

SEPA Nonproject Review Form

The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. The Nonproject Review Form (NPRF) is an optional tool to help the lead agency evaluate the environmental consequences of a nonproject proposal and to provide information to decision-makers and the public.

The NPRF cannot be used as a substitute for the environmental checklist, but may be attached as supplemental analysis. Applicable information in the NPRF can be referenced in the environmental checklist without having to repeat the information.

The NPRF is intended to be used concurrently with the development of a nonproject proposal. To achieve maximum effectiveness and efficiency the initial use of the form should begin at the time a nonproject proposal is being contemplated, i.e. upon identification that a plan, policy or rule is likely to be needed or is mandated.

The information and analysis in the NPRF should be updated as the proposal is developed. The number of revisions will depend on the complexity of the proposal. If the proposal is minor, one iteration of the NPRF may be sufficient. For more complex proposals, the NPRF should be revised as analysis is completed or key issues resolved.

If you are unfamiliar with the form, you should review all of the questions before providing any answers. This will help familiarize you with the questions and should avoid duplication of information. Please note that when a nonproject proposal is first contemplated, it is often premature to respond to some questions in the NPRF. Answers may also change as the proposal is developed and analysis is completed.

NONPROJECT REVIEW FORM

DATE: July 20, 2018

COMPLETED BY: Laurie Bergvall

PART I - FRAMEWORK

1) Background

a) Name of proposal, if any, and brief description.

This is a 10-15 year plan, entitled, “Draft Baker to Bellingham Non-Motorized Recreation Plan,” (for the purposes of this document, to be called The Plan), specifically addressing the Red Mountain, North Fork, Stewart Mountain and Mirror Lake units of the Recreation Planning Area, consists of a narrative description of the planning area and the planning process, a set of objectives and strategies, and a Recreation Planning Concept Map. Together they provide a strategy for the management of public access and non-motorized recreation use in the Vedder, Red Mountain, Black Mountain, Sumas, North Fork, Middle Fork, South Fork, Stewart Mountain, Mirror Lake and Van Zandt Dike units in Whatcom County (for the purposes of this document , to be called the Recreation Planning Area). The plan will provide guidance to the Department of Natural Resources (DNR) to assist in balancing environmental responsibilities, trust management obligations and recreation management in the Recreation Planning Area.

b) Agency and contact name, address, telephone, fax, email

Agency: Washington State Department of Natural Resources
Contact: Laurie Bergvall
Address: 919 N. Township Road, Sedro Woolley, WA 98284
Phone: 360-856-3500
Fax: 360-856-2150
Email: BakertoBellingham@dnr.wa.gov

c) Designated responsible official

Jean Fike, DNR, Northwest Region Manager

d) Describe the planning process schedule/timeline

<p>Fall 2015 – Winter 2016</p>	<p>DNR staff developed the project scope, identified initial data collection needs and created a stakeholder involvement plan for Whatcom County DNR-managed lands.</p>
<p>Winter - Spring 2016</p>	<p>DNR held two community meetings (in Bellingham and Lynden) to identify public concerns about the Recreation Planning Area and initiate the planning process. Through an application process conducted by DNR, members of the recreation community were appointed to the Baker to Bellingham Planning Committee. The agency initiated a periodic email update to a list of interested public; tribal representatives from the Lummi Nation, Confederated Tribes of the Colville Reservation, Muckleshoot Indian Tribe, Nooksack Indian Tribe, Sauk-Suiattle Indian Tribe, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians, Suquamish Indian Tribe, Swinomish Indian Tribal Community, Tulalip Tribes, Upper Skagit Indian Tribe, and Yakama Nation; and agencies such as Northwest Indian Fisheries Commission, Whatcom County Council, Whatcom County Parks & Recreation Department, Washington State Parks, Washington Department of Fish and Wildlife, and the US Forest Service. DNR established a webpage to provide information on the planning process on its website.</p>
<p>Spring 2016 – Fall 2016</p>	<p>Field trips were conducted with the planning committee. The agency initiated a web based user survey to solicit further information from recreation users. A land suitability assessment that included biological, soils and geology, and management components was developed and presented to the planning committee to inform recommendations related to access, trail, and facility location.</p>
<p>Fall 2016</p>	<p>DNR held a community meeting in Bellingham to present the results of the land suitability assessment and obtain public input on recreation related issues in the surrounding areas.</p>
<p>Winter 2016 – Winter 2017</p>	<p>Committee members and DNR developed and refined mapped concepts. The agency held two community meetings in Kendall and Bellingham to present and solicit comments on a set of refined concept maps. DNR redefined the scope of the planning effort to a non-</p>

<p>Spring 2018</p>	<p>motorized recreation plan.</p> <p>DNR prepared a concept map based on input from the planning committee and the public and developed objectives and strategies supporting the concept map. The draft recreation plan was prepared.</p>
<p>Summer 2018</p>	<p>DNR initiates SEPA review including an opportunity for the public to comment on the draft plan. Following completion of the SEPA review, DNR will make a decision on the adoption of the plan.</p>
<p>Summer 2018</p>	<p>DNR will hold two community meetings to present the Draft Baker to Bellingham Non-Motorized Recreation Plan to the public. DNR staff will be available to answer questions related to the planning process and the concept proposed through the plan.</p>

Baker to Bellingham Non-Motorized Recreation Plan: Planning Committee and Public Meeting Dates

Over an approximately two-year period the planning committee met 18 times. Meeting notes from the planning committee meetings and public comments from the public meetings can be accessed on the DNR website at:

<https://www.dnr.wa.gov/BakertoBellingham>

Public Meetings

January 19 & 20, 2016

November 29, 2016

February 21 & 22, 2018

Recreation Planning Process Kick-off Meetings

Land Suitability Assessment Community Meeting

Preliminary Draft Concept Maps Community Meeting

Baker to Bellingham Planning Committee Meeting Dates

March 8, 2016

April 12, 2016

May 10, 2016

June 14, 2016

September 13, 2016

October 11, 2016

November 1, 2016

January 10, 2017

February 21, 2017

March 14, 2017

March 14, 2017

April 11, 2017

May 9, 2017

September 19, 2017

October 10, 2017

January 9, 2018

February 13, 2018

April 10, 2018

May 8, 2018

June 10, 2018

See also **The Plan, pages 26 - 35** for more details on the planning process.

- e) Location - Describe the jurisdiction or area where the proposal is applicable.
(Attach map(s) if appropriate)

The Recreation Planning Area is located in Whatcom County beginning approximately 5 miles east of Bellingham, adjacent to the Canadian border to the north and Skagit County to the south, and Mount Baker/Snoqualmie National Forest to the east. The entire planning area is situated in multiple townships, including:

- T37NR04E SEC. 11 – 14, 23 - 26, 34 – 36**
- T37NR05E SEC. 2 – 5, 7, 9, 10, 15, 16, 18, 19, 21, 22, 25 – 36**
- T37NR06E SEC. 3 – 6, 9, 10, 16, 19, 20, 26, 29 – 32, 36**
- T38NR04E SEC. 19, 20 – 22, 27 – 29, 32, 33, 36**
- T38NR05E SEC. 3, 4, 6, 7, 9 – 16, 21 – 28, 32 – 36**
- T38NR06E SEC. 2 – 4, 9 – 11, 14 – 34**
- T39NR04E SEC. 1, 2, 10, 15, 25**
- T39NR05E SEC. 1 – 21, 28 - 30, 33, 34**
- T39NR06E SEC. 2 – 11, 14 – 18, 20 -23, 26 – 29, 34, 35**
- T40NR04E SEC. 25, 26, 35, 36**
- T40NR05E SEC. 1, 4, 5, 11 – 17, 19 – 21, 23 – 34, 36**
- T40NR06E SEC. 6, 7, 18 – 21, 26 – 36**
- T41NR05E SEC. 33 – 35**

During the evolution of the planning process, consideration for recreation planning focused on four units in the planning area (Red Mountain, North Fork, Stewart Mountain and Mirror Lake units), which are situated in the following townships:

- T37NR04E SEC. 11 – 14, 23 – 25**
- T37NR05E SEC. 7, 18, 19, 30**
- T38NR04E SEC. 19 – 22, 27 – 29, 32, 33**
- T39NR5E SEC. 1, 2, 3, 10, 11, 12, 13, 14, 15**
- T39NR06E SEC. 2 – 11, 14 – 18, 20 – 23, 26 – 29, 34, 35**
- T40NR05E SEC. 1, 11 – 14, 23 – 27**
- T40NR06E SEC. 6, 7, 18, 19, 28, 29, 31, 32, 33, 34**

Detailed maps of the planning area are included in The Plan. In this proposal, approximately 14,000 acres were identified for non-motorized recreation. The balance is intended to remain as dispersed recreation. In its entirety, The Recreation Planning Area contains approximately 86,000 acres of forested terrain situated between Lake Whatcom and the western foothills of the Cascade Mountains. Rural communities and residential, private forest and agricultural lands are intermixed with various units of the planning area. Mount Baker/Snoqualmie National Forest is located to the east of the planning area and several Whatcom County parks are situated adjacent to units in the planning area. Nearby population centers include the city of Bellingham, which is

approximately five miles to the west of the Recreation Planning Area and the rural communities of Deming, Nooksack, Kendall, Maple Falls, Acme, Welcome, Wickersham, and Rome are all located in proximity to units in the planning area.

- f) What is the legal authority for the proposal?

The Washington State Department of Natural Resources retains the legal authority to implement policies and guide the management of state trust lands. The Public Lands Act (Title 79 RCW) and the 2006 “Policy for Sustainable Forests” provide the administrative authority for DNR to develop this plan. In addition, specific authority to plan and provide recreation is contained in the Multiple Use Act (Chapter 79.10.100 and 130 RCW).

- g) Identify any other future non-project actions believed necessary to achieve the objectives of this action.

