



## **Forest Resource Plan Update Scoping Comments Summary**

June 30, 2004

There are eleven sections within this Forest Resource Plan Update Scoping Comments Summary. The sections are as follows:

- I. Scoping Process and Summary Structure (page 1)
- II. Plan Need (page 2)
- III. Plan Purpose (page 2)
- IV. Management Objectives (page 3)
- V. Major Policy Categories (page 5)
- VI. New Issue Areas (page 6)
- VII. General Policy Considerations (page 6)
- VIII. 1992 Policy Content (page 8)
- IX. Environmental Impact Statement Analysis (page 13)
- X. Plan Structure and Organization (page 14)
- XI. Sustainable Harvest Calculation (page 14)

### **I. SCOPING PROCESS AND SUMMARY STRUCTURE**

On March 15, 2004, the Department of Natural Resources (DNR) issued a Determination of Significance and Request for Comments on Scope of EIS (Scoping Notice) and held a series of statewide public workshops to obtain comments regarding the review and possible amendment of the policies in DNR's 1992 Forest Resource Plan (FRP) and for preparation of an Environmental Impact Statement (EIS). The comment period closed on May 17, 2004. The areas DNR requested comments on are as follows: need for updating the plan, purpose of the plan, a set of management objectives to guide policy review and development, major policy categories, new policy issue areas to be addressed, general policy considerations, 1992 policy content, and EIS analysis. Additional comments were received about the structure and organization of the updated FRP.

Sections II, III, IV and V, as outlined above, include preliminary decisions DNR has made related to the need to update the plan, the plan purpose statement, the management objectives, and the major policy categories, as a result of scoping. Under each section, there are four subsections: Scoping Notice Language; Summary of Comments; DNR's Response; and Updated Language. The Scoping Notice Language subsection contains the draft language that was issued in the Determination of Significance and Request for Comments on Scope of EIS; the Summary of Comments subsection contains a summary of the comments received through scoping; the DNR's Response subsection contains the preliminary decisions DNR has made related to these elements; and the Updated Language subsection contains the updated language that reflects DNR's preliminary decisions as a result of scoping.

Sections VI, VII, VIII, IX and X, as outlined above, contain summaries of the comments received on new issue areas to be addressed, general policy consideration, 1992 policy content, and EIS analysis, as well as the structure and organization of the updated FRP. These comments have also been considered by DNR in the revision of the plan need, plan purpose, management objectives, and major policy categories. As the process moves forward and reasonable alternatives are formulated, these comments will be reconsidered based on their merits of achieving the need, purpose and management objectives as outlined by the Board of Natural Resources (BNR) and DNR. Under each section, there are two subsections: Summary of Comments and DNR's Response. The Summary of Comments subsection contains a summary of the comments received through scoping; and the DNR's Response subsection outlines DNR's approach to the information received as part of the next phase of this effort.

Section XI contains a summary of comments related to the Sustainable Harvest Calculation (SHC).

## II. PLAN NEED

Scoping Notice Language: A review and update of the Forest Resource Plan (FRP) is needed to keep pace with the changes shaping forestland management today. When adopted in 1992, the FRP was envisioned as a 10-year document. In 2002, the policies in the FRP were extended for an additional three-year period so that DNR could complete a western Washington Sustainable Harvest Calculation (SHC), the first step to revising the 1992 FRP. The revision of the FRP will position the Department of Natural Resources (DNR) to effectively and sustainably manage the trusts' forestland for the trust beneficiaries and the people of Washington, into the future.

Summary of Comments: No comments were received on the proposed need.

DNR's Response: The need statement to update the FRP is sufficient as written. No updated language is proposed at this time.

## III. PLAN PURPOSE

Scoping Notice Language: To conserve and enhance the natural resources of state forestland while producing long-term, stable income from these lands.

Summary of Comments: 1992 Forest Resource Plan (FRP) purpose should be retained; the current purpose is backwards and should state the obligation to the trusts first and foremost, e.g., "the purpose of the FRP is to ensure production of long term, stable income from trust lands, while conserving and protecting natural resources on these lands"; the highest environmental principles should guide the purpose; and "other benefits" should be included after "stable income" to reflect benefits to the trusts other than income that might accrue, (e.g., K-12 outdoor classrooms) and benefits that are produced for the general public, consistent with producing trust revenue.

