

DEPARTMENT OF FISH AND WILDLIFE

South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720 Telephone: (509) 575-2740 • Fax: (509) 575-2474

December 24, 2020

Melinda Posner, Parks Planner Washington State Parks P.O. Box 42650 Olympia, WA 98504-2650

RE: WDFW Comments on CAMP Alternatives for Ginkgo Petrified Forest State Park

Dear Ms. Posner,

Thank you for the opportunity to provide comments to Washington State Parks ("Parks") on the CAMP Alternatives for the Ginkgo Petrified Forest State Park ("the Park"). The Park's location makes it a high priority to help preserve, perpetuate and restore shrub steppe and riparian habitats that fish and wildlife species rely on. Its location also provides an exceptional opportunity to educate the public about the unique and shrinking shrub steppe plant and wildlife community. Washington Department of Fish and Wildlife (WDFW) recommends consideration of using the Ginkgo Park as a shrub steppe ecology and conservation education center. WDFW would be an eager partner if Parks is interested discussing this idea further.

WDFW is providing input to help the Park provide sustainable recreation while maintaining fish and wildlife populations and protecting habitat. In addition, WDFW manages land adjacent to the Park and is providing input that will help coordinate recreation management across ownerships to meet both state agencies' missions.

As part of the planning process for the Park, WDFW previously submitted comments highlighting fish and wildlife resources to be considered for incorporation during Phase 1 of the CAMP process in February 2020. The comments in this letter center around the current Phase 2 alternatives and their impacts on fish and wildlife, their habitats, and adjacent WDFW managed lands. WDFW would like to voice our support for elements in Alternative 1 due to the emphasis on natural landscape preservation. However, WDFW is supportive of including some elements from Alternatives 2 and 3 as referenced by our comments below if they can be managed to be consistent with natural resource protection.

1. Motorized Roads in the Ginkgo North Area. WDFW supports alternatives that maintain motorized use on the existing through road that accesses the WDFW green dot road management system. WDFW is concerned with possible new motorized roads/trails that would lead to non-green dot roads on WDFW managed land in the Ginkgo North area, and encourages the Park to provide enough signage, enforcement and management. We

appreciate the efforts to restrict motorized use of the Rocky Coulee Road, that were impacting Park's land and adjacent WDFW managed lands.

2. Recreation Management. WDFW appreciates Parks mission to connect people to Washington's diverse natural and cultural heritage. At the same time, we recommend developing management actions to protect and restore habitats impacted by recreation activities. Recreation development can impact adjacent WDFW managed lands, fish and wildlife habitat, and cultural resources. Increased recreation can lead to wildlife disturbance and loss of habitat through either direct clearing or indirectly through increased fire risk or unauthorized habitat damage.

Infrastructure should be managed for sustainable recreation to protect priority habitats and culturally significant areas; using proposals outlined in Alternatives 2 and 3 to upgrade trails and roads to be resilient against impacts caused by recreational use. For example, using roads and primitive trails during wet seasons leads to resource damage, as fragile soils experience erosion and deterioration, and users navigate new terrain to avoid damaged areas contributing to road/trail widening and braiding. Motorized travel on closed roads and off-road travel should be managed to prevent fire potential and increased weed dispersal. WDFW encourages the development and implementation of a weed management plan, as well as a restoration management plan to restore native plant communities in disturbed areas and areas impacted by wildfires.

WDFW asks for advanced and ongoing coordination with Parks as trails in the Gingko North area are developed, as the proposed trail routes may lead to WDFW-managed lands. It is important that recreation management objectives align when it will directly impact lands managed by either agency. Currently WDFW manages e-bikes as a motorized use in the green road dot system and would also ask for continued coordination on any development that would direct e-bikes to non-green dot roads on WDFW managed lands. We support enhancing trails so that they are sustainable, properly located, and managed for the appropriate recreation use.

Alternative 2 and 3 list proposed intensive recreation expansion to the north of the current Wanapum Recreation Area, including potential cabin development and expanded tent and RV camping. That expansion area is currently used by shrub steppe obligate wildlife and the aquatic areas are mapped as priority waterfowl habitat with thousands of waterfowl congregating during migration and winter. With Vantage Bay Planned Unit Development being built in the private property to the north of the Wanapum Area along Huntzinger Road and displacing some of this wildlife, further development of recreation in this area is likely to cause substantial displacement of these priority wildlife species.

3. <u>Long-term Boundary Area.</u> WDFW is not in support of the long-term boundary area adjustment identified in Alternative 1 for WDFW lands in Township 17, Range 22, Section 1. These lands are already owned by WDFW and managed for the protection of fish and wildlife resources. We value our relationship and coordination with Parks and seek to continue to coordinate on boundary and management issues as they may arise.

WDFW is supportive of other long-term boundary adjustments if the management is consistent with protection of fish and wildlife resources.

- 4. Management of Grant County PUD areas by Parks. Currently WDFW works with Grant County Public Utility District (PUD) to ensure that fish and wildlife habitat at "The Cove" are managed properly under the Grant County PUD Wildlife Habitat Management Plan. If management were to change, WDFW recommends incorporating the same protection measures for fish, wildlife, and habitats which are outlined in the current PUD Habitat Management Plan.
- 5. <u>Cultural Resources.</u> WDFW did not see reference to the unique cultural resources at The Park and suggests developing a protection plan in consultation with affected Tribes.
- 6. <u>Specific Land Use Policies</u>. WDFW recognizes that specific measures for land management will be developed at later stages in this process. However, WDFW provided specific recommendations to protect and restore shrub steppe and riparian ecosystems. Those elements include cultural resources, habitat outreach, habitat restoration, recreation management, and weed management plans.

Thank you for the opportunity to engage and provide comments on this planning effort. WDFW remains a willing partner to ensure that Ginkgo Petrified Forest State Park remains quality habitat for fish and wildlife species so the public can gain an appreciation for these resources. As a partner, WDFW would be happy to collaborate with you on development of those plans, especially the possibility of developing a shrub steppe education center. Please contact my staff if you have any questions or to further elaborate on any subjects mentioned in this letter:

Scott Downes, Habitat Program Area Habitat Biologist (509) 607-3578 Scott.downes@dfw.wa.gov

Melissa Babik, Lands Division LT Murray Wildlife Area Manager (509) 899-9686 Melissa.Babik@dfw.wa.gov

Sincerely,

Mike Livingston Regional Director

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Washington Department of Fish & Wildlife, South-Central Region

Cc: Elizabeth Torrey, WDFW
Melissa Babik, WDFW
Ross Huffman, WDFW
Scott Downes, WDFW