. They occur infrequently but, are found within the Chehalis River Valley during the breeding season. Ring-necked duck, wigeon and bufflehead were documented on or within in close vicinity to the Davis Creek Unit during the breeding season of 2015-2106. Scaup appear to be sporadic in occurrence.</p> <p>Common Merganser do appear to occur within area in winter – and were added to the table.</p> <p>Table 20 and Appendix G are included in the final plan. They were not complete for the SEPA 30-day public review.</p>
35.	<p>Inconsistencies between the information found in the draft versus the WDFW website:</p> <ul style="list-style-type: none"> • There are 6 units but only 5 on the website under Scatter Creek Wildlife Area. The 5 units listed plus a 6th called Scatter Creek. 	<p>The website has been corrected to be consistent with the wildlife area plan.</p> <p>Thank you for your comments.</p>

	<ul style="list-style-type: none"> • There are at least 3 different acreages for the Davis Creek Unit: 520 (first page on website) vs 537 (on the website under Davis Creek WAU) vs 542 (draft, p.22) • Also, 3 different acreages for the Skookumchuck Unit: 883 (website) vs 966 (draft, p. 32) vs 974 (draft, p. 38). <p>Denis DeSilvis, Washington Diversity Council</p>	
36.	<p>Questions concerning land acquisition: Wildlife Area Goals, Objectives, p. 52 – do goals include strategies for acquiring the land for the adjacent/nearby habitat needed to support the species? As part of the 5- and 10-year plans? In conjunction with tribal traditional lands? Settler historical usage?</p> <p>As related to land acquisition (and concerning the above item), the following items from the draft plan apply:</p> <p>Mentions of acquisition in Table 7:</p> <ol style="list-style-type: none"> 1. Improve ecological integrity (EI) ... habitats by protecting, restoring, and/or maintaining these critical habitats. <p>G. Maintain and Seek funding... expansion on Davis Creek Unit by 2025, p. 54 4</p> <p>H. Continue to see funding to acquire ..., All Units, p. 55</p> <ol style="list-style-type: none"> 2. Achieve species diversity ... <p>G. Acquire one site to support ...</p> <ol style="list-style-type: none"> 7. Support and maintain ... recreation ... <p>O. ... and as new lands are acquired ...</p> <ol style="list-style-type: none"> 12. Investigate and improve the cultural ecosystems represented by prairies and oak woodlands and savannahs <p>Denis DeSilvis, Washington Diversity Council</p>	<p>Yes, the focus of the land acquisitions has been and will continue for species and habitat protection (e.g. Oregon spotted frog, Mazama pocket gopher, Taylor’s checkerspot butterfly). As lands and funding opportunities for acquisition become available, they will be evaluated and pursued following the internal land acquisition process.</p>
37.	<p>Thank you for the opportunity to provide feedback on the Washington Department of Fish and Wildlife’s (WDFW) 2020 Scatter Creek Wildlife Area Draft Management Plan. Scatter Creek provides recreation access to trails with abundant opportunities like wildlife viewing to the populations of Thurston County and South Puget Sound. Washington Trails Association (WTA) supports the draft management plan as proposed and</p>	<p>Thank you for your review and feedback. It would be great if WTA and WDFW can partner to improve recreational opportunities within the Scatter Creek Wildlife Area in the future.</p>

	<p>appreciates WDFW's efforts to balance the needs of conservation and interests of many different recreation user groups.</p> <p>Washington Trails Association has a 50-year legacy of engaging the hiking community. WTA enhances hiking experiences in Washington state by empowering a diverse and growing community of hikers to explore, steward and protect trails and public lands. WTA is the nation's largest state-based trail advocacy organization, with 24,000 members, thousands of volunteers each year and an online community of more than 100,000.</p> <p>The draft management plan offers a comprehensive package of efforts to address recreation interests in its project management goals. We appreciate the careful work on the management plan's goal #7, "support and maintain appropriate recreation opportunities". This goal includes draft objectives such as comprehensive education efforts, the development of recreational facilities, partnership on a Rails toTrails project, addressing user conflict, promoting recreational opportunities, expanding access for equestrians, and conducting a trails assessment.</p> <p>As presented, these draft objectives indicate a knowledge of best practices, willingness to partner with local user groups, and a vision for the future of the area. We appreciate these draft objectives and encourage their inclusion in the final management plan.</p> <p>Thank you for the opportunity to provide comment on this plan. We are hopeful for the future of the Scatter Creek Wildlife Area! Andrea Imler, Washington Trails Association</p>	
38.	<p>We note that a cultural resources summary is to be included as Appendix D to the plan. Therefore, we appreciate and recommend that interested/affected Tribes, DAHP, and other interested parties be afforded an opportunity to review and comment on the summary before the final plan is adopted. Gregory Griffith, Department of Archaeology & Historic Preservation</p>	<p>Following WDFW process, we will provide DAHP and consulting parties with copies of reports.</p>
39.	<p>In the cultural resources section on page 43 and the reference on page 15 to the Scatter Creek August 2017 wildfire, we appreciate</p>	<p>The section has been revised.</p>

