

## **DNS 22-003: TEN-YEAR RECREATION STRATEGY FOR WDFW-MANAGED LANDS**

Summary of comments during public comment period and WDFW staff responses

April 11, 2022

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The Washington Department of Fish and Wildlife (WDFW) Lands Division initiated development of a recreation strategy for WDFW-managed lands in February 2020. The purpose of the strategy is to improve visitor access and nature-based recreation experiences, while increasing protections for natural, cultural, and tribal resources.

A draft *10-year Recreation Strategy for WDFW-managed Lands* was reviewed through the State Environmental Policy Act (SEPA) process as outlined in state law. A SEPA checklist for the draft strategy was submitted and determination of non-significance (DNS) was issued on Jan. 10, 2022. An initial 30-day comment period on the draft and DNS was extended to Feb. 28, 2022, to provide time for additional outreach and engagement effort, which included translating the draft into Spanish and soliciting public comments in both English and Spanish.

Following is a summary of outreach and engagement efforts to encourage public comment, highlights of comments received during the 49-day comment period, and staff responses to the comments. Following the conclusion of the SEPA process, staff integrated changes into the draft strategy and will finalize it for publication.

### Outreach and Engagement

External engagement efforts during the public comment period included:

- Posting the draft strategy to the SEPA webpage in English and Spanish.
- Announcing the public comment period during a Fish and Wildlife Commission meeting.
- Distributing a news release to statewide media outlets announcing ongoing SEPA public comment period.
- Sharing the draft and advertising public meetings with paid ads on English and Spanish social media platforms.
- Announcing the public comment period to the Outdoor Recreation Caucus.
- Emailing partners, including the Recreate Responsibly Coalition, with request for share on partner social media channels.
- Emailing the WDFW liaison list to forward on to partner organizations.
- Emailing federally recognized tribes reminding them of opportunity to comment and offer of consultation made on Oct. 10, 2021.
- Providing an online briefing (Jan. 25) for active members of WDFW advisory committees, including members of all Wildlife Area Advisory Committees.
- Hosting two public meetings (Feb. 8 and 24) via Zoom with recordings then posted to WDFW's YouTube channel.
- Sharing public comment period details to diverse outdoor recreation groups on Facebook.
- Featuring public comment period on [wdfw.wa.gov](http://wdfw.wa.gov) with alerts on all wildlife area webpages.
- Highlighting public comment opportunity on WDFW e-newsletter (Weekender Report).
- Participating in media interview with Spokesman Review.

- Notifying state government partners, including the Governor’s Office, about the comment period and requesting announcement in Senior Recreation Policy Advisor Jon Snyder’s “Hot List” distributed to organizations concerned with outdoor recreation.

### Comment Highlights

599 comments were submitted during the 49-day public comment period. Comment letters were received from the Northwest Indian Fisheries Commission (NWIFC), Lummi Natural Resources Commission, Kittitas County Commissioners, Outdoor Alliance Washington, Backcountry Horsemen of Washington, Conservation Northwest, Black Hills Audubon Society, and Spokane Audubon Society. Following are paraphrased frequent comments as well as WDFW responses drafted by Lands Division staff.

**Comment:** *Do not expand or open any additional areas for recreation until the existing environmental impacts can be appropriately mitigated. Include rigorous monitoring of the impacts that recreation has on cultural and natural resources that are of significance to Washington Tribes. Establish meaningful consultation and a co-governance relationship with the Tribal governments in Washington.*

This comment was submitted by 15 individuals via online public comment portal (PublicInput) and reflects sentiments in letters submitted by the NWIFC and the Lummi Natural Resources Commission.

The NWIFC letter states:

“Before consideration of any expansion of recreation there must first be an analysis of the current and cumulative impacts of recreation on the landscape, and findings that demonstrate compatibility of the proposed recreational use with your agency’s primary mission to ‘preserve, protect and perpetuate fish, wildlife and ecosystems.’ Tribes are concerned with a status quo approach to addressing recreation and recreation impacts, and the continued threat and impact this approach poses to tribal treaty rights, natural and cultural resources, and treaty tribal access. Moreover, while we understand there is, at present, great pressure on WDFW and other state agencies to meet the high recreation demand in western Washington, tribes cannot support a strategy that reads as expanding recreation. Especially at a time when many tribes have argued that recreation needs to be reined in, and recovery and protection prioritized.”

The NWIFC also “urges and supports the continued coordination and consultation with tribal governments. It is critical that treaty tribes, as sovereign governments and natural resource co-managers, be involved early in the planning, funding, and development and management of recreation.”

**WDFW Response:** The department appreciates the comments from NWIFC and Lummi Natural Resources Commission, as well as the participation of these and other tribes in a series of meetings between October 2020 and November 2021 that greatly informed the draft strategy. WDFW also offered formal consultation on the draft strategy to all of the state’s federally recognized tribes and received helpful input to the draft in a Oct. 25, 2021 letter from the Snoqualmie Tribal Council and Tulalip staff comments provided via email on Oct. 29, 2021.