DNR's Response: The proposed purpose statement as worded accurately reflects the relationship between maintenance of a healthy and functioning ecosystem and the resulting ability to produce long-term, stable income. However, it is equally important to recognize the fiduciary nature of these trust lands, suggesting that the maintenance of a healthy and functioning ecosystem and its ability to produce revenue must be carried out in a manner that is consistent with these fiduciary standards. It is also important to note that in addition to the

benefits that flow from income production, environmental and other social benefits flow to the people of Washington. Therefore, DNR modified the purpose statement to reflect these considerations.

Updated Language: Consistent with the fiduciary standards governing trust management, conserve and enhance the natural systems and resources of state forests to produce long-term sustainable income, environmental, and other benefits to all the people of Washington.

#### **IV. MANAGEMENT OBJECTIVES**

Scoping Notice Language:

1. Meet all federal and state legal mandates, including the trust mandate and the contractual obligations of the Habitat Conservation Plan.
2. Incorporate polices adopted by the BNR as part of the 2004 sustainable harvest calculation for Western Washington, and articulated in BNR Resolution 1110.
3. Promote active and sustainable management of as much of the forested land base as allowed by law (including the HCP) and utilize forestry practices to a) best meet trust fiduciary responsibilities, b) maintain a diverse and productive healthy forest system, c) protect sensitive areas and habitats, and d) provide social and cultural benefits compatible with a, b, and c above.
4. Promote innovative and creative ways to capture existing or future timber and non-timber economic opportunities, compatible with fiduciary responsibilities.
5. Identify forested trust lands that provide special ecological, social, or cultural benefits (beyond direct financial returns to the beneficiaries) that conflict with active management, and protect such areas through creative partnerships and funding mechanisms compatible with fiduciary responsibilities.
6. Include a program that provides for monitoring and periodic reporting to the BNR on the implementation of BNR-approved policies and desired outcomes. Monitoring will also help identify needed changes in policies and DNR practices to better meet trust and BNR objectives.
7. Taken collectively, policies should communicate the role of managed state forested trust lands in Washington State, and the benefits these forests provide to the trust beneficiaries and the people of Washington.
8. Provide for efficient and cost-effective application, implementation and ease of understanding of BNR policy regarding the acquisition, management, and disposition of all state forested trust lands and resources, and promote alignment of implementation tools (planning, operational tools, and public involvement) with policy.
9. Provide a flexible framework within which DNR may use professional judgment, best available science and sound field forestry to achieve excellence in public stewardship.

### Summary of Comments:

General comments about the proposed Management Objectives (MOs) included the following: there is an appearance of internal conflict in the MOs that needs to be resolved; some of the MOs appear to erode the trust mandate (MO Nos. 3, 5 and 7); not actively managing some lands may still support the trust mandate; active management must still be in compliance with state and federal laws and the Habitat Conservation Plan (HCP); contractual obligations in the HCP should be fully integrated, as well as the “Bergeson Principles” that guided the BNR’s identification of a Sustainable Harvest Calculation (SHC) preferred alternative; and the MOs are silent on recreational use of state trust lands and fail to provide the necessary basis for developing policy for management of trust lands as a recreation resource for the people of Washington.

MO No. 1 should be amended to encourage exceeding legal mandates where it would help meet the FRP purpose similar to Policy No. 30 in the 1992 FRP.

MO No. 2 violates the most primary duty of every trustee, to preserve the assets of the trust. These policies overemphasize the short and long term financial return to the beneficiaries. The increased harvest and clear cutting under these policies will degrade the ecosystem.

MO No. 3 has priorities that are not consistent with the current stated purpose and should be reordered to align with the purpose. Maximizing the area under “active and sustainable management” may not be consistent with conserving and enhancing the natural resources. The distribution of forested trust lands managed for commercial production, for restoration and for protection requires careful balancing of environmental concerns with the production of income as well as the needs for both the current and future beneficiaries.

MO No. 4 needs to be creative and innovative in capturing existing and future timber and non-timber economic opportunities, compatible with fiduciary responsibilities. In doing so, do not disturb the balance described in No. 3.

MO No. 5 needs to better identify, define and protect old growth forests using verification modeling and mapping. HCP definition is insufficient. The county trusts should be compensated for meeting social goals. It should not be implied that all areas unsuitable for active management must be purchased from the trusts; DNR has a responsibility to protect public resources.

MO No. 6 needs to include a program that provides for monitoring and periodic reporting to the BNR on the implementation of BNR approved policies to identify needed changes in policies and DNR practices to meet trust and BNR objectives. Any new monitoring efforts should be closely integrated with existing monitoring efforts. Information from monitoring should also be shared with the public and agency employees.

MO No. 7 needs to outline that the benefits provided should be targeted and limited to the trust beneficiaries. “...And for the people of Washington” should be stricken from this objective.

