

August 13, 2011

Representative Jan Angel  
Washington State House of Representatives  
25<sup>th</sup> Legislative District  
P.O. Box 40600  
Modular Building A  
Olympia, WA 98504-0600

Dear Representative Angel:

Thank you for your letter of July 27<sup>th</sup> concerning management of forest resources in Kopachuk State Park. Due to the requirements of the Open Public Meetings Act and the frenetic rate of change confronting the parks staff and commissioners, I am writing you personally rather than calling a quorum to write a consensus opinion to your letter. Responding in this manner allows a quick response following the commission meeting of August 10<sup>th</sup> and 11<sup>th</sup> at which actions affecting the management of Kopachuk and at least five other parks were debated.

Getting to the point, the following actions addressing management of trees in developed landscapes of the parks and the risk diseased trees present to the public were approved by the commission.

The Washington State Parks and Recreation Commission ...

1. Adopted a new section to Commission Policy 73-04-1 Protecting Washington State Parks Natural Resources (Appendix 1 of this letter)
2. Directed the Director or designee to develop and adopt a procedure generally consistent with that outlined in Appendix 2, to address tree risk in parks where reducing risk to acceptable levels will significantly disrupt public use for an extended period of time.
3. Directed the Director or designee to establish a tree risk committee to prioritize and otherwise guide system-wide assessment and treatment of parks with identified or suspected pathogens, pests, or other non-biological impacts to tree and forest health in developed landscapes.
4. Directed the Director or designee to undertake a thorough review of the first several tree risk reduction treatments completed under the proposed policy and report findings to the Commission, and thereafter provide the Commission periodic reports on tree risk reduction efforts and expenditure or use of timber sale proceeds.
5. Delegated to the Director authority to approve the sale of timber at Kopachuck, Moran, Nisqually, Scenic Beach, Schafer, and Seaquest State Parks, as recommended by staff.
6. Affirmed that cash proceeds from the sale of timber will be reinvested into natural resource stewardship and related interpretive activities as recommended by staff.

Prior to approving these actions, commissioners received confirmation from staff that these specific policies and approvals are limited in application to *developed* areas of the parks. This distinction

allows prescriptive assessment of risk, control and response to forest pathogens in accordance with intended type of use. In the situation at hand, it may be advisable in some circumstances to leave standing trees and deadfall in undeveloped areas that would not be left standing near campgrounds, concessions, parking lots, roads, buildings and along trails. This approach is consistent with the Park Commission's land stewardship principles and duty to reduce risk to public and property to acceptable levels, while recognizing the reality that any visit to natural landscapes entails some level of risk.

In addition to these actions, the following guidance was provided to staff through comments by the commissioners:

- New or relocated campgrounds should not be sited in conservation areas designated as high quality, natural and undeveloped land to limit the spread of forest pathogens resulting from normal recreational use.
- While it is not expected that the revenue from the sale of timber will cover the cost of tree removal and park restoration, park staff should consider the use of these funds in ways that benefit the natural integrity and function of the park as a whole -- not just areas where trees have been removed.

The commission also gratefully heard testimony from a neighbor of Kopachuck Park who shared his experience of over 30 years with efforts to control laminate root rot in Douglas Fir stands across the road from the park. The comments provided at the June 21<sup>st</sup> public meeting further demonstrates the passion Kopachuck patrons have for this park.

The actions listed above are in my view consistent with park values as reflected by the interests of the general public. I hope that they also adequately address the concerns outlined in your letter.

I would like to take a moment of your time to share my philosophy and ask for your support as the Washington State Parks and Recreation Commission *transforms* itself around the new paradigm of a nearly self-funding operation.

Promoting value versus offering exceptions to the Discover Pass: Transitioning toward greater self-funding operations requires the commission to re-examine both the market to which the parks deliver services and the nature of stakeholder relationships as revenue sources shift from the general public to users.

In my opinion the State Parks bear the responsibility of providing value commensurate with price. By shifting to a fee based system the parks must present added value in response to several prospective market shifts: i. the market *perception* that services received *free* of charge just a few months ago are now paid-for services, ii. the market *perception* that the entry fee represents double-dipping having already paid for park operations through taxes and iii. that the entry fee signifies a shift in market emphasis to providing services to higher income socioeconomic demographics.

In response to these perceptions it is essential in my opinion to: i. promote the value that parks bring to quality of life -- especially for those people living lifestyles that separate them from regular contact with nature, ii. communicate to the tax-paying public that the cost of park operations are now being covered to a significantly lesser extent by taxes requiring the transition to a fee service model and iii. reduce the price of the Discover Pass by eliminating to the extent possible exceptions to fees currently imposed by statute.

