



**DEPARTMENT OF
NATURAL RESOURCES**

SOUTH PUGET SOUND REGION

950 Farman Avenue North
Enumclaw, WA 98022

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January 18, 2024

**Notice of Final Determination
Breaking Bud Timber Sale #30-103621
SEPA File No. 23-122701**

The Department of Natural Resources issued a Determination of Non-significance (DNS), Mitigated Determination of Non-significance (MDNS), Modified DNS/MDNS on **December 27, 2023** 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Withdrawn. This threshold determination has been withdrawn due to the following: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):

Comment: Received multiple (over 200) comments from January 2, 2024 through the end of the comment period on January 10, 2024. Each comment was based on templated auto-generated comments from environmental groups' websites. The comments opposed the harvest of the proposal, specifically Unit 1, based on ecological and recreational importance, wildlife habitat, and climate concerns.

Response: See attached Appendix A.

Comment: Received January 5, 2024, from Nick Engelfried, as a modification of the templated auto-generated comment from environmental groups' websites requesting to remove Unit 1 of Breaking Bud from the proposal due to its recreation, water quality, and climate resilience value.

Response: See attached Appendix A

Comment: Received January 9, 2024, from Kitsap County Board of Commissioners regarding decisions to actively manage "legacy forests" in general in Kitsap County, including Unit 1 of Breaking Bud, due to ecological value.

Response: Response sent to Kitsap County Board of Commissioners.

Comment: Received January 9, 2024, from Kitsap County Environmental Coalition requesting to remove Unit 1 of Breaking Bud from the proposal due to its recreation, water quality, and climate resilience value.

Response: Response sent to Kitsap County Environmental Coalition.



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Comment: Received January 10, 2024, from Washington Conservation Action requesting to remove Unit 1 of Breaking Bud from the proposal due to its recreational and ecological value.

Response: See attached Appendix.

Comment received post-SEPA comment period: Received January 12, 2024, from Legacy Forest Defense Coalition regarding management of “structurally complex forests”.

Response: Response sent to Legacy Forest Defense Coalition.

All comments were considered, and the review of the Breaking Bud Timber Sale has been conducted in accordance with all applicable laws and agency policies. No new information has been provided to change the determination of non-significance for this proposal.

Responsible Official: Don Melton

Position/title: South Puget Sound Region Manager

Phone: (360) 825-1631

Address: 950 Farman Avenue North, Enumclaw, WA 98022

Date: 1/18/2024

Signature: Don Melton *DM*

There is no DNR administrative SEPA appeal.



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Appendix A: Response to multiple SEPA comments received for Breaking Bud timber sale, SEPA File No. 23-122701

Trust obligation, sustainable forestry and conservation

DNR manages over 3 million acres of state trust lands in Washington—including more than 2 million acres of forests to provide quality habitat, clean water, and other public resources, as well as a stream of sustainable revenue to support trust beneficiaries. DNR manages state trust lands with a distinct legal requirement to be managed to produce non-tax revenue for specific Trust beneficiaries, like school construction or local services, many in rural areas. There are multiple benefits DNR provides the residents of Washington through sustainable forest management of state trust lands. The Breaking Bud Timber Sale is located within state trust lands.

DNR manages state trust lands under a [Habitat Conservation Plan](#) (HCP), an extensive, multi-year agreement with the federal government that guides DNR's revenue-producing activities on forested state trust lands in western Washington while protecting habitat for at-risk species, such as the northern spotted owl and marbled murrelet. DNR recognizes the value in preserving biodiversity and stands in various functional stages. This HCP and DNR's [Policy for Sustainable Forests](#) specifically addresses these values.

Forty percent of DNR-managed trust lands statewide (840,000 acres), including more than 50 percent of land west of the Cascades, is currently managed for habitat conservation. Some of these areas are classified as Natural Areas and designated for conservation, including 2,000 acres recently identified under the Climate Commitment Act. Other areas outside Natural Areas are conserved as long-term forest cover as a result of policy protection for specific ecological features including old-growth forests; wetlands and waterways; habitat conservation areas for marbled murrelets, northern spotted owls, and lynx; and buffers around unstable slopes. The design of both the Breaking Bud timber sale include preservation as long-term forest cover for riparian, wetland and unstable slopes protection and leave trees; this is the same stand type as the proposed harvest area. These areas comprise 52% and 38% of the total area evaluated for harvest for the Breaking Bud timber sale, respectively, that will be deferred from harvest and will be preserved in older forest conditions.

Protections for riparian, steep slopes, and ecological features

The DNR HCP for State Lands includes wetland and stream protection (on State Lands Type 1 through 4 streams) that exceed Forest Practices Rule required buffers. These buffers provide a significant undisturbed vegetated area between the harvest area and the streams that provide shade and recruitment of large woody debris for riparian areas as well as habitat for a variety of wildlife and invertebrates. These buffers also protect more sensitive soils near typed water and the vegetation provides additional filtration from erosion that may occur from the harvest area. In addition to these required buffers, leave trees are retained within the harvest unit to protect sensitive areas such as sections of smaller Type 5 streams, small wetlands, headwalls of Type 5 streams and unique ecological features.



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In addition to field foresters' assessment of the area, they consulted with DNR biologists, geologists and engineers to evaluate the project area and incorporated additional mitigation measures as necessary to protect resources. Additional requirements during harvest operations to protect all Type 5 streams include lead-end log suspension during yarding, 30-foot equipment limitation zone from the stream for ground-based equipment, skid trails closed in a way to reduce potential for erosion towards streams and designing unit configuration and harvest systems so road construction and landing locations minimize resource impacts, and leave tree areas for other unique ecological features. Additional requirements to protect steep slopes include a review by a licensed geologist to identify and exclude all Forest Practices Rule-identified landforms that have the potential to deliver to public resources. Cable and cable-assisted logging methods will be utilized on slopes over 45 percent to reduce soil impacts of ground-based harvesting on steep slopes.

Recreation

DNR values recreation and public use on state managed lands and provides diverse recreation opportunities to the public across over 3 million acres of state trust lands. As previously mentioned, there are designated conservation areas, such as Natural Resource Conservation Areas, that provide opportunities for recreation beyond those offered in working forests. Specifically to the Breaking Bud proposal, DNR provides a large network of recreation opportunities in the Green Mountain State Forest. As stated in the SEPA checklist, there are no recreation trails within the Breaking Bud proposed harvest unit, therefore the direct impact to recreation opportunities is minimal, existing primarily on the existing forest roads, which are also partially used by recreationalists.

Carbon

DNR's westside forests are net sequesterers of carbon. This means that, while DNR regularly removes some timber from the landscape, DNR forests on the whole draw enough carbon dioxide from the atmosphere to make up for the emissions associated with harvest emissions and the eventual disposal of wood and paper products made from those harvested trees. To sequester even more carbon, DNR is working towards innovative carbon project to protect additional acres of ecologically and culturally valuable forests. See DNR's Carbon Project website for more information.