MO No. 8 needs to be clarified and simplified. Create a policy that deals specifically with the conversion of DNR timberland to other uses such as residential or commercial.

MO No. 9 needs to be amended to include cooperation with local communities and the interested public. Specific measurable requirements provide the sideboards of the flexible

framework. Flexible frameworks need to be combined with measurable outcomes and firm timelines to ensure employee direction and coordination.

There were also several recommendations for additional MOs to be considered, some of which included the following: promotion of healthy ecosystems including experimentation with innovative forestry techniques; the need to aggressively seek funding to accomplish all legal mandates, management objectives, and policies; and seek a third party system of Forest Stewardship Council certification to maintain sustainable forestry.

DNR's Response: In response to comments received through scoping and after additional consideration, DNR made a number of changes to the proposed MOs and modified the order in which they are presented.

Updated Language:

1. Meet all federal and state laws, including the trust obligations and the contractual commitments of the Habitat Conservation Plan.
2. Balance trust income, environmental protection, and other social benefits from four perspectives: 1) the prudent person doctrine; 2) undivided loyalty to the trust beneficiaries; 3) intergenerational equity; and 4) not foreclosing future options.
3. Ensure policies provide succinct, relevant and practical guidance to department employees.
4. Seek productive partnerships that help achieve management objectives.
5. Use professional judgment, best available science and sound field forestry to achieve excellence in public stewardship.
6. Pursue outcome-based management within a flexible framework.
7. Promote active, innovative and sustainable stewardship on as much of the forested land base as prudent.
8. Identify trust lands that provide special ecological, social, or cultural benefits that are incompatible with active management, and look for opportunities to protect such areas through creative partnerships and funding mechanisms.
9. Capture existing and future economic opportunities for the beneficiaries from the forestland base by being prudent, innovative and creative.
10. Monitor and periodically report to the Board of Natural Resources on the implementation and outcomes of Board of Natural Resources' approved policies.

## **V. MAJOR POLICY CATEGORIES**

Scoping Notice Language: Economic Performance; Ecological Protection and Enhancement; Social and Cultural Benefits; and Creating Sustainable Forests.

Summary of Comments: The four proposed major policy categories are reasonable and appropriate; there needs to be balance between each of these four categories; dividing the policies into categories like this may counter or bifurcate the Department of Natural Resources

(DNR) and Board of Natural Resources (BNR) goal of balancing social, economic and environmental benefits; there is overlap between these four categories; the FRP needs to describe the interrelationship between each of the categories; the Ecological Protection and Enhancement category should be renamed to Environmental Protection; the Creating Sustainable Forests category should be renamed to Forest Management, Suitable Forest Management, or some other clearer terminology; and there should be an additional category that deals with timber, marine and agriculture trust product purchasers, e.g. policies related to product sales, sales terms, timing and conditions, ancillary fees, etc.

DNR's Response: DNR will use the updated major policy categories for document organizational purposes. The updated policies within the revised FRP will be considered as a whole and implemented collectively. There is overlap between the categories, which will be addressed in the introduction section of the FRP, as well as throughout the FRP. Ecological Protection and Enhancement goes beyond environmental protection, in that it includes improving the health and productive capacity of forest ecosystems. For clarity and ease of understanding, the Creating Sustainable Forests category has been renamed.

Updated Language: Economic Performance; Ecological Protection and Enhancement; Social and Cultural Benefits; and Implementation.

## **VI. NEW ISSUE AREAS**

Summary of Comments: There were several recommendations for new issue areas to be addressed in the updated Forest Resource Plan (FRP). Some of them included: expanding the Department of Natural Resources (DNR) outreach, communication, education and partnerships; addressing forestland conversions for urban uses; forest certification; addressing the relationship between the trust mandate, the policies and the management objectives; pursuing the blocking-up of lands; full-cost accounting measures; reinvestment of funds after sales; aesthetics; assessing risk; special use permitting system to track non-timber related uses on DNR lands; temporary roads; contracting services; motorized vehicle use for recreation; invasive species and their spread through grazing, logging, road construction, open roads and motorized recreation; forestland grazing; litter collecting by inmates on forestland; Clean Water Act; catastrophic events; and maintaining the land base to produce income.

DNR's Response: DNR will consider each of these new issue areas to determine if they warrant a policy-level statement or if they are more procedural in nature, whether they are outside of the scope of this effort, whether they are addressed in other DNR policy documents, and whether addressing the issue with a policy statement would help DNR better meet the need, purpose and management objectives of the updated FRP.