With respect to this last point, I suggest that it is better to charge a fixed price and invest in improving the quality of the park experience to visitors requiring or deserving special support and services, than to offer a discount for an experience that doesn't measure up to needs or expectations. If all patrons perceive that they are receiving equal value at the same standard rate, then the price per visit required to cover park operating expenses (after eliminating exceptions) reduces for everyone and the opportunity appeals to a marketplace characterized by a broader coverage of socioeconomic groups. This by no means is meant as disrespect toward any citizen who deserves extraordinary recognition or support. It simply pairs quality of the park experience with cost in light of the needs of all demographic groups.

Patron based funding and the social contract: Moving from a funding model in which all citizens pay in proportion to their ability to pay, to a patron funded model presents new philosophical challenges that influence the future of the parks. Consider the following issues that arise in the context of future generations of park users. Will children of contemporary non-patrons be considered less entitled to the use of parks when they become adults than children of present day patrons? Will future governance of the parks shift to reflect the interests of an elite group of wealthy donors as opposed to the interests of the general public? Will the relationship between the legislature and commission change as the parks move in the direction of what could evolve into the model of a "concession operated on state lands"? Will park land become privatized as special interests, seeking profit from the consumption of natural resources, seek to reduce revenues from government partners to achieve their objectives?

Teddy Roosevelt was a great proponent of the benefit public lands bring to society and provided the voice of civic responsibility that appends thereto. "*We have fallen heirs to the most glorious heritage a people ever received, and each one must do his part if we wish to show that the nation is worthy of its good fortune.*" I agree with TR. I believe that public land should remain supported by the general public so that future generations may enjoy the experience that nature provides on an equal opportunity basis. I hope that in the future as economies improve that the parks may once again be supported in greater measure through the general fund.

Expanding park uses: The challenges associated with transitioning to a fee based operation in a very short period of time are significant. The extraordinary events of this time require that director Don Hoch and his staff have as unencumbered an environment to work in as possible within the limits of law and the principles and policies of the State Park Commission.

I'm confident that the legislature is as concerned as the commissioners for the impact that the reduction in force has had on the families of the unemployed, staff morale, and the effect on the capacity of the parks to take on new challenges. I appreciate that legislators are approached by their constituents from time to time to extend the park experience with new

uses. The support of the legislature in evaluating new uses in cooperation with the Director prior to enacting legislation would be consistent with the needs of the present times.

I offer these comments personally in the spirit of enabling the success of Director Don Hoch and the staff, building a strong progressive relationship between the commission and legislature and maximizing prospects for success during these extraordinary times. Thank you for your service and the consideration of your time.

Sincerely,

A handwritten signature in blue ink, appearing to read "Don Hoch", is centered on a light yellow rectangular background.

Washington State Parks and Recreation Commissioner  
1111 Israel Road SE  
P.O. Box 42650  
Olympia, WA 98504-2650  
509.670.0343

cc. Director Don Hoch, State Senator Linda Parlette

Attachments (2)

## APPENDIX 1

### **Recommended Addition to Commission Policy 73-04-1 Protecting Washington State Parks Natural Resources**

#### **Part D: Resource Use**

##### **[New Section] 7. Managing Tree Risk in Developed Park Landscapes**

One of State Parks' principle purposes is to facilitate public enjoyment, appreciation, and interaction with the natural world. To this end the agency develops and operates recreational amenities (e.g., campgrounds, picnic areas, and trails) while retaining as many natural features as possible. In managing risk of tree failure in these and other developed park landscapes, State Parks' highest priority is to protect park visitors and staff from harm. To safeguard its financial assets, the agency will also take reasonable actions to effectively manage risk to personal property of park visitors and staff (e.g., vehicles and recreational equipment) and park-related risk to real estate assets and personal property on adjacent lands.

Agency staff will assess tree risk in developed landscapes on a regular basis in concert with assessing risk associated with park facilities. Tree risk assessments will be conducted by agency staff trained in assessing tree risk and using procedures outlined in the agency's Tree Risk Evaluation Form.

In making treatment decisions to reduce tree-related risk to acceptable levels, State Parks will consider: impacts on park natural, cultural, historic and recreational resources; adopted park plans and land classifications; impacts to park revenue and expenses; park conservation, historic, and social context; timing of treatments, and input from park stakeholders.

State Parks may enter into agreements with other public and private entities for tree risk reduction treatments including cutting and removing trees. Any cutting and removal of trees must be consistent with applicable federal, state, and local regulations, satisfy requirements for environmental review and permitting, and otherwise comply with Commission administrative rules and policies. The agency will dedicate expenditure of any net cash proceeds from the sale of timber removed as part of tree risk reduction treatments first to restoring trees and understory vegetation and repairing treatment-related damage to facilities in affected parks. Thereafter, remaining proceeds will be dedicated to natural resource stewardship activities and to related interpretation and public education activities. State Parks may accept sawn lumber or other wood products representing fair market value in lieu of cash for sale of timber as part of tree risk reduction treatments. Sawn lumber will only be accepted if it can be advantageously used first for park natural or cultural resource stewardship activities, related interpretation or public education purposes, and thereafter for general park purposes.

