

## NONPROJECT REVIEW FORM

### Part I - Framework

#### 1) Background

a) *Name of proposal, if any, and brief description:*

**The proposal, entitled “Proposed Strategies for Management of Blanchard Forest State Trust Lands”, represents a set of strategies that will provide guidance to the Department of Natural Resources for balancing environmental, social and economic values in the management Blanchard Forest. The proposal is based on a set of consensus recommendations made by a ten-person group, called the Blanchard Forest Strategies group (BFSG), that was appointed by the Commissioner of Public Lands, Doug Sutherland (see Attachment 2).**

**The proposal is comprised of a set of four management strategies for Blanchard Forest State Trust Lands as well as a map with an addendum that provides further management detail (see Attachment I for four strategies, map and addendum). Among the four strategies in the proposal, the first relates to management activities in Blanchard Forest. It delineates four management zones for Blanchard and with a range of strategies that emphasize different management objectives for each zone. This strategy also recommends the development of two management “overlays” which will apply to the entire mountain: a recreational overlay for trails and other recreational uses and a “demonstration working forest” overlay for emphasizing natural resource stewardship, the role of State forest trust lands and the enduring values of a working forest in an urban setting. See proposal for remaining three strategies.**

**Within the map addendum is more management detail relating to the following elements in Blanchard Forest: core size, ecological management inside the core zone, recreation and education, roads, and implementation of the proposal. The proposal also recommends the formation of an advisory committee, comprised of a membership similar to the BFSG, to assist DNR-decision making on management of Blanchard Forest (see Attachment 1, Addendum to Preliminary Map).**

**The proposal is intended to be implemented within the existing policy and regulatory framework that the Department of Natural Resources (DNR) currently operates for all state forest trust lands. This framework includes all state and federal laws, including Washington State Forest Practices Rules and Regulations, Board of Natural Resources’ adopted Policy for Sustainable Forests (1996), and DNR’s Habitat Conservation Plan (1997).**

b) *Agency and contact name, address, telephone, fax, email.*

**Agency:** Washington State Department of Natural Resources  
**Contact:** Kristen Ohlson-Kiehn, Project Coordinator  
**Address:** 919 N. Township St., Sedro-Woolley, WA 98284  
**Phone:** 360-856-3500  
**Fax:** 360-856-2150  
**Email:** BlanchardForest@wadnr.gov

**Please send SEPA comments to the WDNR SEPA Center,  
P.O. Box 47015, Olympia, WA 98504-7015  
[SEPAcenter@dnr.wa.gov](mailto:SEPAcenter@dnr.wa.gov)**

c) *Designated responsible official:*

**William J. Wallace, DNR, Northwest Region Manager**

d) *Describe the planning process and schedule/timeline*

**Spring 2006** State Lands Commissioner, Doug Sutherland, appointed the ten-person Blanchard Forest Strategies Group (BFSG) to develop a consensus set of management concepts for Blanchard Forest to help the department develop long-term management strategies.

**January 2007** BFSG came to consensus on a set of recommendations and points of agreement for the Department.

**February, 12 2007** DNR and BFSG held a public ‘open house’ meeting held to present BFSG’s recommendations to the public for questions and comments. Copies of the consensus recommendations as well as background material such as maps and other documents, were provided at meeting. Group members and DNR staff also attended and were available for questions.

**February 12 – 28, 2007** DNR requested comments from members of public on the consensus recommendations. Comments came in the form of comment cards (at or after public open house), e-mails and letters and totaled 157 pieces of correspondence. Comments were logged and compiled verbatim into one document. Comments were also

summarized. Both documents will also be made available on the DNR website.

**March 2007**

**BFSG presented their consensus recommendations and points of agreement along with public outreach summary and comments to the State Lands Commissioner.**

**April 2007**

**DNR incorporates recommendations into the “Proposed Management Strategies for Blanchard Forest State Trust Lands.”**

**May 2007**

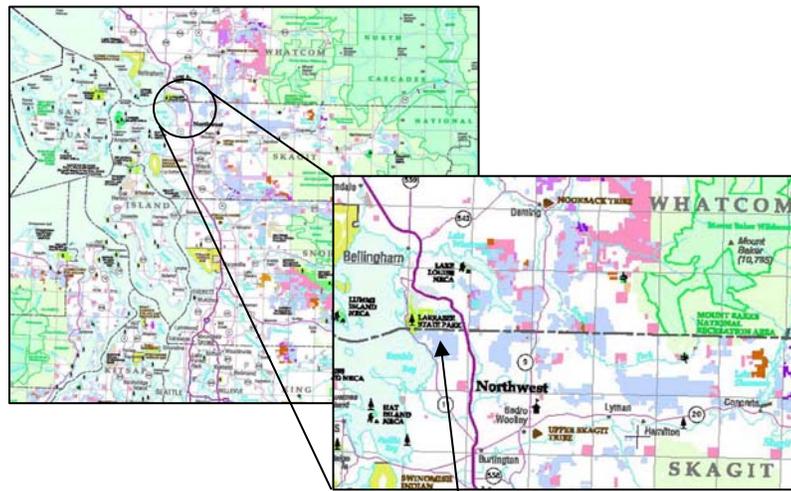
**DNR initiates SEPA review of proposal.**