## **VII. GENERAL POLICY CONSIDERATIONS**

Summary of Comments: DNR needs to consider the following when reviewing and developing policies: ecological and financial risk; cost-effectiveness; ease of implementation; best available science; the differences between Eastern and Western Washington; assessing the collection of policies as a whole, not individually; and striking a balance between high-level direction versus on-the-ground implementation.

In addition, the policies need to provide the following to DNR personnel: flexibility; efficiency; clear direction; ease of understanding; guidance for implementation; and the ability to use professional judgment and sound field forest management.

A number of comments were received regarding economic performance. Some of the comments included the following: be true to the trust mandate and fiduciary responsibilities and not other broader social goals; acquisition and disposal of lands needs to be managed more aggressively; trust beneficiaries need to be treated equally in the annual cut; there is a need to balance revenue and to protect assets for future generations; intergenerational revenue; revenue needs to be maximized and sustainable; recognize the cost of creating habitats; economic development includes tourism and recreation on state lands; use full-cost accounting and not net present value; examine world markets for additional revenue opportunities; look for a niche that DNR can fill; provide a consistent supply of wood and the markets will follow; consider the revenue impacts of timing and seasonal restrictions; charge user fees for recreational activities; the Eastern Washington sustainable harvest should occur after the forest Resource Plan is updated and should be based on actual on-the-ground methodologies; the Eastern Washington trust lands are decades behind on thinning and other treatments necessary to give maximum yield, so the sustained yield should reflect the decades of neglect the forests have suffered; clarify the use of the Access Road Revolving Fund; and pursue land transactions to improve economic performance and move trust lands that meet federal objectives (i.e., roadless areas, old growth, etc.) to appropriate federal agencies.

A number of comments were received regarding ecological protection and enhancement. Some of the comments included the following: DNR should protect lands that are more valuable as conservation areas; DNR should look at the entire range of ownerships and management regimes, i.e. private, state and federal, when assessing wildlife habitat and landscape planning; DNR needs to consider impacts of global warming, climatic shifts, and drier conditions; DNR needs to consider a variety of silvicultural approaches to ensure long-term environmental protection and forest health; DNR needs to consider impacts on water quality and quantity; DNR needs to address wildlife corridors and the needs of ungulate populations; and DNR needs to preserve the diversity of plant life.

A number of comments were received regarding social and cultural benefits. Some of the comments included the following: state trust lands should be managed for all the people, not just timber companies; long-term public benefits must outweigh any short-term profits; population growth will require increased funding for school construction; and local economies and rural communities depend on a healthy wood products industry.

A number of comments were received regarding implementation. Some of the comments included the following: DNR needs to find the most efficient means for timber harvest, in compliance with regulatory and contractual obligations to maximize revenue to the trusts; provide necessary field guidance; the role of managing state forested trust lands and the benefits should be clearly communicated to the citizens of Washington; use generally accepted management practices until untested practices are proven effective; DNR should actively test new means of managing forests; DNR should work with private forest landowners and look at their technologies, practices and efficiencies; manage uneven-aged stands, rather than all single-aged stands; and prioritize measures that restore diversity to state forests; DNR should encourage and support professional organizations and employee membership.

Finally, DNR received many requests by various stakeholder groups to allow for review and input of the draft policies prior to going to the Board of Natural Resources (BNR) for discussion.

DNR's Response: When reviewing and developing policy alternatives, DNR and the BNR will reconsider the above-mentioned concerns that are within the scope of this effort as set out by the plan need, plan purpose and management objectives for the FRP review and update. In addition, in response to the requests made by various stakeholders to allow for review and

input on the draft policies, DNR will be hosting focused stakeholder outreach workshops in early August. While DNR will not have actual draft policy language at this point, DNR would like to obtain input at these workshops on alternative policy approaches that may be evaluated in the Environmental Impact Statement (EIS) and discussed with the BNR.

## **VIII. 1992 POLICY CONTENT**

### Summary of Comments:

No. 1: Federal Grant Land Base. This policy needs to be updated to provide financial vision.

No. 2: Forest Board Land Base. No comments were received on this policy.

No. 3: Land Classifications. This policy needs to be updated to include the following: a definition and discussion about on base and off base lands, general uplands, and temporary and permanent deferments.

No. 4: Sustainable, Even-Flow Timber Harvest. This policy needs to be updated and include the following: a discussion about arrearage, ramp-up, and how DNR will achieve the Sustainable Harvest Calculation (SHC) level.

