



**DEPARTMENT OF  
NATURAL RESOURCES**

**PACIFIC CASCADE REGION**

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05/07/2024

**Notice of Final Determination**

Richmond fire Salvage Timber Sale, App. No. 30-106277

SEPA File No. 24-032902

FP No. 2942288

The Department of Natural Resources issued a  Determination of Non-significance (DNS),  Mitigated Determination of Non-significance (MDNS),  Modified DNS/MDNS on 3/29/2024 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Withdrawn. This proposal has been withdrawn due to the following: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: 5/7/2024

Signature: Scott Sargent *Scott Sargent*

Summary of Comments and Responses (if applicable):

Informational Comment Summary:

Squaxin Island Tribe – Outside Squaxin Island Tribe’s traditional area.

Specific Comment Summary:

Center for Sustainable Economy & Legacy Forest Defense Coalition – Comments on the King County Superior Court’s decision regarding the Wishbone timber sale, Departments analyses of the impacts of

the timber sales program on global climate change, Greenhouse Gas (GHG) emissions, the role of the Richmond Fire Salvage sale area on mitigating for climate change, and analyses of alternatives.

Response:

Thank you for your comments. While we are aware of the King County Superior Court's decision regarding the Wishbone timber sale, we 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, Greenhouse Gas (GHG) emissions, the role of the Richmond Fire Salvage 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 Richmond Fire Salvage 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, Richmond Fire Salvage, 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 34 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 management and 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).

Legacy Forest Defense Coalition – Comments on stand age, fire effects on forest ecosystems, fire effects on mature and old growth forests, older forest, structurally complex forest and wildlife habitat.

Response:

Thank you for providing comments in your April 12, 2024 letter regarding the Richmond Fire Salvage timber sale, SEPA File No. 24-032902. 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 Richmond Fire Salvage TBS is located within Lincoln Management Block in Lewis 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. Prior to the fire, which occurred in late summer of 2023, this area was scheduled to be harvested in 2030 for the Lewis County Trust in accordance with the sustainable harvest calculation. The Douglas-fir trees within the burn scar of Richmond Fire Salvage were exposed to different levels of fire intensity and as such display different degrees of fire injury. Trees impacted by fire may succumb immediately to their injuries or death may be delayed over several years following the fire (Hood, S.M., Varner, J.M. 2019). Damage to the cambium layer may not be immediately apparent and the full extent of damage to the tree may not be known until the droughty season the following summer.

In addition to the direct effects of fire, Douglas-fir beetle and the flathead fir borer are two insects that are attracted to and breed in downed wood or trees stressed by drought, fire, root disease and other stressors (Oregon Dept of Forestry, Forest Health 2016). Bark beetles require living tissue to reproduce thus trees with intermediate levels of crown scorch and cambium injury are the most suitable hosts for beetle infestation (Hood, S.M., Varner, J.M. 2019). It is best practice to remove the fire damaged timber before the first April following the disturbance. If the timber is not removed by the first April, timber should be removed before developing brood leaves the host trees which is typically the following April (Mellen-McLean, et al., 2017).

Ultimately, the timber within the Richmond Fire Salvage TBS is not being harvested because of the impact of the fire, it was already planned for harvest. The timing of this sale was adjusted to capture the maximum value for the Lewis County Trust. Delaying harvest an additional six years would be detrimental to the Trust beneficiary and stand in contrast to the Department's fiduciary responsibility.

The Richmond Fire Salvage TBS was prepared under the policies and procedures of the Department's Habitat Conservation Plan (1997). As such, this sale provides protection for aquatic resources utilizing standard 100-year site-index riparian management zones (RMZs) measuring 186' wide for all fish streams and a minimum 100' wide for all Type 4 streams. Upland areas will retain a minimum of 8 leave trees per acre, one from the dominant crown class, one from the largest diameter class, three green snag recruitment trees and three snag recruitment trees if snags cannot be safely retained. These leave trees were left primarily in clumps totaling an approximate 7.3 acres. The RMZs and leave trees will retain a representative sample of the stand characteristics found on the site, including a minor amount of fire damaged and weakened trees, following timber harvest.

In its responses to your prior correspondences, DNR explained its policy to protect old growth, its procedure to identify and manage structurally complex forests, its obligations under the 1997 HCP, and

the 2006 Policy for Sustainable Forests. As part of the SEPA Materials submitted, including the SEPA Addendum for Richmond Fire Salvage dated May 7, 2024, the results from the May 2024 landscape assessment, incorporated by reference in the Addendum, included in the memorandum *'Landscape Assessment to Identify and Manage Structurally Complex Stands to Meet Older-Forest Targets in Western Washington'* 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.

The Richmond Fire Salvage timber sale is not identified as one of those stands designated to meet older-forest targets over time. In the Richmond Fire Salvage timber sale 73 acres are being harvested, while 29 acres are being conserved (27% of proposal area) for potential unstable slopes, riparian and wetland management zones, and leave tree areas that will contribute to older forests over time. Following the timber sale, the harvested area 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.

The Richmond Fire Salvage 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 Richmond Fire Salvage timber sale. The Richmond Fire Salvage timber sale is located in lands available for harvest.