Washington Department of Natural Resources
Sustainable Harvest Calculation for Eastern Washington

Staff Report

To: Sustainable Harvest Calculation Steering Committee

From: Sustainable Harvest Calculation (SHC) Project Team

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Subject: No Action Alternative

Proposed Actions

The Sustainable Harvest Calculation Steering Committee is requested to make a determination on how the no action alternative will be defined as part of the Environmental Impact Statement (EIS) process for the Sustainable Harvest Calculation (SHC) for eastern Washington.

Background

The no action alternative is a required element of any EIS under the State Environmental Policy Act (SEPA). The EIS process requires that reasonable, alternative courses of action (alternatives) must be analyzed alongside the project's proposal. WAC 197-11-440 specifies that, "Reasonable alternatives shall include actions that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." The no action alternative is required to be analyzed as one of these alternatives. The SEPA Handbook states, "[The no action alternative] provides a benchmark from which the other alternatives can be compared," and that "it is typically defined as what would be most likely to happen if the proposal did not occur." (State Environmental Policy Act Handbook, p. 37) In the case of this project, the no action alternative reflects what would occur if DNR did not complete a new SHC.

The SEPA Handbook states, "As the SEPA Rules do not define what the no-action alternative must look like, the lead agency has some discretion in its design." (State Environmental Policy Act Handbook, p. 37) When the SHC process for western Washington was last completed for the 2015-2024 planning decade, the no action alternative was defined as the sustainable harvest level that had previously been approved by the Board of Natural Resources (BNR) for the fiscal year 2005-2014 planning decade. However, DNR is not required to define the no action alternative in this way and has some discretion to define the no action alternative in a different way for the upcoming SHC for eastern Washington.

The Policy on Recalculation of the Sustainable Harvest Level within The Policy for Sustainable Forests (PSF) requires the department to adjust the calculation no less frequently than every ten years or when "changing circumstances within the planning decade suggest that an adjusted harvest

level would be prudent." (The Policy for Sustainable Forests, p. 30) Additionally, RCW 79.10.320 states, "[DNR] shall periodically adjust the acreages designated for inclusion in the sustained yield management program and calculate a sustainable harvest level." The last time the Eastside SHC was calculated in 1996 was an adjustment of the 1988 calculation based on the adoption of DNR's Habitat Conservation Plan (HCP). Table 1 provides the annual harvest level in millions of board feet for each sustainable harvest unit (SHU) for the 1996 eastside calculation.

Table 1. Annual harvest levels from the 1996 sustainable harvest calculation by sustainable harvest unit

Eastside SHU	1996 (MMBF/Year)
Yakima River	16.9
North Columbia	18.7
Klickitat	12.9
Highlands and South Okanogan	21.1
Arcadia	9.0
Total	78.6

Since 1996, there have been many changes in laws, policies, and land plans that have altered how DNR is required to manage forestlands and there have been no harvest level recalculations since these changes have occurred for eastern WA. Some of these changes include the adoption of HCP Amendment No. 1 in 2004, revisions to the Lynx Habitat Management Plan in 2006, the adoption of the PSF in 2006, the issuance of a Forest Health Hazard Warning in 2012, and new laws related to forest health in 2016 and 2017. All of these changes combined have greatly impacted forest management across DNR lands, which invariably have caused the 1996 sustainable harvest levels to become outdated.

The PSF made direct changes to how and when the SHC is conducted for state trust lands. It also set policies on forest health and catastrophic loss prevention in eastern Washington that led to changes in overarching management objectives for DNR and in policy implementation.

HCP Amendment No. 1 also known as the "Klickitat Amendment" became part of DNR's uplands HCP in 2004 to provide the DNR with more flexibility in addressing forest health issues and to reconfigure owl habitat management areas to better reflect site limitations of developing and maintaining habitat in certain areas. Another plan that heavily impacts forest management is the 2006 Lynx Habitat Management Plan. This plan included habitat development goals and harvest limitations, pre-commercial thinning restrictions, and harvest timing restrictions.

In 2012, due to multiple insect outbreaks that caused damage to the forest across Okanogan, Ferry, Klickitat, and Yakima counties, a forest health hazard warning was issued. Prior to this event, there was an outbreak of mountain pine beetle that resulted in higher harvest levels than planned from 2001 to 2003. There have also been multiple large wildfires on DNR-managed lands across eastern Washington, which have impacted forest inventory. From 2016 to 2017, multiple bills were passed including ESHB 2376, Sec. 308, SB 5546, and HB 1711 that all affected forest health planning and funding. These events and bills eventually led to the adoption of the 20-Year Forest Health Strategic Plan. The insect and disease outbreaks, wildfires, and continued forest health issues have led to a

reduction in standing timber and harvest limitations in certain wildlife habitat management areas. Policy changes have led to more funding for forest health treatments and a greater focus on managing for forest health and resilience.