The non-project action under consideration for this SEPA review is DNR’s adoption of the “Draft Baker to Bellingham Non-Motorized Recreation Plan.”

Revised Draft Environmental Impact Statement for the Marbled Murrelet Long-Term Conservation Strategy.

If new forest land plans are developed for DNR’s Northwest Region, this recreation plan may need to be modified or integrated into those plans as appropriate.

2) Need and Objectives

- a) Describe the need for the action. (Whenever possible this should identify the broad or fundamental problem or opportunity that is to be addressed, rather than a legislative or other directive.)

Historic use of the trust lands has predominately been forest operations. Over the years, the public has recreated on these lands, on a variety of unsanctioned trails, which has caused unacceptable environmental and resource damage.

These lands present an opportunity to plan for the future of DNR-managed lands in Whatcom County. There is a pressing need for well-planned public access and recreation facilities that can be managed and maintained to DNR standards. Public use has been drawn to the area as citizens explore and recreate in Whatcom County on public lands, from the county to federal level.

- b) Describe the objective(s) of the proposal, including any secondary objectives which may be used to shape or choose among alternatives.

The objective of the recreation plan is to provide a recreation management strategy for the DNR-managed units in Whatcom County that is consistent with the following goals:

DNR Goals

Goal 1: Protect the safety of the public, department employees and volunteers

Goal 2: Plan recreation that is consistent with trust obligations

Goal 3: Plan recreation that is consistent with resource protection

Goal 4: Provide quality recreation experiences that can be sustained over time

c) Identify any assumptions or constraints, including legal mandates, which limit the approach or strategy to be taken in pursuing the objective(s).

- **Careful consideration was given to the legal mandates associated with the approach proposed through the Draft Baker to Bellingham Non-Motorized Recreation Plan as a component of the planning process. The intent of the detailed planning process that occurred was to provide a conceptual management strategy that was consistent with DNR’s legal mandate. For DNR, trust land management policy guidance accommodates multiple uses, pursuant to RCW 79.10. If providing for recreation or other amenity uses substantially curtails forest management activities that produce trust revenue, options exist to seek financial compensation to the trust beneficiaries.**
- **DNR will work to control negative effects of public access on forested state trust lands and may close, limit, or redirect public access when necessary to meet trust objectives or protect trust assets from dispersed public access and illegal activities.**
- **The proposal will reflect current policy direction aimed at providing a sustainable balance of environmental, economic, and social values, within current legal requirements.**
- **The social aspects (including recreational use), ecological functions of forestlands and maintaining public access to the diverse units of the planning area are critical values for this part of Whatcom County, and may be emphasized differently over various portions of the area as long as fiduciary responsibilities are met.**
- **All management activities will meet, at a minimum, all state and federal laws and regulations. Trail construction will meet DNR’s Recreational Trails Policy. Management activities will also meet policies set in the Board of Natural Resources-adopted Policy for Sustainable Forests (2006), and DNR’s Habitat Conservation Plan (1997).**

d) If there is no legislative or other mandate that requires a particular approach, describe what approaches could reasonably achieve the objective(s).

The approach to achieving the objectives stated above in question 2b is to adopt and

implement the proposal based on input from the general public and the Baker to Bellingham Recreation Planning Committee. Other alternative approaches to address the key issues were considered by the public and committee as described in question 8.b, later in this document. This proposal has been determined by the agency to be consistent with state and federal laws and Board of Natural Resources policy direction. The management strategies in the proposal provide the necessary landscape level of detail and conceptual framework to allow the objectives and strategies to be accomplished, as funding allows, and given the need for sustainable levels of enforcement and education and on-going maintenance.

3) Environmental Overview

Describe in broad terms how achieving the objective(s) would direct or encourage physical changes to the environment. Include the type and degree of likely changes such as the likely changes in development and/or infrastructure, or changes to how an area will be managed.

With implementation, one of the intents of the proposal is an increase in resource protection and restoration in parts of the Recreation Planning Area. Ongoing recreation will be more closely managed, including relocation and redirection of some recreation uses to less sensitive locations, reducing potential future impacts. The plan provides conceptual guidance on where and how to accomplish future site-specific project proposals. All trails and facilities will be designed and managed to meet, at minimum, required environmental standards and the strategies of this plan.

Environmental standards and strategies are set by federal and state laws and Whatcom County codes, as well as in DNR plans and policies such as the Board of Natural Resources-adopted Policy for Sustainable Forests (1996), and the proposed Baker to Bellingham Non-Motorized Recreation Plan.

Trail and facility development efforts will focus in areas with fewer known environmental issues and away from areas with high concentrations of environmental issues. It also separates incompatible recreation activities, to improve the recreation experience for multiple types of recreation, both within and adjacent to the planning area. As the plan is implemented individual proposals will undergo site-specific SEPA, when required and establishes connectivity to compatible recreational opportunities

4) Regulatory Framework

a) Describe the existing regulatory/planning framework as it may influence or direct the proposal.

DNR POLICIES

- **The Policy for Sustainable Forests (PSF).** Adopted in December 2006, this policy document directs DNR to conserve and enhance natural systems and resources on forested state trust lands. The PSF includes the Policy on Public Access and Recreation, which states:

- When managing public access and recreation use on forested state trust lands, the department will protect trust interests and seek to balance economic, ecological and social concerns by evaluating the following on a landscape or case-by-case basis:
 - The physical condition of the area in a landscape context, including neighboring landowners;
 - The characteristics of the users, including their degree of organization;
 - The reasonable availability of financial, staff and other resources for sustainable, long-term management; and
 - Cost and benefit to the trust(s).
 - The department will work to control negative effects of designated or dispersed public access and use on forested state trust lands through collaboration with the public, user groups, other landowners, and other agencies and organizations. Negative effects include:
 - Threats to public, employee, and department contractor safety;
 - Theft, vandalism, garbage dumping, and other illegal activities; or
 - Damage to soils, water quality, plants, animals, or other elements of the forest environment.
 - Mitigation will include the closing, limiting, or redirecting of public access when necessary.
 - In meeting the intent of the Multiple Use Concept, the department will only expend management funds for closing, limiting or redirecting public access in order to meet the objectives or protect trust assets by controlling the impacts of incompatible dispersed public access and illegal activities.
- **DNR Trust Lands Habitat Conservation Plan (HCP).** Adopted in 1997, this long-term land management plan, authorized under Section 10 of the Endangered Species Act (ESA), is intended to protect threatened and endangered species. The HCP allows timber harvesting and other management activities, including recreation, to continue while providing for species conservation.

COUNTY CODES

- **Whatcom County Zoning Code Chapter 20 – Zoning and Chapter 16.16 – Critical Areas, Land Use Development permits, Stormwater permits, Grading and Drainage permits**

STATE LAWS

- **Public Lands Act** (Title 79 RCW)
The Public Lands Act, by which the department manages all of its lands, defines both the “multiple use” and “sustainable harvest” concepts, which are applicable to this proposal. (<http://app.leg.wa.gov/RCW/default.aspx?cite=79>)
- **The Multiple Use Act** (Chapter 79.10 RCW)
This 1971 legislation directs DNR to allow recreational use on trust uplands if such use is consistent with applicable trust provisions. (<http://apps.leg.wa.gov/RCW/default.aspx?cite=79.10.120>)

- **State Environmental Policy Act** (Chapter 43.21C RCW)

The State Environmental Policy Act (SEPA) requires state agencies to review proposed actions for probable significant adverse impacts and, when necessary, to prepare an environmental impact statement for actions that may have a probable, significant adverse impact on the environment. Compliance with SEPA ensures timely analysis, public comment processes, and mitigation of the probable significant environmental impacts during various activities, including project planning and implementation, as well as during programmatic or policy-level planning efforts.

The SEPA Rules (Chapter 197-11 WAC) provide more details for implementing this law. They also establish uniform environmental review requirements for all agencies. Often department activities related to forest management, i.e., planning, road development, harvesting, tree sales, and sometimes silvicultural activities are subject to SEPA. Similar activities by private landowners are not subject to SEPA unless a private proposal is a Class IV Forest Practice. Development of any motorized recreation facilities, any non-motorized campgrounds with more than 12 sites or any non-motorized parking lots for more than 20 vehicles generally require SEPA review.

- **Growth Management Act** (Chapter 36.70A RCW)

The Growth Management Act requires local governments to establish comprehensive growth management plans that address a range of natural resource issues, including timber and other resources that may be on forested state trust lands.

The Department works with local governments as they develop land use plans and regulations. In some cases, forested state trust lands that lie in zones identified for development will be converted to other uses or transferred out of trust status, with compensation to the trust(s), when it best serves the trust(s) interests. In these cases local government Growth Management Act critical area ordinances require environmental protection associated with development activities when the land use changes from timber to other uses. In other cases, the Department identifies forested state trust lands that should be protected from development when it is in the trust(s) best interests.

- **Shoreline Management Act** (Chapter 90.58 RCW)

It is the policy of the state to provide for the management of the shorelines of the state by planning for and fostering all reasonable and appropriate uses. This policy is designed to insure the development of these shorelines in a manner which, while allowing for limited reduction of rights of the public in the navigable waters, will promote and enhance the public interest. This policy contemplates protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life, while protecting generally public rights of navigation and corollary rights incidental thereto.

- **Forest Practice Rules** (Chapter 7.09 RCW)

The rules give direction on how to implement the Forest Practices Act and Stewardship of Non-industrial Forests and Woodlands (chapter 76.13 RCW). The rules are designed to protect public resources such as water quality and fish habitat while maintaining a viable

timber industry. They are under constant review through the DNR Adaptive Management Program.

- **Hydraulic Projects Approval (RCW 77.55.021)**

A Hydraulic Project Approval is required from the Washington State Department of Fish and Wildlife (or from DNR associated with Forest Practices) for most work done in or above a body of water. This is often necessary for road or trail construction projects, which may or may not occur in conjunction with timber harvest activities from forested state trust lands. If a forest practices application is filed for the activity, the landowner does not have to file separately for a HPA. However, DNR may be required to apply for an HPA if a management activity on state trust lands does not require a forest practices permit but involves a state body of water.