**June 2007**

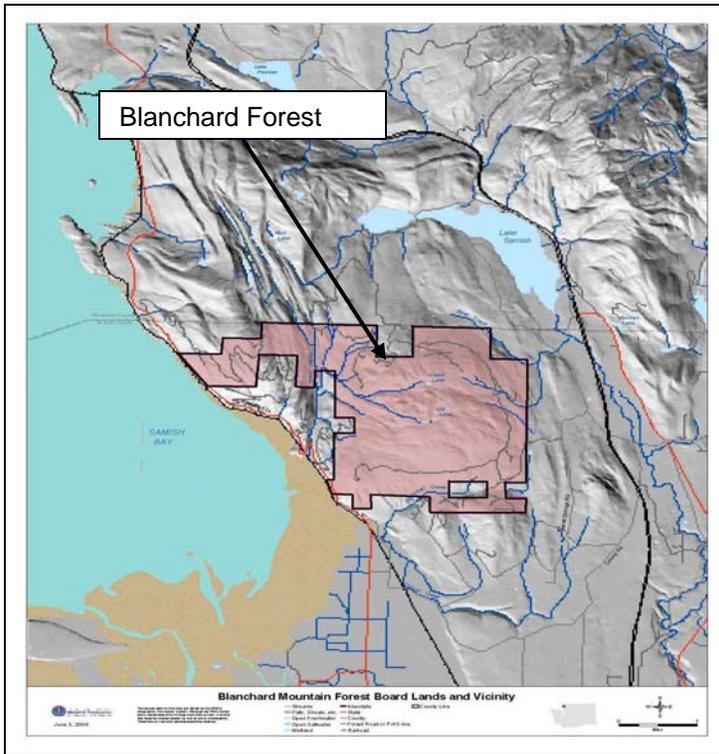
**DNR plans to make final decision about implementing the proposal, provided that SEPA has been completed. The final decision will likely take the form of a memorandum of understanding (MOU) between DNR, Skagit County and other participants of the Blanchard Forest Strategies Group.**

e) *Location:*

**DNR manages 4,827 acres of Skagit County State Forest trust lands on Blanchard Mountain. This area is located in northwestern Skagit County just south of the Whatcom County line. It is approximately 5 miles south of Bellingham and 10-12 miles northwest of Burlington and Mount Vernon. Blanchard Forest is 1.5 miles from Interstate 5 on its eastern edge, and the Chuckanut Drive Scenic Roadway borders its western edge. Larrabee State Park lies to the north of the site.**



Blanchard Forest



f) *What is the legal authority for the proposal?*

**The Washington State Department of Natural Resources retains the legal authority to implement policies and guide the management of state trust lands. The Public Lands Act (Title 79 RCW) and the 2006 “Policy for Sustainable Forests” provide the administrative authority for the Department to develop this “Proposed Management Strategies for Blanchard Forest State Trust Lands.”**

g) *Identify any other future nonproject actions believed necessary to achieve the objectives of this action.*

**The non-project action under consideration for this SEPA review is the Department adopting the “Proposed Management Strategies for Blanchard Forest State Trust Lands.”**

**Other future non-project actions believed necessary to achieve the objectives of adopting the proposal include the formation of a Blanchard Forest Advisory Committee composed of a membership that is consistent with the interests represented in the Blanchard Forest Strategy Group.**

**DNR plans to develop a recreational overlay, in consultation with the yet-to-be-formed Blanchard Forest Advisory Committee, that will apply to trails**

**and other recreational uses that provide multiple recreational experiences in each of the management zones but does not reduce the net area available for timber production within the general management or high visual sensitivity zone.**

**DNR will also develop a future demonstration working forest overlay, in consultation with the Blanchard Forest Advisory Committee, that emphasizes natural resource stewardship, the role of State Forest trust lands and the enduring values of a working forest in an urban setting.**

**Any ecological management inside the 1,600 acre “core zone”, located in the upper elevations of Blanchard Mountain (see attached map), will be based on strategies and plans to be developed by DNR, in collaboration with the Blanchard Forest Advisory Committee. All management activities will meet, at a minimum, all state and federal laws including Washington State Forest Practices Rules and Regulations, and policies set in Board of Natural Resources-adopted Policy for Sustainable Forests (2006), DNR’s Habitat Conservation Plan (1997) and HCP Riparian Forest Restoration Strategy Implementation Procedures (2006).**

**Future individual timber sale plans outside the 1,600 acre “core zone” in Blanchard Forest will also be developed by DNR in collaboration with the Blanchard Forest Advisory Committee and will also meet the same standards listed above.**

**Finally, the department is will undergo a Forest Land Plan development effort for its North Puget Sound HCP planning unit, within which Blanchard is located. All components of Blanchard Forest management guidance will be incorporated into that landscape plan and undergo SEPA review.**

## **2) Need and Objectives:**

- a) Describe the need for the action. Whenever possible this should identify the broad or fundamental problem or opportunity that is to be addressed, rather than a legislative or other directive.)*