A near term priority outlined in the draft strategy is to develop data and a framework for measuring and monitoring impacts of outdoor recreation on natural, cultural, and tribal resources, recreation facilities, and recreation experiences. WDFW plans to collaborate with tribes and state land managers to design and deploy an impact monitoring system across state-managed recreation lands to track changes to the environment

associated with specific recreation facilities and activities. Early in this design process, we will seek to understand and respond to the impacts of greatest concern to tribes.

WDFW is committed to ongoing consultation and coordination with tribal governments in the planning and management of recreation as required by federal and state law as well as department policy. We also will coordinate and consult with tribes on specific projects and investments. This commitment is written into the draft recreation strategy, most explicitly within Objective 5.1 [now Objective 2.11]: *Engage federally recognized tribes in recreation planning and program development.*

“Consistent with Executive Order 21-02 and WDFW Policy 5007, WDFW will coordinate and consult with Washington’s federally recognized tribes on the development and implementation of the *10-year Recreation Strategy for WDFW-managed lands.*”

WDFW also will seek opportunities to collaborate with tribes and other experts in developing systems and programs for measuring, monitoring, and mitigating the impacts of outdoor recreation on tribally significant cultural and natural resources.”

**Comment:** *Taxpayers should have unfettered access to public lands. Do not restrict public access.*

This comment reflects the high value the recreating public places on access to public lands. Some comments emphasize the importance of accessing public lands to support visitors’ physical and mental health and for educating future generations of land stewards. Some call restricting public access “government overreach” and suggest that Washington residents and visitors should have unrestricted use of all public lands in the state. Multiple commenters recommend increasing enforcement of existing rules and/or expanding education of recreationists in lieu of restricting public access.

**WDFW Response:** The department acknowledges the importance of public access to WDFW-managed lands, the contributions of taxpayers to the management of these lands, and the contributions via license fees and Discover pass purchases.

The department also acknowledges the importance of enforcement and public education. Both would be expanded with the implementation of the draft strategy as resources become available. Expanding enforcement and education are among the tools recommended by the strategy. Other priorities include data development and management, planning, and regulation. Education and enforcement alone will be insufficient to meet the goals of the strategy.

The intention of the draft *10-year Recreation Strategy for WDFW-managed Lands* is to improve visitor access and nature-based recreation experiences, while ensuring adequate protections for natural, cultural, and tribal resources. The strategic initiatives outlined in the draft indicate an intent to develop policies, plans, or rules consistent with the department’s mandate to “maximize fishing, hunting, and outdoor recreational opportunities compatible with healthy and diverse fish and wildlife populations” (RCW 77.04.055).

The department will develop and deploy a suite of tools and strategies to strengthen management of areas as needed to protect sensitive resources and/or the quality of recreational experiences on WDFW-managed lands. The development of any such policies, plans, or rules would occur after the adoption of the strategy and include opportunities for robust engagement by partners and stakeholders.

As stated in the draft, for outdoor recreation to be sustainable, “recreation planning and management must continually adapt to a changing landscape, which includes a growing and diversifying population with changing

values and recreation interests, growing pressures on species and habitat from development and land use, and a changing climate, which already is affecting the health of WDFW-managed lands and the quantity and quality of recreation opportunities they can support.”

**Comment:** *Continue to allow dispersed use of WDFW-managed lands for camping, hunting, fishing, gathering, hiking, and horseback riding. Do not restrict travel to designated routes or camping to designated sites. Do not close existing undesignated sites or routes while considering designation.*

This comment indicates the need for further consideration of how to reduce the impacts of informal roads and trails without impeding dispersed use, including hunting, fishing, and nature viewing, which are priorities for the department.

**WDFW Response:** The department will not restrict all travel on WDFW-managed lands to designated roads and trails or camping to designated campsites. Activities including hunting, fishing, and nature viewing, as well as foraging, shed hunting, and other collecting, require opportunities to disperse across landscapes both on and off designated roads and trails. The language of the strategy will be revised to reflect the department’s commitment to allow dispersed use for these purposes. The language about dispersed camping also will be revised.

The strategy recommends moving from an “open unless designated closed” approach to a “closed unless designated open” approach for roads and trails to address a serious challenge. Currently, WDFW lacks adequate controls to limit the creation and use of user-built roads and trails across WDFW-managed lands. For decades, in the absence of routes designated by the department, users have created routes independent of the department and without the benefit of planning to avoid impacts to natural, cultural and tribal resources nor the recreation experiences for diverse users.

WDFW land managers report that creation of user-built routes has exploded in recent years as more and more visitors are traveling to WDFW-managed lands for trail-based recreation and informal routes are promoted via word of mouth and on social media. An inventory of all routes, both designated and undesignated, is underway and will provide important insight to where routes are located and how they should be individually and collectively managed. We anticipate that some user-built routes will be designated for ongoing use and that others will be closed.

