

WDFW Response to public comments received during public review of the South Puget Sound Wildlife Area Management Plan draft under the State Environmental Policy Act (SEPA) – DNS 21-049 from September 14, 2021 until October 14, 2021.

	Comment	WDFW Response
1.	<p>The WDFW mission is “to preserve, protect and perpetuate the state’s fish and wildlife species, while also providing sustainable recreational opportunities that are compatible with fish and wildlife stewardship.” This is about balancing the recreational use of wildlife areas with ecological impacts and setting limits on acceptable change. However, the Recreation section of this plan only lists opportunities and does not mention what types and levels of recreation are sustainable or compatible with wildlife. The exception is the lone mention of pet-wildlife conflicts.</p> <p>The sensitive habitats and species will need more protection and some types of recreation will have to be removed from these areas and be relocated on other less sensitive areas. I have been told that the specifics of this issue are being delayed until the Statewide Recreation Plan is finished. I hope that the statewide recreation plan includes a summary of the latest research with regard to impacts of recreation on wildlife. Each wildlife area unit should be evaluated for impacts from recreation and then remedial strategies should be implemented.</p> <p>In the past few years, other issues like grazing and target shooting on WDFW lands were addressed separately and special rules were approved by the Fish and Wildlife Commission. I commented on those rules at that time. Most wildlife areas are open to dispersed target shooting according to the new rules. However, each wildlife area unit needs to be evaluated for closure areas that may be needed on a seasonal or year-round</p>	<p>The WDFW Recreation Strategy is expected to be available for public review in November 2021. The document is written at a higher level, and recreation plans will be developed for each wildlife area in the future. Much of the work will be done during the implementation phase of the plan. A pilot recreation planning process is starting in 2022 at the Methow Wildlife Area.</p> <p>WDFW will develop and implement a recreation planning module for integration into the existing ongoing wildlife area management planning process. The recreation planning module will include spatial analysis to determine the suitability of recreation uses by season in specific wildlife area units and help ensure that recreation uses support wildlife area plans and other management goals and objectives.</p> <p>One of the new goals in the strategy is to accommodate outdoor recreation where it is compatible with conservation goals and other management priorities. There is a section on recreation impacts included in the introduction of the plan.</p>

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	<p>basis to protect sensitive wildlife during vulnerable periods of their life cycle.</p> <p>E. Rodrick, Black Hills Audubon</p>	
2.	<p>I'm glad to see the section on local land use zoning and threats from surrounding land uses was added. Copies of the wildlife area plans should be sent to local jurisdictions with a request to notify Wildlife Area Managers when large developments or rezones may impact the wildlife areas. The section on Habitat Connectivity does emphasize that acquisition of additional lands may be needed to buffer the wildlife areas from development and to connect existing conservation lands.</p> <p>E. Rodrick, Black Hills Audubon</p>	<p>Through Habitat Program representatives, WDFW will ensure local jurisdictions in the South Puget Sound Wildlife Area are both aware and have access to the wildlife area plan. Additional language was added to tasks under Objective 3J.</p>
3.	<p>The Stewardship and Volunteer Opportunities table is a valued addition to the plans so local organizations can see how they might assist with management activities.</p> <p>E. Rodrick, Black Hills Audubon</p>	<p>Thank you for your support on this item. We are hopeful it will be beneficial for the community and for the wildlife area.</p>
4.	<p>Listing research and other studies indicates that WDFW is trying to use a science-based approach to management including monitoring and adaptive management. The success of this approach is inevitably tied to adequacy of funding. The Goals, Objectives, and Tasks section will allow prioritization of tasks when funds are limited.</p> <p>E. Rodrick, Black Hills Audubon</p>	<p>We appreciate your perspectives in the Goals and Objectives section for the reasons you mentioned.</p>
5.	<p>Skokomish Unit - The Wildlife Area Planning Framework (2021) states that planners attempt to coordinate with local Native</p>	<p>WDFW sent letters to nine tribes at the onset of the South Puget Sound Wildlife Area Planning process and prior to the SEPA review in July</p>

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	<p>American tribes on cultural resources early in the planning process but there is little mention of the outcome of such efforts. There is no mention of coordination with the Skokomish Tribe on management that occurs directly adjacent to their reservation. This is a significant omission.</p> <p>E. Rodrick, Black Hills Audubon</p>	<p>2021. We did not receive any comments from the tribes on the draft plan. WDFW conducts a great deal of coordination with the Skokomish Tribe in the management of both lands and shared resources. WDFW will improve coordination as it relates to adjacent landownership in the South Puget Sound Wildlife Area.</p>
6.	<p>The plan states that “Lake Koeneman is one of the few protected and relatively undisturbed natural lakes in the vicinity and is part of the headwaters of the Rocky Creek watershed, which is relatively intact.” The lake is stocked annually with trout. To improve ecological integrity, WDFW should discontinue the trout stocking and remove warm water fish. Very few lowland lakes are not stocked for fishing and at least a few should be managed for naturally-occurring species and ecological functions.</p> <p>E. Rodrick, Black Hills Audubon</p>	<p>Thank you for taking the time to comment on Lake Koeneman. In carrying out our mission statement of preserving and protecting fish and wildlife resources, while providing recreational opportunity, WDFW is constantly balancing conservation with activities such as fishing. While we respect your perspective concerning the value of fishless waters, there is no way to remove the warmwater fish from Lake Koeneman without impacting other species.</p> <p>Since WDFW received its in-holding from the UW School of Fisheries, Lake Koeneman has a long history as a sport fishery for trout and warmwater species. As development has dramatically reduced public access to other lakes, Koeneman has become increasingly important in providing a quality fishery with shore access in a natural setting. WDFW currently stocks relatively low numbers of rainbow trout which are quickly fished out, thereby spending short periods of time in the lake. We consider this modest stocking program a relatively low impact to the aquatic community, while providing a unique recreational opportunity.</p>
7.	<p>Goal 1. Obj D. Add new task – Discontinue stocking trout at Lake Koeneman.</p> <p>E. Rodrick, Black Hills Audubon</p>	<p>See comment #6</p>