**The department needs to implement a set of management strategies in Blanchard Forest that balances, with broad community support, fulfillment of the department’s legal obligations (see Part IV for legal framework). However, because Blanchard Forest is located within a unique community setting where many interests within Skagit and Whatcom County converge, it has been a difficult balance to strike. DNR has an obligation under state law to manage its lands in a sustainable fashion and to generate revenue from the sale of timber. Blanchard has sizeable acreage that is ready for harvest. The county and local junior taxing districts receive a share of the timber revenue generated on Blanchard. The site is also a very popular**

recreational destination. There are a wide variety of recreational users: hikers, bikers, horseback riders, hanggliders, bird watchers, and campers. It has an established network of well-used trails and is adjacent to Larrabee State Park. Blanchard also has substantial ecological value. The forest habitat provides a home for a wide variety of flora and fauna. Blanchard is part of a network of timber lands in Skagit County that provides jobs for those in the industry, logs for the mills, and long-term timber supply for the region. And with growing urban pressures from Bellingham and Mount Vernon, the DNR has seen an increase in the number of residential neighbors to Blanchard. All of those interests are directed toward a site that is relatively small in size – 4800 acres.

This proposal meets the needs of the department. The department has determined that it is consistent with state and federal laws and Board of Natural Resources policy direction, fulfilling DNR's legal responsibility. The proposal represents a set of recommendations that were established through consensus by BFSG members who represent the broad array of groups with interest in how Blanchard is managed.

- b) *Describe the objectives of the proposal, including any secondary objectives which may be used to shape or choose among alternatives.*

**The objectives of the Blanchard Forest Strategy include the following:**

- 1. Be consistent with the purpose and objectives of State Forest trust lands;**
- 2. Produce sustainable revenue for Skagit County trust beneficiaries, at reasonable costs;**
- 3. Provide sustainable ecological and social benefits for the community and region;**
- 4. Consider Blanchard Forest trust lands as part of a larger regional landscape, including the overall State Forest trust land responsibilities; and**
- 5. Maintain all ownership within Blanchard Forest as State Forest trust lands.**

- c) *Identify any assumptions or constraints, including legal mandates, which limit the approach or strategy to be taken in pursuing the objectives.*

- 1. Trust land management policy guidance is currently flexible enough to accommodate multiple values, pursuant to RCW 79.68. If providing for recreation or other amenity uses substantially curtails forest management activities that produce trust revenue, options exist to seek financial compensation to the trust beneficiaries.**

2. **The proposal will reflect current policy direction aimed at providing a sustainable balance of environmental, economic, and social values, within current legal requirements.**
3. **The social aspects (including recreation use), ecological functions of forestlands, and production of trust revenue are critical values for this area, and may be emphasized differently over various portions of the area.**
4. **The public expects DNR to successfully provide for recreational use, ecological functions, trust revenue, and economic opportunity.**
5. **Ecologically sensitive areas will receive protection under DNR's current laws and policies.**

**See also section 4, “Regulatory Framework”, of this document.**

- d) If there is no legislative or other mandate that requires a particular approach, describe what approaches could reasonably achieve the objective(s).*

**The department’s approach to achieving the objectives stated above is to implement this proposal that is based on recommendations developed by the Blanchard Forest Strategies Group. This proposal has been determined by the department to be consistent with state and federal laws and Board of Natural Resources policy direction. The management strategies in the proposal provide the necessary landscape level of detail and conceptual framework to allow the above objective(s) to be accomplished.**

### **3) Environmental Overview**

*Describe in broad terms how achieving the objective(s) would direct or encourage physical changes to the environment. Include the type and degree of likely changes such as the likely changes in development and/or infrastructure, or changes to how an area will be managed.*

**Implementation of the proposal would not result in any change to the environment. However, future site-specific project proposals would be designed to meet all required environmental standards and the strategies of this proposal. Environmental standards and strategies are set by federal and state laws, including Washington Forest Practices Rules and Regulations, as well as DNR plans and policies such as the Board of Natural Resources-adopted Policy for Sustainable Forests (1996), Habitat Conservation Plan (1997) and HCP Riparian Forest Restoration Strategy Implementation Procedures (2006) and the “Proposed Strategies for Management of Blanchard Forest State Trust Lands.” The kinds and impact of site-specific project proposals are not known at this time and further analysis will be done for specific actions requiring SEPA.**

### **4) Regulatory Framework**

- a) *Describe the existing regulatory/planning framework as it may influence or direct the proposal.*

### **STATE LAWS**

Washington state laws are categorized in the Revised Code of Washington (RCW). Corresponding state rules that provide more details about implementing the laws are categorized in the Washington Administrative Code (WAC).

#### **Public Lands Act (Title 79 RCW)**

The Public Lands Act is one of the laws by which the department manages all of its lands. The land management authorities and policies contained in it define both “multiple use” and “sustainable harvest,” which are key concepts applicable to the proposal.

#### **Multiple Use Concept (RCW 79.10.120)**

The Legislature has directed the department to utilize a “multiple use concept” in the administration of public lands. The uses allowed under this concept must be in the best interests of the state and the general welfare of the citizens, as well as consistent with the trust provisions of the various lands involved.