- **The State Water Pollution Control Act (Chapter 90.48 RCW)**

The Water Pollution Control Act requires that the state of Washington maintain the highest possible standards to ensure the purity of all waters of the state, consistent with public health and public enjoyment; the propagation and protection of wildlife, birds, game, fish and other aquatic life; and the industrial development of the state. It also requires the use of all known available and reasonable methods by industries and others to prevent and control the pollution of the state's waters.

- **Maximum Environmental Noise Levels (Chapter 173-60 WAC)**

The Washington Department of Ecology (DOE) adopted WAC Chapter 173-60 pursuant to the agency's authority to regulate noise under RCW Chapter 70.107. The Maximum Environmental Noise Levels regulate the intensity, duration, and character of sounds on specific receiving properties.

FEDERAL LAWS

- **Endangered Species Act (ESA)**

The Endangered Species Act protects federally listed species and their ecosystems. Section 10 of the Endangered Species Act (16 U.S.C. 1539) authorizes a landowner to negotiate a habitat conservation plan with the United States Secretary of the Interior to minimize and mitigate any incidental impact to threatened and endangered species while conducting lawful activities such as forest practices. A habitat conservation plan may allow the landowner to develop habitat for endangered species at a landscape level, rather than protecting the individual sites at which the species is found on the landowner's property. As long as the landowner manages under the terms and conditions of the habitat conservation plan, the landowner will not be prosecuted for "take" of an individual animal. The permit issued to the landowner by the federal government is referred to as an "Incidental Take Permit," and identifies the range of activities allowed under each habitat conservation plan.

In 1997, the department and the United States Fish and Wildlife Service and the National Oceanic and Atmospheric Administration-Marine Fisheries Service (collectively referred to as "the Federal Services") signed a multi-species *Habitat Conservation Plan* to address the department's compliance with the federal Endangered Species Act in its management

of forested state trust lands.

The Department's *Habitat Conservation Plan* covers approximately 2.2 million acres of forested state trust lands and is a multi-species land management plan that takes a landscape approach to managing for conservation of threatened and endangered species. The plan protects all currently listed and potentially listed species and manages for species populations, which in turn protects individual animals. Because many of the department's forested state trust lands are adjacent to federal lands, the *Habitat Conservation Plan* is designed to supplement federal land management protection measures at a landscape level, as described in the *Northwest Forest Plan*.

- **Federal Water Pollution Control Act (CLEAN WATER ACT)**

The Clean Water Act relates to protecting water quality. Washington's Forest Practices Rules are co-adopted by DNR and Ecology so that meeting the requirements of the rules also meets the requirements of the state Clean Water Act and federal law.

- **The Bald and Golden Eagle Protection Act**

The Bald and Golden Eagle Protection Act prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" bald eagles, including their parts, nests, or eggs. The Act provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb."

Paper copies or access to electronic copies of all Reference Documents maybe requested from the DNR SEPA Center at 1111 Washington St. SE Olympia, WA 98504, or electronically at sepacenter@dnr.wa.gov

FEDERALLY RECOGNIZED TREATIES AND OTHER AGREEMENTS

- **Point Elliott Treaty of 1855**

The lands settlement treaty between the United States government and the Native American tribes of the greater Puget Sound region in the newly formed Washington Territory (March 1853).

- b) Identify any potential impacts from the proposal that have been previously designated as acceptable under the Growth Management Act (GMA), chapter 36.70A RCW.

This proposal is consistent with the intent and purpose of the Growth Management Act as well as Whatcom County's Comprehensive Plan.¹ Whatcom County designates county lands within the Recreation Planning Area as part of Commercial Forest Lands Zone.² This proposal provides support for DNR-managed lands in Whatcom County to remain commercially viable forest resource land, as a working forest while allowing for a variety

¹Chapter Nine – Recreation, Goal 9F Whatcom County Comprehensive Plan, 2017

²Whatcom County Zoning Map, 2016

of non-motorized recreational activities.

5) Related Documentation

- a) Briefly describe any existing regulation, policy or plan that is expected to be replaced or amended as a result of the proposal. (Adequate descriptions in section 4.a may be referenced here, rather than repeated.)

No existing regulations, policies or plans will be replaced or amended as a result of this proposal.

- b) List any environmental documents (SEPA or NEPA) that have been prepared for items listed in 4.a. or that provide analysis relevant to this proposal. **Note:** Impacts with previous adequate analysis need not be re-analyzed, but should be adopted or incorporated by reference into the NPRF. Identify the:
- i) Type of document
 - ii) Lead agency and issue date
 - iii) Where copies can be viewed or obtained
 - iv) The portions of the document applicable to the current proposal and briefly explain relevancy. Summarize the relevant impact assessment or, provide reference to discussion(s) in Part II that includes this information.

The following documents provide analysis relevant to this proposal and are available by request from the DNR SEPA Center at 1111 Washington St. SE Olympia, WA 98504, or electronically at sepacenter@dnr.wa.gov

Final Environmental Impact Statement on the Policy for Sustainable Forests (Department of Natural Resources, 2005 - 2006). This document discusses the potential environmental impacts of 26 policies guiding the management of 2.1 million acres of forested state trust lands. If interested specifically in public access and recreation information, see pages 3-132 through 3-145. In addition, the policy document **Policy for Sustainable Forests** (Department of Natural Resources, Dec 2006) is available. See pages 40 through 42 if interested in specific public access and recreation information.

Final Environmental Impact Statement Habitat Conservation Plan (Department of Natural Resources, 1997). This document discusses the potential environmental impacts of implementing conservation strategies to protect threatened and endangered species on forested state trust lands.

Draft Environmental Impact Statement for the Marbled Murrelet Long Term Conservation Strategy (Department of Natural Resources, December 2016)

Final Environmental Impact Statement on Alternatives for the Forest Practices Rules for Aquatic and Riparian Resources (Washington Forest Practices Board, 2001). This document discusses the environmental impacts of forest practices activities on aquatic and

riparian habitat on private and forested state trust lands, as well as habitat protection for salmonid species listed as threatened or endangered under the Endangered Species Act. If interested specifically in public access or recreation information, see pages 4-177 through 4-179.

Final Forest Practices HCP, December 2005 and 2006 Final Environmental Impact Statement for the Proposed Issuance of Multiple Species Incidental Take Permits or 4(d) Rules for the Washington State Forest Practices HCP.

- c) List other relevant environmental documents/studies/models which have been identified as necessary to support decision making for this proposal.

Recreation Land Suitability Assessment for the Baker to Bellingham Non-Motorized Recreation Plan (Biology, Geology and Soils, and Management Criteria). The mapped areas within the Recreation Planning Area depict those areas that have long-term limiting factors that could affect recreation planning. The suitability assessment was intended to be broad scale and does not replace future site-specific analysis for individual projects where they are required. The suitability assessments resulted in composite maps that helped guide the planning effort. A more detailed description of the land suitability assessment may be found on pages 26 - 29 of The Plan.

Washington State Elk Herd Plan: North Cascade (Nooksack Elk Herd) 2002. March 2002. Prepared by Michael A. Davison, Washington Department of Fish and Wildlife. Report is available at <http://wdfw.wa.gov/publications/00772/>

6) Public Involvement (Optional)

- a) Identify agencies with jurisdiction or expertise, affected tribes, and other known stakeholder groups whose input is likely to be specifically solicited in the development of this proposal.

Federal and State Agencies

U.S. Forest Service – Mount Baker/Snoqualmie National Forest – Baker Ranger District

Washington Department of Fish & Wildlife

Washington Department of Ecology

Washington Department of Archaeology and Historic Preservation

Tribal Entities

Lummi Nation

Confederated Tribes of the Colville Reservation

Muckleshoot Indian Tribe

Nooksack Indian Tribe

Sauk-Suiattle Indian Tribe

Snoqualmie Indian Tribe
Stillaguamish Tribe of Indians
Suquamish Indian Tribe
Swinomish Indian Tribal Community
Tulalip Tribes
Upper Skagit Indian Tribe
Yakama Nation

Counties

Whatcom County

Cities

Bellingham

Nooksack

Census Designated Places

Deming

Welcome

Kendall

Maple Falls

Acme

Saxon

Public/Non-Governmental Agencies

Mount Baker Chamber of Commerce*

Whatcom Tourism Board*

Bonneville Power Administration

Puget Sound Energy

Northwest Indian Fisheries Commission

Recreation User Groups

Mount Baker Motorcycle Club*

Washington Trails Association*

North Cascade Soaring Club*

Northwest Quad Association*

Around the Sound Jeep Club*

Washington Backcountry Hunters & Anglers*

Whatcom Mountain Bike Coalition*
Rainer Ridge Rams 4x4 Club*
Whatcom Chapter Backcountry Horseman*
Cascade Mountain Runners
Greater Bellingham Running Club*
Whatcom County Snowmobile Club*

Stakeholder Groups

Citizens for Forest Roads*
American Rivers*
American Whitewater
Pacific Northwest Trail Association
Mt. Baker Group, Washington State Chapter Sierra Club
Whatcom Land Trust

**Participated through representation on the planning committee*

- b) Briefly describe the processes used or expected to be used for soliciting input from those listed. [Examples: ad hoc committees, tribal consultations, interagency meetings, public workshops or hearings, newsletters, etc.]

