

OUTDOOR ALLIANCE WASHINGTON

February 28, 2022

Kelly Susewind, Director
Washington Department of Fish and Wildlife
PO Box 43141
Olympia, WA 98504-3200

Comments submitted electronically to 10YearRecStrategy@PublicInput.com

Re: WDFW 10-year recreation strategy

Dear Director Susewind:

Thank you for the opportunity to provide comments on the Washington Department of Fish and Wildlife's draft 10-Year Recreation Strategy for WDFW Managed Lands. Outdoor Alliance Washington is pleased that WDFW is working to integrate recreation into its strategic planning efforts. This proposed strategy is a wonderful first step in building sustainable recreation networks on WDFW-managed lands.

We offer our broad support of the goals and six strategic initiatives of this plan. We offer our appreciation for WDFW's careful consideration of tribal interests within this strategy. Washington's tribes have used and cared for these lands since time immemorial, and their strong inclusion in this process and the strategies that this document sets forth are a representation of the well-thought collaboration WDFW strives to provide.

Outdoor Alliance Washington is a network of member-based organizations representing the human powered outdoor recreation community in Washington and the thousands of Washingtonians who climb, paddle, mountain bike, hike, and enjoy coastal recreation on our state's public lands and waters.

Our members enjoy the numerous recreational opportunities available on WDFW lands, including climbing at Frenchman Coulee, hiking at Ancient Lakes, mountain biking in the Methow Wildlife Area, surfing at Westport, and whitewater paddling on the Klickitat River. We agree with the strategy's conservation and recreation principles and support the goal of balancing conservation and recreation.

In this letter, we outline support for the plan and also our feedback for this 10-year strategy. Our major concerns are centered on ensuring that stakeholder input is considered in future planning decisions, the use of permitting systems as a potential recreation planning tactic, and the strategy's language that



alludes to trails and roads being considered in similar fashions with regards to travel management and education and engagement. Specific feedback on the draft strategy is below, organized by each strategic initiative within the plan.

Goals

We recommend the 10-year strategy's goals be broadened to address the need to increase, improve, and diversify recreation access on WDFW lands. To offer "quality recreation opportunities on WDFW-managed lands," recreation opportunities will need to keep up with Washington's growing and changing demographics, increasing recreation use, changing recreation trends, and curtail ongoing informal use in sensitive habitats as a result of lacking recreation infrastructure.

Use and Impact Monitoring

We appreciate the department's focus on monitoring recreation impacts as a key part in informing planning and management decisions. Understanding the predictability of the number of anticipated visitors will produce a greater understanding of the uses of WDFW-managed lands. We recommend that these data be referenced in future planning decisions. We also welcome the strategy's focus on the need for greater coordination and collaboration among public land managers, and encourage shared efforts to monitor visitation and recreation impacts.

Many of the impacts as listed in Table 1 of the 10-year recreation strategy indicate the negative associations with recreation use on WDFW-managed lands. The report acknowledges the well-analyzed economic and health benefits of outdoor recreation in Washington state. We encourage the department to ensure that *positive impacts* of recreation are presented and considered when making future decisions regarding recreation planning as well.

We encourage the department to consider utilizing its suggested ambassador program in section five (education and engagement) to be a part of data collection efforts. Partners like Washington Trails Association have engaged in supporting data collection projects for state agencies like the Department of Natural Resources and federal agencies such as the United States Forest Service to support recreation use impact research and assist in things like grant applications.

Recreation Planning

We appreciate this section's forward thinking in limiting recreation impacts by considering accommodations where it is compatible with conservation and other management priorities.

This section references permitting systems as potential strategies the department may use in recreation planning efforts. Effective visitor use management recognizes a continuum of management strategies and actions that can be used to redistribute types and amounts of visitor use that can be implemented to reduce, maintain, or allow for increase in visitor use levels. The key to effectiveness is identifying desired conditions and visitor capacity and then evaluating the potential effectiveness of different management strategies; permits are among the most administratively burdensome of these strategies. Immediately proceeding to a permit-based system without taking a holistic approach to visitor use



management is inappropriate. We encourage the department to strongly engage stakeholders and the public in any process that considers permitting as an option. We believe that permitting should only be utilized as a last resort when all other management techniques and tools have first been utilized.

Permitting systems can create inequities by:

- Requiring a fee that disproportionately favors people who can afford to pay for the privilege of visiting public lands that should be accessible to everyone.
- Requiring advanced planning, which is a benefit only certain people can take advantage of due to varying degrees of flexibility in schedule. This level of planning also disproportionately favors people working jobs with more flexible and reliable schedules or benefits.
- Removing spontaneity to outdoor activities. As mentioned above, reservation systems work best for people who can plan for their visits. They also remove opportunities to enjoy the outdoors for those who may be passing by WDFW managed lands and want to stop for a visit or who have unexpected time off.
- Making access a factor of information dissemination. Only those who have time or prior knowledge to research these destinations will have the opportunity to book a reservation, while others who may not have equal access or familiarity with the area will not do so.
- Requiring access to technology. Many permit systems require setting up user accounts, entering lottery systems, or being online at midnight to make a reservation or pick up a cancellation. Some individuals with advanced programming skills have even developed scripts to automate and receive immediate notification of available permits.

