



January 7, 2019

Notice of Final Determination
Draft Baker to Bellingham Non-Motorized Recreation Plan
SEPA File No. 18-072701

The Department of Natural Resources issued a Determination of Non-significance (DNS), Mitigated Determination of Non-significance (MDNS), Modified DNS/MDNS on **July 27, 2018** for this proposal under the State Environmental Policy Act (SEPA) and WAC 197-11-340(2).

This threshold determination is hereby:

Retained.

Modified. Modifications to this threshold determination include the following:

Withdrawn. This threshold determination has been withdrawn due to the following:

Delayed. A final threshold determination has been delayed due to the following:

Summary of Comments and Responses

Clarifications made in the Final Baker to Bellingham Non-Motorized Recreation Plan:

- Objective B for Recreation Trails section of Part II: The Plan was revised to read: DNR is willing to participate in trail planning, for example, on the Whatcom County conceptual Bellingham – Mt. Baker Trail, that may result in trail development on DNR land should another state agency, local government body, or organized group of individuals convene a planning committee of stakeholders.
- The Restoration section of Part II. The Plan, Objective A was revised to: Identify areas with resource damage due to past recreational use throughout the recreation planning area.
- A new strategy for Objective A in the Restoration section of Part II: The Plan was added to the Restoration section of Part II. The Plan as follows: Prioritize restoration efforts across the recreation planning area, including units that do not contain recreation zones.
- In Table 2. Proposed Project Implementation Priorities, Tier I, II, and Tier III project priorities on restoration were expanded to include additional areas outside of recreation zones.

- The Introduction of the Final Recreation Plan was expanded to address the zoning of DNR-managed lands as follows: The current zoning on DNR-managed lands in Whatcom County is Commercial Forestry, which excludes motorized vehicular recreational trails or ORV parks.
- An additional strategy was added to Objective A in the Education and Enforcement section of Part II. The Plan in the final recreation plan that reads: In areas outside of proposed recreation zones, look to develop methods to increase the presence of DNR staff and volunteers to reduce unsanctioned use within the recreation planning area.
- The final recreation plan Part III. Planning Area Background, Regional Planning Area Context was revised as follows: Winters in the Recreation Planning Area range from rain to significant amounts of snow and extended periods of below freezing temperatures.
- Exhibit C of the Final Recreation Plan was revised, as follows: Additional public comments were submitted throughout the planning process, in writing, by email, and verbally, in response to the monthly recreation planning committee meetings. These comments are available on the planning webpage.
- The following strategy was added to the Recreation Plan at Partnerships and Volunteer Coordination section, Objective C: Partner with Whatcom County to evaluate and identify methods for maintaining current level of services as site-specific projects are implemented in the Recreation Planning Area.
- The final concept map of the final recreation plan does not include any part of a marbled murrelet conservation zone in the Red Mountain unit.

Also, see the attached Comment and Response Summary document.

Responsible Official: Jean Fike

Position/title: Northwest Region Manager, DNR

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Date: 1.7.19

Signature: 

There is no DNR administrative SEPA appeal.

Draft Baker to Bellingham Non-Motorized Recreation Plan State Environmental Policy Act Comment and Response Summary

The Draft Baker to Bellingham Non-Motorized Recreation Plan and related State Environmental Policy Act (SEPA) documents were released to the public for formal review and comment on July 27, 2018; the comment period closed at 4:30 PM on August 26, 2018. Two public community meetings were held on July 31 and August 1, 2018 to present the draft plan and explain how public comments would be accepted under SEPA rules.

This document provides a response to comments received as part of the SEPA review process. This document was provided to DNR's SEPA Responsible Official – along with a verbatim transcript of all SEPA comments received – for consideration prior to issuing a final determination. DNR staff reviewed each comment to identify the SEPA or draft recreation plan components that were addressed.

This summary does not speculate as to whether any of the opinions articulated in the comments represented a certain quantity of opinions, such as the “majority” or “minority” opinion.

INTRODUCTION

In the SEPA Non-Project Review Form, five categories of issues were identified in Part II, Section 8 – Key Issue Assessment. The Response to Comment Summary is set up to follow those categories and two additional ones:

- Working Forest and Recreation Uses
- Public Access
- Recreation Trails and Facilities
- Restoration
- Enforcement and Partnerships
- The Recreation Plan
- SEPA Process

COMMENT OVERVIEW

The public comment period elicited a range of SEPA comments and comments pertaining to The Draft Baker to Bellingham Non-Motorized Recreation Plan. Among those who supported the draft plan, there were those who expressed strong support of certain plan components and a minority of the public who offered reluctant acceptance. Others expressed conditional support, based on suggested modifications to the plan, additional SEPA analysis, or a revised SEPA determination. There were several comments expressing dissatisfaction or did not approve of the plan.