No. 5: Harvest Levels Based on Volume. This policy needs to be updated and include the following: a definition of the difference between volume and value, needs to be succinct, and needs to outline the responsibility to the trusts.

No. 6: Western Washington Ownership Groups. This policy needs to be updated to include support of sustainable harvest calculations for each individual Forest Board counties.

No. 7: Eastern Washington Ownership Groups. This policy needs to be updated to include support for the use of an ownership grouping, which provides sustainable harvest calculations for each individual county.

No. 8: Special Forest Products. This policy needs to be updated to include the following: non-timber revenue opportunities, i.e. Christmas tree production, brush sales, salal, cedar, and forest botanicals; and an evaluation/economic analysis of the value of special forest products.

No. 9: Forest Health. This policy needs to be updated to include the following: a definition of forest health; an assessment of conditions; a discussion about slash burning, control of insects, prescribed fire, catastrophic events, recent state and federal legislation; consideration of salvage sales, protection of future forests, additional funding mechanisms for innovative forestry techniques, variable density thinnings, extended rotations, conservation of biological legacies; and an outline for forest rehabilitation.

No. 10: Fire Protection. This policy needs to be updated to include the following: a discussion on whether this policy has contributed to forest health issues, how to speed up the process for timber salvage after fire, the relationship between DNR and community-based fire plans; an analysis of the costs and effectiveness of fire suppression and the fire program; and an environmental critique of impacts associated with post fire and timber harvest.



No. 11: Managing On-Base Lands. This policy needs to be updated to explain how DNR will meet their fiduciary responsibility on production lands, while meeting biodiversity pathway standards.

No. 12: Annual Review of Financial Assumptions. No comments were received on this policy.

No. 13: Special Ecological Features. This policy needs to be updated to include the following: a discussion on how Natural Area Preserves and Natural Resource Conservation Areas are funded and managed; and outline what lands have been taken out of trust ownership because they have “special ecological features that fill critical gaps in ecosystem diversity” since the 1992 FRP.

No. 14: Old Growth Research Area Deferrals. This policy needs to be updated. General comments included the need to define, quantify, locate and map old growth; a discussion on how much old growth has been cut or set aside since 1992, what lands are associated with these deferrals and define the deferral period, and the role of the Habitat Conservation Plan (HCP) in old growth protection. There were also a number of comments related to setting aside old growth. Some of these included the following: DNR should not harvest any old growth or mature stands; if old growth is set side, the trusts need to be compensated for it; older stands of trees are a tourist attraction and recreational benefit; larger trees provide the best genetic stock for tree seedlings and erosion protection; old growth is not a renewable resource; creation of old-growth structure is not a substitute for actual old growth; old growth is imperative to the protection of rare and endangered species; save, screen and transfer old growth lands adjacent to federal lands to the appropriate federal agency; distribute old forests across all of the WRIAs in the planning unit; and do not harvest any trees over 16” in diameter. In addition, there were a number of comments related to the management and harvesting of old growth as part of the commercial forestland base.

No. 15: The Genetic Resource. No comments were received on this policy.

No. 16: Landscape Planning. There were comments that indicated this policy has not been followed or implemented as intended. This policy needs to be updated to include the following: an analysis of how the 1992 policy has worked; DNR should initiate landscape planning that takes recreation, clean water, wildlife needs and aesthetic views into consideration to produce management plans that meet the needs for all of the citizens of the state; use measurable timelines and milestones; define how the SHC and FRP are related; landscape plans need to be implemented at a finer scale than HCP planning units to be effective; view trust lands in the context of surrounding landscapes and consider what the landscape should look like in 20, 50 and 100 years; landscape planning seems to be driven more by public impact than trusts’ interests; there should be integration between policies Nos. 16 and 19; consider wildlife and all ownerships when landscape planning; landscape and watershed level planning are important to forest health and are viable to wildlife population; landscape planning is an important element of HCP implementation; landscape plans should allocate lands for wildlife needs and other HCP commitments; landscape planning should cover an area no larger than a Water Resource Inventory Area (WRIA); and WRIAs should serve as a minimum scale of landscape planning.

No. 17: Soliciting Information. There were comments that stated this policy has not been followed or implemented as intended. This policy needs to be updated to ensure implementation and to outreach to conservation groups when soliciting comments.

No. 18: SEPA Review. This policy needs to be updated to include the following: an analysis of DNR's consideration over the past 12 years of cumulative effects of past, present and proposed activities during State Environmental Policy Act (SEPA) reviews; performing SEPA for an annual action plan, instead of each individual timber sale; assessing efficiency of SEPA review and clarify processes, i.e. who is responsible for what within DNR; and the need for reliable data sources with clarification and consistency on what data source is being used.

