



**DEPARTMENT OF
NATURAL RESOURCES**

PACIFIC CASCADE REGION

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March 3, 2025

Notice of Final Determination

Highlander Timber Sale, App. No. 30-107290

SEPA File No. 25-021102

FP No. 2943118

The Department of Natural Resources issued a Determination of Non-significance (DNS), Mitigated Determination of Non-significance (MDNS), Modified DNS/MDNS on 02/11/2025 for this proposal under the State Environmental Policy Act (SEPA) and WAC 197-11-340(2).

This determination is hereby:

Retained.

Modified. Modifications to this proposal include the following:

Withdrawn. This proposal has been withdrawn due to the following:

Delayed. A Final Determination has been delayed due to the following:

Responsible Official: Scott Sargent

Position/title: Pacific Cascade Region Manager Phone: (360) 577-2025

Address: P.O. Box 280 Castle Rock, WA 98611

Date: 3/3/2025

Signature: Scott Sargent

Summary of Comments and Responses (if applicable):

Informational Comment Summary:

None.

Specific Comment Summary:

Legacy Forest Defense Coalition (Stephen Kropp) – Concerns with aged, wildlife habitat and older forest thresholds.

Response:

Thank you for providing comments in your February 22, 2025 letter regarding the Highlander timber sale, SEPA File No. 25-021102. This letter is in response to your comments and provides information outlining how this proposal is consistent with all the applicable laws, rules, policies and procedures, including the Habitat Conservation Plan (HCP) and Policy for Sustainable Forests (PSF).

The Highlander Timber Sale is located within Deep Creek Management Block in Lewis County. This proposal is located in the South Coast HCP Planning Unit. These lands are designated for General Ecological Management (GEM) for which there are no species-specific management requirements, and timber within this designation is available for harvest.

During the layout of the timber sale, all guidelines and procedures laid out by the Habitat Conservation Plan (HCP), Washington State Forest Practices and Policy for Sustainable Forests (PSF) were followed. There were no old growth trees or stands found in Unit 2 and 3. No old Growth Assessment Form was needed or completed for the Highlander Timber Sale.

In the Highlander Timber Sale 184 net acres are being harvested, while 62 acres (25% of the proposal area) are being conserved from the overall proposal area that was evaluated for harvest. These conservation areas may include potentially unstable slopes, riparian and wetland management zones and other conservation areas. Many of these conservation areas are regeneration harvest deferred and will contribute to older-forests over time. The stage of stand development for the harvest areas within this proposal on the stand level scoring using the Van Pelt guide (Van Pelt 2007) includes Maturation 1 and Biomass Accumulation/Stem Exclusion.

The Department of Natural Resources has a multi-species Habitat Conservation Plan (HCP) with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service concerning threatened and endangered species and their habitats, which requires the Department to manage landscapes to provide and sustain long-term habitat in exchange for an Incidental Take Permit. This agreement substantially helps the Department to mitigate for cumulative effects related to management activities. The Department follows Forest Practices Rules as applicable to roads and potentially unstable slopes. The Department follows Forest Protections related to fire hazard mitigation.

The General Silviculture Strategy (policy) in the Policy for Sustainable Forests (PSF) emphasized that older-forest targets will be accomplished over time and that DNR intends to actively manage structurally complex forests to achieve older-forest structures (i.e. stands with older-forests identified by structural characteristics) across 10 to 15 percent of each western Washington HCP planning unit in 70 to 100 years from the adoption of the PSF.

In September 2024, the DNR revised a document titled 'Landscape Assessment to Identify and Manage Structurally Complex Stands to Meet Older-Forest Targets in Western Washington, May 2024' (landscape assessment). This document describes the background, historical analyses regarding attainment of older-forest conditions in western Washington, and updated data and modeling analyses showing when the various HCP planning units across western Washington are expected to attain a level of older-forest conditions through implementation of the HCP and other conservation objectives, and outlined as targets within the PSF.

This landscape assessment identifies the existing structurally complex stands, and additional suitable stands, to be managed for older-forest targets over time. The identified stands are located in conservation areas and deferred stands unavailable for regeneration harvest. These stands include areas identified as long-term forest cover under the marbled murrelet long-term conservation strategy, riparian areas, areas conserved under the multispecies conservation strategy, potentially unstable slopes, spotted owl nest patches, old growth, Natural Areas and Natural Resource Conservation Areas, and other conservation areas permanently deferred from regeneration harvest.

Some of these conservation areas are based on specific HCP strategies that are spatially fixed and conserved on the landscape, such as marbled murrelet occupied sites or spotted owl nest patches. However, other conservation areas are modeled and must be field verified based on HCP strategies, such as riparian areas or unstable slopes. There is naturally some adjustment to the location, absence, or presence of conservation areas upon field verification. This timber sale has been field verified for compliance with all conservation objectives and the planned harvest units are determined not to be regeneration harvest deferred and are available for harvest. These harvest areas also do not count towards the attainment of older-forests over time and have been excluded from the calculations and tables included in the landscape assessment. Conversely, when field verification identifies specific areas required for conservation, they will be protected from harvest and included in future conservation area modeling.

The landscape assessment demonstrates that while the South Coast HCP Planning Unit does not currently contain 10 to 15 percent older-forest conditions, the structurally complex and other suitable stands designated to be managed for older-forest targets are projected to develop into older-forest structure that meets or exceeds this threshold by 2100 through implementation of the HCP and other policies and laws. Stands identified to be managed toward older-forest targets, including currently older-forests and stands projected to develop older-forest structure in the future, are depicted in associated maps within the landscape assessment document for each western Washington HCP planning unit. DNR has designated forest stand acreage within regeneration harvest deferred areas in each HCP planning unit to meet or exceed the policy's 10% older-forest target. This identified acreage is designated in DNR's GIS database as the Westside Forest Cover (Conservation Areas) and Older-Forest in Conservation Areas layers.

The Highlander Timber Sale is not identified as one of those stands designated to meet older-forest targets over time. Following the timber sale, the variable retention harvest units will be replanted with

native, conifer tree species that will be supplemented by natural regeneration expected to occur as a result of the conservation areas in and around the harvest units.

Your letter does not raise new concerns, or substantive concerns specific to the Highlander Timber Sale that have not been previously raised in your prior comment letters and responded to by DNR. In its responses to your prior correspondences, DNR explained its policy to protect old growth, its procedure to identify and manage structurally complex forest, its obligations under the 1997 HCP, and the 2006 Policy for Sustainable Forests. As you identify in your letter, DNR staff provided information to the Board of Natural Resources in a series of Board meetings to address your concerns about the amount of structurally complex forests that is expected to be on the DNR-managed landscape at the termination of the 1997 HCP, fifty years in the future.

The Highlander timber sale was designed to be consistent with DNR's framework (WAC 332-41-665 (1)(f)). The harvest was designed in accordance with DNR's Habitat Conservation Plan and Policy for Sustainable Forests. While your comment letter expresses disagreement with that framework, it does not identify a probable, significant, adverse environmental impact which was not analyzed in the environmental impact statements for the programmatic decisions or an inadequacy in the SEPA checklist prepared for the Highlander timber sale. The Highlander timber sale is located in lands available for harvest.

Thank you for your comments.