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8.	<p>Goal 3. Add new objective. In units with ecological systems of concern, conduct rare plant surveys and work with the WDNR Natural Heritage Program to protect the habitat.</p> <p>E. Rodrick, Black Hills Audubon</p>	<p>Your recommendation is warranted and will be added to the Goals and Objectives section. A task was added to objective 4C - “Conduct a wetland inventory on the wildlife area by 2025 and prioritize waterfowl management”. This task will address some of the survey needs related to ecological systems of concern. Eelgrass surveys are being conducted on the Nisqually Unit in collaboration with DNR and local education organizations.</p>
9.	<p>Goal 7 is about providing recreation opportunities in the wildlife area. A new Goal is needed to reduce recreation impacts in sensitive areas. WDFW needs to evaluate impacts and specify which types of recreation in which areas need to be monitored. Then reduce or remove recreation and restore habitat as needed.</p> <p>E. Rodrick, Black Hills Audubon</p>	<p>During the implementation of the Recreation Strategy, each wildlife area will develop a recreation plan which will identify sensitive areas that need protection from certain recreation activities.</p>
10.	<p>Table 12 lists one bird species of greatest conservation need, the surf scoter, that has moderate-high vulnerability to climate change based on a 2015 assessment.</p> <p>A more recent 2019 study (Wilsey et al.) shows three more SGCN bird species: Barrow’s goldeneye, cinnamon teal, and common loon, that have moderate-high vulnerability to climate change. I suggest adding these species to Table 12.</p> <p>Another new reference (Michel et al. 2021) may be useful to habitat managers. It includes avian-habitat suitability models for 5 estuary-associated species and can be used to explore suitability for estuary birds</p>	<p>Table 12 now includes both Barrow’s goldeneye and common loon, species likely to occur near the wildlife area units.</p> <p>Third paragraph reference added to task in 4B. mid-winter waterfowl surveys.</p>

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	<p>now or under future conditions in Puget Sound.</p> <p>E. Rodrick, Black Hills Audubon</p>	
11.	<p>We appreciate the results of the work that the authors have put into this draft of the Washington Department of Fish and Wildlife (WDFW) South Puget Sound Wildlife Area Management Plan (WAMP). The diversity of plant and animal species, as well as the habitats, of this area may be one of the most complex in the state, and the fact that you’ve addressed them indicates to us the very good start on the plan that you and the advisory committee members, have made.</p> <p>Wildlife Diversity Advisory Council</p>	<p>Thank you for the recognition and support.</p>
12.	<p><u>What new or more land units, specifically, would the WDFW want in order to do an even better job with this management area?</u></p> <p>An understanding of the “wants” could add more context to associated tasks related to goals.</p> <p>Wildlife Diversity Advisory Council</p>	<p>A section on future land acquisitions was added to Wildlife Area Management and Planning section of the plan. The projects listed have been through the internal land acquisition and public review process. The agency does not publicize lands we may want in the future until they have completed the internal review / public review process. All lands purchased are with willing landowners.</p>
13.	<p>Page 68 – Item 7c – Under tasks, add “Create checklist to include birds, mammals, and native plants found within each site.” This would enhance the public awareness of the diversity of the wildlife found in this WAMP.</p> <p>Wildlife Diversity Advisory Council</p>	<p>A task was added to Objective 7C. to include this activity - Increase public awareness of wildlife viewing opportunities by 2025.</p>
14.	<p>Page 69 – Item 7e – Under WDFW Lead – Change to read “WLA Manager/WDFW Outreach Coordinator.” The WDFW has a dedicated outreach position and the WLA</p>	<p>Revision completed.</p>