Proponents of the draft plan typically expressed support for (1) approving existing mountain bike trails as part of the plan, (2) making the North Fork and Stewart Mountain recreation zones a priority, (3) having the water access day-use facility on the North Fork Nooksack River as part of the recreation plan, and (4) excluding motorized recreation use from the entire recreation planning area.

Those who are dissatisfied with the draft plan expressed a range of reasons including: (1) the impacts to public services caused by increased recreational use, (2) insufficient analysis by DNR of potential impacts to local communities and public services, (3) minimal enforcement of DNR rules and regulations in the recreation planning area, (4) the location of a trailhead in the Red Mountain Unit, (5) neglecting to adequately consider environmental impacts, and (6) inadequately describing the nature of the rural communities and neighborhoods that make up the Columbia Valley Urban Growth Area. There was one comment that expressed disappointment that the plan did not include a motorized recreation component.

Some of the comments were similarly themed and had identical wording and phrases. The following are summaries of the comments received.

ISSUES RAISED THROUGH SUBMITTED COMMENTS

The comments below are representative of the comments in submitted letters and are intended to characterize the major subject areas included in all comments received. As noted above, the SEPA Responsible Official received a verbatim transcript of all comments, in their entirety. The SEPA Responsible Official reviewed the resulting modifications to the Draft Baker to Bellingham Non-Motorized Recreation Plan and considered all the SEPA-related plan comments before issuing the final SEPA threshold determination. The DNR proposal decision makers will then consider the final SEPA record including all comments, agency policies, and legal mandates before the final plan adoption decision.

COMMENTS RELATED TO WORKING FORESTS AND RECREATION USES

There were no comments on working forests and recreation uses.

COMMENTS RELATED TO PUBLIC ACCESS

Concerns pertaining to public access were few in number and are presented below.

COMMENT: *Pg. 23 "public access" states the DNR will limit access into proposed facilities so as to not impact private property. My concern is that DNR will not be able to maintain limited access without adequate funding and will be exposed to potential lawsuits that cost taxpayers.*

RESPONSE: Public access to the proposed recreation zones and trailheads is directed to DNR-managed forest roads that have public access for recreation. Road work and maintenance from public use will be addressed with volunteers, private donations, operating funds, or capital project dollars.

COMMENT: *Will the service roads be open to automobiles past the trailheads in any form? If they will be in any way, what is the plan to mitigate the impact this will have on those road and for the eventual repair of the damage that will result.*

RESPONSE: The status of forest roads currently open for public use will not change as a result of this plan. Future site-specific planning may involve changes to road access. Potential impacts from public use of forest roads on DNR lands will be addressed with volunteers, private donations, operating funds, or capital project dollars.

COMMENTS RELATED TO RECREATION TRAILS AND FACILITIES

Comments on recreation trails and facilities were diverse. The majority of comments focused on adopting existing unsanctioned mountain bike trails in the North Fork Unit. Comments also addressed providing trail connections across DNR-managed land, planning for single-use trails, connecting recreation zones and allowing shuttles to access trails. There were several comments supporting day-use facilities and concerns voiced on the location of a trailhead.

The following comments represent major subject areas for Recreation Trails and Facilities.

COMMENT: *On the Northern section, we would prefer the DNR to include pre-existing trails and usage in the North Fork area with or without the conditional use that is tied to the Marbled Murrelet Conservation Strategy. Other trail networks around Western Washington will be grandfathered into the Murrelet Conservation Strategy due to their official status. While the North Fork has always been an unsanctioned trail network, it has a long history of use and it would benefit the DNR to move forward in sanctioning this area for non-motorized use. On the included map, this is the area with the diagonal lines through it.*

RESPONSE: The Recreation Trails section of Part II: The Plan, Objective A, addresses the conversion of undesignated, non-sanctioned trails into designated trails. As staffing/funding become available, undesignated trails may be evaluated for potential reuse as part of a designated trail system. Trails that meet DNR standards, stewardship responsibilities, suitability criteria, safety and risk management, and user experience will be integrated into a new trail system.