No. 19: Watershed Analysis. There were comments that indicated this policy has not been followed or implemented as intended. This policy needs to be updated to include the following: an analysis of whether the 1992 policy effectively improved and protected the aquatic network; watershed analysis needs to be operational and practical, not duplicative with the HCP and other policies; eliminate the 50/25 procedure, as it conflicts with implementation of the HCP, a reduction of management flexibility, reduced harvest volumes and little added environmental protection; watershed analysis plans must be completed and DNR needs to evaluate the cumulative effects of all management within each watershed and base management decisions on these watershed analyses; determine and describe a process of completing watershed analysis; there should be integration between policies Nos. 16 and 19; and expanded to examine the effects of forest practices on Washington State marine environments.

No. 20: Riparian Management Zones. This policy needs to be updated to include the following: an analysis of the positive and negative effects of buffering; the changes as a result of the HCP and Forests and Fish; encourage active management of riparian zones; identify fish blockages on county roads and state highways; inclusion of a mandatory 100 foot riparian management zone along both sides of all Type 5 waters; riparian protection requires a broader understanding of watershed conditions and processes which will guide appropriate Type 5 protection strategies; analyze the effects of forest practices on marine environments; and establish a minimum level of funding that is needed to effectively implement DNR responsibilities for watershed planning.

No. 21: Wetlands. This policy needs to be updated to include the following: a discussion on how effective the 1992 policy was related to protecting wetlands as part of the assessment of current conditions and needs to identify any loss of wetlands since 1992.

No. 22: Wildlife Habitat. This policy needs to be updated to include a discussion on how the 1992 policy worked over the last 12 years.

No. 23: Endangered Species. This policy needs to be updated to include the following: a description of how the 1992 policy has maintained populations of wildlife species and prevented them from becoming listed as endangered or threatened; identify the list of species that need protection; provide a proactive approach to wildlife habitat conducted across all land ownerships; promote natural species diversity; protect threatened and endangered plant species, especially on the Eastside; and implement intensive field inventories before doing a timber sale and protect species and habitats.

No. 24: Identifying Historic Sites. This policy needs to be updated to include the following: creating systematic cultural resources surveys that identify archaeological sites, areas of traditional value, sacred sites, locations with Indian place names, resource gathering areas, prior to any and all ground disturbing activities within state-managed trust lands, include fire rehabilitation activities; setting all cultural resource sites officially off base; communicating with the tribes on all timber sales in areas of cultural importance; assessing the progress that has been made on the TRAX system in the past 12 years; and allowing access for hunting and gathering.

No. 25: Providing Public Access. This policy needs to be updated to include the following: direction for how DNR can work with user groups to better manage trust forest lands for off-road vehicle use; this policy should be made secondary and subordinate to the trust mandate of maximizing revenue to the trust beneficiaries and include clear and concise language that prevents the existence of a recreational trail from controlling timber management activities; and “recreation activities are not providing money to the trust beneficiaries, thus they should not control the land.”

No. 26: Granting Public Rights of Way. This policy needs to be updated to include the following: explanation of whether or not DNR will accept forest legacy easements or property with conservation easements; explanation of whether or not DNR grants permanent easements; and provide easements with appropriate lease rates for public safety, i.e. communication sites.

No. 27: Acquiring Rights of Way. No comments were received on this policy.

No. 28: Developing and Maintaining Roads. This policy needs to be updated to include the following: a discussion about roadless lands and not building new roads in roadless areas; an update to be in compliance with the HCP; the additional requirements for environmental protection; the Forest Practices Rules upgrades; a summary of how many roads DNR manages and how this has changed since 1992; and consider how road design and location to protect the environment may be resulting in increased road mileage (e.g., ridgetop locations instead of stream adjacent).

