



**DEPARTMENT OF
NATURAL RESOURCES**

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December 5, 2024

Notice of Final Determination

SEPA File No. 24-111504

FPA No. 2618490

Agreement No. 30-103864

Timber Sale: Blow Dry Salvage

The Department of Natural Resources issued Determination of Non-significance (DNS), Mitigated Determination of Non-significance (MDNS), Modified DNS/MDNS on **November 15, 2024** 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Withdrawn. This threshold determination has been withdrawn due to the following: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):

See attached.

Responsible Official:

William Wells

Position/title:

Olympic Region Manager

Address:

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Phone:

(360) 374-2800

Date: 12/6/2024

Signature: *William Wells*

There is no DNR administrative SEPA appeal.

The Department received comments from the Legacy Forest Defense Coalition and the Center for Responsible Forestry regarding the Blow Dry Salvage proposal. The Department prepared the below response to address the concerns in these comments:

The Blow Dry Salvage timber sale is consistent with all the applicable laws, rules, policies and procedures, including the Habitat Conservation Plan (HCP) and Policy for Sustainable Forests (PSF).

Comment – Managing structurally complex forests across 10 to 15 percent of the Straits planning unit

Response

The stands contained within this proposal are representative of those found within this landscape and have experienced logging activity prior to stand initiation. Regarding your comments related to older forest thresholds, DNR implements practices to achieve older forest structure (not old growth) across 10-15% of the Straits HCP Planning Unit over the next 70-100 years. Stands designated to meet this goal include old growth stands and structurally complex forests located in designated natural resource conservation areas, natural area preserves, special ecological management areas such as Marbled Murrelet habitat areas, Northern Spotted Owl habitat areas, riparian and wetlands management zones, areas of potentially unstable slopes, gene pool reserves, etc. The Straits Planning Unit is on track to meet at least 10% older forest within conservation areas by 2090 as stated in the Landscape Assessments to Identify and Manage Structurally Complex Stands to Meet Older-Forest Targets in Western Washington, May 2024 (revised September 2024), attached. Other areas not designated to meet this goal, like the stands in this proposal, are available for timber harvest consistent with previously mentioned policies and BNR approved sustainable harvest levels. The stands contained in the Blow Dry Salvage timber sale area are not identified as one of the stands designated to meet older forest targets in the Straits HCP Planning Unit.

As described in the SEPA checklist, 13 acres immediately adjacent to the proposed harvest are being retained for wildlife areas, riparian, wetland, and unstable slopes protection; this is the same stand type as the proposed harvest area. This includes 4 acres of clumped leave tree areas. These clumped leave tree areas were selected with an emphasis on preserving areas representing diverse native species that will contribute to future stand structure, wildlife habitat, and biodiversity. These areas of future conservation within the proposal area comprise approximately 27% of the total area evaluated for harvest that will be deferred from harvest and will contribute to the older forest thresholds and maintain habitat connectivity.

The comments received on this proposal do not raise new concerns, or substantive concerns specific to the Blow Dry Salvage proposal that have not been previously raised in prior comment letters and responded to by DNR. In prior responses, DNR has 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.

Additionally, DNR staff provided information to the Board of Natural Resources in a series of Board meetings in 2023 and 2024 to address 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. Furthermore, at the December Board of Natural Resources Meeting, the Board approved resolution 1645 which states in part: The Board interprets the General Silvicultural Strategy to mean that the Department will identify suitable forest stands that may be actively managed to achieve the desired 10-15% of older-forest structure in each western Washington HCP planning unit within 100 years of the adoption of the PSF.

- The Board interprets the General Silvicultural Strategy to direct the Department to identify structurally complex stands that are suitable to be managed toward older-forest targets over time.
- The Board does not interpret the General Silvicultural Strategy to prohibit the Department from harvesting structurally complex stands until it has achieved 10-15% older-forest structure across each western Washington HCP planning unit.
- The Board's interpretation of the General Silvicultural Strategy expressed above is consistent with the PSF as a whole, the release of structurally complex stands for harvest resulting from the adoption of the Long-Term Conservation Strategy for the Marbled Murrelet and the 2019 Sustainable Harvest Calculation, DNR's management over the past eighteen years, other Board adopted policy, and the Department's governing law.

The Blow Dry Salvage proposal was designed to be consistent with DNR's management 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 comments express 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 Blow Dry Salvage proposal. The Blow Dry Salvage proposal is located in lands available for harvest.

Comment – Rare Plant Communities

Response

The Blow Dry Salvage proposal was screened for the presence of Plant Communities of Concern and no records of presence of these plant communities was found within the boundaries of this proposal.