The proposed Conditional Use Non-Motorized Trail System zone in the North Fork unit was created to respond to the final marbled murrelet long-term conservation strategy. This area will not be considered for trail development until the Board of Natural Resources makes a decision on the long-term conservation strategy.

The preferred alternative described in the revised draft EIS lays out a process for addressing new or expanded recreation facilities, trails and recreational leases in occupied sites, occupied site buffers and special habitat areas. In this process, DNR will assess whether any proposed activities within these areas will have potential murrelet habitat impacts. If impacts are identified, DNR will have the ability to consult with the U.S. Fish and Wildlife Services, to determine how to avoid, minimize, and mitigate those impacts.

The preferred alternative is currently being analyzed for environmental impacts in the revised draft EIS. Final decision by the Board of Natural Resources on the long-term conservation strategy is anticipated to occur late 2019. Until this decision is made, DNR activities will comply with DNR's current policies and procedures, including the interim murrelet conservation strategy, which is described in the 1997 Habitat Conservation Plan.

COMMENT: *Having shuttle access trails is a key experience the mountain bike community is looking for and hopefully this will be possible in both of the north fork areas.*

RESPONSE: Allowing shuttle vehicles to provide rides between trailheads and mountain bike trails is an emerging concept for DNR. There have been times where shuttle vehicles have been allowed on a case-by-case instance. DNR will continue to look for these opportunities where appropriate. This is a concept that may be considered during the planning and design of a non-motorized trail system for the North Fork units.

COMMENT: *In previous emails I have encouraged the DNR to consider a trail connection from Whatcom County Parks & Recreation's Ostrom Conservation Site on South Pass Road to the Aron School Park on Lost Lake (owned jointly by all schools in Whatcom County and managed by Nooksack Valley School District).*

RESPONSE: While this idea was not specifically addressed in the draft recreation plan, planning for trail connections across DNR property to connect to non-managed DNR lands was discussed with the recreation planning committee. It is addressed in the draft recreation plan under Part II: The Plan, Recreation Trails, Objective B: Participate in trail planning that may result in trail development on DNR land, should another state agency, local government body, or organized group of interested individuals convene a planning committee of stakeholders.

COMMENT: *I strongly object to a park and entrance across from my property on Silver Lake RD. Until you can show the community how you plan to fund and address the concerns we have this proposal should be aborted.*

RESPONSE: DNR will begin the planning process for a trailhead with a period of public engagement to identify concerns and issues of the community and how they will be addressed during the design of the trailhead. Potential impacts to public services will be evaluated and discussed with the public, neighboring landowners, local services (such as fire districts and the Sheriff's Department), and Whatcom County as part of that process.

COMMENT: *Would like to see multiple campground locations as they are lacking in our area.*

RESPONSE:

A goal of DNR for the recreation planning process has been to address the long-term use of unsanctioned trails in the planning area. DNR chose to address this issue by focusing on the

development of a plan that emphasizes establishing sanctioned trails and trailheads for public recreation. In the 10-15 year timespan this plan is intended to cover, the development of campgrounds will not raise to a priority level for funding.

COMMENT: *Mountain bikes whether they intend to or not frighten horses and as a result frighten riders. They often disrupt the peaceful environment that horsemen and other users cherish. As a result of frightening horses and riders they tend to drive them away.*

RESPONSE: As part of preparing a trail system, consideration will be given to multi-use trails and single-use trails. The proposed recreation zones are large enough to allow for a variety of trail types.

COMMENTS RELATED TO RESTORATION

The comments in this section were in support of restoration with concern expressed about the potential of closing recreation areas when restoration occurs and how those areas would be protected. The following comments represent major subject areas on restoration.

COMMENT: *page 23 Section 8 Key Issue Assessment Issues, Restoration: This section should be amplified as part of the ongoing need for enforcement.*

Restoration should include not only blocking of illegal trails, but also restoration of creek beds, forested hillsides and new plantation, and the like. Without the blocking of illegal trails, restoration will not stop the illegal use. This is specifically the case on Sumas Mtn. which is not included in the targeted areas for the Recreation Plan.

