



November 21, 2024

Andrea Martin
MS 47014, Olympia, WA 98504

RE: Washington State Department of Natural Resources Draft Outdoor Access and Responsible Recreation Strategic Plan

Submitted via Online Portal: [Washington State Outdoor Access and Responsible Recreation Strategic Plan](#)

Dear Andrea Martin,

The Mountaineers, Washington Trails Association, Evergreen Mountain Bike Alliance, American Whitewater, and the Surfrider Foundation welcome the opportunity to comment on the Washington Department of Natural Resources Draft Outdoor Access and Responsible Recreation Strategic Plan. Our organizations represent tens of thousands of human powered recreationists who care deeply about the public lands and waters managed by the DNR. Our organizations work together on issues relating to recreation, access, and conservation. We have participated extensively in the OARR planning process and we have consistently shared our feedback with DNR in the hopes of strengthening this document. Thank you for the opportunity to provide further comment on and analysis of the OARR strategic plan.

Our organizations applaud the Department of Natural Resources for developing a strategy to manage recreation and outdoor access on DNR-managed lands. **We support the overall vision of this plan.** As demand for outdoor recreation continues to rise in Washington, we are pleased to see that the agency is proactively planning to provide equitable and consistent access to recreation opportunities, while protecting critical natural and cultural resources. We also commend the ways in which the agency is working with Tribal nations to protect natural and cultural resources and fulfill the agency's trust obligations. This letter offers our thoughts on components of the draft plan and contains some of our collective thinking about the complex challenges the strategic planning process seeks to address. We hope that our comments, which are grouped thematically, will be useful to you as you finalize the plan.

The Value of Recreation

The undersigned organizations applaud DNR's development of a strategic plan that seeks to ensure that "recreation opportunities are equitable, predictable, durable, and compatible with natural and cultural resource protection".¹ The 5.6 million acres of land that DNR manages, including 2.6 million acres of state-owned aquatic lands (SOAL), 1,300 miles of trail, and 80 campgrounds, are absolutely vital to outdoor recreational access.

Access to public lands and waters is critical to the health of Washingtonians. Studies have shown that access to nature has immense personal wellness and overall physical and mental health benefits. According to the Recreation and Conservation Office, trail-based recreation alone provides more than \$390 million in estimated health care savings to residents of Washington.² The plan does a good job of sharing the numerous health benefits of recreation: "While recreation provides significant economic benefit to Washington, it also enhances quality of life, allowing recreationalists to escape their everyday stress and connect with nature."³

Recreation on DNR-managed lands and waters also creates immense economic value for the state. Recreation supports tens of thousands of jobs and outdoor recreation spending supports \$40.3 billion in economic contributions in Washington.⁴ We encourage the agency to recognize that the economic benefits of recreation are comparable to the revenue generated by DNR's timber production and leasing programs for its trust beneficiaries. We expect that, as demand for outdoor recreation continues to grow in Washington, so too will the economic benefits of recreation.

Our organizations appreciate that DNR is aware of its pivotal role as a provider of outdoor recreation experiences. Thank you for recognizing the vast importance and value of recreation on DNR-managed land, and for undertaking this planning process.

Tribal Nations Participation in Developing this Plan

Our organizations commend the agency for its commitment to "building a just and inclusive future honoring the land and the Indigenous peoples who have stewarded it since time immemorial."⁵ This plan is particularly strong due to the agency's work with Tribal nations and its integration of relevant conversations associated with the State Tribal Recreation Impacts Initiative (STRII) into the development of this plan. We appreciate that the plan acknowledges the lasting impacts of colonization and directs DNR staff to take meaningful steps to honor Tribal sovereignty and Indigenous knowledge.

¹ OARR, p. 1

² Economic, Environmental, & Social Benefits of Recreational Trails In Washington State, n.d. <https://rco.wa.gov/wp-content/uploads/2020/01/HikingBikingStudy.pdf>, p. 4.

³ OARR, p. 4

⁴ Mojica, J., Fletcher, A., 2020. Economic Analysis of Outdoor Recreation in Washington State, 2020 Update. Earth Economics. Tacoma, WA

⁵ OARR, p. 1

We also applaud the agency's pledge to commit to working “with Tribes through applicable laws, government-to-government consultation, and STRII to implement and refine the actions described in the OARR Strategic Plan.”⁶ **It is vital that DNR continue to center Tribal rights as it moves forward with both near-term and long-term actions to manage outdoor recreation and access.**

We encourage DNR to create opportunities for collaboration among state and federal agencies, Tribes, and organizations representing the recreational user community to develop recreation management strategies that safeguard resources critical to Indigenous practices and lifeways. We believe that recreation can be managed in a way that respects Tribal rights and protects vital resources, while also ensuring continued public access to opportunities to experience the outdoors.

