



DEPARTMENT OF  
NATURAL RESOURCES

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February 21, 2020

**Notice of Final Determination  
City Skidder Timber Sale Agreement #30-099253  
SEPA File No. 20-020601  
Forest Practice Application #2616337**

The Department of Natural Resources issued a  Determination of Non-significance (DNS),  Mitigated Determination of Non-significance (MDNS),  Modified DNS/MDNS on **February 6, 2020** 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Withdrawn. This threshold determination has been withdrawn due to the following: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):

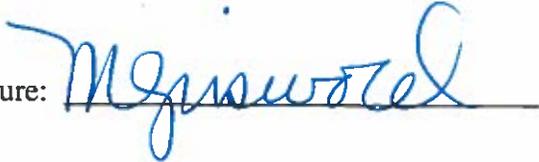
A comment was received from Department of Ecology. A comment was received from Mr. Kropp and is addressed in the attached document.

Responsible Official: Mona Griswold

Position/title: Olympic Region Manager Phone: 360-374-2800

Address: 411 Tillicum Lane  
Forks, WA 98331

Date: 3.11.2020

Signature: 

There is no DNR administrative SEPA appeal.

**City Skidder Timber Sale #30-9253**  
**SEPA File # 20020601**  
**Forest Practice Application #2616337**

- Comment:** The applicant states in the SEPA checklist that forested wetlands will be "protected by leave tree areas", and yet there are no leave tree areas marked anywhere within the vicinity of the wetlands shown on the forest activity map for units "2", "3" and "8". Not only are there no leave tree areas, the proposal includes the harvest of trees from within the forested wetland. Paul Adamus, a wetland scientist at the Institute for Applied Ecology, concluded after an exhaustive literature review that "no studies have examined effects of [timber] harvest on wetland plants in the PNW, or the degree to which buffers minimize any undesired changes to wetland plant communities" (Adamus, 2014). The DNR Cooperative Monitoring, Evaluation and Research Committee reached a similar conclusion in 2016, stating that the "effects of timber harvest and other forest practices on forested wetland structure and function remain poorly understood" and that "very little characterization of forested wetlands in the Pacific Northwest has been done" (Becket, et. al., 2016). Although relationships between timber harvest practices, buffer widths, and wetland function can be (and commonly are) inferred from studies in other regions of the country and other parts of the world, the effects of harvest on specific species, biological communities, and environmental metrics are often contradictory and far from conclusive. There exists no widely-accepted, scientific protocol for measuring the condition of forested wetlands, and relatively little is known about the microclimate requirements or preferences of individual wetland species (Adamus, 2014).
- Response:** Per policy PR14-004-150 all wetlands in this timber sale greater than 1 acre are protected with a 100 year site index width wetland management zone (WMZ), .25 to 1 acre are protected with a 100 foot wide WMZ. The proponent has elected to protect wetlands less than .25 acres with leave tree clumps. Removals within the WMZ's are allowed by policy.
- Comment:** The SEPA checklist indicates that the origin date of harvest units "1", "2", and "3" is 1935; and that the origin date of harvest units "5" and "6" is 1943. These origin dates are averaged over each FIU and do not represent the true age class distribution of the trees included in this timber sale. DNR Forest Resource Inventory (FRIS 3.0) data suggest that many of the trees, particularly in units "1", "2", and "6", may be well over 100 years old.
- Response:** The origin dates are based on information from the "FRIS - Forest Inventory Units" data layer in the Department's GIS database. The stand origin dates listed in question A.11.b of the SEPA checklist are based on the "FRIS-Age Class" data layer in GIS. It is important to understand that origin dates tend to be estimates only since we don't have exact information on when these stands were last harvested and how quickly they regenerated. Origin dates are updated occasionally as new information becomes available. The origin dates listed in the SEPA checklist appear to be consistent with our best available information.

**Comment:** The timber sale overlaps two spotted owl management units, and spotted owls have apparently been documented within the boundaries of unit "2". No attempt is made by the applicant to evaluate the likelihood that spotted owl nests may exist within the proposed timber sale, the potential of the stands to provide suitable spotted owl habitat now or in the near future, or the extent to which the proposed project may impact existing spotted owl populations.

