









April 21, 2018

Randy Kline

Project Manager

Wallace Falls State Park CAMP Planning Process

Washington State Parks Department

P.O. Box 42650

Olympia, WA 98504

**RE: Joint Comment letter on Wallace Falls State Park Classification and Management Planning (CAMP)**

**Stage 2 - Exploring Alternative Approaches**

Dear Mr. Kline:

The following organizations are writing to provide comments as part of a long-term sustainable vision for one of Washington State’s most popular and inspiring state parks. While we represent different constituencies and geographies, each of our organizations cares deeply about the Skykomish Valley and have engaged in several public processes over the years supporting conservation initiatives and recreation opportunities that in turn provide economic benefits for local communities.

Wallace Falls State Park features lakes, rivers, waterfalls and hiking and biking trails for visiting families and local residents alike. Nestled in the heart of the Skykomish River Valley - just minutes from the restaurants and shops of the scenic town of Gold Bar - the park is a special place to all those that visit.

We appreciate the opportunity that the CAMP process offers to take stock of what makes the park so special as well as identify the challenges it faces. At many times of the year the park is “loved to death” as crowds often overwhelm the main trail access to the falls, if they can find a place to park. Parking is a significant issue, as overflow and illegal parking on busy summer days has frustrated the relationship with local residents.

We feel the CAMP process has the potential to help solve these problems and create a more enjoyable, accessible and sustainable experience to the hundreds of thousands of visitors in the future. We believe this is important because Wallace Falls State Park attracts visitors to the scenic towns of the Sky Valley like Gold Bar, Sultan, Monroe, Index, and Skykomish. These visitors spend money on food, gas and lodging making an economic imprint on the local communities each year. For local Valley residents, Wallace Falls is their backyard and a place for relaxation, exercise and a part of the unique quality of life that they enjoy in the Sky Valley.

**Comments on Stage Two - Exploring Alternative Approaches**

At the March 21, 2018 public meeting held in Sultan, the Washington State Park planners outlined two alternatives based on feedback from stakeholders. The two alternatives were: (1) a current operation emphasis and (2) an enhanced operation emphasis. Stakeholders were encouraged to identify existing elements and propose new elements that they support – rather than choose one or the other alternative. In stage 3, these comments will be turned into a preliminary plan for the Park.

Elements of the enhanced operation emphasis that we support

* **Provide additional recreation opportunities** **(including equestrian and mountain biking)** – People come in great numbers to Wallace Falls State Park because of what it has to offer, its proximity to Puget Sound populations centers and the charm of the local communities in the Sky Valley. As part of the long-term planning process we would like to see consideration about new hiking opportunities either within or connected to the park. While the park access is currently primarily focused on hiking, some trail running and limited mountain biking, the park should consider accommodating other recreational opportunities moving forward. Equestrian access and potential extended mountain biking opportunities should be considered after meeting with each of these communities to understand their access and trail needs. It would be important to manage or avoid potential user conflict between different user groups moving forward. For example, allowing equestrian or mountain biking on the main trail to the falls viewpoints would be challenging for all user groups given the number of people using that trail. However, investigating the opportunity to allow equestrian access to Wallace, Jay and Shaw Lakes from Washington Department of Natural Resources (DNR) lands is an opportunity worth pursuing. Existing mountain bike trails are located in the western part of the park and acquiring lands outside of the park which provide extension opportunities should be considered in this area, as well as to the east of the park.
* **Work collaboratively with DNR to provide additional trail connections** – Due to the shape and limitation in size of the current park boundary, it is important to cooperate with adjacent landowners to support recreational opportunities. This strategy could alleviate some of the stress on certain trails in the parks by giving alternative options to locals and visitors alike. A key partner in this respect in the Washington DNR. The map provided shows several trail connections between the park and DNR land indicated by a cross hatched section. We agree with this focus. As was voiced at both public meetings many visitors to the park have a strong preference for forested trail corridors. It is important to consider the potential difference in trail experience if and when trails that leave or enter the park to DNR land are logged under a variable retention harvest.

