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ADDENDUM

SEPA File No. 24-090401

Description of the original proposal:

Cougar VRH VDT Timber Sale #106246 and Forest Practice Application #2819529 proposal is for a variable retention harvest with a variable density thinning component, for a total harvest of 4,480 MBF from 148.6 acres. The proposal includes up to 4,796 feet of road construction and reconstruction (of which 803 feet are to be abandoned after completion of use, if built), and 17,906 feet of pre-haul maintenance. Located in Sections 10, 14, 15, 16, 22, 23, 24, township 29 North, Range 07 East, W.M., Snohomish County. In the Cougar VRH VDT Timber Sale 121.3 net acres are being harvested, while 128.7 acres (51% 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 Biomass accumulation/ stem exclusion and Maturation I.

The stands in Cougar VRH VDT timber sale have not been identified as those needed to meet older forest targets over time. Nonetheless, what follows describes structurally complex forests and acreage managed to meet older forest targets in the North Puget HCP Planning Unit.

Description of the addendum:

The Department of Natural Resources is providing an addendum to this SEPA analysis to document the revised evaluation and identification of suitable structurally complex forest to be managed to meet the older-forest targets expected as a modeled byproduct of management under the 1997 Trust Lands Habitat Conservation Plan (HCP), and a policy target stated in the DNR's Policy for Sustainable Forests (PSF).

DNR has corrected an error with the data query used in the 2024 Landscape Assessment to delineate conservation areas that are permanently deferred from variable retention harvest (VRH, a type of stand replacement harvest) and to quantify older forests that will contribute to older forest stand structure targets over time. The error was isolated to portions of the Columbia HCP Planning Unit.

The data query to locate permanently VRH-deferred conservation areas within each HCP planning unit included several types of conservation areas, such as areas permanently conserved for marbled murrelets. Murrelet conservation areas often overlap with Northern Spotted Owl (NSO) conservation areas.

While murrelet conservation areas are permanently deferred from VRH, NSO habitat is not deferred unless it overlaps a murrelet conservation area or other permanently deferred area. NSO habitat that does not overlap these areas may be available for harvest in planning units that have exceeded threshold habitat amounts set by the Northern Spotted Owl Conservation Strategy in the HCP. As noted in the main body of the landscape assessment, DNR removed such NSO habitat from the query.

The query correctly identified murrelet conservation areas in all HCP planning units except for part of the Columbia HCP Planning Unit. In the Columbia HCP Planning Unit, the query erroneously identified high-quality NSO habitat as permanently conserved murrelet habitat, even though a large portion of the Columbia HCP Planning Unit is outside of the range of the marbled murrelet and therefore does not include marbled murrelet conservation areas. Having been identified in this query, these acres were included in the May 7 calculation of permanently VRH-deferred conserved acreage that will contribute to older forest stand structure targets over time.

As a result of this error, approximately 3,475 acres within the Columbia HCP Planning Unit were miscategorized as permanently VRH-deferred conservation areas. Therefore, projections of older forest stand structure over time were inaccurate in that planning unit. Now that this error has been corrected, the Columbia HCP Planning Unit is projected to meet the 10 percent older-forest target by the year 2100, rather than by year 2090 as previously published.

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 North Puget 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 2070 (Table A) 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.

Table A. Percent area western Washington HCP planning units with older-forest stands in conservation areas by decade through 2120. With plot discounts and disturbance factor. Landscape Assessment to Identify and Manage Structurally Complex Stands to Meet Older-Forest Targets in Western Washington, May 2024 (Revised September 2024).

ADJUSTED QUERY OUTPUT (WITH PLOT DISCOUNT & DISTURBANCE FACTOR)											
HCP Planning Unit	Year										
	2021	2030	2040	2050	2060	2070	2080	2090	2100	2110	2120
COLUMBIA	1.0%	1.2%	1.4%	1.7%	2.4%	3.9%	6.2%	9.4%	13.3%	16.5%	18.2%
N. PUGET	3.2%	3.9%	4.9%	6.2%	7.9%	10.2%	13.2%	16.7%	20.5%	23.9%	25.0%
OESF	10.2%	10.7%	11.0%	11.7%	12.6%	13.9%	15.9%	20.0%	24.9%	28.3%	29.5%
S. COAST	0.2%	0.3%	0.6%	1.2%	2.1%	3.6%	5.9%	8.8%	12.2%	15.9%	18.6%
S. PUGET	1.7%	2.2%	2.7%	3.6%	4.6%	6.1%	8.4%	11.3%	14.4%	17.1%	18.7%
STRAITS	1.9%	2.6%	3.2%	4.3%	5.6%	7.4%	9.9%	12.6%	15.1%	18.0%	19.5%

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 Cougar VRH VDT 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.

Adjustments to the location, absence, or presence of conservation areas upon field verification for this proposal include, but not limited to the following:

- Potentially Unstable Slopes
- Riparian Management Areas
- Wetland Management Areas
- Other: Pileated woodpecker nesting site

This addendum incorporates the following analyses, policies, procedures, documents, and data layers as directly pertaining to or were reviewed as part of the proposal:

- DNR Policies and Implementation
 - Landscape Assessment to Identify and Manage Structurally Complex Stands to Meet Older-Forest Targets in Western Washington, May 2024 (Revised September 2024).
- DNR Trust Lands Habitat Conservation Plan and Supplemental Information
 - Biological Opinion on the HCP, USFWS; January 27, 1997
 - Biological Opinion on the HCP, NMFS; January 29, 1997
 - Biological Opinion on the HCP Marbled Murrelet Long-term Conservation Strategy Amendment, USFWS; November 7, 2019
 - Reinitiated Biological Opinion on the Incidental Take Permit (PRT-812521), USFWS; March 21, 2024
- Supporting Data for Unstable Slopes Review
 - Published Landslide Inventories
 - Historic Aerial Photographs
 - Published Geologic Mapping

Referenced documents may be obtained from the Northwest Region Office.

Description of existing environmental document: SEPA Checklist, Determination of Non-significance, Forest Practices Application/Notification #2819529, and HCP Checklist.

Proponent: Washington State Department of Natural Resources
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Lead Agency: Washington State Department of Natural Resources

This addendum is being distributed pursuant to WAC 197-11-600 and 197-11-625. It has been determined that this new information does not substantially change the analysis of significant impacts in the existing environmental document.



Jay Guthrie, Northwest Region Manager

Date: 9/28/24

There is no DNR administrative SEPA appeal.