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	<p>Manager could easily use this asset for this work.</p> <p>Wildlife Diversity Advisory Council</p>	
15.	<p><u>Several Latin genus or species designations are outdated in Table 8 and the updates shown below:</u></p> <p>Page 83 – Band-tailed Pigeon – change “<i>Columba</i>” to “<i>Patagioenas</i>”</p> <p>Page 83 – Black Scoter – change “<i>nigra</i>” to “<i>americana</i>”</p> <p>Page 83 – Caspian Tern – change “<i>Sterna</i>” to “<i>Hydroprogne</i>”</p> <p>Page 85 – White-winged Scoter – change “<i>fusca</i>” to “<i>deglandi</i>”</p> <p>Page 86 – Hoary bat – change “<i>Lasiurus</i>” to “<i>Aeorestes</i>”</p>	Revisions completed.
16.	<p>Page 106 – When is the MOU anticipated to be in place? The date would enhance an expectation of signing.</p> <p>Wildlife Diversity Advisory Council</p>	WDFW will proceed with updates to the existing deed and the timeline is – TBD subject to state and federal processes.
17.	<p>Page 109 – Last paragraph above “Nisqually” – concerning Streaked Horned Larks – “...are discussing...” This should be rewritten to reflect current status of “discussion.” “...are discussing...” leads me to believe something is actively taking place NOW. What is the status?</p> <p>Wildlife Diversity Advisory Council</p>	Streaked horned larks have and will continue to be surveyed on McNeil Island. Additional discussions are occurring about McNeil Island’s benefit to the SHL species conversation and recovery.
18.	<p>Page 117 – Table 13, Goal 1 (undesignated column at right) – “Start a volunteer</p>	Your recommendation will be considered.

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	<p>emergence scheme” should add at least a year. For example: “Start a volunteer emergence scheme by 2024.”</p> <p>Wildlife Diversity Advisory Council</p>	
<p>19.</p>	<p>Eleven instances of the term “and/or” within the document (pages 45/63/64/69/72 – 2 instances/73/115/116/117/127). Review all uses of this term for logical sense. Further specific comments are shown below.</p> <p>Page 63 – The table has many “and/or” usages and should be cleaned up to indicate whether it is “and” or “or.” What is really meant?</p> <p>Page 64 – Goal 2 – Change “...while maintaining and/or improving habitat...” to “...while maintaining or improving habitat....”</p> <p>Page 117 – Goal 2 – “Improve ecological...maintaining and/or improving...” should read “Improve ecological...maintaining or improving....” Goals shouldn’t be ambiguous: Which is it – “and” or “or”?</p> <p>Page 127 – Second paragraph – “...control objective and/or strategy....” It appears that all control items in Table 15 are objectives, thus the second paragraph should read “...control objectives....” Delete “and/or strategy.” Strategies lead to objectives, but only the objective “control” is shown.</p> <p>Wildlife Diversity Advisory Council</p>	<p>Revision completed.</p>

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20.	<p>Page 23 – last line of first paragraph “This change was made to improve general management and increase conservation actions this unique property.” Change to read: “This change was made to improve general management and increase conservation actions <u>for</u> this unique property.” Wildlife Diversity Advisory Council</p>	Revision completed.
21.	<p>Page 45 – Last paragraph, last line above Table 1 – Change “...assessed for repairs, removal, and replacement” to read “...assessed for repairs, removal, or replacement” or “...assessed for repairs or removal and replacement.” Wildlife Diversity Advisory Council</p>	Revision completed.
22.	<p>Page 63 – Table starting on this page has no title Wildlife Diversity Advisory Council</p>	Revision completed.
23.	<p>Page 65 – Item I – 3rd and 5th columns: change to “streaked horned lark” Wildlife Diversity Advisory Council</p>	Revision completed.
24.	<p>Page 76 – Change glacial retreat number to read “13000-16000 years ago” vs. “13-16000 years ago.” Wildlife Diversity Advisory Council</p>	Revision completed.
25.	<p>Page 76 – Change sea stabilization number to “5000-6000” vs. “5-6000.” Wildlife Diversity Advisory Council</p>	Revision completed.
26.	<p>Page 77 – First line under “Climate” – Change “regions” to “region’s” or better yet, “...climate in the region.” Wildlife Diversity Advisory Council</p>	Revision completed.

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27.	<p>Page 86 – Change “Steller’s sea lion” to “Steller sea lion.”</p> <p>Wildlife Diversity Advisory Council</p>	Revision completed.
28.	<p>Page 99 – Under “Nisqually” – Change “...Joint Base Lewis and McCord...” to “...Joint Base Lewis McChord...” The name of the base does not include “and” and “McCord” is “McChord.”</p> <p>Page 101 – Under “South Puget Sound Wildlife Unit” – Change “Joint Base Lewis and McChord” to “Joint Base Lewis McChord.”</p> <p>Wildlife Diversity Advisory Council</p>	Revision completed.
29.	<p>Page 109 – Second to last paragraph, 1st sentence: “impending” should probably be “impeding.”</p> <p>Wildlife Diversity Advisory Council</p>	Revision completed.
30.	<p>Page 123 – Table 14 – Consider slanting the table headings to enable better readability.</p> <p>Wildlife Diversity Advisory Council</p>	Revision completed.
31.	<p>Page 123 – Table 14 – Change “Sandhill Craine” to “Sandhill Crane”</p> <p>Wildlife Diversity Advisory Council</p>	Revision completed.
32.	<p>Page 127 – Table 15 – change column headed “Control Objective/Strategy” to “Control Objective.” (See statement regarding this under “Usage” above.</p> <p>Wildlife Diversity Advisory Council</p>	Revision completed.