Public participation in the planning process was an integral part of creating the plan. The input process included six main components:

- **A series of public meetings held throughout the planning process:**
 - **Two kick-off community meetings to introduce the project and collect public input.**
 - **One community meeting to present the findings of the land suitability assessment and collect public input.**
 - **Two community meetings to present two concept maps and collect public input.**
- **Formation of a citizen committee to discuss challenges and recommend improvements within the Recreation Planning Area.**
- **External information gathering from a variety of sources including local recreation user groups, tribal interests, the US Forest Service, Washington Department of Fish & Wildlife, and Whatcom County. DNR staff communicated with these groups multiple times, including via letters, emails, phone calls, and on-site consultations.**
- **Creation of a webpage to provide general information on the planning process and solicit comments.**
- **Distribution of a web-based survey to assess user patterns, concerns, and overall impressions of the Recreation Planning Area.**
- **Periodic distribution of an email update to an extensive mailing list of interested public and stakeholders, including the above mentioned agencies and organizations.**
- **Tribal consultations: The Department consulted throughout the process with the tribes referenced on page 14.**

Detailed discussion of the public process is included in the plan.

PART II – IMPACT ANALYSIS AND ALTERNATIVES

7) Affected Environment

Generally describe the existing environmental landscapes or elements (e.g., character and quality of ecosystem, existing trends, infrastructure, service levels, etc.) likely to be affected if the proposal is implemented. Include a description of the existing built and natural environment where future on-the-ground activities would occur that would be influenced by the non-project proposal.³

Developing a recreation plan for these lands is being proactive in an area of the state where recreational use of public lands is increasing and is usually accompanied by uses and activities that impact related resources. In developing a 10-15 year recreation plan, recreational use will be directed to areas more suitable to support sustainable recreation development. Several concerns were expressed by agency staff, the County Council, and external groups in recent years about the lack of authorized trail systems on DNR-managed lands in Whatcom County (Sumas, Red Mountain, Black Mountain, Vedder, North Fork, Middle Fork, South Fork, Van Zandt Dike, Mirror Lake and Stewart Mountain being the major landscapes), which agency staff felt should be addressed. With the absence of legal trails, the primary issues included unsanctioned ORV and mountain bike use in several areas, the reduction of trail and road systems on adjacent federal forestlands putting additional pressure on DNR to provide trails, and providing opportunities for outdoor recreationists to move between DNR-managed lands and adjacent Whatcom County parklands.

Natural Environment

a. Earth

Geology, Soils, Topography, Unique physical features, Erosion/enlargement of land area

Located in Western Washington, the Recreation Planning Area is part of the lands between the western foothills of the Cascade Range and the Nooksack River valley and eastern portion of the watershed of Lake Whatcom. It is defined by several large landforms in the northern portion of the planning area. The planning area is predominantly alpine forests and some meadows, and the North Fork, Middle Fork and South Fork Nooksack Rivers. The foothills include Sumas Mountain, Red Mountain and Black Mountain. Slopes range from relatively flat to areas that are 100% and greater. There are well-defined drainages that flow into all three branches of the Nooksack River. The rivers have a variety of topography, from low-lying bars to sections dominated by canyons and cliffs.

³ When complete, this section needs to provide information on existing conditions for the elements of the environment discussed in sections 8 and 9. A list of both the built and the natural elements of the environment is found in WAC 197-11-444, and included at the end of this form.

Much of the planning area has soils derived from loess, volcanic ash, alluvium, slope alluvium, and colluvium. Such soils tend to be deep and include plateaus, hillslopes, summits of hills and hillslopes, canyon walls, and mountain slopes. Loams, ash loams, rock outcrops and rubble are additional soil types found in the planning area. Changes to the shoreline of the North Fork, Middle Fork and South Fork of the Nooksack River may occur, causing some erosion or enlargement of the shoreline. Many unique physical features exist within the Recreation Planning Area, including Van Zandt Dike, some un-named sub-alpine lakes, views from the top of Sumas Mountain, Red Mountain and Slide Mountain, and areas overlooking Lake Whatcom.

b. Air

Air quality, Odor, Climate

Generally, throughout the year, the air quality is good. There are existing emissions such as equipment exhaust and road dust created by vehicle traffic, forest management and agricultural traffic, ORVs (including 4x4's, ATVs and motorcycles), and some smoke from campfires that could have an impact on the overall air quality in some parts of the planning area. Conditions range from short moist cool summers at the higher elevations of the forest to warm and dry summer conditions at the lower elevations. Winters are cold and snowy in the higher elevations and not as prevalent lower down across the landscapes. Across the planning area, the average annual precipitation ranges from 30 to 75 inches in the lowlands, whereas the higher elevations in the forested zones have an average annual precipitation of 45 to 85 inches.

c. Water

Surface water movement/quantity/quality, Runoff/absorption, Floods

The North Fork, Middle Fork and South Fork branches of the Nooksack River are either adjacent to or flow through the Recreation Planning Area. Multiple creeks drain into these rivers, including Bell Creek, Coal Creek, Racehorse Creek, Hutchison Creek, Doaks Creek, Skookum Creek, Maple Creek, and Clearwater Creek. Swift Creek drains into the Nooksack River from the western slopes of the Sumas landscape and Olsen Creek is part of the Lake Whatcom watershed, draining directly into Lake Whatcom. Peak runoff normally occurs between March and June. In the forested environment, most of the surface runoff drains into the forest floor, replenishing the groundwater table and the creek channels.

Across the Recreation Planning Area, the potential for flooding varies due to a variety of conditions, and occurs on an infrequent basis. Snowmelt affects spring runoff in the creeks, originating in the high forest environment, draining to the North Fork, Middle Fork and South Fork of the Nooksack River. This may happen from March through June.

High water events move large amounts of materials causing streams/creeks to move and reclaim floodplains. Streams and creeks generally do not support well-developed floodplains. All three forks of the Nooksack River contain 100-year flood zones in or adjacent to landscapes in the planning area.

d. Plants and animals

Habitat for and numbers or diversity of species of plants, fish, or other wildlife; Unique species,

Fish or wildlife migration routes

The native coniferous forest is primarily made up of Douglas fir, western red cedar and western hemlock; red alder and big leaf maple are found in the riparian areas. Understory plants include sword fern, snowberry, salmonberry, yarrow, camas, Pacific dogwood, salal, cascara, spirea, white trillium, vetch, and many others. Rare ecological communities and high-quality examples of common ecological communities found in the planning area include:

- Pacific Silver Fir - Western Hemlock Forest
- Pacific Silver Fir / Devil's-club Swamp Forest
- Pacific Silver Fir / Foamflower
- Pacific Silver Fir / Oval-leaf Blueberry
- Pacific Silver Fir / Oval-leaf Blueberry
- Red Alder Forest
- Inland Sedge - Bog St. John's Wort Fen
- Russet Cottongrass - Inland Sedge Fen
- Fowl Mannagrass Pacific Coast Marsh
- Bog Labrador-tea / Carex - Red Fescue Shrub Fen [Provisional]
- Skunkcabbage Marsh
- North Pacific Herbaceous Bald and Bluff
- Yellow Pond-lily Aquatic Vegetation
- Sitka Spruce - Western Hemlock Forest
- Black Cottonwood - Red Alder / Salmonberry Riparian Forest
- Western Redcedar - Western Hemlock / Skunkcabbage Swamp Forest
- Western Redcedar - Western Hemlock Forest
- Western Hemlock / Oval-leaf Blueberry

Additionally, there are five rare plant species from Whatcom County found in the planning area:

- Pygmy water-lily
- Spotted Joe-Pye weed
- Several-flowered sedge
- Tall bugbane
- Western touch-me-not

The Recreation Planning Area supports populations of elk, black-tailed deer, mountain lions, raccoons, crows, lynx, coyotes, opossums, tree squirrels, chipmunks, and black bears. Herons, Red-tailed hawks, grouse, common loon, harlequin duck, and sparrows are all found in the planning area. There are many wildlife species in the planning area listed as endangered, threatened, sensitive, candidate or species of concern. Species listed as candidate, threatened, or endangered under the federal Endangered Species Act, or are considered by Washington state to be a “species of greatest conservation need”, which have a reasonable likelihood of occurring within or near the planning area include: fisher, gray wolf, grizzly bear, lynx, martin, wolverine, Cascade red fox, Townsend’s big-eared bat,

Keen's myotis, marbled murrelet, harlequin duck, golden eagle, band-tailed pigeon, Northern spotted owl, purple martin, Columbia spotted frog, Oregon spotted frog, Western toad, bull trout/dolly varden, chinook salmon, coho salmon, chum salmon, sockeye salmon, rainbow trout/steelhead, white sturgeon, Pacific lamprey, river lamprey, and Johnson's hairstreak. Species whose geographic distributions are limited to the marine environment are not included.

The planning area is part of the winter range for the Northern Cascades Elk herd and their summer range is dispersed within portions of the planning area. The Recreation Planning Area is part of the Pacific flyway for migratory waterfowl.

e. Energy and natural resources

Amount required/rate of use/efficiency, Source/availability, Nonrenewable resources, Conservation and renewable resources, Scenic resources

There are several rock pits located in the Planning Area used by DNR to build forest management roads and maintain existing roads on DNR-managed lands. There are no existing energy sources or uses in the Recreation Planning Area.

Many locations within the Recreation Planning Area can be considered scenic resources both from the perspective of being a viewpoint to other areas or exhibiting a natural beauty experienced from driving on the road system in the planning area.

Built Environment

a. Environmental health

Noise, Risk of explosion, Releases or potential releases to the environment affecting public health

Current background noise from land management activities exists such as timber harvesting, road construction and gravel removal from rock sources; recreational traffic, camping, and motorized recreation use on unauthorized trails. The several rock pits in the planning area are a source of rock for road improvement projects. Infrequent blasting may occur in these areas as part of producing road material.

b. Land and shoreline use

Relationship to existing land use plans and to estimated population, Housing, Light and glare, Aesthetics, Agricultural crops, Recreation. *Due to an omission in this document, historic and cultural preservation descriptions are addressed in the SEPA Checklist, Section B.13 – Historic and cultural preservation.*

The lands in the Recreation Planning Area are managed for long-term forestry. Whatcom County designates county lands within the Recreation Planning Area as part of Commercial Forest Zone. The Baker to Bellingham Non-Motorized Recreation Plan is consistent with the Whatcom County Comprehensive Plan.

