



**DEPARTMENT OF  
NATURAL RESOURCES**

**OLYMPIC REGION**

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June 6, 2024

**Notice of Final Determination  
Power Plant Adjusted Timber Sale #104354  
SEPA File No. 24-051601**

The Department of Natural Resources issued a  Determination of Non-significance (DNS),  Mitigated Determination of Non-significance (MDNS),  Modified DNS/MDNS on **May 16, 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Withdrawn. This threshold determination has been withdrawn due to the following: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):

Comments were received from Center for Sustainable Economy and Legacy Forest Defence Coalition, Center for Responsible Forestry, and two concerned citizens See attached response.

Responsible Official: Bill Wells

Position/title: Olympic Region Manager

Phone: 360-374-2800

Address: 411 Tillicum Lane  
Forks, WA 98331

Date: 6/05/2024 Signature: *William Wells*

There is no DNR administrative SEPA appeal.

**Center for Sustainable Economy**

**RE: Comments on File No. 24-051601 (Power Plant Adjusted Timber Sale #104354 and Forest Practice Application #2617912)**

Thank you for your comments. While we are aware of the King County Superior Court's decision regarding the Wishbone timber sale, we respectfully disagree with the court's ruling and will be pursuing an appeal of it. The Department believes that its analyses of the impacts of the timber sales program on global climate change, GHG emissions, the role of the Power Plant Adjusted 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 Power Plant Adjusted 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, Power Plant Adjusted, 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 35 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).

**Center for Responsible Forestry, Jeff Morfitt, Greg Maust**

**RE: Comments on File No. 24-051601 (Power Plant Adjusted Timber Sale #104354 and Forest Practice Application #2617912)**

Thank you for providing comments regarding the Power Plant Adjusted timber sale, SEPA File No. 24-051601, located in the Clallam County, as well as regarding Washington DNR's timber harvest program for trust beneficiaries. This letter is in response to your comments 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).

#### Carbon Sequestration

Like you, 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.

#### Old Forest

The General Silviculture Strategy (policy) in the Policy for Sustainable Forests 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.

In May 2024, the DNR produced a document titled ‘*Landscape Assessment to Identify and Manage Structurally Complex Stands to Meet Older-Forest Targets in Western Washington*’, which is incorporated by reference in this Addendum. 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 forests of existing structurally complex stands, and additional stands suitable 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 deferred from regeneration harvest.

The results from the May 2024 landscape assessment, and included in the above-referenced memorandum, show that while the Straits HCP Planning Unit does not currently contain 10 to 15 percent older forest conditions, it demonstrates that through implementation of the HCP and other Policies and laws, stands containing structurally complex forests or managed for older forest targets in conservation areas is projected to exceed 10 percent in the Straits HCP Planning Unit by 2090 (Table 1). Stands currently identified to meet older forest targets are represented in the attached map titled, “2021 Older Forest Within Conservation STRAITS” (2024).

Additionally, those stands projected to meet older-forest targets are depicted in the attached map titled, “Projected 2100 Older Forest Within Conservation STRAITS” (2024).

**Table 1.** Percent area western Washington HCP planning units with older-forest stands in conservation areas by decade through 2120. With plot discounts and disturbance factor.

<b>ADJUSTED QUERY OUTPUT (WITH PLOT DISCOUNT &amp; DISTURBANCE FACTOR)</b>											
<b>HCP Planning Unit</b>	<b>Year</b>										
	<b>2021</b>	<b>2030</b>	<b>2040</b>	<b>2050</b>	<b>2060</b>	<b>2070</b>	<b>2080</b>	<b>2090</b>	<b>2100</b>	<b>2110</b>	<b>2120</b>
COLUMBIA	1.1%	1.2%	1.4%	1.8%	2.6%	4.3%	6.8%	<b>10.1%</b>	<b>14.0%</b>	<b>17.3%</b>	<b>18.9%</b>
N. PUGET	3.2%	3.9%	4.9%	6.2%	7.9%	<b>10.2%</b>	<b>13.2%</b>	<b>16.7%</b>	<b>20.6%</b>	<b>23.9%</b>	<b>25.0%</b>
OESF	<b>10.2%</b>	<b>10.7%</b>	<b>11.0%</b>	<b>11.7%</b>	<b>12.6%</b>	<b>13.9%</b>	<b>16.0%</b>	<b>20.1%</b>	<b>25.0%</b>	<b>28.4%</b>	<b>29.6%</b>
S. COAST	0.2%	0.3%	0.6%	1.2%	2.2%	3.6%	6.0%	8.8%	<b>12.3%</b>	<b>16.0%</b>	<b>18.7%</b>
S. PUGET	1.7%	2.1%	2.7%	3.6%	4.6%	6.1%	8.4%	<b>11.3%</b>	<b>14.4%</b>	<b>17.2%</b>	<b>18.7%</b>
STRAITS	1.8%	2.5%	3.2%	4.3%	5.6%	7.4%	9.9%	<b>12.6%</b>	<b>15.0%</b>	<b>17.9%</b>	<b>19.3%</b>

The Power Plant Adjusted timber sale is not identified as one of those stands designated to meet older-forest targets over time. In the Power Plant Adjusted timber sale 38 acres are being harvested, while 35 acres are being conserved (47% of proposal area) for potential unstable slopes, riparian management zones, and leave tree areas that will contribute to older forests over time. Following the timber sale, the 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 harvested units.

#### Recreation

Dispersed recreation use is common throughout DNR managed lands. There are no recreation trails within the Power Plant Adjusted timber sale boundaries. Disruptions to dispersed recreation in forms of motorized and non-motorized use will occur during operations, but measures which include sign posting will occur during these activities. These dispersed and non-designated uses will continue after harvest activities are completed.