



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,

Thank you for the opportunity to submit comments on the Washington State Department of Natural Resources' Outdoor Access and Responsible Recreation Strategic Plan (OARR). Our 16,000+ members regularly engage in active outdoor recreation throughout WA Department of Natural Resources (DNR)-managed land.

The Mountaineers applauds 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 The Mountaineers thoughts on components of the draft plan and contains some of our organizational thinking about the complex challenges the strategic planning process seeks to address. For clarity, this letter is organized thematically.

Our Organization

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is "to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond." The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,200 skilled volunteers lead 3,200 outdoor education trips and courses annually for 16,000+ members. Our youth programs provide over 15,000

opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, and protects the outdoor experience for current and future generations.

Our ability to teach sustainable recreation skills relies on access to land managed by the Washington Department of Natural Resources. We have a Land Use License agreement with the agency that allows our community of volunteer leaders to teach critical outdoor education skills to over 5,000 students in areas ranging from the Tiger Mountain and Raging River State Forests to the Mount Si NRCA. Many members of our community participate in stewardship activities on DNR-managed land.

The Mountaineers has also been an active participant in the development of the OARR plan. Our organization and members of our community have shared our thoughts and experiences with DNR throughout the planning process in hopes of strengthening this document. Thank you for the opportunity to provide further comment on and analysis of the OARR strategic plan.

Importance of Recreation on DNR-Managed Land

The Mountaineers applauds 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, 1,300 miles of trail, and 80 campgrounds that DNR manages are absolutely vital to outdoor recreational access.

Washingtonians experience a wide range of benefits from recreating on DNR-managed lands. Studies have shown that access to nature has immense personal wellness and overall 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

Additionally, recreation on DNR-managed land 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 expect that, as demand for outdoor recreation continues to grow in Washington, so too will the economic benefits of recreation.

The Mountaineers appreciates 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.

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

Tribal Nations' Participation in Developing this Plan

The Mountaineers commends 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 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.

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.**

The Mountaineers encourages DNR to create opportunities for collaboration among state and federal agencies, Tribes, and nonprofit organizations 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, protects vital resources, and ensures continued public access.

Partner Engagement and Collaboration

The Mountaineers deeply values our longstanding partnership with DNR. We are pleased to see that the OARR plan recognizes the importance of partner organizations, and that the agency is committed to continuing to work closely with user groups like The Mountaineers. 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'd like to thank the agency for meaningfully engaging with our organization throughout the OARR plan development process.

We would also like to highlight several proposed action steps in the plan that we believe will deepen and strengthen our ability to work together. 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.
 - Our organization specializes in leading facilitated outdoor recreation experiences, often for groups that historically face barriers to outdoor recreation and access. We are glad that the agency plans to work with partners, like ourselves, who

⁵ OARR, p. 1

⁶ OARR, p. 7

⁷ OARR, p. 30

have expertise in providing equitable and accessible outdoor recreation opportunities.

Strategy Topics

The Mountaineers supports the goals and statewide strategies highlighted in the strategic plan. In this section, we highlight specific action steps within each of the 5 strategy topics that we support or seek clarity on.

Planning Processes and Tools

We are pleased to see that DNR is prioritizing filling data gaps regarding visitation levels and recreation-use impacts. Comprehensive recreation data will be critical in helping the agency and its partners develop effective planning processes to promote sustainable outdoor recreation and proactively plan for climate-related impacts to DNR-managed lands.

We particularly appreciate and support the following proposed near-term and ongoing actions:

1. Continued development of a centrally-managed trail data set that is publicly available for outreach and planning purposes, including an inventory of known undesignated trails. This will be an invaluable resource for our volunteer leaders and general community.
2. Create a public-facing tracking tool for new and proposed recreation planning and development projects. Access to DNR-managed land is critical to our community's ability to teach and learn sustainable outdoor recreation skills. As the agency carries out actions related to the strategic plan, which may involve closures, a public tracking tool for recreation development projects would allow our community to more effectively navigate potential changes to access.
3. In each DNR region, use the adaptive management framework for outdoor access and recreation planning to identify priority areas for new or updated management planning, including needed resources for successful implementation and projections for recreation demand over the next 10-20 years. Proactive planning is critical to ensuring sustainable recreation in the face of expected population growth and increased climate-related impacts.