The following existing documents relate to different areas adjacent to the Recreation Planning Area:

- USFS Mount Baker/Snoqualmie National Forest – Mount Baker/Snoqualmie National Forest Plan 1990

- **Upper Nooksack River Recreation Plan 2015**
- **Whatcom County - Comprehensive Parks, Recreation and Open Space Plan 2014**
- **Whatcom County - Lookout Mountain Forest Preserve & Lake Whatcom Park Recreational Trail Plan 2016**
- **Whatcom County Foothills Subarea Plan 2014**

The city of Bellingham, at approximately 89,400 residents, is the closest population center to the planning area. Several small census designated places (see Section 6.a for a list) are spread out in Whatcom County near various units of the Recreation Planning Area. Outdoor recreation-based activities have increased statewide on a yearly basis, with portions of the planning area, mostly Sumas, Red Mountain and North Fork units, experiencing similar recreational pressures.

Housing is not a part of The Plan. Lighting is not a part of the primitive type of recreation facilities and trail systems developed by DNR. A source of glare in the planning area at this time is from individual vehicles that drive in the planning area. The working forest environment natural environment have no facilities. Aesthetic values focus on the natural beauty of the landscape.

There are several rural housing developments and residential properties adjacent to portions of the planning area.

There are no agricultural crops on DNR-managed land within the Recreation Planning Area.

Within the Recreation Planning Area, there are a variety of dispersed recreation activities - hunting, fishing, camping, pleasure driving, bird watching, wildlife viewing, and picnicking. In the immediate vicinity, Mount Baker/Snoqualmie National Forest has an extensive trail system of motorized and non-motorized trails. Whatcom County has several county parks adjacent to units in the Recreation Planning Area. They include Silver Lake Park, which offers a variety of non-motorized, boating and camping recreation opportunities; Maple Creek Park (temporarily closed) offers non-motorized recreation opportunities; Lake Whatcom Park, offers a variety of non-motorized recreation opportunities; South Fork Park, which offers a variety of non-motorized recreation opportunities; and Canyon Lake Community Forest, managed as a nature reserve. In the winter, snowmobiles have access to many acres of undeveloped land in the planning area at the upper elevations of Slide Mountain. There are no designated recreation trails. Current use is characterized as “dispersed” as it occurs throughout the landscape. The Plan will serve to direct the current dispersed use to proposed designated facilities and trails. Some areas where unsanctioned motorized and non-motorized uses have been occurring will no longer be available for trail use. The Plan proposes areas non-motorized trail systems only. Hunting and fishing will continue to be emphasized as important recreational opportunities provided by DNR and are not expected to be negatively impacted under The Plan.

c. Transportation

Transportation systems, Vehicular traffic, Waterborne, rail, and air traffic, Parking, Movement/circulation of people and goods, Traffic hazards

Whatcom Transportation Authority provides public Transportation from State Highway 542 to the Van Zandt community and the Kendall area along State Highway 547 which are adjacent to units in the Recreation Planning Area.

The Recreation Planning Area contains more than 280 miles of forest roads, maintained for forest practices.

State Highways 542, 547, and 9 provide public access to various units within the Recreation Planning Area. County roads such as the Y Road, Mosquito Lake Road, North Fork Road, Park Road, and Saxon Road also provide limited or public access to the Recreation Planning Area.

d. Public services and utilities

Fire, Police, Schools, Parks and other recreational facilities, Maintenance, Communications, Water/storm water, Sewer/solid waste, and Other governmental services or utilities

There are no governmental services provided in the Recreation Planning Area. DNR maintains communications equipment in the planning area for agency use. Whatcom County Parks and Recreation Department manages several county parks adjacent to portions of the Recreation Planning Area (Lake Whatcom Park, Silver Lake Park, Maple Falls Park, South Fork Park, and Canyon Lake Community Forest). Whatcom County Sheriff's Office and Whatcom County EMS respond to emergency calls within the Recreation Planning Area. Whatcom County Fire Districts 1, 14, 16, and 19 are all in close proximity to the Recreation Planning Area.

8) Key Issue Assessment

List the identified key issues or areas of controversy or concern and include a brief statement of why each is a key issue. For each item listed:

- **Working Forests and Recreation Uses**
 - **A key issue is that trails, trailheads and access roads will experience closures during forest practices operations in order to protect the safety of contractors and members of the public as well as maintain the ability of the agency to fulfil our fiduciary obligation to the Trust beneficiaries.**
 - **These closures may be seen as inconvenient by user groups and may disrupt accustomed patterns of recreation since timber harvesting and other forest practices operations are episodic in nature, shifting across the landscape from year to year. There may be stretches of time when no forest practices operations occur and the public develops a sense that these forests are maintained for recreational purposes only, which is erroneous.**
 - **Non-sanctioned recreational use has caused environmental and resource damage and affected Trust lands in the planning area. Water diversions from non-sanctioned trails have led to new stream locations. Critical habitat like cliffs and**

caves have been impacted by users and make adherence to HCP and forest practice requirements more difficult. Shooting, vandalism and garbage have all impacted Trust resources, including the value of trees left for HCP obligations and the value of trust assets. Additionally, there is a risk from fire starts with both more recreational users and the types of use on the landscape.

- **Public Access**

- A key issue is that public access from county roads into the various units of the Planning Area is limited. Many DNR roads cross private property in order to access state lands.
- In some of these cases, DNR manages the road and has established legal agreements, usually easements that allow both the road and its use by DNR for timber management purposes.
- In cases where DNR does not actually own the road it will still have negotiated for the right to use the road and typically pays the landowner for that privilege.
- Many of these access agreements were created before significant consideration was given to recreation so they may only address management use and public access may not have been included.
- Landowners are now often unwilling or hesitant to include the right for public access when negotiating agreements because of concerns about fiscal impacts, damage to environmentally sensitive areas, liability, wildland fire, trash, and more.
- Even where roads may not currently be gated that doesn't necessarily mean that legal access for the public has been secured.

- **Recreation Trails and Facilities**

The majority of recreational use (motorized and non-motorized) within the Recreation Planning Area today occurs on user built trails. These trails are mostly located in the Sumas, Red Mountain, North Fork, Middle Fork, Mirror Lake and South Fork units of the Planning Area. The rest of the recreation use occurs throughout the planning area in a generally undirected manner. The forest road system is the primary means of public access into and throughout the planning area. There are several locations on Sumas Mountain, Red Mountain and the North Fork area where unsanctioned recreation use has proliferated over the years. There is public interest in developing trail systems and associated parking as needed in the planning area. There also is interest in keeping portions of the area primitive and undeveloped. The public values the opportunity to continue to explore in an undirected manner. Issues related to recreational use include the need to address the extensive use of unsanctioned trails across the Planning Area; ongoing impacts from motorized use; how and where to provide future trail systems; and how to encourage recreationists to stay on an authorized network of trails.

- **Restoration**

Several areas of concern related to impacts to the environment and abuse of the land

in the Recreation Planning Area were identified and discussed during the planning effort. In particular, forested hillsides, new plantations, and stream crossings were identified as being damaged by illegal recreation activities.

- **Enforcement & Partnerships**

The need for increased enforcement in the Recreation Planning Area was identified and discussed by the committee on numerous occasions. The idea of correcting and preventing further damage caused by unsanctioned recreation was brought up by the planning committee. Currently there are limited enforcement resources available for this area. Suggestions were made to increase law enforcement and partnerships that leverage enforcement for the area. There was support for the idea of improving enforcement efforts related to recreating off trails and garbage dumping. This could include, among other things, increased enforcement presence, adding signage, and improving maps of developed trail systems.

Forming local partnerships with stakeholder groups and other governmental agencies was an idea brought up in the public open house meetings and at the recreation planning committee meetings on several occasions. Committee discussions included ideas such as having local groups support education and enforcement efforts throughout the Recreation Planning Area and working with agency staff on development grants for the design, and construction of trail systems.

- a) Identify alternative options or solutions for the objective or concern.

Alternatives for each key issue were organized into two different groups: Mapped Options (Concepts A-H), and Planning Area-Wide objectives and strategies to accomplish the management goals (identified in 2b.Needs and Objectives.) throughout the planning area. Two of the four key issues identified (public access and recreation trails and facilities) are depicted in the mapped options, the others are addressed within the eight planning area-wide objectives and strategies starting on page nine of The Plan. Mapped options are spatially tied to general locations within the planning area. Many of these mapped options were considered and discussed in different locations within the planning area (NOTE: all options are conceptual in nature and not site-specific. No proposals are tied to specific detailed locations in the planning area at this time. Detailed site-specific proposals would occur after this plan is adopted and when individual projects are being implemented.)