RESPONSE: In the Restoration section of the draft recreation plan, Part II: The Plan, Objective A and the accompanying strategies describe the process for restoration activities within the Recreation Planning Area. Specific areas may be closed for restoration work. Redirecting or restricting recreational uses during restoration work is a fundamental step in ensuring that restoration work is protected and preserved. Objectives B and C of the Restoration section provide for protection and communication and education efforts to inform the public and redirect access as needed. To further define efforts on restoration across the recreation planning area, Objective A is expanded to read:

“Objective A: Identify areas with resource damage due to past recreational use throughout the recreation planning area.”

Objective A strategies outline how restoration will occur and establishes the priorities for restoration activities. Restoration of impacted areas in the Sumas Mountain Unit of the recreation plan will be dependent on obtaining funding to conduct a restoration program as the restoration priorities in the Proposed Project Implementation Priorities of the final recreation plan.

COMMENT: *Add a Tier I Implementation Prioritization for “Restoration of areas damaged by unauthorized use on Sumas Mtn. and on any other DNR properties in the Recreation Planning Area that are not targeted for sanctioned trailheads and sanctioned trails.”*

RESPONSE: Tier I, Tier II, and Tier III project priorities on restoration are expanded to include additional areas outside of recreation zones.

COMMENTS RELATED TO ENFORCEMENT AND PARTNERSHIPS

Comments covered enforcement concerns, partnering, and inclusion of stakeholders on implementation of the Recreation Plan and specific projects. The following comments represent major subject areas relating to Enforcement and Partnerships.

COMMENT: *Section 8.5th bullet.p24. Woefully inadequate language to describe the historical and current problems with enforcement. Language needs to be more forthright and honest. The language used is so nondescript of the realities as to be misleading.*

RESPONSE: DNR acknowledges that enforcement capacity has been an ongoing need in the recreation planning area. Enforcement issues were brought up multiple times by local residents in the latter part of the planning process. Those issues, both current and historical in nature, were

expressed many times by the local residents. The recreation planning committee, DNR staff, and members of the community continued to discuss these issues at committee meetings, during the community meetings and with DNR representatives in one-on-one conversations. DNR is committed to finding reasonable solutions to the enforcement issues.

Additional responses in this summary provide further information on this subject.

COMMENT: *page 24, Section 8 Key Issue Assessment Issues, Enforcement and Partnerships: This section should be amplified to include contribution by local residents to the discussions of the need for enforcement and partnerships. Local residents have provided extensive input to that discussion, particularly during 2018 when the residents participated extensively in the public comments spoken and written to the Committee Meetings.*

RESPONSE: The contributions by local residents was important in shaping DNR's position on the need to enhance education, enforcement and partnerships in the recreation plan.

COMMENT: *Discussion of enforcement issues and capabilities as impacts not only Red Mtn. but also Sumas Mtn. I note that enforcement issues are addressed for the 4 proposed recreation sites, but not for Sumas Mtn.*

RESPONSE: The conceptual planning phase of the planning process started out looking at multiple options across the recreation planning area. After removing motorized recreation as an option, the final concept was narrowed down to four recreation zones. The development of objectives and strategies were developed to focus on specific units in the recreation planning area. Enforcement issues in general have been acknowledged. Objective A of the Education and Enforcement section of Part II. The Plan includes enforcement efforts at sanctioned and unsanctioned sites across the various landscapes in the Recreation Planning Area.

GENERALIZED COMMENTS RELATED TO THE ENTIRETY OF THE RECREATION PLAN

More generalized comments relating to the Recreation Plan varied, with support for the plan, concern over ensuring specific recreation zones are highly prioritized for development, providing for trail development to connect DNR-managed lands to other public or privately managed lands, enhancing restoration objectives and increasing education and enforcement efforts in the recreation planning area.

The following comments represent more generalized topics in the Recreation Plan.

COMMENT: *Please prioritize trails in the area around Lake Whatcom. Whatcom County Park already has gone through a multi-year planning phase and has trail plans ready to put on the dirt in the Stewart Mountain area. The DNR land in this area will provide more connectivity for longer rides and offer opportunities for many more different routes.*

RESPONSE: The Stewart Mountain and Mirror Lake units, which are situated on the north and south sides of Lake Whatcom Park, are both identified as Tier I priorities in Table 2. Proposed Project Implementation Priorities. The Tier I priorities are the more likely to be pursued in the early years of implementing the recreation plan.