Partner Engagement and Collaboration

We are pleased to see that the OARR plan acknowledges the importance of working closely with partner organizations. Our organizations deeply value our longstanding partnerships with DNR. One of the 6 goals of the strategic plan is to “Respect Reserved Rights and Improve Collaboration in Recreation Planning,” which includes engaging proactively with partners.⁷ We would like to highlight several proposed action steps in the plan that we believe will deepen and strengthen our ability to work together proactively to manage sustainable recreation on DNR-managed land. These include:

- Develop and pilot a statewide recreation management advisory body to foster two-way communication between DNR and partners in coordination with STRII.
- Improve early and transparent public messaging through existing DNR communication tools, and in coordination with partners, to communicate why DNR closures or access changes to recreation areas are needed to achieve DNR’s mission and obligations.
- Collaborate, learn from, and provide paid partnership opportunities for partners that have expertise in removing barriers to access.
- Proactively communicate legislative funding proposals and resource and capacity needs to Tribes and recreation partners through a recreation advisory body.

Recreation and Visitation

Statements in the plan suggesting that recreation has grown too quickly may lead readers to assume a simple, predictable relationship between increased visitation and recreational impacts. **It is important to recognize that the relationship between visitation and environmental or social impacts is not linear.** Recreational impacts are influenced by a variety of factors, including the type of visitors, individual behaviors, seasonality, existing infrastructure, use levels, management actions, and more. These impacts are localized, depend on specific conditions at particular sites, and are highly dependent on various management actions making it impossible to accurately generalize the effects of statewide visitation trends on DNR lands as a whole. While it may be tempting to assume that visitation should be reduced to

⁶ OARR, p. 7

⁷ OARR, p. 30

a certain capacity to mitigate impacts, the reality is more complex and extensively covered in the Interagency Visitor Use Management Council's Visitor Use Management Framework.⁸ Public behavior can be positively influenced through modification of use or visitor behavior, improved infrastructure and site design, targeted education and communications, setting visitor expectations and enforcement of regulations, and restoration of damaged areas. The plan's blanket assertions that lands have been "overwhelmed" by increased visitation may overlook the potential for positive, collaborative solutions that address both recreational demand and resource protection. These solutions should draw from the literature on visitor use management and the knowledge of recreation planners.

Additionally, the writers of this document assume that readers of the strategic plan have a shared definition of recreation. More clarity would be useful, as the draft document is occasionally inconsistent in what types of activities fit within the term "recreation" and tends to equate all "visitation" with "recreation." For example, the plan claims that "DNR-managed lands have been overwhelmed by visitors, which has led to overcrowding, development of unsanctioned trails, litter and dumping, disruptive effects to wildlife and natural ecosystems, and other resource damage."⁹ This statement suggests that criminal activity has increased because more people spent time recreating outside in the last 5 years, but that is not necessarily accurate. In fact, we have observed that many locations with high visitor use and a consistent presence of recreational activities are less attractive as locations for those engaged in illegal activity. People who choose to leave personal property or hazardous materials on DNR properties are generally doing so to avoid paying to dispose of their waste properly. They are not visiting DNR sites to recreate.

Our requests:

- Define "recreation" at the beginning of the plan and on the definitions page.
- In Strategy 5 and Strategy 6, the plan specifies that staff will "work across DNR programs" to address unsanctioned use, illegal dumping, vandalism, and unhoused individuals living on DNR lands "whether driven by recreation or other outdoor activities."¹⁰ We ask that the final plan adds more language in the narrative section of the draft plan that explains how activities that are not primarily associated with recreation fit within this strategic plan.
- Review statements in the plan that equate the levels of use with the amount of impact. Emphasize the need to improve resource conditions. Avoid implying that a simple relationship exists between use levels and impacts at sites across the state.
- It would help to see the visitation data that DNR has used to understand trends in recreational use. Could you please share the data of visitation before, during, and after the pandemic?

Equitable Access

⁸ Interagency Visitor Use Management Council, Visitor Use Management Framework, July 2016.

⁹ OARR, p. 4

¹⁰ OARR, p. 6

Our organizations commend the agency for working to improve equitable access to DNR-managed land. We support the agency's plan to "learn about lived experience and/or compile existing research that will help DNR recreation staff and other DNR divisions better understand the experiences of recreationalists from communities underrepresented in the outdoors" and to "develop strategies to improve the accessibility of DNR-managed lands."¹¹ As part of this strategy, we recommend that the DNR invest in an assessment of why specific communities are or are not using specific recreational resources.