Significant changes in the land base in eastern Washington have also occurred since 1996. Forest land has been affected by large land transactions, as well as changes in land use and trust status. For instance, in 2006, approximately 24,700 acres were set aside for the Loomis Natural Resources Conservation Area (NRCA) and were removed from regular timber harvest management. Agency data shows that around 200,000 acres have been acquired and 136,000 acres have been sold or transferred out of trust land status in eastern Washington since 1996 (note this estimate includes non-forested acres). Even accounting for the fact that some of these lands may not have been forested, this is a significant amount of land that has changed hands, relative to the current eastside trust-managed forested land base of approximately 680,000 acres.

All of the changes detailed in this section have led to a situation in which the eastside regions are operating under a highly outdated sustainable harvest level. The PSF says that circumstances suggest an adjusted harvest level may be needed when "major changes in legal requirements, significant new policy direction from the BNR, new information about the resource base available for harvest, or changes in technology." (The Policy for Sustainable Forestry, p. 30) All of these changes and more have happened in the decades since the last calculation.

Analysis of the No Action Alternative

DNR must identify a no action alternative to be used in the next sustainable harvest calculation for eastern Washington. One option is to force the model to harvest 78.6 MMBF annually to reflect the harvest volume of the 1996 calculation as the baseline no action alternative. The other option is to model current management using current inventory as the baseline no action alternative without consideration for 1996 harvest levels.

Option 1: Use 1996 sustainable harvest level as the baseline no action alternative.

Option 1 proposes to set the no action alternative to force the model to harvest 78.6 MMBF annually to reflect the harvest levels set in the 1996 calculation for eastern Washington. This option would use the last harvest levels that were approved by the Board of Natural Resources, since they still represent the approved harvest levels for eastside regions until a new calculation is completed. This method reflects how the no action alternative was defined for the last SHC for western Washington.

However, this option would not be reasonable due to the changes in laws, policies, land plans, land base, and inventory since the last calculation, detailed in the Background section above. When the westside calculation was completed, the no action alternative reflected a sustainable harvest level that was approximately 10 years old and based on relatively up-to-date data and conditions. This is very different from the current eastside calculation, which is long overdue and based on outdated technology and conditions that no longer reflect DNR's current operating environment.

This option for the no action alternative would not act as a suitable baseline from which to compare other alternatives. Since so much has changed since the last calculation, setting the baseline as the last harvest level calculated would not reflect all the updated laws, policies, and other changes to

the landscape. If we set the no action alternative to the 1996 sustainable harvest level, we would be comparing the proposed alternatives to an option that would not be possible to implement due to the numerous changes since 1996 described in this document. It would be a non-sensical comparison that would compromise the utility of the EIS for DNR decisions makers and the public. In contrast, comparing possible alternatives to a no action alternative that reflects DNR's current management would provide meaningful comparison between operationally feasible choices by effectively demonstrating how different policy and modeling choices would play out over the planning decade in comparison to current practice.

Option 2: Model current management as the baseline no action alternative.

Modeling the no action alternative to reflect DNR's current management would align most closely with the reality of what would happen if the SHC did not occur. This method would incorporate information on DNR's current land base, inventory, and management practices applicable to the strategic SHC models. The no action alternative would align with new laws and policies that DNR has incorporated into its management over the years which are not reflected in the 1996 sustainable harvest levels.

Option 2 would allow for meaningful comparison among the reasonable alternatives in the EIS process. Therefore, it would make sense for the no action alternative to as closely as possible reflect DNR's current practices and land base. This would allow for meaningful comparisons to be made among the no action alternative and the action alternatives in the EIS analyses.

Modeling the no action alternative based off DNR's current operating environment falls within the scope of the SEPA Handbook guidance and demonstrates the best use of the SEPA process to inform environmental decision making.

Recommendation for No Action Alternative

The SHC Project Team recommends that the SHC Steering Committee select Option 2 the No Action Alternative to be used for the sustainable harvest calculation for eastern Washington.

Review and Decision

Document was reviewed and edited by:

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Document was reviewed by the following members of the SHC Steering Committee:

- Todd Welker – Deputy Supervisor for State Uplands
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The Steering Committee has approved the staff recommendations as project decisions as of October 28, 2024.