



**DEPARTMENT OF  
NATURAL RESOURCES**

**PACIFIC CASCADE REGION**

601 BOND ROAD  
PO BOX 280  
CASTLE ROCK, WA 98611

**375-577-2025**

TRS 711

PACIFIC-CASCADE.REGION@DNR.WA.GOV  
WWW.DNR.WA.GOV

07/24/2024

**Notice of Final Determination**

Action Item Sorts Timber Sale, App. No. 30-105538

SEPA File No. 24-070201

FP No. 2942411

The Department of Natural Resources issued a  Determination of Non-significance (DNS),  Mitigated Determination of Non-significance (MDNS),  Modified DNS/MDNS on 07/02/2024 for this proposal under the State Environmental Policy Act (SEPA) and WAC 197-11-340(2).

This determination is hereby:

Retained.

Modified. Modifications to this proposal include the following:

Withdrawn. This proposal has been withdrawn due to the following:

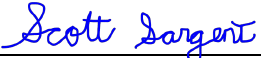
Delayed. A Final Determination has been delayed due to the following:

Responsible Official: Scott Sargent

Position/title: Pacific Cascade Region Manager Phone: (360) 577-2025

Address: P.O. Box 280 Castle Rock, WA 98611

Date: 7/24/2023

Signature: Scott Sargent 

Summary of Comments and Responses (if applicable):

Informational Comment Summary:

None.

Specific Comment Summary:

Legacy Forest Defense Coalition – Concerns with stand age, wildlife habitat and older forest thresholds.

Response:

Thank you for providing comments in your July 16, 2024 letter regarding the Action Item timber sale, SEPA File No. 24-070201. This letter is in response to your comments and provides information outlining how this proposal is consistent with all the applicable laws, rules, policies and procedures, including the Habitat Conservation Plan (HCP) and Policy for Sustainable Forests (PSF).

The Action Item TBS is located within Doty Block in Grays Harbor County. These lands are designated for General Ecological Management (GEM) for which there are no species-specific management requirements, and timber within this designation is available for harvest.

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 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'. 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 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 South Coast 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 South Coast HCP Planning Unit by 2100. Stands currently identified to meet older forest targets and stands projected to meet older forest targets are depicted in associated maps within the assessment document for each western Washington HCP planning unit.

Additionally, DNR has designated forest stand acreage in each HCP planning unit to meet or exceed the policy's 10% older forest target.

The Action Item Timber Sale is not identified as one of those stands designated to meet older-forest targets over time. In the Action Item Timber Sale 102 net acres are being harvested, while 68 acres are being conserved from the overall area considered for harvest (40% of the proposal area) for potential unstable slopes, riparian management zones plus leave tree areas that will contribute to older forests 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 harvested units.

Your letter does not raise new concerns, or substantive concerns specific to the Action Item Timber Sale that have not been previously raise in your prior comment letters and responded to by DNR. In its responses to your prior correspondences, DNR 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. As you identify in your letter, DNR staff provided information to the Board of Natural Resources in a series of Board meetings to address your 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, fifty years in the future.

The Action Item timber sale was designed to be consistent with DNR's 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 your comment letter expresses 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 Action Item timber sale. The Action Item timber sale is located in lands available for harvest.