Additional trail connections to the park to consider should include:

* + Work with DNR and other public land owners to provide trail access, including consideration of any necessary bridges, from the Snohomish County owned parcel south of the park on 429th Street to Wallace Falls State Park. This option is perhaps the most compelling given the existing investment in public ownership of the property and existing trail network.
  + Work with adjacent public land trailheads located on neighboring public land managers including DNR and the US Forest Service to investigate whether a connection to the Wild Sky Wilderness Area is practical.
  + Look to provide trail connections to Stickney Lake and Mt. Stickney east of Wallace Falls State Park.
  + Work to provide an improved trail connection from Jay Lake to Shaw Lake. Work with adjacent forest land owners to enable this trail connection.
  + Consider providing a trail connection from the park to Lake Isabell in the Wild Sky Wilderness.
  + Investigate the potential for a trail connection between Wallace Falls and Forks of the Sky State Parks
* **Potential parking options are expanded to include land outside the current park boundaries** – Parking is a major issue currently for the park. Any plan moving forward needs to explore all options to address this issue. This is important for visitor experience, safety and the continued supportive relationship with local residents and the community of Gold Bar. There are a number of options to alleviate the parking issues that should be considered:
  + Investigate the use of shuttle vans through a concessionaire, volunteer group or park staff to provide a shuttle from downtown Gold Bar on the north side of the highway to avoid crossing the heavy traffic volume on State Route 2. This service could be optional rather than mandatory and perhaps provide some incentive for visitors to spend time in the town of Gold Bar before and after their trip to the park. Perhaps the local chamber could coordinate a coupon book for shuttle users with discounts at local restaurants, gas stations and shops.
  + Use web cams or other technology to alert park users prior to arrival regarding availability of parking
  + Include land in the long -term boundary that supports additional parking opportunities.
  + Work with the City of Gold Bar and Snohomish County to investigate the possibility to improve parking and pedestrian activity along Ley Road including a path or sidewalk that takes pedestrians off the road and/or potentially widens shoulders to accommodate parking.
  + The following additional parking locations should be considered and pursued:
    - Work with the county to provide additional parking at the county owned site south of the park on 429th Avenue once a trail connection to the park is created. This is especially beneficial since this trailhead is already in public ownership
    - Work with Camp Huston on the potential to use the in-holding parcel along the trail and below the powerlines
    - Relocate the existing shop and office to provide parking in that area.
    - The property on May Creek Road at the gravel pit
* **Consider a dispersed parking scenario to spread out park access points and reduce trail impacts –** Another major challenge of the park is that the vast majority of visitors use the same trail to reach the prime destination – the waterfall viewpoints. On a busy summer day this can feel more like a parade and impact visitor experience and the trail itself. The park needs to explore and invest in additional trail access points, especially to the falls viewpoints to take pressure off the main route and primary parking areas. Promising efforts have already been made to establish a new Snohomish County trailhead south of the park that could provide trail access to the waterfall viewpoints in the park from a different parking lot and trail than the main thoroughfare. There are additional opportunities that should be explored from the Reiter Forest non-motorized planning area and perhaps other future trailheads. Both coordination and/or additional land acquisition will be important tools in addressing this issue.

Additional aspects that we strongly feel should be incorporated in a preliminary Stage 3 draft plan

1. **Embrace the opportunity of targeted DNR trust land transfers to expand the park as part of the long term boundary** – We were disappointed to see that neither the presentation at the March 21 public meeting or the lengthy handouts provided as part of Stage 2 of the CAMP process identified even the consideration of a state trust land transfer as part of the long term boundary discussion for the park. This is an important consideration for expanding the park to include more primitive recreation areas as well as important wildlife habitat. In fact, during the presentation and other materials, discussion was limited to looking at only private parcels rather than DNR lands for potential acquisition by the park. This is surprising because there had been direct conversations with park planning staff about the interest in exploring this tool as part of the long term boundary. There is no excuse for not discussing and considering potential trust land transfers as part of the long-term planning process. The CAMP process is the appropriate venue for this discussion.

