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. **Long-term Boundary Area.** 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. **Cultural Resources.** 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. **Specific Land Use Policies.** 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  Melissa Babik, Lands Division  
Area Habitat Biologist  LT Murray Wildlife Area Manager  
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Scott.downes@dfw.wa.gov  Melissa.Babik@dfw.wa.gov

Sincerely,

Mike Livingston  
Regional Director  
Washington Department of Fish & Wildlife, South-Central Region

Cc: Elizabeth Torrey, WDFW  
Melissa Babik, WDFW  
Ross Huffman, WDFW  
Scott Downes, WDFW
December 31, 2020

Melinda Posner
Project Lead
Washington State Parks and Recreation Commission
PO Box 42650
Olympia, WA 98504-2650

Dear Ms. Posner,

We, the Kittitas County Board of Commissioners, thank you for your work and wish to provide comment on the proposed CAMP Alternatives under consideration for Ginkgo State Park.

After review of the three options, we find that Alternative 3 (Trail Emphasis Theme) is the preferred alternative for this Board. While Alternative 3 would maintain present road access, both Alternatives 1 and 2 would result in diminished or eliminated motorized access opportunities to the Whiskey Dick and Quilomene Wildlife Areas. This is critical as current access provides the only motorized point of egress during winter WDFW closures. Having previously passed Resolution 2019-061 entitled “No Net Loss for Public Access on Public Roads”, this Board has maintained a core value of preserving motorized access, whether by existing or new roads, to county geographic areas at their current service levels. Therefore, we find Alternative 3 to be the only supportable option.

We also note with interest your apparent intent to develop a broader approach to recreation management across the entire Wanapum Pool area, specifically by identified areas currently administered by Grant Public Utility District (GPUD) as having joint management potential. The Vantage area is a historically underserved rural community heavily dependent on tourism. Given the recent renewed focus on improving the Beverly Bridge to improve the Palouse to Cascades State Park Trail and new housing development currently underway north of Wanapum State Park, this Board believes coordination amongst your agency, GPUD, and others is critical. Kittitas County is interested in developing a shared vision for the greater Vantage area to not only provide a top recreational destination, but also for those residents economically dependent on consistent visitor use.

Thank you again for the opportunity to provide comment on this plan. We look forward to our continued work together in this area and others throughout Kittitas County.

Sincerely,

Cory Wright
District One

Laura Osiadacz
District Two

Brett Wachsmith
District Three
December 28, 2020

Melinda Posner, Parks Planner
Project Lead
P.O. Box 4260
Olympia, WA 98504

RE: Ginkgo/Wanapum C.A.M.P. Alternatives

Ms. Posner,

Kittitas County Public Lands Advisory Committee appreciates the opportunity to review the Ginkgo/Wanapum C.A.M.P. Alternatives provided through the public planning process. The committee supports the implementation of Alternative 3. This is the only option provided which maintains access to the WDFW Whisky Dick Wildlife Area.

On June 9, 2016 the Kittitas County Board of Commissioners Adopted Resolution 2016-076 approving a county recreation plan. The Kittitas County Park, Recreation, and Open Space (PROS) Plan under Policy 6.5.1 states, “Coordinate and support a comprehensive system of off-road 4-wheel drive and all-terrain vehicle trails and backcountry roads that access scenic, environmental, historic, and open space attributes throughout Kittitas County expanding and linking existing trail systems in the urban and upper county areas into area-wide networks including the Wenatchee National Forest, Teanaway Community Forest, Naneum Ridge State Forest, LT Murray, Oak Creek, Wenas, Colockum, and Whiskey Dick Wildlife Area.

On March 25, 2019 the Kittitas County Board of Commissioners adopted Resolution 2019-061. This is a position statement titled, “No Net Loss for Public Access on Public Roads”. This resolution establishes that to achieve “No Net Loss” on any established road or roads that are currently open which are permanently eliminated for the use of public travel by way of motorized transportation on public land or a public road should be replaced in the system by another road giving passage into the same geographical area.

There has been no recent evidence that has been provided to the public that shows a history of abuse or off-road driving. Furthermore, there has been no evidence that motorized vehicle drivers are responsible for stealing petrified wood, vandalizing, or committing other violations.

The Kittitas County Public Lands Advisory Committee’s By-Laws state, “Public lands are a vital community resource. The vision of the Public Lands Advisory Committee is to create cooperative relationships with public lands managers to ensure that public lands in Kittitas County provide access for the public and are sustainably managed for multiple uses while providing opportunities for outdoor recreation and economic benefit to County residents.” We stand by this statement and strongly encourage the Washington State Parks Department to adopt “Alternative 3: Trail Emphasis Theme" of the Ginkgo/Wanapum C.A.M.P. planning process alternatives.

Respectfully,

Laura Osiadacz
Public Lands Advisory Committee, Chair
TO: Melinda Posner, Parks Planner  
Project Lead  
P. O. Box 4260  
Olympia, WA 98504

SUBJ: Ginkgo/Wanapum C.A.M.P. Alternatives

Dear Ms. Posner,

After careful review of the three alternatives presented by Washington State Parks, the Kittitas County Field & Stream Club (KCFSC) officers and board members have found Alternative 3 to be the only acceptable one. It is the only option that preserves reasonable motorized access through the Recreation Drive gate. As you know, this dirt road provides the only year-round access to the WDFW Whisky Dick Wildlife Area. This access has been in use for at least the last 40 years. There is no recent evidence of abuse or off-road driving. Many of our members use this road regularly for recreational access, and there are still a few property in-holders inside the Wildlife Area whose access depends on this road also.

We have seen no evidence presented that would indicate that drivers are stealing petrified wood, vandalizing, or committing other violations. The road has served well for many decades, and could continue to do so for many more. Neither is there any need for any maintenance on this road.

The KCFSC is the oldest continuously operating sportsmen’s conservation organization in Washington State. We have been serving the outdoor recreationists here for over 100 years, and we take pride in our commitment to conserving the outdoor opportunities and resources of Kittitas County. We, the officers and board members, urge the Washington State Parks Department to adopt “Alternative 3: Trail Emphasis Theme” of the Ginkgo/Wanapum C.A.M.P. planning process alternatives.

Thank you for the opportunity to comment.

Bill Essman, President  
John Entwistle, Vice-President  
Crystal Smith, Secretary  
Gloria Sharp, Treasurer  
Steve Douglas, Past-President  
Board of Directors: Buzz Chevara, Aaron Kuntz, Jim Huckabay, Robert Weyna, Kevin Clements, Bret Hollar