Utilizing the multiple use concept means the department will manage trust lands to provide for other public uses when those uses are compatible with the obligations of trust management. Public uses that may be compatible with trust management activities include: recreational areas; recreational trails for both vehicular and non-vehicular uses; special educational or scientific studies; experimental programs managed by various public agencies; special events; hunting, fishing and other sports activities; maintenance of scenic areas; maintenance of historical sites; municipal or other public watershed protection; greenbelt areas; and public rights of way. If such additional uses are not compatible with the fiduciary obligations in the management of trust land, they may be permitted only if there is compensation to satisfy the trust’s financial obligations.

#### **Sustainable Harvest Program (RCW 79.10.300)**

The department manages the forested state trust lands on a sustained yield basis. The department is required to periodically adjust the acreages designated for inclusion in the sustained yield management program and calculate a sustainable harvest level.

Sustainable harvest level is defined in the law as the volume of timber scheduled for sale from state-owned lands during a planning decade, as calculated by the department and approved by the Board of Natural Resources. In September 2004, the Board of Natural Resources met the requirements of this law by adopting a revised sustainable harvest calculation.

#### **Forest Practices Act (Chapter 76.09 RCW)**

The purpose of Washington's Forest Practices Act is to protect the state's public resources while maintaining a viable timber industry. The act regulates activities related to growing and harvesting timber on all non-federal forest lands in the state, including department-managed forested state trust lands. The Forest Practices Board was established and mandated to adopt the state Forest Practices Rules (Title 222 WAC) that govern how the Forest Practices Act must be implemented. Both the act and the rules have been amended over time to address evolving protection of public resources.

In 1999, the Washington Legislature authorized the Forest Practices Board to adopt new rules consistent with the *Forests and Fish Report*, an agreement that addressed protection of aquatic resources (RCW 76.09.055). In response, the Forest Practices Board amended the state Forest Practices Rules in July 2001. The objectives of the new rules are to further protect public resources by focusing on water quality, salmon habitat and other aquatic and riparian resources.

The department's Forest Practices Program administers and enforces the state Forest Practices Act and its rules on non-federal public and private forest lands in Washington. It operates independently of the department's state land management programs. Management activities on forested state trust lands are subject to the state Forest Practices Rules.

#### **State Environmental Policy Act (Chapter 43.21C RCW)**

The State Environmental Policy Act (SEPA) requires state agencies to review proposed actions for probable significant adverse impacts and, when necessary, to prepare an environmental impact statement for actions that may have a probable, significant adverse impact on the environment. Compliance with SEPA ensures timely analysis, public comment processes and mitigation of the probable significant environmental impacts during various activities, including project planning and implementation, as well as during programmatic or policy-level planning efforts.

The SEPA Rules (Chapter 197-11 WAC) provide more details for implementing this law. They also establish uniform environmental review requirements for all agencies. Often department activities related to forest management, i.e., planning, road development, harvesting, tree sales, and sometimes silvicultural activities are subject to SEPA. Similar activities by private landowners are not subject to SEPA unless a private proposal is a Class IV Forest Practice.

#### **Growth Management Act (Chapter 36.70A RCW)**

The Growth Management Act requires local governments to establish comprehensive growth management plans that address a range of natural resource issues, including timber and other resources that may be on forested state trust lands.

The department works with local governments as they develop land use plans and regulations. In some cases, forested state trust lands that lie in zones identified for development will be converted to other uses or transferred out of trust status, with compensation to the trust(s), when it best serves the trust(s) interests. In these cases local government Growth Management Act critical area ordinances require environmental protection associated with development activities when the land use changes from timber to other uses. In other cases, the department identifies forested state trust lands that should be protected from development when it is in the trust(s) best interests.

## **OTHER STATE LAWS**

### **Hydraulic Projects Approval (RCW 77.55.021)**

A Hydraulic Project Approval is required from the Washington State Department of Fish and Wildlife for most work done in or above a body of water. This is often necessary for road construction projects, which may or may not occur in conjunction with timber harvest activities from forested state trust lands. If a forest practices application is filed for the activity, the landowner does not have to file separately for a HPA. However, DNR would be required to apply for an HPA if a management activity on state trust lands does not require a forest practices permit but involves a state body of water.

### **Surface Mining Act (Chapter 78.44 RCW)**

The Surface Mining Act requires anyone who engages in surface mining activities, as defined by the act, to obtain a permit from the department. A SEPA review is required for this permit. The law applies equally to any mining activities that may occur on forested state trust lands.

### **The Shoreline Management Act (Chapter 90.58 RCW)**

The Shoreline Management Act requires the Washington State Department of Ecology and local governments to manage shorelines by planning for and fostering all reasonable and appropriate uses. When the DNR conducts a management activity on forested state trust lands which falls within the purview of this law, the department must obtain a permit from the appropriate local government.

### **The State Water Pollution Control Act (Chapter 90.48 RCW)**

The Water Pollution Control Act requires that the state of Washington maintain the highest possible standards to ensure the purity of all waters of the state, consistent with public health and public enjoyment; the propagation and protection of wildlife, birds, game, fish and other aquatic life; and the industrial development of the state. It also requires the use of all known available and reasonable methods by industries and others to prevent and control the pollution of the state's waters.