COMMENT: *I am writing to comment on the Baker to Bellingham Recreation plan with recommendations for amendments to the draft plan. Amendment 1. Add wording to Part II. Objectives and Strategies, Recreation Trails, Objective B, to read:*

“Objective B: Recognizing Whatcom county’s conceptual trail corridor for the Bellingham-Mt. Baker Trail. DNR is willing to participate in trail planning that may result in trail development on DNR land, should another state agency, local government body, or organized group of individuals convene a planning committee of stakeholders.”

Amendment 2. Add a recreation area polygon to the final draft concept map to include the Middle fork area linking Whatcom county's South fork park to the Forest Service boundary on USFS road 38. A sample polygon is provided at the bottom of this email and attached.

RESPONSE: Objective B for Recreation Trails is revised to read “DNR is willing to participate in trail planning, for example, on the Whatcom County conceptual Bellingham – Mt. Baker Trail, that may result in trail development on DNR land should another state agency, local government body, or organized group of individuals convene a planning committee of stakeholders.” DNR has consistently explained to the public and the recreation planning committee that this level of recreation planning is too broad to provide an area specifically for a trail connection between other public or private lands. Objective B for Recreation Trails outlines a method where such a process could occur. The Recreation Plan’s Concept Map will not be revised to include additional recreation development zones.

COMMENT: *I would also urge you to consider designating non-motorized recreational trails originating on the east side of Sumas Mountain in the area that was previously proposed for motorized trails.*

RESPONSE: The Concept map contains four large recreation zones for the development of non-motorized trails along with a conditional use zone. The areas identified for possible trail development will take 10 – 15 years to develop as outlined in Table 2. Proposed Implementation Priorities. DNR and the recreation planning committee recognized that adding further development zones to the plan and the implementation priorities would be difficult to accomplish during the life of the recreation plan. Future recreation planning for this area may be pursued, at which time consideration of areas like Sumas Mountain would be reviewed for non-motorized recreational use.

COMMENT: *Page 1 Introduction: Add the following sentence at the end of the second paragraph: “In addition, as of the date of this Plan, the Whatcom County Zoning Ordinance for Commercial Forestry lands, which include all of the DNR managed land in Whatcom County, prohibits motorized vehicles.”*

RESPONSE: The Introduction of the Final Recreation Plan has been expanded to address the zoning of DNR-managed lands as follows: “The current zoning on DNR-managed lands in Whatcom County is Commercial Forestry, which excludes motorized vehicular recreational trails or ORV parks.”

COMMENT: *Page 17 Education and Enforcement, Objective A Strategies: Add a strategy for the enforcement of illegal use in unsanctioned sites across the Recreation Planning Area; the Section omits any such discussion.*

RESPONSE: Objective A in the Education and Enforcement states: “Pursue resources that will increase education and enforcement efforts at sanctioned and unsanctioned sites across the various landscapes in The Recreation Planning Area.” An additional strategy has been added to Objective A in the final recreation plan that reads: “In areas outside of proposed recreation zones, look to develop methods to increase the presence of DNR staff and volunteers to reduce unsanctioned use within the recreation planning area.”

COMMENT: *Page 22 , first paragraph: Winters in the Recreation Planning Area do include rain but also frequently include significant amounts of snow (several feet of snow) and several weeks of near zero temperatures. Please revise the description of the Planning Area as being ‘temperate’ to a more accurate description of the PNW winters in the Recreation Planning Area as including snow and cold weather.*

RESPONSE: The recreation plan has been revised as follows: “Winters in the Recreation Planning Area range from rain to significant amounts of snow and extended periods of below freezing temperatures.”

COMMENT: *Page 44 Exhibit C: Add the following: “Additional public comments are also found on the website as submitted either in person at Committee Meetings, or in writing after Committee Meetings.” There were extensive public comments in 2018 after the local residents got involved.*

RESPONSE: Public comments were provided to DNR throughout the planning process relating to discussion topics at the recreation planning committee meetings. Exhibit C has been revised as follows: “Public comments were also submitted throughout the planning process in writing and verbally, in response to the monthly recreation planning committee meetings. These comments are available on the planning webpage.”

COMMENT: *So they are proposing that people can not use ATVs? This I think would be sad for all of*

the wonderful people who respect the laws and roads.

RESPONSE: It is noted on page one of the draft recreation plan that motorized recreation was removed from consideration during the planning process due to the strong opposition for this type of recreation and because the Whatcom County Code does not allow for motorized recreational uses in Commercial Forest zones in Whatcom County. All of the DNR-managed land in Whatcom County is zoned as Commercial Forest.