Washington DNR lands are managed as trust lands under the Washington Constitution. As a result, they are managed to benefit specific beneficiaries, usually through providing revenue from timber harvest. However, in many cases DNR lands have been transferred from trust land to other agencies where they are managed for conservation, wildlife, watershed or recreation values. This requires the State legislature (or perhaps State Parks) to buy out the trust so that the beneficiaries are compensated for the loss of working forest lands. The funds received for the value of the timber can then be reinvested in buying additional lands that can be managed as working forest and provide income to the trust beneficiaries. In order to keep the specific trust beneficiaries whole, any replacement lands purchased would need to be ensured to benefit the same beneficiaries.

While trust land transfers within DNR (or between DNR and State Parks) can be complicated or even difficult, it is an option. We would argue in this case it is a compelling one for the park, the local beneficiaries or junior taxing districts and for the local communities of the Sky Valley. The following goals are important to create a win-win for the park, its users and the relevant trust beneficiaries.

Land Choice – We suggest that much of any trust land transfer focus on DNR lands that are currently managed under logging restrictions due to geologic or ecologic concerns as well as spotted owl or marbled murrelet habitat restrictions. These lands retain their forested character making them attractive and consistent with other land in the park. However, other trust lands may be of interest to provide connectivity to other protected areas (Wild Sky, Morning Start NRCA) or a manageable boundary with the existing park as well as lands which offer significant abilities to increase recreational opportunities.

Compensation to Trust Beneficiaries – In any scenario, the trust beneficiaries or junior taxing districts will need to be fairly compensated for any DNR trust land that is transferred to the park. Generally, the appraisal of the timber that could be harvested is part of that appraisal. In the event that any of the murrelet or owl managed lands are chosen for a trust land transfer, the compensation for the junior taxing districts would include all the timber (not just the restricted amount that could be thinned by the DNR). This potentially increases revenues for beneficiaries from lands which otherwise would have restrictions on logging. This provides a value added component in the compensation that should be attractive for trust beneficiaries.

Reinvestment in Additional Working Forest Lands – Once compensation funds are received they can be reinvested by purchasing additional private lands within the boundary of the junior taxing districts. This allows for long term working forest income for the junior taxing districts over time not restricted by owl and murrelet habitat guidelines.

Additional Value Added Expansion for Park - Transferred lands to the park can provide important options for more primitive recreation opportunities, important wildlife habitat and (where access allows) additional opportunities for equestrian or mountain bike trails on forested trails.

1. **Acknowledge and highlight the potential recreational connection to the park from the DNR non-motorized Reiter Forest recreational planning effort** – We appreciated that the map associated with the enhance emphasis option identified areas where trails from DNR connected with the park using a cross hatch entitled State Park and DNR Shared Recreation opportunities. This is an important component to identify options to disperse access to park destinations from other trailheads and parking areas. This has significant potential to enhance recreational opportunities as well as meet many of the overuse and parking challenges that currently plague the park.

For several years, DNR has invested in the Reiter Forest recreation area which includes a non-motorized trail system (e.g., mountain bikes, equestrian, hiking) just south and east of Wallace Falls State Park. There is excellent potential to design trail systems for a variety of users to include a destination of points within Wallace Falls State Park through DNR lands. This is particularly compelling for mountain bike and equestrian user groups who cover more miles per hour than hikers and therefore prefer longer trails. The trails can also provide an alternative approach to the park for hikers as well. Such a trail system would allow access to Wallace Falls State Park by equestrian and mountain bikers while avoiding: (1) user conflict issues; (2) exacerbating crowding on the most popular trail segments in the park; (3) and adding to parking challenges at the main park entrance.   
  
Any future maps used in this CAMP process needs to be expanded and amended to highlight this powerful recreational opportunity as part of the long term boundary. This is especially true to the southeast of the park to include areas which the DNR and the public have identified for potential multi use recreational opportunities.

Thank you for the opportunity to provide comments on this planning effort early on in the process. We hope to see an improved preliminary draft plan as part of Stage 3 that embraces some of the important opportunities that were not discussed or explored in the previous two public meetings. We are excited about the opportunity that this process can provide to meet many of the current challenges that the park faces and improve on the experience to visitors and economic benefits to local communities moving forward.

Sincerely,

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