

# Appendix O

COMMENTS-RESPONSES ON DRAFT EIS

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## List of Draft EIS Commentors

<b>Commentors</b>	<b>Affiliation- Organization or City</b>
Gary Bell	Washington State Department of Fish and Wildlife
Herb Gerhardt	Belfair
Bob Hagar	Unknown
Dick Malcolm Jr.	American Forest Resource Council
Mark Ostwald	U.S. Fish and Wildlife Service
Judy Scavone	Ashford
Julie Svenson	Seabeck

## Subject Areas, Issues and Responses

### Forest Conditions

Subject Area: Forest Conditions

Issue: Clearcuts

**Comment Summary:**

A Commenter expressed concern about DNR's timing of clearcuts. For example, clearcuts must not be positioned adjacent to one another until vegetation between units has grown-up and it was suggested that vegetation 15 to 20 feet tall or 10 to 15 years old would be adequate. Clearcuts should be positioned in a checkerboard pattern to allow wildlife travel corridors and minimize hydrologic concerns. Additionally, clearcuts should not occur following a pole sale and DNR should notify people if this is expected to occur on the same piece of ground. The Commenter also felt that clearcutting on the Tahuya and Green Mountain state forests contributed to the December 3, 2007 flooding in the Tahuya River Valley.

**Response:**

DNR agrees with the importance of wildlife corridors, riparian areas and 'green-up.' DNR is guided by tools that help protect these areas. DNR follows Washington's State Forest Practice Rules (WAC 222-30-025) for green-up of recently-harvested stands prior to harvesting any adjacent stands, for additional information refer to visual management (p. 171). DNR follows the procedure *Assessing Hydrologic Maturity on the westside* (Procedure 14-004-060; refer to Appendix E of this document), which specifies additional green-up requirements when harvesting in watersheds with designated rain-on-snow areas. For a discussion about rain-on-snow, refer to the section on water quantity (p. 65). In addition to the above, the department recognizes the importance of riparian corridors and has developed the *Riparian Forest Restoration Strategy* in order to protect and enhance riparian forests that provide habitat and cover for wildlife movement next to harvested landscapes as discussed in the (DNR 1996, page 4-490).

In order to meet important trust revenue objectives, occasionally DNR markets high-value products such as poles in a separate timber sale prior to a variable retention harvest in the same area. Each trust lands timber sale undergoes a separate public environmental review process as part of the State Environmental Policy Act (SEPA), which includes a discussion of any known future forest management or harvest operations within the area of the proposed timber sale. For example, the SEPA checklist for the pole sale mentioned above would identify a variable retention harvest as a known future activity (when planned in advance), allowing reviewers to understand the broader context of the current activity and to comment on any potential cumulative impacts. Notification of the completion of a SEPA environmental checklist is sent to all parties that have expressed an interest in receiving them. Interested parties need to contact the South Puget Sound Region office (360) 802-7001 and ask to be placed on their mailing list for a particular area.

Subject Area: Forest Conditions

Issue: Thinning & pole sales

**Comment Summary:**

DNR should conduct more thinning and pole sales because they bring in more revenue and cause less environmental damage.

**Response:** Generally, pole sales do provide higher revenue for a given volume harvested, and may not disturb the ground as much as variable retention harvest activities. However, only a few forest stands have enough trees suitable as poles to economically justify a pole sale. Thinning is used to accomplish many of DNR's objectives for trust lands; however, only a subset of forest stands are in a condition suitable for thinning at any one time, and thinning sales almost always generate less revenue for a given volume harvested than do other harvest types. Therefore, there is a balance between the proportions of thinning and variable retention harvests the department conducts in order to meet economic, as well as social and environmental objectives set forth by the Board of Natural Resources.

Subject Area: Forest Conditions

Issue: Leave tree pattern

**Comment Summary:**

DNR should revise the leave tree policy and require a clumped retention pattern of leave trees in harvest units in order to mitigate against likely blowdown, which can amount to 15 to 25 percent of leave trees blown down during the first winter.

**Response:**

Where a clumped leave tree pattern is deemed best to meet stand objectives, DNR encourages the use of a clumped pattern. Generally, a clumped pattern affords better protection against blowdown from wind, allows for more effective future stand maintenance, and provides better growing conditions and islands of undisturbed forest, adding diversity to the forest. However, a dispersed pattern may do a better job mitigating visual concerns and/or may benefit certain wildlife species better than clumped patterns. Therefore, the choice is based upon unique objectives for each forest stand. The guidance that helps foresters manage leave trees is contained in the *Management of Forest Stand Cohorts on the westside* (PR 14-006-090 in Appendix E), which provides guidance for managing green trees, snags, and down woody debris.

