



DEPARTMENT OF
NATURAL RESOURCES

OLYMPIC REGION
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FORKS WA 98331

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January 24, 2019

Notice of Final Determination
SEPA File No. 19-010401
Timber Sale Willey Ridge 30-098103
FP No. 2615793

The Department of Natural Resources issued a Determination of Non-significance (DNS), Mitigated Determination of Non-significance (MDNS), Modified DNS/MDNS on **January 4, 2019** for this proposal under the State Environmental Policy Act (SEPA) and WAC 197-11-340(2).

This threshold determination is hereby:

Retained.

Modified. Modifications to this threshold determination include the following:

Withdrawn. This threshold determination has been withdrawn due to the following:

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

Summary of Comments and Responses (if applicable):

Received and reviewed SEPA comment from Wash. Department of Ecology dated January 18, 2019 regarding any discharge of sediment-laden runoff or other pollutants to waters of the state. The proponent was provided this information. Other SEPA comments and responses from Olympic Forest Coalition and private citizens are attached.

Responsible official: Kali R. Clark

Position/title: Assistant Region Manager

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Phone: (360) 374-2800

Date: 1.24.19 Signature: 

There is no DNR administrative SEPA appeal.
10/10/04



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Comment - Approximately 20 acres in unit 1 and 20 acres in unit 6 are mapped as marbled murrelet habitat, according to data from the P-stage habitat model and DNR Large Data Overlay. These acres are included in Alt F and G for the Long-Term Conservation Strategy and should be removed from the sale until the final EIS for the LTCS is adopted.

According to my calculations using DNR's Large Data Overlay and the P-stage habitat model, the Willey Ridge timber sale proposes to harvest ~39.4 acres mapped as marbled murrelet habitat (19.5 ac in unit 1 and 19.9 ac in unit 6). In addition, all 22 acres of unit 7 is designated as low quality Spotted Owl habitat, which is defined as Long Term Forest Cover for Alt. F. Proceeding with the sale as currently planned would limit the conservation options put forth under Alt. F and G (or any combination thereof) for the Long Term Conservation Strategy (LTCS) amending the DNR Habitat Conservation Plan, inconsistent with WAC 197-11-070. All of the LTCS alternatives are technically under consideration and should remain whole until the final EIS for the LTCS is adopted by the Board of Natural Resources. If these areas are harvested prior to that decision, then equivalent area and quality habitat should be set aside elsewhere to compensate for this loss.

Response - Unit 7 is designated as non-habitat for Northern Spotted Owls and the harvest is in compliance with the HCP and the OESF Forest Land Plan. Unit 2 is Structural habitat and is being thinned in compliance with the HCP and OESF Forest Land Plan to maintain habitat. Units 1 and 6 are variable retention harvests and include some harvest of draft P-stage (value 0.25) which is a component in some alternatives of an HCP marbled murrelet long term conservation strategy. Willey Ridge timber sale is compliant with the current HCP interim marbled murrelet conservation strategy and associated incidental take permit.

Comment - Only the western portion of Wetland 1 has been protected with the necessary 155' tree height potential. This is required buffering for a wetland of this size. The combination of RMZ over mapped on the wetland buffer makes it impossible to know if there is adequate buffering to the north of unit 5.

Response - The portion of Wetland 1 with a mapped WMZ is the only part of the wetland which did not have greater than the necessary 155' protection due to Type 3 and Type 4 RMZs. At the closest, Unit 5 is 180' away from Wetland 1.

Comment - There is insufficient detail regarding the plan for extracting timber from Unit 5. The FPA states cable logging but no landings or tower profile are included. How will the RMZ buffers which surround this unit be protected?

Response - Unit 5 will be cable yarded through a yarding corridor in the RMZs of creeks 4T and 4R to the W-1200 in Unit 6. Per policy PR-14-004-160 (Riparian Management in the OESF HCP Planning Unit), yarding corridors are included as "Activities that may occur in the riparian management zone."

Comment - Exterior buffers are not included for type three streams adjacent to unit 5. However, based on total buffer width for the type 5 streams upslope it seems they have been applied to some parts of unit 6 upslope of unit 5. If exterior buffers are included in some but not all of that area, what is the rationale for reduced the buffers in that area? Does the windthrow model adjust for increase the in fetch due to adjacent harvests?

Response - Exterior buffers were applied at locations that the OESF windthrow probability model predicted severe endemic windthrow risk. It is likely that the model predicted a lower risk in Unit 5 due to the substantial surrounding timber in the RMZs, the general small size of the unit (0.3 acres) and thus limited fetch, and the position low on the slope. It is worth noting that the lowest portion of Unit 6 directly



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upslope of Unit 5 also was not predicted to experience severe endemic windthrow. The windthrow model does adjust for increase in fetch due to adjacent harvests, but it also adjusts due to unharvested areas such as RMZs.

Comment - The steep and mildly convergent features at the top of stream 5AH, 5AI, 5GAE are bisected in some places by the sale boundary for unit 6. Above the harvest boundary is a 3-5 degree slope change suggesting that the upper edge of the inner gorge could also be interpreted to be higher on the slope. Perched wetland vegetation suggests that these headwalls are hydrologically connected to the type 5 streams below.

Response - As shown on the slope stability map, of the streams listed, only stream 5AI was found to have an associated potentially unstable slope. The potentially unstable slope was excluded from harvest.

Comment - Although the S. Fork Bear Creek is buffered by the appropriate width interior core buffer, the total impact of clearing required for cable logging is difficult to determine from the profiles but could be significant. According to the FPA, 9 crossings which vary in length from 200 to 500 ft., with a maximum of 30 feet width would result in an additional 2 acres of clearcut in the RMZ, with resulting impacts to stream shading and slope stability.

Response - Corridors will not exceed 30 feet in width and shall not be spaced closer than 100 feet where they cross inner gorges. The size and spacing of corridors will limit stream shade impacts. Based on the geotechnical report produced for this proposal, there is a low likelihood that corridors over the South Fork Bear Creek will cause movement on the potentially unstable slopes or landforms or contribute to further movement of a potentially unstable slope or landform.

Comment - Although modern road building techniques have improved upon historic practices, roads still represent locations that increase the likelihood of delivery of sediment to streams. This sale includes 12,000 ft of new road construction, representing 4 acres of additional VRH. The W1000 and W1100 run in parallel, which certainly prompts the question about whether this is truly the only feasible road plan. W-1000 bisects a shrub swap at the top of stream 5 AL which will likely impact the hydrologic function of that stream. Although the FPA states that "This road will be designed to not increase the risk of slope failure or delivery to a public resource within these features" – what about the risk of road failure if the design and implementation of the keyed embankment is insufficient?

Response - The W-1000 road through the bedrock hollow and inner gorge (Stations 199+15 & 201+95) has been designed to minimize excavation in these features, the primary failure mechanism. Both sites were evaluated by both engineering staff and trained geologists and all concluded that both the location and design minimized resource risk.