Mapped options were developed using a three-phase approach. The first phase included developing map concepts A, B, and C. These concepts were discussed with the committee and staff and then refined to two mapped options; concepts D and E. Concepts D and E were discussed with the committee and shared at a set of community meetings. At this point, following a Whatcom County Council meeting, DNR decided to remove motorized recreation from the recreation planning process. To reflect this decision, Concepts D and E were revised into Concepts F and G and reviewed with the planning committee. After committee discussion and staff review, these concepts were refined into Concept H. Concept H was further refined into the Draft Concept Map for The Plan that the planning area wide objectives and strategies will apply to. All options were based on the

recreation land suitability information and environmental protection. Concepts varied in the amount and location of the areas identified for public access, non-motorized and motorized use and the type of facilities provided. Ultimately, the recreation plan addresses non-motorized recreation opportunities only. These concepts were developed to explore and discuss a range of recreation management options with the Recreation Planning Committee. The concept maps are available as part of the draft recreation plan on DNR's SEPA webpage: <https://www.dnr.wa.gov/non-project-actions>

Initial Concepts A, B, and C were developed by agency staff for discussion with the Committee as follows. Detailed notes related to discussion of these concepts can be found on the Baker to Bellingham Recreation Plan website. (See planning committee notes for September 19, 2017): <https://www.dnr.wa.gov/BakertoBellingham>

Mapped Options

CONCEPT A

Key Issue—Public Access:

- Provide public access into Sumas unit for motorized recreation from Washington State Highway 542 onto Forest Road V-1000
- Provide public access into Red Mountain unit for motorized recreation from Silver Lake Road (Whatcom County road) onto existing Forest Road
- Provide public access into Van Zandt Dike unit for non-motorized recreation from Mosquito Lake Road (Whatcom County road) via new forest road
- Provide public access into Stewart Mountain unit for non-motorized recreation from Y-Road (Whatcom County road) from Forest Road OC-ML
- Provide public access to a water access facility from Highway 542 near Maple Falls

Key Issue—Recreation Trails and Facilities:

- Provide separate motorized (Sumas Unit and Red Mountain Unit) and non-motorized (Van Zandt Dike Unit and Stewart Mountain Unit) trail systems in The Recreation Planning Area (see Concept Map)
- Provide a conditional use zone for a non-motorized trail system in the Van Zandt Dike unit based on:
 - Does not encroach into a long-term marbled murrelet conservation zone as defined in the adopted Marbled Murrelet Long Term Conservation Strategy
 - Has connectivity to the non-motorized trail system shown on the Concept Map for the Van Zandt Dike unit
- Maintain large areas of the forested landscape for dispersed exploring in a working forest
- Provide two trailheads for motorized recreation in the Sumas and Red Mountain units and two trailheads for non-motorized recreation use in the Van Zandt Dike and Stewart Mountain units

- Provide non-motorized connections to Lake Whatcom Park (Whatcom County park) from Stewart Mountain unit
- Provide day-use recreation facilities of the following type in The Recreation Planning Area:
 - Paragliding/hang gliding launch facility in Red Mountain unit
 - Water Access facility adjacent to the North Fork Nooksack River off of Highway 542 near Maple Falls
 - Picnic facility in the Van Zandt Dike unit

CONCEPT B

Key Issue—Public Access:

- Provide public access into Red Mountain unit for motorized recreation from Silver Lake Road (Whatcom County road) onto existing Forest Road
- Provide public access into Stewart Mountain unit for non-motorized recreation from Y-Road(Whatcom County road) from Forest Road OC-ML
- Provide public access into Mirror Lake north unit from Park Road (Whatcom County road) onto Forest Road BX-ML
- Provide public access for a conditional use zone for non-motorized recreation in North Fork unit from North Fork Road (Whatcom County road) onto Forest Road NF-ML

Key Issue—Recreation Trails and Facilities:

- Provide separate motorized (Red Mountain unit) and non-motorized (Stewart Mountain and Mirror Lake units) trail systems in The Recreation Planning Area (see Concept Map)
- Maintain large areas of the forested landscape for dispersed exploring in a working forest
- Provide a conditional use zone for a non-motorized trail system in the North Fork unit based on:
 - Does not encroach into a long-term marbled murrelet conservation zone as defined in the adopted Marbled Murrelet Long Term Conservation Strategy
 - Has full public access from North Fork Road onto Forest Road NF-ML and Forest Road S-1000
- Provide one trailhead for motorized recreation in Red Mountain unit and two trailheads for non-motorized uses in Stewart Mountain and Mirror Lake north units
- Provide non-motorized connections to North Lake Whatcom Park (Whatcom County park) from Stewart Mountain and Mirror Lake north units
- Provide day-use recreation facilities of the following type in The Recreation Planning Area:
 - Fishing and picnicking in North Fork unit

- Picnicking and scenic point in Stewart Mountain unit

CONCEPT C

Key Issue—Public Access:

- Provide public access into Sumas unit for motorized recreation from Highway 542 onto Forest Road V-1000
- Provide public access into Red Mountain unit for non-motorized recreation from Silver Lake Road (Whatcom County road) onto existing Forest Road
- Provide public access into Mirror Lake north unit from Park Road (Whatcom County road) onto Forest Road BX-ML
- Provide public access into North Fork unit from North Fork Road (Whatcom County road) onto Forest Road Forest Road NF-ML and Forest Road RH-ML

Key Issue— Recreation Trails and Facilities:

- Provide separate motorized (Sumas)and non-motorized (Mirror Lake north, Red Mountain and North Fork units) trail systems in The Recreation Planning Area (see Concept Map)
- Provide a conditional use zone for a non-motorized trail system in the North Fork unit based on:
 - Does not encroach into a long-term marbled murrelet conservation zone as defined in the Final EIS for the Long Term Marbled Murrelet Conservation Strategy
 - Has full public access from North Fork Road onto Forest Road NF-ML and Forest Road S-1000
 - Has connectivity to the non-motorized trail system shown on the Concept Map for North Fork unit
- Provide one trailhead for motorized trails (Sumas unit) and three for non-motorized trails (Red Mountain, North Fork and Mirror Lake north units) in The Recreation Planning Area (see Concept Map)
- Provide non-motorized connections to Lake Whatcom Park (Whatcom County park) from Mirror Lake north unit
- Provide one day-use picnicking and fishing facility in the North Fork unit
- Maintain large areas of the forested landscape for exploring in a working forest

Based on input from the committee, these concepts were refined, resulting in two new concepts - D and E. As these new concepts were developed, there were ideas and/or elements from A, B, and C that were either changed or dropped out. These included eliminating non-motorized recreation from the Van Zandt Dike unit and the accompanying picnic facility, changing non-motorized recreation in Mirror Lake north unit adjacent to Lake Whatcom Park to a conditional use zone for non-motorized recreation and separating the conditional use zone from non-motorized recreation use in North Fork unit.

Detailed notes related to discussion of these concepts can be found on the Baker to Bellingham Recreation Plan website. (See planning committee notes for January 9, 2018)

CONCEPT D

Key Issue—Public Access:

- Provide public access into Sumas unit of The Recreation Planning Area from Highway 542 onto Forest Road V-1000; evaluate options for full public access with adjacent property owners
- Provide public access into Red Mountain unit from Silver Lake Road onto existing Forest Road that has full access rights
- Provide public access for the conditional use zone in the North Fork unit from North Fork Road onto Forest Road NF-ML
- Provide public access into the conditional use zone in the Mirror Lake north unit from Park Road
- Provide public access to a water access facility from Highway 542 near Maple Falls

Key Issue—Recreation Trails and Facilities:

- Provide two trailheads, one for motorized trails (Sumas unit) and one for non-motorized trails (Red Mountain unit) in planning area
- Provide separate motorized (Sumas unit) and non-motorized (Red Mountain) trail systems in The Recreation Planning Area (see Concept Map D)
- Provide non-motorized connections to Silver Lake Park (Whatcom County Park) from Red Mountain unit
- Maintain large areas of the forested landscape for dispersed exploring in a working forest
- Provide a paragliding/hang gliding launch facility in the Red Mountain unit
- Provide a water access facility with full access from Highway 542 near Maple Falls
- Provide a conditional use zone for a non-motorized trail system in the North Fork unit based on:
 - Does not encroach into a long-term marbled murrelet conservation zone as defined in the adopted Marbled Murrelet Long Term Conservation Strategy
 - Has full public access from North Fork Road onto Forest Road NF-ML and Forest Road S-1000
- Provide a conditional use zone for a non-motorized trail system in the Mirror Lake north unit based on:
 - Trail connectivity from Lake Whatcom Park

CONCEPT E

Key Issue—Public Access:

- Provide public access into Sumas unit of The Recreation Planning Area from Highway 542 onto Forest Road V-1000; evaluate options for public access with adjacent property owner
- Provide public access into Red Mountain unit from Silver Lake Road onto existing Forest Road that has access rights
- Provide public access into North Fork unit of The Recreation Planning Area from North Fork Road onto Forest Road NF-ML
- Provide public access into Stewart Mountain Unit from Y-road using Forest Road OC-ML; evaluate options for public access with adjacent property owner.

Key Issue— Recreation Trails and Facilities:

- Provide four trailheads, two for motorized trails (Sumas and Red Mountain units) and two for non-motorized trails (North Fork and Stewart Mountain units) in The Recreation Planning Area
- Provide separate motorized (Sumas and Red Mountain units) and non-motorized (North Fork and Stewart Mountain units) trail systems in the planning area (see Concept Map)
- Provide a picnicking and scenic point facility in the Stewart Mountain unit
- Provide non-motorized connections to North Lake Whatcom Park from Stewart Mountain unit
- Maintain large areas of the forested landscape for dispersed exploring in a working forest

Based on a decision by Whatcom County Council to not change the County Zoning Codes, as well public comment received at committee meetings and the two community meetings (held on February 21 and 22, 2018), and internal agency reviews and discussion, Concept D and E were revised as Concept F and Concept G, to show only non-motorized recreation opportunities.