## **FEDERAL LAWS**

**Endangered Species Act (16 U.S.C. 1531 ET SEQ.)**

The Endangered Species Act protects federally listed species and their ecosystems. Section 10 of the Endangered Species Act (16 U.S.C. 1539) authorizes a landowner to negotiate a habitat conservation plan with the United States Secretary of the Interior to minimize and mitigate any incidental impact to threatened and endangered species while conducting lawful activities such as forest practices. A habitat conservation plan may allow the landowner to develop habitat for endangered species at a landscape level, rather than protecting the individual sites at which the species is found on the landowner's property. As long as the landowner manages under the terms and conditions of the habitat conservation plan, the landowner will not be prosecuted for "take" of an individual animal. The permit issued to the landowner by the federal government is referred to as an "Incidental Take Permit," and identifies the range of activities allowed under each habitat conservation plan.

In 1997, the department and the United States Fish and Wildlife Service and the National Oceanic and Atmospheric Administration-Fisheries (collectively referred to as "the Federal Services") signed a multi-species *Habitat Conservation Plan* to address the department's compliance with the federal Endangered Species Act in its management of forested state trust lands.

The department's *Habitat Conservation Plan* covers approximately 1.6 million acres of forested state trust lands within the range of the northern spotted owl and is a multi-species land management plan that takes a landscape approach to managing for conservation of threatened and endangered species. The plan protects all currently listed and potentially listed species and manages for species populations, which in turn protects individual animals. Because many of the department's forested state trust lands are adjacent to federal lands, the *Habitat Conservation Plan* is designed to supplement federal land management protection measures at a landscape level, as described in the *Northwest Forest Plan*.

**The Federal Water Pollution Control Act (CLEAN WATER ACT)  
(33 U.S.C. 1251 ET. SEQ.)**

The Clean Water Act relates to protecting water quality. Washington's Forest Practices Rules are co-adopted by DNR and Ecology so that meeting the requirements of the rules also meets the requirements of the state Clean Water Act and federal law.

- b) *Identify any potential impacts from the proposal that have been previously designated as acceptable under the Growth Management Act (GMA), chapter 36.70A RCW.*

**This proposal is consistent with the intent and purpose of the Growth Management Act and with Skagit County's Comprehensive Plan for forest**

resource lands of long-term commercial significance. This proposal provides support for Blanchard Forest to remain a commercial forest resource land – a working forest – including managing those forest lands outside the 1,600 acre core zone primarily to generate revenue. Inside the core zone the proposal allows for ecologically-based thinnings to accelerate the development of older forest conditions.

## 5) Related Documentation

- a) *Briefly describe any existing regulation, policy or plan that is expected to be replaced or amended as a result of the proposal. (Adequate descriptions in section 4.a may be referenced here, rather than repeated.)*

**No existing regulations, policies or plans will be replaced or amended as a result of this proposal.**

- b) *List any environmental documents (SEPA or NEPA) that have been prepared for items listed in 4.a. or that provide analysis relevant to this proposal. **Note:** Impacts with previous adequate analysis need not be re-analyzed, but should be adopted or incorporated by reference into the NPRF. Identify the:*
- i) *Type of document*
  - ii) *Lead agency and issue date*
  - iii) *Where copies can be viewed or obtained*
  - iv) *The portions of the document applicable to the current proposal and briefly explain relevancy. Summarize the relevant impact assessment or, provide reference to discussion(s) in Part II that includes this information.*

**The following documents provide analysis relevant to this proposal and are available for review on the department’s website ([www.dnr.wa.gov](http://www.dnr.wa.gov)) and may also be requested from the DNR SEPA Center ([SEPAcenter@dnr.wa.gov](mailto:SEPAcenter@dnr.wa.gov)):**

**Draft and Final Environmental Impact Statement on the Policy for Sustainable Forests** (Department of Natural Resources, 2005 - 2006). This document discusses the potential environmental impacts of 26 policies guiding the management of 2.1 million acres of forested state trust lands.

**Draft Environmental Impact Statement Habitat Conservation Plan** (Department of Natural Resources, 1996) and **Final Environmental Impact Statement Habitat Conservation Plan** (Department of Natural Resources, 1997). These documents discuss the potential environmental impacts of implementing conservation strategies to protect threatened and endangered species on forested state trust lands.

**Final Habitat Conservation Plan** (Department of Natural Resources, 1997). This document discusses the conservation of threatened and endangered species on forested state trust lands.

**Draft and Final Environmental Impact Statements on Alternatives for Sustainable Forest**

*Management of State Trust Lands in Western Washington* (Department of Natural Resources, 2004). These documents discuss the environmental impacts associated with the sustainable harvest level for each planning area for each decade in Western Washington.

**Final Environmental Impact Statement on Alternatives for the Forest Practices Rules for Aquatic and Riparian Resources** (Washington Forest Practices Board, 2001). This document discusses the environmental impacts of forest practices activities on aquatic and riparian habitat on private and forested state trust lands, as well as habitat protection for salmonid species which are listed as threatened or endangered under the Endangered Species Act.

