



**DEPARTMENT OF  
NATURAL RESOURCES**

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June 25, 2024

**Notice of Final Determination**

**SEPA File No. 24.060403**

FPA No.2618292

Agreement No. 30-103767

Timber Sale: Doc Holliday

The Department of Natural Resources issued  Determination of Non-significance (DNS),  Mitigated Determination of Non-significance (MDNS),  Modified DNS/MDNS on **June 4, 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Withdrawn. This threshold determination has been withdrawn due to the following: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):

Responsible Official:	William Wells
Position/title:	Olympic Region Manager
Address:	411 Tillicum Lane Forks, WA 98331
Phone:	(360) 374-2800

Date: 06/25/2024

Signature: *William Wells*

There is no DNR administrative SEPA appeal.

**Comments on File 24-060403, Doc Holiday Timber Sale # 103767 and Forest Practice Application #2618292 from Legacy Forest Defense Coalition, Earth Law Center, Center of Responsible Forestry, Center of Sustainable Economy, and multiple commenters by form letter relating to Large Diameter Trees, Old Growth, Climate Change, Marbled Murrelets, Recreation, and Riparian area management.**

Thank you for providing comments regarding Doc Holiday timber sale, SEPA File No. 24-060403, located in the Clallam County, as well as regarding Washington DNR's timber harvest program for trust beneficiaries. This letter is in response to comments received during the SEPA process and provides information outlining how this proposal is consistent with all applicable laws, rules, policies and procedures, including the 1997 Habitat Conservation Plan (HCP) and 2006 Policy for Sustainable Forests (PSF).

The Doc Holiday timber sale, specifically Unit 5, had both an Old Growth Assessment and a Stand Development Stage Assessment completed by trained staff. The results from these assessments show that Unit 5 is a second growth stand, with cut stumps throughout the unit. Due to the productivity as a high site class location, these second growth trees have grown to large diameters. These large trees were cored sampled for age verification and confirmed that they are not legacy old growth trees. No legacy old growth trees were found within the unit boundaries. However, the largest of the trees have been selected as leave trees and additionally are protected by contractual language for the timber sale that requires that trees over 60" DBH shall not be harvested. As stated in the SEPA checklist, 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 observed stands in Biomass Accumulation/Stem Exclusion stages of development. Regarding other habitat observations, this proposal does not occur within designated Marbled Murrelet habitat and this proposal follows all policies and procedures related to DNR's HCP and the FEIS of the 2019 HCP Long-Term Conservation Strategy for the Marbled Murrelet.

Leadership and staff at DNR are concerned about how sustainable forest management can mitigate the effects of climate change. For instance, the DNR's Natural and Working Lands Carbon Sequestration Advisory Group is actively considering our role in carbon sequestration on managed and un-managed forest lands. Forests are the most efficient means we have for removing carbon from the atmosphere. They draw in vast amounts of carbon dioxide and store carbon as biomass. But we know this is only one way that forests contribute to climate solutions. By balancing ecological, economic, and social outcomes, we can compound the benefits forests provide. To begin with, active management of forests for timber and revenue enables us to push back against economic pressure to convert those forestlands to non-forest uses. Management for timber also helps maintain a steady supply of local logs to local mills. When we source our wood from nearby forests, we reduce the amount of fossil fuel required to bring logs from forests to mills and from mills to local retailers. We know that a substantial percentage of wood from State lands ends up as dimensional lumber, plywood, and other manufactured building

materials. Forest products used in construction store more carbon—and their manufacture emits far less carbon dioxide, methane, and nitrous oxide—compared to non-wood alternatives such as concrete, steel, brick, and plastics.

When it comes to sequestering carbon in our working forests, DNR does more than most large forest landowners in Washington. For example, our rotation ages tend to exceed the industry average for forest managers in the Pacific Northwest. On lands covered by our Habitat Conservation Plan, we leave larger riparian buffers and more habitat trees than are required by law. In total, close to half of the forested trust lands we manage are deferred from harvest for ecological reasons. To quantify these carbon benefits, we worked with partners at the US Forest Service to conduct an inventory of carbon on both private and public forestlands across Washington.

While we are aware of the Superior Court ruling, this ruling was issued before the climate impacts were included in SEPA checklists for timber sales. The Department believes that its analyses of the impacts of the timber sales program on global climate change, GHG emissions, the role of the Doc Holliday sale area on mitigating for climate change, and analyses of alternatives have been adequately addressed in the final environmental impact statement (FEIS) for the 2015-2024 Sustainable Harvest Calculation and the FEIS for the 2019 HCP Long-Term Conservation Strategy for the Marbled Murrelet. This is because these analyses considered these impacts with the area including the Doc Holliday timber sale as included in being available for the full management suite of harvest activities, including variable retention harvest. Sustainable forestry remains consistent with the legislature's express policies for limiting greenhouse gas emissions in Washington. RCW 70A.45.005 and .090. This sale, Doc Holliday, was also included in the western Washington analyses for the development of the FEIS for the 2015-2024 Sustainable Harvest Calculation and the FEIS for the 2019 HCP Long-Term Conservation Strategy for the Marbled Murrelet, and, therefore, has already been included in the aforementioned analyses.

As for alternatives to the proposal, please understand that the purpose of the proposal is to generate revenue for the institutional beneficiaries of the lands at issue in this sale. Making the trusts productive is one of DNR's responsibilities as a trust manager, and DNR's statutes include directives to harvest timber in accordance with its sustainable harvest level. RCW 79.10.340. This timber sale implements in part this statutory directive, and alternatives such as thinning or partial cutting, or not cutting at all what is currently proposed for harvest inherently produce less revenue than DNR's current proposal. The Department has proposed and implemented substantial mitigation measures as part of its development of this site, including providing protections to riparian and wetland areas that far exceed Forest Practices minimums, as well as green retention trees within the extent of the harvest boundaries which together with the riparian and wetland protections amount to 64 acres. Mitigating measures are properly considered as alternatives in SEPA, and properly considered as part of the threshold determination process. WAC 197-11-792(2)(b); -786; 330(1)(c); and 197-11-350(1).

Finally, this land has been in forest production for over one hundred years. After the timber sale is completed, the site will be planted and naturally forested, and will remain available to the spectrum of

multiple uses identified in RCW 79.10.120. The timber on this site is a renewable resource, consistent with DNR's sustainable forest management under RCW 79.10.300-.340. Thus, the other uses of the site in RCW 79.10.120 will not be precluded in the future, except for the relatively short period of time where timber harvest operations occur. Additionally, there are no other, competing proposals for use of the timber sale site. DNR therefore believes that the sale does not present unresolved conflicts concerning alternative uses of available resources per RCW 43.21C.030(2)(e).