For purposes of this section, stewardship activities may include building agency expertise and capacity to assess and treat tree-risk, advance forest health, and secure grants for related activities; preparing tree risk reduction and forest health plans and treatment designs; conducting environmental review and securing permits; coordinating on-site treatments and prescriptions; and monitoring treatments to ensure their long-term success.

The agency will use all practical means to inform the public about pathogens, pests, or other non-biological impacts to tree and forest health requiring large-scale cutting and removal of trees from developed park landscapes. Agency staff will hold a public meeting near affected parks and will consider public input when making treatment decisions with the potential to disrupt significant park activities either temporarily or permanently.

Agency staff will prepare periodic reports to the Commission on tree risk reduction efforts and an accounting of the expenditure or use of cash and in-kind proceeds of timber sales.

## APPENDIX 2

### **Recommended Procedure for Addressing Large-Scale Tree Risk Incidents**

Agency response to tree risk situations varies depending on the nature and magnitude of the identified elevated tree risk. Issues requiring the treatment of one or several trees, with minimal disruption to the park environment and services, will be addressed through the agency's Tree Activity Procedures (emergency and non-emergency options). Where the issue threatens to disrupt significant activities in a park (temporarily or permanently), the agency will utilize both incident command teams and executive decision-making to address the elevated risk as outlined below.

#### **Initial Response Team (IRT)**

The IRT is charged with conducting a thorough evaluation of the elevated risk, considering the elements below, and developing a recommended course of action. The IRT will be comprised of the following agency representatives and their associated duties:

- Incident Commander (Region Director): coordinates IRT and has final decision making-authority over the team recommendation to executive team members and ultimately the Deputy Director.
- Technical Officer (Forest Health and Restoration Ecologist): assesses extent of problem and develops treatment options to address event\*.
- Risk Officer (Risk Manager): identifies risk associated with each treatment options.
- Public Information Officer (Region Steward): oversees communication with stakeholders and assists with treatment development\*.
- Operations Officer (Region Operations Manager): identifies financial and recreational impacts; coordinates initial response efforts with park.
- Implementation Officer (Park or Area Manager): implements initial response activities and assists with treatment development.

\*Engaging Region Planner, Historic Preservation Officer, Archaeologist, and Region Environmental staff as appropriate depending on the type and extent of treatment options and their implications on park facilities and cultural resources.

The IRT will consider the following influences in the development of treatment recommendations:

- Natural Resources
  - Biological significance
    - Species, community
    - Connectivity
  - Non-biological factors (wind, fire fuel loading, slope, soils)
  - Current condition of resources
  - Restoration / rehabilitation opportunities
  - Future trajectory with and without management
- Cultural /Historical Resources
  - Significance
  - Condition under current use vs. potential future use
- Recreational Resources
  - User demand
  - User experience
  - Disruption of users
  - Uniqueness of site / experience
  - Alternative experiences / sites
- Land classification
  - Public interest / support for current or alternative uses

- Deed restrictions
- Economics
  - Costs of operation
  - Costs of treatment (including rehabilitation)
  - Income generation/loss
  - Level of investment
- Risk
  - Current condition
  - Future condition
    - With treatment
    - Doing nothing
- Timing
  - When can the work be done and by whom
  - Permitting
- Park Context
  - Regional and statewide conservation context
  - Historical context
  - Social context
- Stakeholder input
- Others

#### **Management Recommendation**

The Region Director (Incident Commander), a member of the Executive Leadership Team (ELT), will develop a recommended course of action. During the development of this recommendation, the Region Director will keep other members of the ELT apprised of the situation and engage their assistance/services as needed. The Region Director will obtain concurrence on the recommended course of action from the Directors of Operations, Parks Development, and Administration, Finance, and Technology and obtain final approval by the Deputy Director or Designee.

#### **Treatment Team (TT)**

Following the adoption of a recommended course of action, completion of that action falls to the TT. The TT is charged with developing and implementing the final prescriptions, including informing and engaging stakeholders to a level consistent with the magnitude of the recommended action. The TT will be comprised of the following agency representatives and their associated duties:

- Incident Commander (Region Operations Manager): coordinates TT and has final decision making-authority over the team actions.
- Technical Officer (Forest Health and Restoration Ecologist): develops final treatment prescription and coordinates implementation of technical response activities\*\*.
- Public Information Officer (Region Steward): coordinates communication with stakeholders and assists with treatment implementation\*\*.
- Implementation Officer (Park or Area Manager): coordinates and leads all non-technical response activities associated with management action.

\*\* Engaging Region Planner, Historic Preservation Officer, Archaeologist, and Region Environmental staff as appropriate depending on the type and extent of recommended treatments.

In the event of new discoveries during the implementation process, the TT Incident Commander will engage the Region Director for advice and possible reformulation of the agency response to the event (including reengagement of participants in the IRT planning process and members of ELT).