**Response:** DNR's HCP for state trust lands is a multi-species conservation strategy that covers the range of the northern spotted owl (NSO) within the state of Washington and augments the federal Northwest Forest Plan. The intent of the HCP NSO strategy is to create habitat that significantly contributes to the species' demography, distribution, and habitat contiguity. DNR's role in this strategy is to provide nesting, roosting, and foraging (NRF) as well as dispersal habitat in key areas. The timber sale units are not located within an area managed as NRF or Dispersal for NSO and were also evaluated for NSO habitat and identified as non-habitat. This sale is located more than 2.0 miles from the Salmon Creek site center (status 1 spotted owl management circle) and 1.1 miles from the Snow Creek site center (status 2). The proposal does not contain any of the best 70 acres of owl habitat.

**Comment:** ....the Sustainable Forestry Initiative (Performance Measure 4.1) requires participants to support a diversity of native forest cover types and age or size classes, and ecological community types at both stand and landscape levels, in order to conserve overall biological diversity. The proposed timber sale does the opposite by targeting for harvest the least common and nearly depleted size and age classes in the watershed.

The DNR Policy for Sustainable Forests lists as one of its intended outcomes to "meet a 10 percent to 15 percent older-forest target for each Western Washington HCP planning unit". "Older forests" are defined in the Policy as those that are "in the fully functional stage of stand development". "Fully functional" forests are defined as those that exhibit "structural complexity including a diversity of sizes and conditions of live trees, snags and logs". These features are not generally present in forests less than 80 years old, and often may take many more years than that to develop. Based on an analysis of the most recent combined-origin remote sensing Forest Inventory (FRIS 2020) data, only about 700 acres of 80+ year-old second growth forest remain on DNR administered land in the Discovery Bay WAU. This represents less than six percent of DNR administered lands (see charts, below). The proposed timber sale would reduce the number of acres in this nearly depleted age class even further, since much of the timber within the proposed sale is more than 80 years old.

**Response:** Under the Sustainable Forestry Initiative (SFI) Performance Measure 4.1 we have a program to conserve biological diversity at the stand and landscape levels, develop criteria and implement practices to retain habitat at the stand level, and to document and support a diversity of native forest cover types at the landscape level. We are not required to conserve or support a diversity of cover types at the stand scale. We conserve native biological diversity at the stand level through our riparian and leave tree strategies. Using this proposal as an example, we originally considered 256 acres for

harvest but that was reduced to 177 net acres after taking into account riparian buffers, leave trees and other factors.

We implement the procedure “Identifying and Managing Structurally Complex Forests to Meet Older Forest Targets (Westside)” to set targets for old forest conditions. These targets are for the HCP Planning Unit as a whole and not by the individual Watershed Administrative Unit (WAU). The City Skidder timber sale is located within the Straits HCP Planning Unit. Stands designated to meet the 10 to 15 percent older forest target within 70 to 100 years include old growth stands and structurally complex stands located in special ecological management areas such as spotted owl and marbled murrelet habitat, riparian management zones, natural areas, gene pool reserves, etc. Other stands not designated to meet this goal, like the general ecological management lands in this proposal, are available for the full spectrum of timber harvest activities consistent with the HCP and PSF.

**Comment:** **Commissioner of Public Lands Hilary Franz recently called on the State to manage working forests to increase storage of soil moisture and carbon storage, and improve summer flows. Executive Order 18-01, signed by Governor Jay Inslee in 2018, requires all State agencies to consider how their actions contribute to climate change, and to take steps to reduce greenhouse gas emissions. The proposed timber sale does the opposite. The continued clearing of older forests from the Snow Creek watershed will release more carbon into the atmosphere, and reduce the capacity of the forests to sequester carbon. Because DNR has failed to consider how their actions contribute to climate change or develop a plan to mitigate such impacts, the proposed project violates Executive Order 18-01.**

**Response:** A key priority of the Commissioner of Public Lands is to explore opportunities to sequester carbon in natural and working lands and wood products. Executive Order 18-01 specifically relates to zero-emission vehicles, new facility construction, energy efficiency in owned and leased facilities, state ferries, 100% clean electricity, toxics reduction and finance and budget. While this order is not specific to DNR forestland management, we are certainly interested in the topic. The first meeting of DNR’s new Carbon Sequestration Advisory Group occurred in Olympia on February 12<sup>th</sup>. This group is comprised of state, tribal, local government, and private industry representatives as well as landowners and non-governmental organizations. They will explore opportunities to sequester carbon in natural and working lands and wood products. If you’d like more information on this group you can contact Dan Stonington at [Dan.Stonington@dnr.wa.gov](mailto:Dan.Stonington@dnr.wa.gov).

It is my assessment that the FPA and SEPA reviews have been conducted in accordance with all applicable laws and Department procedures. There is no new information identified in your comments to warrant a withdrawal of the approved forest practice application.