**Final Environmental Impact Statement for the Proposed Forest Practices Rules and Regulations** (Washington Forest Practices Board, 1992). This document discusses State Forest Practices Rules and Regulations.

**The following documents are available at the Northwest Region Office, Department of Natural Resources, 919 N. Township Street, Sedro-Woolley, WA 98284:**

Westview Thin Timber Sale (2006) #76888  
Cashew – (1992) #51305  
Filbert – (1995) #54142  
Pecan PC- (2002) #71824  
Pistachio – (1999) #70110  
Shenandoah PC – (2004) #74776  
Chuckanut Fire Kill – (1970) #33220  
Chuckanut Cleanup – (1972) #36002  
Section 5 Cleanup – (1975) #37409  
Barrel – (1990) #50508  
North Blanchard – (1985) #46782  
Blanchard Hill – (1976) #38501  
Section 2 – (1979) #41973  
Woolley Worm – (1986) #45709  
One for the Road – (1989) #49636  
Royal Coachman – (1985) #45708  
Macadamia – (1992) #51304  
South Blanchard – (1987) #43797

- c) *List other relevant environmental documents/studies/models which have been identified as necessary to support decision making for this proposal.*

**Although the following documents have not been identified as necessary to support decision making for this proposal, they have been utilized through**

**the course of developing this proposal for their detailed background information. These documents are available for review at the Northwest Region Office, Sedro-Woolley, WA, and many of them are viewable at the Blanchard Forest website at [www.dnr.wa.gov](http://www.dnr.wa.gov).**

**Evaluation of Blanchard Mountain Social, Ecological & Financial Values**, (Cedar River Group, Mundy Associates LLC, and William B. Beyers, Ph. D, 2002). This document came about through Washington State Legislature-appropriated funding which was matched by the Northwest Ecosystem Alliance. It evaluates social, ecological, and financial values of Blanchard Forest.

**Blanchard Mountain Assessment**, (Resources Northwest Consultants, 1999). Submitted to Washington Department of Natural Resources. Developed for the Department of Natural Resources, this report describes natural resources and land uses that pertain to Natural Resource Conservation Area (NRCA) criteria in and around Blanchard Forest

**Chuckanut Mountain Trails Master Plan** (Osprey Environmental Services, Northwest Trails, Worthy & Associates, and Ernst & DelBoca, 1999). This document represents a proposed plan for a comprehensive trails system throughout the Chuckanut Mountain Area that crosses multiple public ownerships, and provides information on the area surrounding Blanchard Forest.

## **6) Public Involvement**

- a) *Identify agencies with jurisdiction or expertise, affected tribes, and other known stakeholder groups whose input is likely to be specifically solicited in the development of this proposal.*

### **Blanchard Forest Strategy Group Members**

Ken Osborn, Consulting Forester  
Eron Berg, Friends of Blanchard  
Mike Crawford, Business  
Molly Doran, Skagit Land Trust  
Mitch Freidman, Conservation Northwest  
Will Hamilton, Hamilton Resource Management, Inc.  
Bob Rose, Citizen of Skagit County  
Kendra Smith, Skagit County  
Michael McGlenn, Backcountry Horsemen  
Clay Sprague, State Department of Natural Resources

- b) *Briefly describe the processes used or expected to be used for soliciting input from those listed.*

### **Processes Used to Solicit Input**

### **Formation of Blanchard Forest Strategy Group**

Beginning in May 2006, DNR entered into a collaborative, consensus-based process as a participant on the Blanchard Forest Strategies Group. The local members represent the county (as a trust beneficiary), recreation interests, conservation groups, a land use organization and the timber industry. Over the span of eight months, the group met twelve times providing DNR with a consistent stream of input from Group members. All of the meetings were open to the public, and at most of the meetings members of the public asked questions or provided comments.

### **Public Outreach on BFSG's Recommendations**

DNR and the Blanchard Forest Strategy Group held an 'Open House' meeting on February 12<sup>th</sup>, 2007 to show the public the conceptual strategies that were developed by the BFSG, as well as to provide the opportunity for attendees to meet members of the BFSG and DNR managers of Blanchard Forest to ask questions.

February 12<sup>th</sup> – 28<sup>th</sup>, 2007, DNR and the BFSG requested comments from the public on the recommendations either at the Open House, via comment card, or afterwards via email, letter, or comment card. These comments were presented to the Commissioner of Public Lands to inform his decision on whether the DNR should adopt the recommendations.

### **Processes Expected to be Used**

Continued collaboration will be ensured through a variety of public review processes following this SEPA review. These will include a Blanchard Forest Advisory Committee, public meetings, and notices for project SEPA reviews and comment opportunities on site-specific projects.