We also want to highlight Strategy 4 - "Proactively Plan for Climate-Related Impacts to DNR-Managed Lands and Operations".⁸ As the impacts of climate change continue to intensify, it is imperative that the agency prepares for extreme climate-related events and implements climate-resilient infrastructure in order to mitigate the impacts of climate change on recreation and natural and cultural resources. We urge the agency to allocate the necessary resources to prioritize the following proposed ongoing actions:

1. Collaborate with DNR internal experts to conduct an assessment of climate risks, impacts, and mitigation efforts related to recreation operations and maintenance to inform climate mitigation measures.

⁸ OARR, p. 38

2. Assess recreation infrastructure to create a comprehensive inventory and improvement plan aimed at strengthening the resiliency of DNR's infrastructure to a changing climate.
3. Update facility and site design standards to incorporate climate-informed design for new and ongoing recreation projects.

One of the major impacts of climate change is intensifying wildfires, which increasingly affect the outdoor recreation experience. We encourage DNR to more thoroughly incorporate outdoor recreation into the design, implementation, and monitoring phases of forest restoration projects, as well as consistently restore recreation infrastructure as part of post-fire restoration and rehabilitation projects.

Additionally, The Mountaineers 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."⁹ Well-maintained roads are critical to ensuring safe and reliable access to recreational experiences. The Mountaineers hope DNR prioritizes road maintenance needs, and we ask the agency to reach out to additional partners, like The Mountaineers, to determine which roads to prioritize for maintenance and repairs. Our community frequently recreates on DNR-managed lands and can offer valuable insights to support this important access work.

We also urge the agency to prioritize the development of geographic information system (GIS) tools to monitor and track the impacts of recreation and recreation-use levels on DNR-managed land. The strategic plan states that "promoting sustainable, equitable, and safe outdoor recreation while conserving resources and strengthening climate resilience will require enhanced planning frameworks and comprehensive data."¹⁰ The use of GIS to monitor recreation use-levels on agency land is needed to establish a comprehensive and fluid data set that will allow the agency to track recreation impacts and visitation patterns over time. **This is especially important as visitation levels do not always have a linear relationship with impacts on the landscape.**

Resource Protection, Enforcement, and Public Safety

We applaud the agency for "using education as a preferred first level of corrective action when engaging with visitors."¹¹ As DNR works to address and mitigate resource damage on its managed lands, we hope the agency continues to adopt an "education-first" approach.

We also commend the agency for recognizing that resource damage is driven by a suite of factors, including high visitation, illegal dumping, and unsanctioned trails. We hope the agency develops a system to better track the drivers of resource degradation to

⁹ OARR, p. 36

¹⁰ OARR, p. 34

¹¹ OARR, p. 41

determine what user groups or actions are most responsible for damage to DNR-managed lands.

Equitable Access

The Mountaineers commends 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."¹² 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.¹³ **We believe these strategies will improve equitable recreation access.** However, we hope the agency goes one step further and commits 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.

Education and Stewardship

The Mountaineers have a deep and long standing partnership with DNR's Recreation Program. We have a Land Use License agreement with the agency, and members of our community consistently participate in stewardship activities on DNR-managed land. We are pleased to see that the agency is continuing to prioritize partnerships with user groups like The Mountaineers and is seeking to enhance this work in key areas, including working with partners to develop and implement educational opportunities for visitors to DNR-managed lands. Action steps including working with Tribes to incorporate culturally relevant interpretive signage and collaborating with the STRII to explore other opportunities for culturally-relevant education resources will be particularly useful in helping the agency protect its cultural and natural resources.

We also want to highlight the agency's plan to implement education focused on climate resiliency and safety. As the impacts of climate change continue to intensify in Washington, we expect unsafe conditions and recreation closures to become more commonplace. Proposed actions including improving communications tools to track and

¹² OARR, p. 45; OARR, p. 6

¹³ OARR, p. 44

inform visitors of extreme climate events, including wildfires, will help our volunteer leaders and general community plan rewarding and safe outdoor experiences.

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 writes, "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. The Mountaineers appreciates the work that DNR staff have done to reach this conservative estimation. We know that recreation funding is heavily dependent on competitive grant dollars. Our organization consistently advocates 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, 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 The Mountaineers asks that nonprofit partners and others in the recreation community are included in the process of developing this proposed new funding plan.