Detailed notes related to discussion of Concepts F and G can be found on the Baker to Bellingham Recreation Plan website. (See planning committee notes for April 10, 2018)

CONCEPT F

Key Issue—Public Access:

- Provide public access into Red Mountain unit from Silver Lake Road onto existing Forest Road that has full access rights
- Provide public access for the conditional use zone in the North Fork unit from North Fork Road onto Forest Road NF-ML
- Provide public access into the conditional use zone in the Mirror Lake north unit from Whatcom County's Lake Whatcom Park trail system

- Provide public access to a water access facility from Highway 542 near Maple Falls

Key Issue—Recreation Trails and Facilities:

- Provide one trailhead one for non-motorized trails (Red Mountain unit) in planning area
- Provide non-motorized (Red Mountain) trail systems in The Recreation Planning Area (see Concept Map)
- Provide non-motorized connections to Silver Lake Park from Red Mountain unit
- Maintain large areas of the forested landscape for dispersed exploring in a working forest
- Provide a paragliding/hang gliding launch facility in the Red Mountain unit
- Provide a water access facility from Highway 542 near Maple Falls
- Provide a conditional use zone for a non-motorized trail system in the North Fork unit based on:
 - Does not encroach into a long-term marbled murrelet conservation zone as defined in the adopted Marbled Murrelet Long Term Conservation Strategy
 - Has public access from North Fork Road onto Forest Road NF-ML and Forest Road S-1000
- Provide a conditional use zone for a non-motorized trail system in the Mirror Lake north unit based on:
 - Trail connectivity from Lake Whatcom Park

CONCEPT G

Key Issue—Public Access:

- Provide public access into Red Mountain unit from Silver Lake Road onto existing Forest Road that has full access rights
- Provide public access into North Fork unit of The Recreation Planning Area from North Fork Road onto Forest Road NF-ML
- Provide public access into Stewart Mountain unit from Y-Road using Forest Road OC-ML ; evaluate options for public access with adjacent property owner.

Key Issue— Recreation Trails and Facilities:

- Provide two trailheads for non-motorized trails (North Fork and Stewart Mountain units) in The Recreation Planning Area
- Provide non-motorized (North Fork and Stewart Mountain units) trail systems in the planning area (see Concept Map)
- Provide a picnicking and scenic overlook facility in the Stewart Mountain unit
- Provide non-motorized connections to Lake Whatcom Park from Stewart Mountain unit
- Maintain large areas of the forested landscape for dispersed exploring in a working forest

Based on input from the planning committee at the May 8, 2018 and June 12, 2018 committee meetings a final concept map (Concept H) was developed and proposed in The Plan. This final concept map is available as Figure 4 on page 10 of The Plan. Concept H represents a melding of the two previous concepts, reflecting the planning committee's desire to include all proposed recreation zones in the final concept.

CONCEPT H (Draft Concept Map proposed in Plan)

Key Issue—Public Access:

- Provide public access into Red Mountain unit from Silver Lake Road onto existing Forest Road that has full access rights
- Provide public access into North Fork unit of The Recreation Planning Area from North Fork Road onto Forest Road NF-ML
- Provide public access into Stewart Mountain unit from Y-Road using Forest Road OC-ML; evaluate options for public access with adjacent property owner

Key Issue—Recreation Trails and Facilities:

- Provide three trailheads for non-motorized trails (Red Mountain, North Fork and Stewart Mountain units) in The Recreation Planning Area; a fourth trailhead will be developed to service the conditional use zone in the North Fork unit if it becomes available for recreational use.
- Provide non-motorized (North Fork, Red Mountain, Mirror Lake and Stewart Mountain units) trail systems in the planning area (see Concept Map)
- Provide a conditional use zone for a non-motorized trail system in the North Fork unit based on:
 - Does not encroach into a long-term marbled murrelet conservation zone as defined in the adopted Marbled Murrelet Long Term Conservation Strategy
 - Has public access from North Fork Road onto Forest Road NF-ML and Forest Road S-1000
- Provide a picnic facility in the North Fork unit
- Provide a picnic facility and scenic overlook in the Stewart Mountain unit
- Provide non-motorized trail connections to Lake Whatcom Park from Stewart Mountain and Mirror Lake units
- Provide non-motorized trail connections to Canyon Lake Community Forest from North Fork unit
- Provide a paragliding/hang gliding launch facility and scenic overlook in the Red Mountain unit
- Provide a water access facility from Highway 542 near Maple Falls
- Maintain large areas of the forested landscape for dispersed exploring in a working forest

Planning Area-Wide Options

In addition to the Mapped Options (Concepts A-H), The Plan includes objectives and strategies that are not necessarily tied to any particular location within the planning area. These objectives and strategies will be applied generally to the planning area once The Plan is adopted. Objectives and strategies are organized into the following categories:

Public Access

The draft recreation plan calls for providing public access and maintaining forest roads to developed trailheads or day-use facilities. This will be accomplished by seeking opportunities to expand funding mechanisms for road maintenance and enforcement and to evaluate and identify forest roads appropriate for public access for the purpose of pleasure driving and dispersed recreation, while maintaining the ability to close roads that are sometimes open when active logging operations are occurring.

Recreation Trails, Facilities, and Dispersed Use

Recreation Trails

Providing developed trail systems is an objective of the recreation plan. Trails will be designed and constructed that address stewardship responsibilities, land suitability criteria, safety and risk management and user experience. Trail systems will be located and developed to minimize long-term maintenance and to prevent or minimize the potential for erosion and sediment delivery into nearby creeks and streams. Providing and maintaining a network of recreation trails will require developing an inventory of existing unauthorized trails and assessing them for environmental damage or reuse as part of a designated trail system. DNR will invite the public to participate in the planning, design, construction and maintenance of trails.

Recreation Facilities

The Plan proposed to provide a network of recreation facilities to direct and accommodate use in the area. Similar to the trail systems, facilities will be located and designed to protect the environment and natural resources, support safe and sustainable recreation opportunities, and to comply with the Americans with Disabilities Act (ADA).

Dispersed Recreation Management

Dispersed recreation is intended to continue to occur throughout the planning area. Strategies for providing dispersed recreation address providing opportunities for dispersed camping, pleasure driving, hunting, fishing and exploring; manage dispersed recreation on DNR-managed lands consistent with WAC 332.52. Approximately 72,000 acres are available to provide opportunities for dispersed recreation.

Restoration

Restoration objectives are included in the recreation plan. Restoring areas impacted by past recreational use is critical for the long-term viability of the natural systems within the Recreation Planning Area. The North Fork unit, as well as other locations within the planning area, has areas that need restoration to correct damage from past use. Restoration objectives address this issue and have strategies to protect areas that have

been restored. Communicating restoration objectives to the public will improve long term restoration opportunities throughout the planning area.

Enforcement and Partnerships

Partnerships and Volunteer Coordination

Developing partnerships and encouraging volunteer opportunities often assists the agency on aspects of operations such as the design and construction of trail systems which provide an overall increased presence on the landscape. Opportunities that enhance safety and support education and enforcement efforts are of particular interest.

Education and Enforcement

The Plan identifies the need to increase enforcement within the Recreation Planning Area. The objectives for education and enforcement include improving signage, user awareness of the forest road system, and compliance with the road rules. This will be accomplished through more active enforcement presence on the landscape and increasing the availability of educational information about the area. Additional objectives include increasing public awareness of the agency's vision and enhancing emergency access to the developed areas of The Recreation Planning Area in support of enforcement efforts.

Adaptive Management

As spelled out in The Plan, the objective and strategies to support adaptive management include:

Objective: Employ adaptive management practices to implement this recreation plan, adjusting recreation management practices in order to respond to changing laws, environmental information, recreation trends, and circumstances on the ground.

Strategies

- Evaluate site-specific conditions when implementing projects on the ground.
- Respond and adapt to new or changing information and variable site conditions.
- Consider proposals submitted to DNR by others that are consistent with achieving recreation plan concepts, goals, strategies and objectives, and are compatible with agency requirements.
- Evaluate new or emerging recreation activities for compatibility with the management objectives laid out in this plan and the vision and management goals of the DNR statewide Recreation Program.
- Hunting and fishing will continue to operate under the rules promulgated by the WDFW Commission that includes a separate public process.

Sustainable Funding

The plan supports pursuing sustainable funding opportunities that will allow for

education, enforcement, and the ongoing maintenance of facilities and trails.

- b) Describe the environmental considerations/impacts relevant to each of the alternatives identified in 8.a.

Public Access

In proposed Concept H, the plan includes using existing forest roads to provide public access into the four proposed trail development ones in The Recreation Planning Area. For three of the trailheads, located within a mile of the public improved road, the forest road may be paved up to the trailhead. Paving the roads may include disturbing soil, plants and animals surrounding the roadway. Run-off from precipitation events would increase and have to be managed to meet Whatcom County Stormwater Permit standards.

Restoration

Restoration efforts will result in improved site conditions and a reduction of resource damage. Restoration was considered in all options. Individual site-specific projects will be identified during plan implementation. Restoration efforts supported in the plan include repairing areas damaged by recreational use. This generally includes stream adjacent trails, creek and stream crossings where vehicles have been made through the water channel.

Recreation Facilities, Trails, and Dispersed Use

Proposed Concept H includes creating three trailheads, a scenic overlook/picnic facility, a water access facility, a paragliding/hang gliding launch facility/scenic overlook, and one small day use fishing/picnic facility.

Three, (plus a potential fourth) separate trailheads are proposed. All but one of the four trailheads is proposed near the perimeter of the planning area to minimize vehicular road use, necessary for access, on the forest road system. There is one trailhead proposed in the Red Mountain unit to support non-motorized trail users. An upper non-motorized trailhead is proposed near the center of the North Fork unit to provide access to the non-motorized trails in that area given the human powered nature of the sports in conjunction with the terrain and distance necessary to travel to get to the area. The third trailhead is proposed for the Stewart Mountain unit.

Non-motorized trail systems are proposed in Concept H. General locations for these trail systems are identified on the map. Trail connections to Lake Whatcom Park, Silver Lake Park, and Canyon Lake Community Forest are proposed as a means to provide connectivity to Whatcom County parks. Not all the area identified as a trail area will be developed. Trails will need to be located and designed at a site-specific level before construction occurs. There will be places within the “trail development zones” that preclude trail development. The zones identify the general locations to evaluate for developing trails. Most of the existing recreation trail-based use currently occurs on unauthorized trails. The addition of trail systems will improve the recreational trail opportunities and quality of experience for many recreationists.