## Part II – IMPACT ANALYSIS AND ALTERNATIVES

### **7) Affected Environment**

*Generally describe the existing environmental landscapes or elements (e.g., character and quality of ecosystem, existing trends, infrastructure, service levels, etc.) likely to be affected if the proposal is implemented. Include a description of the existing built and natural environment where future "on the ground" activities would occur that would be influenced by the non-project proposal.*

*Note: When complete, this section needs to provide information on existing conditions for the elements of the environment discussed in sections 8 and 9. A list of both the built and the natural elements of the environment is found in WAC 197-11-444, and included at the end of this form.*

**For a complete description of the existing natural and built environment, see Attachment A (Affected Environment – Existing Conditions: Natural & Built Environment) to this document.**

## **8) Key Issue Assessment**

### **Key Issues Defined by Blanchard Forest Strategy Group**

Blanchard Strategy Group members identified seven key issues facing Blanchard and brainstormed strategies to address those issues. The Group's discussions were supported by a professional facilitator and DNR staff provided background materials, maps, and technical information. Other information sources were made available upon the request of the group. The key issues identified by the Blanchard Forest Strategy Group included:

1. Income generation for beneficiaries
2. Regional role of Blanchard in the context of regional social, ecological, economic systems
3. Maintaining a working forest in Skagit County and larger region
4. Access for recreation by all non-motorized users
5. Economic issues (work and use) related to use of lands, maintaining working forests in Skagit County and larger region
6. Maintenance of wildlife habitat (not limited to Habitat Conservation Plan) – on as large a scale as possible
7. Compatibility of recreation with resource management

### **Options Identified for Each Issue**

After defining each issue, BFGS participants discussed a definition for the issue, identified interests behind the issue, and brainstormed options to address each issue. For each option, the Group members discussed pros and cons. For more detail on these discussions, please refer to the Compilation of Blanchard Forest Strategy Group Meeting Notes May 22, 2006- January 3, 2007 (available at the Northwest Region Office).

#### **Issue #1: Income generation for beneficiaries**

##### **Options:**

1. Logging according to DNR's Sustainable Harvest Calculation prediction.
2. Income generation from other Trust Lands
3. County could take back the land (reconveyance)
4. Public funding to offset revenue reductions (i.e., legislature has Washington Wildlife and Recreation Program (WWRP) fund which can reimburse landowner for land)

5. Purchase in-holding blocks.
6. Private funding sources to offset revenue reductions (probably not lump sum, but regular annual payments like an annuity).
7. Recreation fees
8. Alternative revenue sources for the timber value (i.e., leasing).
9. Chuckanut Park District tax generation.

**Issue #2: Regional role of Blanchard in the context of regional social, ecological, economic systems**

**Options:**

The Group decided this issue had already been covered in discussion of other issues.

**Issues #3 and 5: Maintaining a working forest in Skagit County and larger region *and* Economic issues (work and use) related to use of lands, maintaining working forests in Skagit County and larger region**

**Options:**

1. Expanding land base for timber harvest – more flexibility to meet multiple interests
2. Identification of areas where harvest and recreation do not conflict.
3. Acquiring land base in areas that are now zoned for forestry.
4. Maintain Blanchard as a working forest with multiple uses with wildlife and recreation connectivity and defensible boundary for forestry.

**Issues #4 and 7: Access for recreation by all non-motorized users & Compatibility of recreation with resource management**

**Options** (Developed for both issues):

1. Deliberate, intensive recreation with advanced trail system, huts, lodging.
2. Existing conditions with enhanced logging practices (i.e., latest technology, different silvicultural regimes) relative to compatibility with recreation use. (Option could include roadless logging above the road, insuring that timber sales contracts are sensitive to recreational (i.e., trail) use - different harvest regimes to enhance compatibility with recreation).
3. Designation of landscape level recreational blocks, and other special management areas (visually sensitive, trails, ecologically significant areas) where no activity goes on, other areas for only thinning – not just corridors. For example, no or limited harvest, at top of mountain.
4. Purchase/ acquire inholdings or adjacent properties (620 acres currently without homes). Add Bloedel property to include large block of land to Blanchard land base in Whatcom County.
5. Trail relocation to lessen impact of timber management.
6. No harvest above the road system.

7. Accelerate closure of roads used for logging.
8. Blanchard as recreation trust? Designation as recreation area, find replacement lands.

**Issue #6: Maintenance of wildlife habitat (not limited to Habitat Conservation Plan) – on as large a scale as possible**

**Options:**

1. Olympic Experimental State Forest Model.
2. Preserve the entire site.
3. Define acceptable levels of disturbance in terms of numbers of acres you can disturb.
4. Rely on Habitat Conservation Plan and DNR Policy for maintaining wildlife habitat.
5. Set up as experimental zones to test biodiversity on Blanchard over time.

**Decision-Making Criteria**

Options deemed viable by Group members were run through the following set of decision-making criteria defined by the Group:

1. Compliance with County, State and Federal Law or reasonable prospects for making changes.
2. Consistent with July 11, 2006 version of Board of Natural Resources Policies.
3. Leads to resolution and longer-term sustainability of outcome. Has to meet the interests of all parties.
4. Reasonable financial accountability. Can resources reasonably be secured?
5. Operational feasibility – is it doable?
6. Ensuring perpetual revenue for Trust beneficiaries (consistent with State law)
7. Maintain Skagit County State Forest Land base that meets social, economic, and environmental/ecological benefits.
8. For any reallocation of assets, the benefits to all beneficiaries will remain intact or are enhanced.