It will be important to craft any future rules or policies related to designating roads and trails to ensure that dispersed use is allowed wherever hunting or other dispersed use is allowed. Walk-in access for dispersed use will be preserved. The department also will further consider dispersed access for horses and pack animals and where their presence off designated roads and trails may be compatible with local management objectives. As noted above, development of any such policies, plans, or rules would occur after the adoption of the strategy and include opportunities for robust engagement by partners and stakeholders.

Staff do not recommend a statewide rule or policy restricting camping to designated camping sites on WDFW-managed lands and the department will clarify this within the strategy. Dispersed camping will remain available where it is compatible with local management goals. The area-based rulemaking approach recommended in the draft strategy will not prohibit all dispersed camping as some commenters have suggested. Rather, the intent is to provide a more centralized and transparent system for identifying where dispersed camping is available.

**Comment:** *Prioritize hunting and fishing on WDFW-managed lands. Hunters and anglers have contributed and continue to contribute financially to the purchase and management of WDFW-managed lands and these uses should be prioritized over other forms of outdoor recreation.*

**WDFW Response:** The department is best known for hosting dispersed recreation, including hunting and fishing, and remains steadfast in its commitment to hunters and anglers. This commitment is mandated in RCW 77.04.055 and reflected in the department's *25-Year Strategic Plan*. It also is reflected in agency budget commitments to fishing and hunting opportunities. In the 2017-19 biennium, WDFW spent an estimated \$165 million managing fishing and hunting opportunities. This does not include funding for preserving and restoring species and habitat or producing hatchery fish, activities that directly benefit hunting and fishing. In contrast, WDFW spent an estimated \$1.2 million managing all other forms of outdoor recreation.

WDFW is developing a statewide R3 (recruitment, retention, and reactivation) strategy that will support hunters and anglers recreating on and off WDFW-managed lands. The draft strategy includes a commitment to the implementation of the broader agency R3 strategy as it relates to WDFW-managed lands.

Direct management of hunting and fishing is a highly regulated body of work that is not specific to WDFW-managed lands. Therefore, a large amount of the work related to providing hunting and fishing opportunities that is relevant on WDFW-managed lands is not part of this strategy. Rather, the focus of this strategy is to support quality recreation opportunities through planning and management which will serve the interests of all users. It is intended to complement ongoing and future commitments to a wide variety of recreation by improving capacity for planning, monitoring, adaptive management, and engagement that serves the needs of diverse recreation users.

WDFW holds a responsibility to the public trust for all Washingtonians in service to our mission. The public at large contributes significantly to the budget for WDFW-managed lands through increasing support from the state General Fund (for Fiscal Year 2022, this funding constitutes 29% of WDFW's operating budget).

**Comment:** *Include stakeholders in planning decisions. Extend WDFW's commitment of consultation to local governments. Expand collaboration and improve opportunities for volunteers.*

In a Feb. 28, 2022 comment letter, Outdoor Alliance Washington emphasizes the importance of stakeholder engagement in future planning decisions and encourages the department to consider "staffing capacity that is solely dedicated to conduct community engagement with local and regional communities that engage with the land."

In a Feb. 28, 2022 letter, the Kittitas County Board of County Commissioners (BOCC) ask that a policy similar to WDFW Policy 5007: Consultation and Coordination with Tribal Governments "be developed for consultation with local governments to ensure a full understanding of plans and potential impacts is available for local decisionmaker input." The BOCC also offers assistance in developing impact monitoring systems and invites WDFW to join Kittitas County in area-wide planning efforts.

In a Feb. 28, 2022 letter, Conservation Northwest expresses "a strong interest in collaborating in efforts related to education, engagement, and recreation impact monitoring."

Multiple organizations and individuals expressed support of expanded volunteer opportunities to support management and delivery of recreation opportunities. One commenter wrote: "I would like to volunteer

when/where I am able to improve the items I have mentioned above -- I'm not getting any younger, but can still do some physical stuff. Please keep a bit of focus on volunteering..."

**WDFW Response:** Engagement is a high priority for the department and within the recreation strategy. Staff agree that local governments are important partners and collaborators in recreation planning and management. The strategy language will be revised to acknowledge this important point with the addition of an objective in the education and engagement priority area. Staff also agree that more capacity is needed for engagement with local and regional communities. This need is acknowledged within Objective 6.1: *Increase statewide capacity for recreation planning and management.*

WDFW will expand staffing capacity for developing, implementing, and evaluating recreation programs, projects, and facilities, and for monitoring the condition of facilities and impacts on natural and cultural resources. Needed functions will include data development and management; policy development and rulemaking; project and grant management; funding and budget management; *public engagement and facilitation*; internal and *external* communications; *volunteer and partnership coordination*.

Expanding opportunities for volunteers is a priority for the department and is referenced in the draft strategy in several areas, including Objective 5.5 [now Objective 2.5]: *Engage volunteers in supporting the recreation needs of visitors to WDFW-managed lands.* This objective includes recommendations for creating an ambassador program and expanding citizen/community science programs that engage people in wildlife conservation research. We anticipate that volunteers also would be employed by partner organizations operating under master contracts recommended under Objective 6.1: *Increase statewide capacity for recreation planning and management.*