Additional Comments

Facilitated Outdoor Recreation

The plan does not address the myriad benefits of facilitated outdoor recreation.

Facilitated or guided outdoor recreation has a number of unique benefits, including:

- Education - facilitators teach proper technique, leave-no-trace policies, history of area, and respect for the land.
- Equitable Access - Facilitated outdoor recreation has a proven track record of reducing barriers many diverse groups face when attempting to recreate outdoors, including providing access to transportation, gear/equipment, and the knowledge needed to successfully complete a trip.
- Conservation - Public lands are the "infrastructure" organizations like The Mountaineers depend upon to lead trips, making us important advocates for

¹⁴ OARR, p. 21

¹⁵ OARR, p. 7

sustainable use, good outdoor ethics, and long term stewardship of our public natural resources.

Facilitated outdoor recreation would directly help the agency address complex challenges including the growing demand for recreation and increasing concerns about recreation impacts, and help the agency meet its aspirational goals to improve equitable access, cultivate a stewardship and responsibility ethic through education, and conserve and enhance the natural environment. Facilitated access is key to building a sustainable and equitable future for recreation on DNR-managed lands. We ask the agency to address the role of facilitated recreation in managing recreation, improving equitable access, and protecting natural and cultural resources in the final plan. **Additionally, we urge the agency to identify concrete opportunities within the final OARR plan for DNR to collaborate with organizations, such as The Mountaineers, that specialize in facilitating outdoor recreation. These partnerships can play a key role in achieving the plan's goals and actions, including:**

- Collaborate, learn from, and provide paid partnership opportunities for partners that have expertise in removing barriers to access.
- Cultivate a stewardship and responsibility ethic through user education and engagement.

We also encourage DNR to designate its Recreation Permit Fees Workgroup as a near-term action in the final plan. DNR's new authority to charge fees for recreational use permits for groups led by commercial entities, such as The Mountaineers, will help the agency better manage its resources by enhancing the consistency, predictability, and transparency of the agency's permitting system. The Mountaineers testified in favor of DNR's ability to charge these fees before both House and Senate committees, and our organization will actively participate in DNR's workgroup to help the agency's project team develop recommendations on permit fee types and amounts, and on the permit application process. Including the Recreation Permit Fees Workgroup in the final OARR plan will demonstrate DNR's commitment to working with partner organizations to undertake this important work.

Winter Recreation

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."¹⁶ We urge DNR to add winter recreation activities, such as snowshoeing, to the list. The subalpine meadows and upper elevations in areas including the Mount 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.

¹⁶ OARR, p. 14

Transportation and Accessibility

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.”¹⁷ **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 members of our community rely on public transit such as Trailhead Direct to reach outdoor recreation destinations.

The Relationship Between 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. **The Mountaineers wish to remind land managers 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, and more. These impacts are localized and depend on specific conditions at particular sites, 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 a certain capacity to mitigate impacts, the reality is more complex. Public behavior can be positively influenced through improved infrastructure, targeted communications, enforcement of regulations, and restoration of damaged areas. The plan’s blanket assertions that lands have been “overwhelmed” by increased visitation during the Covid-19 pandemic may overlook the potential for positive, collaborative solutions that address both recreational demand and resource protection.

The writers of this document assume that readers of the strategic plan have a shared definition of recreation, but more clarity would be useful. 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.”¹⁸ This type of statement is misleading. It falsely suggests that illegal activity is a function of DNR lands receiving a higher number of visitors. One might assume that criminal activity has increased because more people spent time recreating outside in the last five years, but this is not necessarily accurate. People who choose to leave personal property or hazardous material on DNR properties are generally doing so to avoid paying to dispose of their waste properly. They are not visiting DNR sites to recreate. In some places increased visitation may actually deter illegal activity.

¹⁷ OARR, p. 38

¹⁸ OARR, p. 4

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”. 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 instead of implying that there is a simple relationship 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?

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

Sincerely,

A handwritten signature in black ink, appearing to read "Betsy Robblee", with a stylized, flowing script.

Betsy Robblee
Conservation & Advocacy Director
betsyr@mountaineers.org