	<p>reference to the historic Miller-Brewer House. We recommend that in both references, it should be mentioned that the house was listed in the National Register of Historic Places and Washington Heritage Register in 1988. It should also be mentioned that the Miller-Brewer House was significant as being one of only a few surviving examples in southwest Washington of vernacular Greek Revival style of architecture and plank construction dating to the Territorial era. We also recommend inclusion of information about when, why, and how the Miller-Brewer House was acquired and incorporated as part of the Scatter Creek Unit in the Wildlife Area Description on page 17 and/or on page 39. Gregory Griffith, Department of Archaeology & Historic Preservation</p>	
40.	<p>In the Wildlife area goals, objectives, and monitoring section beginning on page 52, we support and commend the Department of Fish and Wildlife (DFW) for inclusion of Goal 12: Investigate and improve cultural ecosystems represented by prairies and oak woodlands and savannahs. In view of this goal, we recommend that DFW consider inviting Tribal representation on the Wildlife Area Advisory Committee. Gregory Griffith, Department of Archaeology & Historic Preservation</p>	<p>WDFW would prefer to have tribal representative on the Wildlife Area Advisory Committee. At the initiation of the Scatter Creek planning process, WDFW sent letters to 11 tribes. WDFW did not receive any response to the letters nor comments on the draft plan. If you have any suggestions on appropriate representatives it would be appreciated.</p>
41.	<p>We note on page 23 and on pages 69-70 references to removal and/or preservation of buildings on the Davis Creek Unit by 2022. We recommend that the plan include a general goal and tasks to conduct a comprehensive survey and inventory effort of cultural resources (including buildings, structures, sites, objects, and cultural landscapes) within the wildlife area that are 40 years of age and older (given the 10 year timespan of the plan's implementation). The survey effort should be conducted by cultural resource professionals meeting National Park Service (NPS) Professional Qualification standards in the appropriate area of expertise. Plus, all of the cultural resources should be documented on the appropriate DAHP inventory forms and uploaded into DAHP's WISAARD GIS database. It is recommended that the results of the survey/inventory work of the Wildlife Area shall be used to guide DFW on management decisions as to removal and/or preservation of any buildings/structures, and particularly those at the Davis Creek Unit. Gregory Griffith, Department of Archaeology & Historic Preservation</p>	<p>All state funded WDFW projects are reviewed under Executive Order 05-05; when historic structures are present WDFW will have these structures inventoried by a person or persons meeting the SOI qualifications. Field survey and inventory, likewise, will be conducted as needed. WDFW's funding does not permit comprehensive cultural studies of acquisitions.</p>

42.	<p>In view of the loss of the historically significant Miller-Brewer House, we recommend that goal 11 include a task to develop and implement an interpretation plan for the house site and any surviving archaeological resources. The interpretation plans should be developed in consultation with interested/affected Tribes, DAHP, and other interested parties. Gregory Griffith, Department of Archaeology & Historic Preservation</p>	<p>WDFW has consulted with DAHP, the Thurston County Historic Commission, and the Tribes regarding several proposed interpretive plans and archaeological investigations at the Miller-Brewer House and elsewhere on the Scatter Creek WLA. To date WDFW has not identified funding sources to complete the interpretive work, when a project is identified WDFW will engage it's consulting partners. The report for the archaeological investigations at the former Miller-Brewer house is in production, the historic presented in the Planning document is part of that report.</p>
43.	<p>In view of the Scatter Creek wildfire that destroyed the Miller-Brewer House and increasing potential for wildfires to impact DFW facilities and properties across the state, we recommend that the Department develop and implement goals, policies, and procedures to protect and manage cultural resources in order to minimize or avoid losing such resources in the future. Gregory Griffith, Department of Archaeology & Historic Preservation</p>	<p>WDFW cultural resources staff are currently working with Tribal staff and WDFW Burn Teams to develop appropriate responses to prescription fire. We appreciate the guidance to extend this effort to wildland fire. The wildlife area manager will also complete a Fire Management Plan by the end of 2021, this objective is included in the plan.</p>