No. 29: Recreation on State Forest Lands. This policy needs to be updated to include the following: clear policy direction that recognizes the importance of DNR trust land as a motorized recreation resource that provides support for managed off-road vehicle recreation; direction for DNR to work with user groups to better managed trust forest lands for off-road vehicle use in a manner that does not compromise trust fiduciary responsibilities, that meets the needs of the increasing off-road vehicle community, and protects the environment; specifically address the importance of forested trust lands for multiple use recreation; DNR lands are the ideal place to accommodate motorized recreation, as these forest areas generally contain many roads as a result of forestry activities and already contain modifications to natural areas and habitat; motorized recreation can occur on DNR trust lands without significantly impacting the land and its use for forestry, provided the recreation use is managed; this policy should be made secondary and subordinate to the trust mandate of maximizing revenue to the trust beneficiaries and include clear and concise language that prevents the existence of a recreational trail from controlling timber management activities; address the criteria for keeping lands available for public use and flexibility for closures when abuse occurs on the land; address enforcement issues and the need for additional law enforcement staff; address recreational shooting; creating a system of stewardship by particular use, trail or campground; address the increasing demand for public use on state lands and the growth since the 1992 plan, as well as the closure of public lands; recreation and trust mandate are not mutually exclusive; address where Non-highway Off-road Vehicle Account (NOVA) funds are spent and involve user groups in where the money goes; address the option of user fees or daily use fees to maintain access; define multiple use; recreation activities are not providing money to the trust beneficiaries, thus they should not control the land; evaluate implications of recreation to timber operations; create partnerships with volunteers; describe how to accept donations for recreation; include a reference to horseback riding and off highway vehicle use; promote conversion of abandoned roads to trail systems; preserve trails after harvesting; partner with local recreational businesses for upkeep of lands; recreation is a cornerstone of life in Washington and state trust lands are critical areas for local and regional recreation; consider trends and anticipate demands for recreation management decisions; and consider recreation as an opportunity for citizens to enjoy state lands.

No. 30: Silviculture Activities. This policy needs to be updated to include the following: an analysis of the 1992 policy and what the results of an updated policy will be; define how DNR will intensively manage the land base to optimize production and revenue; introduce plants for medicinal purposes; protect, monitor and identify chemical treatments; and test and implement innovative silvicultural techniques to restore forest health.

No. 31: Harvest and Reforestation Methods. This policy needs to be updated to include the following: HCP and anticipated biodiversity pathways practices; include Forest Stewardship Council (FSC) certification; and test and implement innovative silvicultural techniques to restore forest health.

No. 32: Green-up of Harvest Units. This policy needs to be updated to include the following: reflect current forestry practices; address 100-acre green up limit; 1992 language is too prescriptive; interject more flexibility; include FSC certification; and test and implement innovative silvicultural techniques to restore forest health.

No. 33: Control of Competing Vegetation. This policy needs to be updated to include the following: consulting with local tribes before using chemical treatments; the increased scrutiny of pesticide use and the impacts to forest health; and a discussion of what methods DNR uses for vegetation control, how often each method is used, and whether or not these methods have increased forest health and structure.

No. 34: Fertilizing, Thinning and Pruning. This policy needs to be updated to include the following: how often each method is used, and whether or not these methods have increased forest health and structure; and a discussion about the financial benefits of healthy forests in the long-term to be consistent with the proposed increase in thinning and implementation of biodiversity pathways.

No. 35: Public Involvement. No comments were received on this policy.

No. 36: Implementing the Forest Resource Plan. This policy needs to be updated to include the following: aggressively seek funding to fully implement enforcement, monitoring, landscape planning, wildlife habitat management, and forest restoration activities; address how to resolve conflicts between policies if they arise; discuss the increasingly complex task of managing state forest lands and how DNR will ensure that funding is available to implement the new policies; ensure that all stakeholders are engaged; provide good direction to the field staff; and align procedures with policy to have a smooth and seamless implementation.

No. 37: Monitoring the Forest Resource Plan. This policy needs to be updated to include the following: monitor the different land uses and show how the use contributes to management objectives; HCP needs to underlie everything in the FRP; identify performance targets with qualitative milestones to be measured; assess cumulative effects with measurable targets and criteria; BNR should annually review silvicultural investments and periodically review performance; address budgetary issues of monitoring; and implement a process for reviewing the performance of the FRP over time.

No. 38: Modifying the Forest Resource Plan. This policy needs to be updated to include the following: include a strong adaptive management program to facilitate and accommodate change; and allow flexibility for making changes to the plan, rather than every 10 years.

No. 39: Consistency. This policy needs to be updated to include the following: provide a linkage between the Forestry Handbook, HCP, Transition Lands Plan, Asset Stewardship Plan

and the FRP and ensure integration between them and avoid contradictions; acknowledge existing plans and provide consistency; and discuss and provide guidance on DNR's implementation plans as a result of SHC.

No. 40: Research. This policy needs to be updated to include the following: expand DNR's focus on the marine aspects of watershed planning and research is especially critical in Washington State where forest practices have such a strong impact on Puget Sound and the coast.

DNR's Response: As the process moves forward and reasonable alternatives are formulated, these comments will be reconsidered based on the merits of achieving the plan need, plan purpose and management objectives as outlined by the BNR and DNR.