It may also decrease the forest road use by trail-based recreationists. Providing links to adjacent lands may increase use over time. By defining where to and then developing trail systems in specific locations, future trail-based use will be directed into areas defined by the agency as more sustainable. Predetermining where to locate trail systems could reduce the potential for users to establish trail systems in areas with higher resource sensitivity.

If all developed trails and facilities listed above were implemented it is estimated that approximately 27 acres (all facilities) and 47 acres (all trails) of land, for a total of 74 acres, within the planning area would be developed. This said, approximately 0.09% of the planning area is estimated to be developed under Option H.

All proposed facilities and trails will be designed and constructed in the future. Construction activities could affect local traffic patterns and include impacts to noise, traffic, and disturbance to plants and animals. As required, these projects will undergo site-specific SEPA analysis at that time.

All other options (A, B, C, D, E, F, and G) considered and discussed including trailheads in several locations within the planning area. Trail systems were identified as a key component of the plan and the options leading up to Concept H considered various locations and configurations for those trail development zones. In all options, locations for facilities and trails are conceptual in nature and are generally away from areas with more broad-scale environmental concerns such as core elk habitat, marbled murrelet conservation zones, and areas with highly erodible soils (for more discussion see response to 9.a). Site-specific environmental concerns will be evaluated in more detail during site-specific project implementation.

Enforcement and Partnerships

The strategy portion of the objectives suggests ways to increase enforcement and promote partnerships that support enforcement in the planning area. Enforcement efforts could improve user knowledge of forest road system. Partnerships will leverage efforts toward implementing recreation projects, restoration efforts, and enforcement. Partnerships can often result in more awareness of the resource management considerations in an area and increased stewardship.

- c) Describe reasonable mitigation of adverse impacts identified.

Public Access

The Plan includes maintaining portions of the forest road system for public access (as funding allows). Reasonable mitigation measures includes directing water runoff from forest roads (paved or gravel surfaced) onto the forest floor. Stormwater plans as required by Whatcom County will be developed and implemented to mitigate any runoff impacts.

Restoration

The restoration proposed in The Plan will improve areas with existing resource damage due to past recreation use. Stream channels and banks, wet meadows, and damaged hillsides are planned to be restored.

Recreation Facilities, Trails, and Dispersed Use

Reasonable mitigation at this conceptual plan level involves the identification of areas for trails and facilities that avoid and/or limit the potential for resource damage. All trails and facilities constructed in the future will be required to meet agency trail guidelines. The planning process included a land suitability analysis that identified areas with more limiting factors. Future development of facilities and trails is generally planned in areas with fewer limiting factors. The considerations in the land suitability analysis included broad-scale criteria related to biology/habitats, soils, and geologic features. Management considerations such as rock pit locations and communications equipment were also included.

Enforcement and Partnerships

The strategy portion of the objectives suggests ways to increase enforcement and promote partnerships that support enforcement in the planning area.

- d) Identify those alternatives to be carried forward for further analysis.

The concept map (Concept H) and the planning area wide objectives and strategies were applied to the whole landscape and were broken down into the following categories:

- **Public Access**
- **Recreation Trails**
- **Recreation Facilities**
- **Dispersed Recreation Management**
- **Restoration**
- **Partnerships and Volunteer Coordination**
- **Education and Enforcement**
- **Adaptive Management**
- **Sustainable Funding**

The following aspects of Concept H are being carried forward for further analysis:

Public Access

The solutions proposed in Concept H above that includes road reconstruction, repair, paving and other site specific analysis will be carried forward for further analysis.

Restoration

The solutions proposed in Concept H above will be carried forward for further analysis.

Recreation Facilities and Trails and Dispersed Use

The location and designing of facilities and trails will require site-specific analysis and will be carried forward for further analysis.

- e) Briefly describe why those alternatives rejected from further consideration were not carried forward.

Concepts were developed that were consistent with agency parameters and missions. They were considered in four cycles (A, B, C), (D, E), (F, G) and (H). Concepts were discussed and synthesized with the recreation planning committee, and agency staff, as a means of understanding the public’s response and interest in the proposals. As the cycles advanced, proposals with limited or no support were eliminated, and ideas with strong support moved forward. The discussions around the proposals shaped and refined the ideas until Concept H was completed.

9) Proposed Nonproject Action or Alternative Actions

Describe a range of reasonable alternatives or the preferred alternative that will meet the objective(s). For each alternative, answer the following questions referring again to the list of the elements of the environment in WAC 197-11-444:

- a) If this alternative were fully implemented (including full build-out development, redevelopment, changes in land use, density of uses, management practices, etc.), describe where and how it would direct or encourage demand on or changes within elements of the human or built environment, as well as the likely effects on the natural environment. Identify where the change or affect or increased demand constitutes a likely adverse impact, and describe any further or additional adverse impacts that are likely to occur as a result of those changes and affects.

The Draft Baker to Bellingham Non-Motorized Recreation Plan is intended to improve environmental conditions, provide a mechanism for restoration of damaged resources and to identify management strategies for recreation activities in The Recreation Planning Area. The plan includes objectives, strategies, and a concept map that identify areas for future trail and facility location that are consistent with the environmental responsibilities of the agency. A land suitability assessment that identified potential limiting factors for recreation was conducted during the planning process. Planners, scientists, geographic information systems (GIS) analysts, and land managers were involved in developing the suitability maps. The process included identifying and mapping biologic, soils/geologic, and management criteria within the planning area. These criteria included:

Criteria Category	Specific Criteria
Biological Criteria	Wetlands Wetland Buffers

	Riparian Areas
	Elk Habitat
	Cliffs, Bluffs and Talus Slopes
	High Quality & Rare Plant Communities
	Sensitive, Threatened, and Endangered Species
Geological/Soils Criteria	Soils With High Erosion Potential
	Poorly Drained Soils
	Slope Percentage
	100-year Flood Plains
	Alluvial Fans
	Areas That have Moved In Previous Landslides
	Areas With High Potential for Landslides
Management Criteria	Communications Sites
	Rock Sources
	Utility Easements
	Land Adjacent to Other Properties
	Water Sources
	Cultural and Archeological Sites

It is anticipated that the Draft Baker to Bellingham Non-Motorized Recreation Plan adoption will reduce the potential for adverse impacts to the natural environment in areas where unsanctioned trail construction and use have damaged the forest environment and streams or creeks by providing management strategies that direct existing and future recreational use for non-motorized recreation into the areas that are less likely to cause adverse impacts.

Ultimately, the area may attract more use than currently exists. This may occur as people become familiar with the location of and use the trailhead facilities. Potential impacts may ultimately occur if the future trail systems become overloaded by recreational users.

- b) Identify potential mitigation measures for the adverse impacts identified in 9.a and describe how effective the mitigation is assumed to be, any adverse impacts that could result from the use of the mitigation, and any conflict or concern related to the proposal objectives and/or key issues identified.

Mitigation measures would be developed for the site-specific proposals to direct recreation use in areas less likely to cause adverse impacts. The conditions of approval for any permit would be coordinated with responsible agency staff to ensure the proposed mitigation offsets the impacts.

By planning for the future use, the agency can direct it to areas with less resource sensitivities.

- c) Identify unavoidable impacts and those that will be left to be addressed at the project level.

This is a non-project proposal. However, anticipated future projects, including future trail and facility locations for non-motorized recreation uses, are proposed for areas with less potential for adverse impacts. Site-specific field assessments will be included as part of the trail system(s), trailheads, para gliding/hang gliding launch facility, water access facility, small day-use fishing facilities and picnicking facilities design and construction process. There will be some unavoidable impacts from recreational use, such as public safety issues, erosion and storm water movement toward surface water or streams and fish habitat, noise, and wildlife disturbance from new trail use patterns.

The total capacity for recreation use in the area and the associated impacts will be better defined as parking capacity is established, facilities are constructed, and other control measures are put in place (e.g., directing trail use, defining parking areas, gates, and enforcement). Recreational use is expected to increase over time with or without planning.

- d) Describe how the proposal objectives will or will not be met if the impacts described in 9.c were to occur.

Adaptive management strategies are established mechanisms to address unforeseen circumstances and site conditions. Specific strategies to be applied include:

- **Evaluate site-specific conditions when implementing projects on the ground.**
- **Respond and adapt to new or changing information and variable site conditions. See also response to question 11)b) below.**
- **Consider proposals submitted to DNR by others that are consistent with achieving The Plan's concepts, goals, strategies and objectives, and are compatible with agency requirements.**
- **Evaluate new or emerging recreation activities for compatibility with the management objectives laid out in The Plan and the vision and management goals of DNR's statewide Recreation Program.**
- **Hunting and fishing will continue to operate under the rules promulgated by the WDFW Commission, which includes a separate public process.**

Note: Alternatives may be rejected at any point in the process if: they have no environmental benefit, are not within existing authority, are determined unfeasible, or do not meet the core objectives.

PART III – IMPLEMENTATION CONSIDERATIONS

10) Consistency of the proposal with other plans, policies and laws.

- a) Internal consistency - If there are internal inconsistencies between this proposal and your agency's previously adopted or ongoing plans and regulations, identify any strategies or ideas for resolving these inconsistencies.

There are no known inconsistencies.

- b) External consistency - If there are external inconsistencies between this proposal and adopted or ongoing plans and regulations of adjacent jurisdictions and/or other agencies, identify any strategies or ideas for resolving these inconsistencies.

There are no known inconsistencies.

11) Monitoring and Follow-up

- a) Describe any monitoring that will occur to ensure the impacts were as predicted and that mitigation is effective, including responsible party, timing, and method(s) to be used.

Ongoing management of developed facilities will identify and address any unforeseen impacts that may occur.

- b) Identify any plans or strategies for updating this proposed action based on deviation from impact projections or other criteria.

If unanticipated environmental impacts are discovered or identified, DNR will take actions to mitigate for such impacts. Actions may include restricting, limiting or relocating recreation access or timing of use to prevent or minimize impacts. Adaptive management strategies will be applied as necessary.

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