

Summary Report to the Board of Natural Resources

Public comment received on the Sustainable Harvest Level

Draft Environmental Impact Statement

This report briefly summarizes written comments received by DNR during a 90-day comment period for the sustainable harvest calculation draft environmental impact statement (DEIS). DNR's SEPA Center maintains the official record of these comments. Comments were received in the mail, via e-mail, and via comment cards submitted during four public meetings held by DNR throughout the state in January 2017. The comment period closed on March 9, 2017.

Staff received **1,370** written comments on the sustainable harvest DEIS (**1,256** of these comments were "form letter" type comments). A memory stick of all comments received is provided.

Commenters included beneficiaries (counties, cities, school and utility districts), industry and industry associations, environmental organizations and a coalition of environmental organizations, and members of the public.

To follow is a brief summary of comments, organized by topic. Responses to comments will be provided in a Final Environmental Impact Statement. This brief summary is intended to provide the Board with a sense of the major issues and themes covered by the commenters. Many comment letters are lengthy and contain multiple points, not all of which may be captured here.

Support for completing the marbled murrelet long-term conservation strategy before setting a sustainable harvest level

Many commenters stated that DNR should seek approval by the U.S. Fish and Wildlife Service for the marbled murrelet long-term conservation strategy before setting the sustainable harvest level. Some of these commenters expressed concern that selecting a sustainable harvest level prior to completing the long-term conservation strategy would result in a violation of the State Environmental Policy Act, as it would pre-determine the result of the long-term conservation strategy process. This is because setting a sustainable harvest level would require DNR to pre-select one of the marbled murrelet long-term conservation strategy alternatives. Further, any such sustainable harvest level would be unattainable because in reality areas included in all six marbled murrelet conservation strategies should be restricted until the marbled murrelet

conservation strategy is approved. They suggested DNR could only avoid violating the State Environmental Policy Act by setting a sustainable harvest level that includes all six marbled murrelet conservation strategies.

Support for revenue diversification

Commenters stated the need to diversify revenue sources on state trust lands. Many requested that the Commissioner of Public Lands, either alone or with the governor's office and other state agencies, convene a task force to study sustainable sources of funding for timber counties and communities. Specific recommendations for revenue sources include carbon and ecosystem service markets and increased revenue from agricultural products. Other suggested options for increasing revenue to beneficiaries include increasing contract harvesting by extending and expanding RCW 79.15.510 and/or managing state forest lands as a single, 'unitary,' trust. Another commenter proposed compensating beneficiaries through using the existing intergrant exchange and Trust Land Transfer Program process to place state forest lands into 'formal non-harvest status.' Other commenters who support higher harvest levels suggested that revenue could be increased by increasing commercial thinning.

Concern that the DEIS does not contain an adequate range of alternatives

Several commenters suggested adding new alternatives and analyzing them in a revised DEIS. Commenters supporting additional conservation of state forest lands requested adding a sustainable harvest alternative that includes the "conservation alternative" proposed by a coalition of major conservation groups and submitted as a comment to the marbled murrelet long-term conservation strategy DEIS.

Several industry representatives requested that DNR develop a new alternative that provides a higher harvest level than the alternatives analyzed in the DEIS. This alternative would be based on a revised inventory, different volume yield projections and/or more commercial thinning (included riparian thinning) than projected in any of the current alternatives.

Support for specific alternatives

Alternative 1

Several commenters questioned the accuracy of the DNR's forest inventory system (discussed further below). These comments stated that DNR should improve the quality of the inventory

and, in the meantime, continue operating under the current sustainable harvest level of 550 MMBF per year.

Alternative 2

Several beneficiaries and other members of the public stated a preference for Alternative 2. These commenters stated that Alternative 2 best meets DNR's fiduciary obligations and will best allow for continuation of services provided by trust beneficiaries.

Support or lack of support for particular arrearage options

Support for harvest of 702 million board feet (MMBF) of arrearage volume

Several beneficiaries, industry representatives and members of the public stated their support for harvesting 702 MMBF of arrearage volume. They suggested this volume should be harvested in a three, five or 10 year period. Some commenters state a strong preference for the 10-year period (versus three or five years) citing a study prepared for Clallam County and the Port of Port Angeles in 2017 which indicates that harvesting over ten years would result in the greatest economic return to Clallam County.

Several commenters who support the higher arrearage volume (702 MMBF) also state that the Board of Natural Resources does not have the authority to adopt an alternative that includes 462 MMBF of arrearage volume citing the trust mandate requirements of undivided loyalty, prudent trust management, and impartiality.

Support for rolling arrearage into the inventory

Several members of the public expressed support of the option to roll arrearage into the inventory when setting the sustainable harvest level. Some stated that this method for dealing with arrearage volume was the fairest. Others noted that it followed past DNR practices.

Lack of support of '1 and 9' option

Beneficiaries expressed their lack of support for the arrearage option included in Alternative 4 in which only arrearage volume is harvested in one year of the planning decade and the sustainable harvest level volume is harvested in the other nine years. They pointed out that this option results in no harvest in some sustainable harvest units that include State Forest Transfer Trust lands for

several counties. This lack of harvest would reduce revenue to these beneficiaries for a 1-year period resulting in shortage of funding.

Concern with forest inventory and modeling accuracy

Several commenters from both conservation and industry interests questioned the accuracy of DNR's forest inventory and forest estate model. Concerns included too few ground based sample plots for the Remote Sensing Forest Resource Inventory System (RS-FRIS), discrepancies between RS-FRIS inventory polygons and actual conditions, land classification, and volume yield curves.

Support and lack of support for riparian thinning

Some commenters stated the need for additional riparian thinning while others said there should be less. Commenters supporting more riparian thinning stated that it was necessary to meet DNR's fiduciary responsibility; others said it was necessary to comply with DNR's HCP. Comments supporting less riparian harvest are concerned with the risk of overly aggressive harvests, risk to aquatic species, and failure to comply with the HCP.

Concern about the lack of economic analysis

Beneficiaries, industry representatives, environmental groups and members of the public noted that the DEIS did not include an analysis of economic impacts. They expressed concern for the lack of an economic analysis in the DEIS and some stated that without this analysis it would not be possible to assess whether or not the alternatives fulfill the trust mandate. Some commenters said that an economic analysis should look at the effects on junior taxing districts; others said it should look at effects on employment.

Other topics

A lengthy comment letter ("white paper") was received from the Washington Forest Law Center arguing against some of the basic assumptions around the trust mandate.

Next steps

DNR staff are working together to craft responses to the comment letters received. The overall project timeline is subject to decisions by the Board of Natural Resources.