The plan states that the agency will develop an "interdependent system of strategies" in order to ensure that the DNR's Recreation Program is responsive to the needs and experiences of communities who are disproportionately impacted by barriers to outdoor recreation and access.¹² **We believe the proposed system of strategies will improve equitable access to recreation.** However, we urge the agency to go one step further and commit to piloting or otherwise operationalizing these strategies. Equity work has a higher likelihood of success when direct, data-driven action is taken to remove barriers to access to an area. We urge DNR to pilot specific components of these strategies in one or more DNR regions. Additionally, DNR should commit sufficient staff time and resources, and work closely with partner organizations, to prioritize and undertake this work.

We noticed that strategy 4 within the strategy topic "Planning Tools and Processes" states an ongoing action in which DNR will "coordinate with public transit partners to ensure that access to DNR-managed lands is considered in transit master plans."¹³ We believe this should be an agency priority as it directly connects to and impacts equitable access. We encourage DNR to actively collaborate with public transit agencies, such as King County Metro, to identify opportunities to integrate public transit access to recreation sites into transit master plans. Many recreationists currently rely on public transit opportunities such as Trailhead Direct to access recreation opportunities on DNR-managed land.

Funding

The OARR plan provides an easily digestible explanation of the DNR Recreation Program's funding structure and provides a clear picture of the current funding gap. The plan states, "DNR's conservative estimate is that a minimum of \$9 million more is needed per biennium to keep up with the cumulative cost of maintenance needs on each of the agency's landscapes that offers developed recreation opportunities."¹⁴ The \$9 million gap does not include the costs associated with expanding education and enforcement at DNR sites as envisioned in the plan. Our organizations value the efforts of DNR staff in arriving at this conservative estimate. We know that recreation funding is heavily dependent on competitive grant dollars. Our organizations consistently advocate to the legislature to fund DNR's recreation program and will continue to explain the importance of investing in the agency's programs. The OARR plan envisions adding additional money into the DNR's budget through novel funding mechanisms,

¹¹ OARR, p. 45; OARR, p. 46

¹² OARR, p. 44

¹³ OARR, p. 38

¹⁴ OARR, p. 21

such as private donations. We value the DNR staff's openness to trying new things. However, we believe that the simplest solution would be for the Legislature to increase base funding in recognition of the tremendous value the public derives from DNR lands.

Our request:

- The plan states that “To implement all actions, DNR will first conduct an assessment of funding needs and capacity to identify funding shortfalls and a plan for pursuing additional funding.”¹⁵ We ask that nonprofit partners and others in the recreation community are included in the process of developing this proposed new funding plan.

Additional Comments

- Our organizations would appreciate the opportunity to learn more about DNR's proposed ongoing action to “work with DNR's Timber Sales program to audit road inventory and usage by recreational visitation to develop management and funding options for road maintenance needs.”¹⁶ Well-maintained roads are critical to ensuring safe and reliable access to recreational experiences. We urge DNR to include partners, such as our organizations, in conversations and planning efforts around road maintenance. We represent tens of thousands of recreationists who frequently recreate on DNR-managed lands and waters and can offer valuable insights to support this important access work.
- The OARR plan states that “DNR offers opportunities for recreation across more than 5.6 million acres – on which visitors can enjoy hiking, kayaking, mountain biking, swimming, horseback riding, fishing, paragliding, rock climbing, and off-road vehicle riding.”¹⁷ We urge DNR to add winter recreation activities, such as snowshoeing, to this list. The subalpine meadows and upper elevations managed by DNR including in the Mt. Si NRCA and Middle Fork NRCA are critical areas for winter recreation in the state of Washington. We hope the plan considers management actions that seek to provide equitable and sustainable access to winter recreation opportunities.
- Strategy 5 contains what we assume to be an unintended association between partner groups and illegal acts. One of the ongoing actions is to “proactively communicate with partners and update internal policies to discourage illegal use, including building and usage of unsanctioned user-built trails.”¹⁸ The way the statement is currently written makes it sound like partner groups are responsible for the construction of unsanctioned trails. The intended meaning of this action would be more clear if the final draft broke apart the idea of updating “internal policies to discourage illegal use” from DNR's intention to “communicate with partners.” Perhaps the plan envisions working with partners to communicate to the public so that we might all work together to discourage the creation of illegal and unsanctioned trails.

¹⁵ OARR, p. 7

¹⁶ OARR, p. 36

¹⁷ OARR, p. 14

¹⁸ OARR, p. 41

Thank you for considering our input. We look forward to seeing the final OARR strategic plan and to continuing our partnerships with DNR. Please contact our organizations if you have any questions or would like to further discuss our feedback and perspectives.

Sincerely,

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