We encourage the department to continue providing further details on its statewide land classification system. Further details on this classification system should indicate how recreation will be impacted in each classification, and what recreation would be allowed in each classification.

Rulemaking

We appreciate the strategy's care in identifying undesignated routes and considering them for either closure or designated public use. This could however have a significant impact on access routes used by climbers to reach a crag, boaters and anglers who access waterways through informal social trails, hikers reaching the top of a mountain peak, and backcountry skiers who utilize a skin track. As the department develops a more detailed strategy for conducting this work, we encourage the department to utilize impact data (mentioned in the use and impact monitoring section) and also consult with recreationists to help inform its decisions.

We are encouraged with the department's interest in developing area-specific rulemaking approaches and appreciate the intent to engage with the nuance and differences among Washington's watersheds and forests. Clear decision making guidance for rulemaking will be appreciated, as all recreation will have some impact on habitat. Clarity on how WDFW will determine what levels of recreation are acceptable in order to meet the goals of this 10-year recreation strategy will be appreciated.



We hope the process for developing these area-specific rules will include stakeholder and partner input. Please consider ensuring that area-specific rules allow for continued analysis and revisions as climate impacts continue to change the outlook of our state's public lands in the future, and evolving recreation equipment and technologies continue to change use patterns and interest.

Similarly, we also encourage the department to consider stakeholder and public input when deciding where camping is allowed or prohibited. Restrictions on dispersed camping can also create inequities, since they require advanced planning, remove spontaneity, and make access a factor of information dissemination.

Travel Management

We are encouraged by the department's interest in establishing a multimodal travel management program. We offer the following guidance as you continue to develop these plans:

- As much as possible, de-couple road and trail management plans from each other. Roads and trails do not create the same level of environmental impact, nor do they necessarily create the same levels of user conflict. While the strategy mentions that trails are "generally associated with negative effects for terrestrial and aquatic ecosystems," these impacts are not consistent between roads and trails. Trail design usually considers these impacts through SEPA processes and works to reduce them as much as possible. A well designed trail can greatly reduce impacts on the landscape by keeping recreational users on designated routes and away from areas of ecological or cultural significance. Consider allowing for SEPA processes to be the necessary guidance to ensure that trail networks are built sustainably to reduce impacts.
- We encourage the department to provide more guidance on the criteria it may use when addressing wildlife and habitat impact within travel networks and the access that employees, partners, contractors, and the public may need. Mitigating linear miles and network densities as criteria may not represent a full picture of the level of service delivery the department should provide.
- We encourage the department also to provide more guidance on how it will consider trail network connectivity within its management plans. Connectivity is a key principle in providing high quality user experience, and also in improving dispersement amongst recreationists and thus reducing impact.
- As the department revises the recreation strategy, it would be helpful to clarify the definitions of "undesigned" trails and "illegally created" trails. Considering the department's original constituency of hunters and fishermen, many of the routes and waterway access points they have used for decades are not formal designated trails. We also encourage the department to share more information on the process for closing these travel routes and evaluating formal designation. As this process moves forward, please consult with recreationists and stakeholders as much as possible in making these decisions.

We appreciate the careful thought put into guidance on how the department will undergo the development of a trails policy and associated procedures. We encourage the department to leverage the



depth of expertise and experience available to them through partner organizations in the further development of their trails policies.

Education and Engagement

We commend the department's efforts in engaging in listening sessions with the public to facilitate the reduction of barriers to making WDFW lands more welcoming for diverse visitors of all ages and backgrounds. Like you, we believe in the transformative power of the outdoors to create future conservationists and stewards.

Capacity and Funding

We commend the department's inclusion of expanding staff capacity and pursuing master agreements as strategies to address the department's needs associated with implementing this strategy. Outdoor Alliance member organizations have had success implementing these agreements with government entities and we encourage you to continue to leverage partner support as much as possible in the implementation of these tactics.

While this section references staffing capacity to address regional planning, data systems and law enforcement, we encourage the department to consider staffing capacity that is solely dedicated to conduct community engagement with local and regional communities that engage with the land. These positions can offer the extra support needed to ensure that planning processes continue to run smoothly as you implement more recreation opportunities on your lands.

We thank you again for the opportunity to provide our feedback with WDFW on this 10-year recreation strategy. The Department's care and engagement with partners and stakeholders in this process has been greatly appreciated and we look forward to working with WDFW in the future.

Best Regards,



Betsy Robblee
Washington Policy Manager
Outdoor Alliance Washington

Cc:

Ty Tyler, Stewardship Director, Access Fund

Thomas O'Keefe, Pacific Northwest Stewardship Director, American Whitewater

Yvonne Kraus, Executive Director, Evergreen Mountain Bike Alliance

Gus Gates, Washington Policy Manager, Surfrider Foundation

Betsy Robblee, Conservation and Advocacy Director, The Mountaineers

James Moschella, Policy and Planning Manager, Washington Trails Association