COMMENT: *Fire hazard - I honestly don't know enough about this topic to speak intelligently. But, here's what I do know. The sky has been hazy for weeks now with the smoke from fires in California, Canada, and places far more distant. I'm concerned about this and I'm not sure if creating a recreation area will increase or decrease the fire risk in this area. I think this is worth further conversation.*

RESPONSE: The threat of wild fires is a concern for DNR. Whether or not fire risk is increased or decreased is difficult to quantify. Managing for recreation provides DNR with the opportunity to reduce the impacts to the forest caused by unsanctioned use. Many wild fires are human caused – by leaving campfires burning, driving off forest roads or onto dry areas. Campgrounds are not part of this recreation plan. Directing vehicles to trailheads and approved forest roads is also a means to reduce the risk of human caused wild fires. DNR also provides signage at trailheads and kiosks informing the public on the causes of wild fires and methods for reducing wild fire risks while recreating on DNR-managed lands.

COMMENTS RELATED TO THE STATE ENVIRONMENTAL PROTECTION POLICY ACT (SEPA) PROCESS

Those that commented on the SEPA process disagreed with the level of analysis, suggesting the analysis of the Recreation Plan should have resulted in a Determination of Significance (DS) resulting in an Environmental Impact Statement (EIS). There were comments regarding cumulative impacts and future project specific impacts resulting from the adoption of the Recreation Plan. There were also comments on the responsiveness of the Recreation Plan in relation to other plans.

The following comments represent major subject areas on the SEPA process.

COMMENT: *I object to the DNS determination for this project and ask that a Determination of Significance be issued that requires Concurrency determinations from all impacted Fire Districts in the County as well as from the County Sheriff's Department.*

RESPONSE: DNR respects the importance of concurrency determinations between the involved public services and the agency when it relates to the impacts to those particular public services. DNR acknowledges that the agency will have to work with the County Sheriff's Department and the County's various Fire Districts on a case-by-case basis for concurrency management. SEPA's procedural provisions require DNR, as lead agency, to consider the environmental impacts of this plan with attention to impacts that are likely with a focus on issues that are ready for decision on the site-specific level. Concurrency determinations will be addressed for any site-specific projects related to the Final Recreation Plan as they require assistance or coordination with the impacted Fire District(s) and the County's Sheriff's Department.

COMMENT: *Built Environment.b.p21 Saying that there are 'several' residences near this proposal is disingenuous. There are over 4,000 residents in Columbia Valley alone, between Sumas & Red Mountain. DNR has not adequately considered the impact on residents & the infrastructure needed to provide for both residents & recreational visitors. Fire, EMS, and Law Enforcement will all be drained further with the additional people the DNR development hopes to bring into these rural areas. These areas are already underserved & DNR has not considered the impact on County resources. DNR has simply looked at the positives (assumed) for increased recreation without responsible consideration on the danger such an increase will cause for residents.*

RESPONSE: Part III Planning Area Background, Recreation Planning Area Context of the final recreation plan has been expanded with a paragraph on the Columbia Valley Urban Growth Area.

The Baker to Bellingham Non-Motorized Recreation Plan is a broad scale planning document intended to guide recreation management for the next 10 to 15 years. It establishes a framework for the more detailed site-specific planning, education and enforcement, restoration, and trail and facility development projects that may occur in the future as the plan is implemented.

Project approvals in order to implement the plan will require adequate funding commitments and details before they are initiated. Additional project-phase SEPA review will also be conducted for all trailheads and day-use facilities, and other projects as required. Site-specific projects would provide the necessary information to assess potential impacts to public services. Over the life of the plan, potential impacts on local jurisdictions may vary as individual site-specific projects are proposed and developed. DNR will work with Whatcom County as projects are proposed to identify potential impacts on local services and discuss opportunities for addressing potential impacts on local services.

The following strategy has been added to the Recreation Plan at Partnerships and Volunteer Coordination section, Objective C:

“2. Partner with Whatcom County to evaluate and identify methods for maintaining current level of services as site-specific projects are implemented in the Recreation Planning Area.”

One of the primary intentions of the Recreation Plan is to ensure the safety of the public. The plan sets out education and enforcement strategies that include better access to information, specific enforcement strategies for new trails and sites, as well as coordinating with state agencies, county governments, and volunteers for emergency response.