## **IX. ENVIRONMENTAL IMPACT STATEMENT ANALYSIS**

Summary of Comments: The Environmental Impact Statement (EIS) should include the following: an analysis of the outcomes of the 1992 policies, whether they were met, and the resulting practices; consideration for managing Eastern Washington state forestlands as forests and not plantations; consideration of how DNR management of its Eastern Washington forestlands will provide sufficient stream flow to meet wildlife, irrigators, and societal needs for the life of the next Forest Resource Plan (FRP); consideration of a mechanism to monitor the ongoing plan objectives for the next lifespan of the FRP; examination of the role forest pathogens and insects have in a forest setting; analyze and discuss the various certification options and discuss the pros and cons of certification; analyze an alternative that commits to producing high-quality timber grown on longer rotations and certified under Forest Stewardship Council (FSC) standards; analyze an alternative that commits DNR to exploring new potential revenue sources, such as carbon sequestration credits, and to ensuring that today's management will not preclude those future options; analyze an alternative that commits to protecting all existing old-growth forests that are currently unprotected by other measures, such as state Forest Practices rules or the Habitat Conservation Plan (HCP); analyze and discuss monitoring and monitoring reports for every aspect of trust land management; analyze how threatened and endangered species in Eastern Washington are being protected; consideration of options to dispose, trade or sell lands in Eastern Washington that have unmarketable trees; analyze all alternatives under the full-cost accounting method to evaluate forest management options for their impacts on intergenerational equity and to help guide DNR and Board of Natural Resources (BNR) decisions; analyze the entire aspect of post-fire harvest and include an informed discussion on the pros and cons, and the scientific substantiation of the policy decisions; analyze an alternative the commits to using landscape planning to mitigate the cumulative effects of multiple logging operations; analysis of how the HCP relies on landscape planning and watershed analysis and how these plans will be completed; analyze and discuss the impacts of off-road vehicles; analyze the trends in recreational use over the past 10 years and if there have been impacts; analyze the scrutiny of pesticide use, particularly in riparian areas adjacent to salmon bearing streams; analyze how to mitigate or avoid adverse impacts of DNR forest management on adjacent federal roadless areas or Wilderness; analyze invasive species, i.e. spread of noxious weeds, impacts of land-management activities on spread of invasive species, grazing, logging, road construction, existing roads, motorized vehicles and herbicides; and analyze impacts of roads and road systems.

DNR's Response: DNR will revisit these comments when beginning the drafting of the EIS to ensure that the range of impact analysis and range of alternatives covers the significant impacts of the policy choices being evaluated. These will be dictated by the scope of the plan need, plan purpose and management objectives for the FRP review and update.

## **X. PLAN STRUCTURE AND ORGANIZATION**

Summary of Comments: The updated Forest Resource Plan (FRP) should include the following: discussion about funding and staffing available to implement the policies; description of how the HCP, SHC and FRP relate; description of the relationship between all of DNR's planning efforts; discussion about how the 1992 plan worked and what was accomplished over this time-period; update the Income Generated chart; an annual report page that documents how much money has been brought in and where the money has gone, specifically, not clinically, like the 1992 FRP; discussion on what happens when objectives and goals are not met; move the trust mandate section to the front of the FRP; discussion about recreation; statistical information that outlines the volume from 50 years ago compared to today; create a glossary of terms that defines sustainable harvest, biodiversity pathways, multiple use, sustainable forestry, innovative silvicultural techniques, GEMS, old growth, arrearage, and wetlands; and discussion about the costs of trust land management with a goal of improving efficiencies.

DNR's Response: The updated FRP will be restructured to better reflect the existing and anticipated future forestland management environment. A significant amount of information in the 1992 FRP will be reused, updated, and rewritten. DNR will look for opportunities to incorporate the above suggestions throughout the update. In addition, the layout will be reorganized in a manner that best suits DNR staff and other users and readers. A glossary of terms will also be included in the updated FRP.

## **XI. SUSTAINABLE HARVEST CALCULATION**

DNR received a number of comments regarding the SHC that are addressed in the SHC Environmental Impact Statement (EIS). DNR also received a number of comments regarding the potential need for recalculation of the sustainable harvest level based on any changes in policy that the Board of Natural Resources (BNR) might make as part of the updated Forest Resource Plan (FRP) process. It is not expected that these changes would significantly impact the sustainable harvest level and the decisions the BNR has already made. However, if it appears that the harvest level may be significantly affected, DNR will evaluate whether it should be adjusted.