**Principles for a Solution**

Based on these discussions surrounding the options to address each issue and the pros and cons for each option, the Group crafted a set of principles for a solution:

1. Maintain or increase operable land base for DNR
2. Maintain or increase timber volume in Skagit County
3. Conserve core area to meet recreation interests
4. Compensate Trust for core area

**Recommendations**

Further discussion of the principles for a solution lead to an outline of draft concepts for the Group to consider and ultimately to the Blanchard Forest Strategy Group's Consensus Recommendations and Points of Agreement, Additional Management Directions, and the map entitled, "Blanchard Forest Strategy Group's Recommended Core." (See attached).

## **9) Proposed Nonproject Action or Alternative Actions**

*Describe a range of reasonable alternatives or the preferred alternative that will meet the objective(s). For each alternative, answer the following questions referring again to the list of the elements of the environment in WAC 197-11-444\*\*:*

- a) If this alternative were fully implemented (including full build-out development, redevelopment, changes in land use, density of uses, management practices, etc.), describe where and how it would direct or encourage demand on or changes within elements of the human or built environment, as well as the likely affects on the natural environment. Identify where the change or affect or increased demand constitutes a likely adverse impact, and describe any further or additional adverse impacts that are likely to occur as a result of those changes and affects.*
- b) Identify potential mitigation measures for the adverse impacts identified in 9.a and describe how effective the mitigation is assumed to be, any adverse impacts that could result from the use of the mitigation, and any conflict or concern related to the proposal objectives and/or key issues identified.*
- c) Identify unavoidable impacts and those that will be left to be addressed at the project level.*
- d) Describe how the proposal objectives will or will not be met if the impacts described in 9.c were to occur.*

**Note:** *Alternatives may be rejected at any point in the process if: they have no environmental benefit, are not within existing authority, are determined unfeasible, or do not meet the core objectives.*

**Proposed Nonproject Action:**        **To Implement Proposed Blanchard Forest Management Strategies for Blanchard Forest State Trust Lands**

**The preferred alternative is to implement the "Proposed Management Strategies for Blanchard Forest State Trust Lands" (see Attachment 1 for entire proposal), consisting of a set of conceptual management strategies proposed by the DNR. These are conceptual strategies intended to be implemented within the existing policy and regulatory framework DNR currently operates.**

- a) Implementation of the proposal would not result in any environmental impact. This non-project action would provide overall management strategies, guidelines and designations that emphasize a range of**

management practices within Blanchard Forest in order to better balance the environmental, social, and economic values of the proposal area. This non-project proposal will not result in an increased discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise. If the use level increases within the planning area, either due to the recommendations from the plan or from other factors, efforts will be made to mitigate impact from such use.

- b) **No adverse impacts are anticipated.**
- c) **No unavoidable impacts are expected. Future site-specific project proposals would be designed to meet all required environmental standards. These include federal and state laws, DNR plans and policies such as the 1997 HCP, April 2006 HCP Riparian Forest Restoration Strategy Implementation Procedures, and the 2006 DNR Policy for Sustainable Forests as well as the guidance in this proposed Blanchard Forest Strategy. These must all be met while providing revenue to the trusts and recreational opportunities for the public. The increase in impervious surfaces, emissions, or noise is anticipated to be very minimal. The kinds and impact of site-specific project proposals are not known at this time and further analysis will be done for specific actions requiring SEPA.**
- d) **No adverse impacts are anticipated.**

### **Part III – IMPLEMENTATION CONSIDERATIONS**

#### **10) Consistency of the proposal with other plans, policies and laws.**

- a) *Internal consistency - If there are internal inconsistencies between this proposal and your agency's previously adopted or ongoing plans and regulations, identify any strategies or ideas for resolving these inconsistencies.*

**There are no known inconsistencies.**

- b) *External consistency - If there are external inconsistencies between this proposal and adopted or ongoing plans and regulations of adjacent jurisdictions and/or other agencies, identify any strategies or ideas for resolving these inconsistencies.*

**There are no known inconsistencies.**

## 11) Monitoring and Follow-up

- a) *Describe any monitoring that will occur to ensure the impacts were as predicted and that mitigation is effective, including responsible party, timing, and method(s) to be used.*

**We do not anticipate environmental impacts that will occur due to implementing these recommendations. All management activities will meet, at a minimum, all state and federal laws including Washington State Forest Practices Rules and Regulations, and standards set in Board of Natural Resources-adopted Policy for Sustainable Forests (2006), DNR's Habitat Conservation Plan (1997) and HCP Riparian Forest Restoration Strategy Implementation Procedures (2006). All activities will be evaluated for potential environmental impacts and if required, undergo a SEPA review. With assistance of the Blanchard Forest Advisory Committee, DNR will monitor to ensure the intent of the Blanchard Forest Strategy Group recommendations is implemented.**

- b) *Identify any plans or strategies for updating this proposed action based on deviation from impact projections or other criteria.*

**If unanticipated environmental impacts are identified through the SEPA review process, DNR will take actions to mitigate for such impacts.**