COMMENT: *DNR states that “no public services exist in the Recreation Planning Area” but DNR has records of multiple historical occasions when the local community public services (the local Fire Districts) respond both to fires in the Recreation Planning Area and to medical emergencies due to accidents in the Recreation Planning Area. And there have been police emergencies as well in the Recreation Planning Area which have been reported to County Sheriffs Dept as well as to DNR’s own enforcement officers.*

The statement by DNR that as facilities are designed, maintained and monitored will reduce need for public services is rather surprising given the track record of incidents at other planned recreation sites (such as Walker Valley, and annual fatalities) in the State. And, since DNR does not have the money even now to provide enforcement of existing violations of DNR laws and regulations governing the Recreation Planning Area, and increased usage of the Recreation Planning Area brings more people to the RPA, the result likely will be of more incidents requiring public service assistance.

RESPONSE: DNR acknowledges that the local fire districts and Whatcom County Sheriff’s Office have been involved in responding to fires and medical emergencies in the recreation planning area. DNR has acknowledged that enforcement is an ongoing issue. The Education and Enforcement section of Part II. The Plan identifies objectives and strategies to improve education and enforcement in the recreation planning area.

As the recreation plan is implemented, and objectives and strategies in the Education and Enforcement section are carried out, it is anticipated with an enhanced enforcement presence in the recreation planning area, the need for public services may be reduced.

COMMENT: *Noise carries like crazy here - This is a detail, but I've noticed that when my neighbor a half a mile away plays his banjo on his porch I can hear it clearly. Noise carries like crazy in the forest and it's amazing what I can hear from a great distance. If this plan moves forward and the area on Red Mountain is approved we'll be able to hear all the construction noise all the time. I think I'd like more information about what's involved in the construction of a recreation area like the one proposed.*

RESPONSE: Construction activities related to developing a trailhead include clearing the land for earth moving operations, grading the site for trailhead construction, hauling gravel onto the site for surfacing the trailhead and compaction of the gravel to create a durable surface for long-term use. These activities are carried out by a variety of construction equipment similar to ones used in timber harvesting, road

construction and gravel removal from rock sources. Trailhead construction in a forest environment typically lasts from three to six months.

COMMENT: *Note, there is no section on public utilities in the SEPA Questionnaire submitted by DNR.*

RESPONSE: There are no public utilities, such as water, sewer, electric or natural gas services located on DNR-lands in the Recreation Planning Area. Public utilities available to the public include the Columbia Valley Water District, which provides public water service to residential and camper lots within the Paradise Lakes area. Peaceful Valley has a water and sewer system managed by Water District 13. Electric power is part of the public infrastructure to the rural communities and residential areas in the recreation planning area.

COMMENT: *The NonProject Review Form does not include any discussion of the Marbled Murrelets habitat on Red Mtn., which is sensitive, endangered or threatened species habitat, even though DNR has that information (see January 2017 presentation to DNR Advisory Committee). The draft plans for Red Mtn should explicitly describe the findings of that habitat, and acknowledge that the Marbled Murrelet habitat shall be excluded from any proposed trail network on Red Mtn.*

page 14, Part I Framework, Section 5 Related Documentation, Subsection c: Should be amended to include: “ the DNR Marbled Murrelet Long Term Conservation Strategy Report (presented by Peter Harrison of DNR to the Advisory Committee, on January 10, 2017) and the TriComposite Map prepared on February 21, 2017, which show Marbled Murrelet habitat, both of which documents show locations in the Recreation Planning Area where there is Marbled Murrelet habitat, such as the North Western Corner of Red Mountain.”

RESPONSE: The Marbled Murrelet Long Term Strategy conservation zones were included in the Land Suitability criteria as outlined in Table 3. Suitability Criteria of the recreation plan. DNR staff and the recreation planning committee discussed the conservation strategy during numerous committee meetings. During the development of the concept maps, the proposed recreation zones respected these zones. The final concept map for the recreation plan will not include any part of the conservation zone in the Red Mountain unit.

COMMENT: *page 16 Section 6 Public Involvement, subsection b “briefly describe the process used to solicit input”, Should be amended to include: Outreach to local rural communities that physically abut the Recreation Planning Area once residents became aware of the planning process: emails, phone calls, meetings with local community representatives, presentations to the Whatcom County Council, posting notices of upcoming meetings at libraries and post offices.*

RESPONSE: The outreach to the local residents of the rural communities was increased during the planning process , including the many methods described, which have been noted in the final recreation plan.