Currently, DNR field staff estimates that roughly five percent of leave trees will blow down in a given unit, but that in extreme cases 10 percent blowdown may be observed. Blowdown is expected, and while it may affect visual resources or future forest conditions, it provides down woody debris that is important for wildlife and for healthy forest ecosystems.

Subject Area: Forest Conditions

Issue: Age-class distribution

**Comment Summary:**

The age class requirement should not be averaged over all DNR-managed lands; it should be analyzed and summarized separately for each DNR state forest (for example, Tahuya and Green Mountain state forests). In addition, the Commenter felt that each forest should contain old-growth, second growth, and young stands and that no single forest should have more than 25 percent of its area clearcut in any one time period.

**Response:**

DNR does not manage forests by age classes; instead the department uses indicators of forest stand structure to classify forests into various stages of stand development. The department's stand development stage classification is used to help determine whether planning unit objectives likely will be met over time; for example the number of acres meeting habitat or representing older forest conditions in a given decade. In this document, modeled output has been summarized by watershed (Appendix D). These summaries demonstrate that, indeed, each forest will contain a mix of stand development stages over time, including older-forest condition. For additional discussion of stand development stages refer to Forest Conditions, p. 44. DNR is committed to maintaining 10 to 15 percent of its land base in each planning unit in older-forest conditions (DNR 2006, p. 46).

Subject Area: Forest Conditions

Issue: Older forests

**Comment Summary:**

All alternatives substantially exceed DNR's 10 to 15 percent target of stands in older forest conditions by the year 2067, as specified in DNR's 2006 *Policy for Sustainable Forest*. The Final EIS needs a description of what timber harvest and/or economic opportunities might be foregone by exceeding the 10 to 15 percent target, or an explanation of why this target is being exceeded (for example, aging owl habitat).

**Response:**

DNR models forest conditions over time using a forest estate model called Woodstock. This model will apply a harvest at various points in time when it is economically optimal, unless over-ridden by another DNR objectives, such as protection of riparian forests or providing habitat for owls. These models are run to maximize the future economic value of the forest, in terms of Net Present Value. Net Present Value is the discounted value of all investment costs and revenues expected over the next 100 years from DNR-managed forested trust lands in the South Puget planning unit.

The increasing percentage of older forest observed over time occurs mainly from thinned and un-harvested areas, as they develop into older-forest conditions. Most are areas such as riparian management zones or uplands. Currently, riparian areas account for 30 percent of DNR-managed forestlands in the planning unit; while uplands with specific objectives account for 54 percent. As stands in these two land classes grow into older forests over time, the percentages may exceed the 10 to 15 percent target, because collectively they represent almost 84 percent of the planning unit land base.

For further discussion of anticipated trends in older forest conditions over time, refer to p. 124 of this document.

Subject Area: Forest Conditions

Issue: Harvest Level

**Comment Summary:**

It is recommended that the harvest level, acres of forest in certain conditions, and other targets (Draft EIS Table 2-1) be estimated with a range of uncertainty by reporting a range of values in order to reflect the possible outcomes of the evaluated alternatives.

**Response:**

There is always uncertainty with any values, the alternatives were designed to provide a range of values that are evaluated in this document. Table 2-1 now resides in the executive summary as Table ES-1.

## Riparian Areas

Subject Area: Riparian Areas

Issue: Stream buffers

**Comment Summary:**

Due to water quality concerns there should be changes made to existing harvesting techniques in the Hood Canal watershed. One Commenter recommended DNR increase the size of no-cut buffers along streams to reduce nutrient and sediment runoff. The Commenter suggested that Scot's Broom and Alder have been shown to be significant sources of nitrogen input into Hood Canal marine waters therefore; any practices resulting in cleared areas supporting these species should be eliminated.

**Response:**

There are many possible contributing reasons for the current water quality problems in Hood Canal. What role, if any, management of forested state trust lands plays in contributing to these conditions is difficult to determine. However, the department is committed to protecting and restoring the ecological functions of riparian areas under the 1997 HCP and the recently adopted *Riparian Forest Restoration Strategy* (DNR 2006). Such functions include regulation of nutrient loads, sediment filtering, stream bank stability and stream shading, among others. Refer to water quality for additional information p. 150.

Scot's broom is a non-native, aggressive colonizer of cleared areas in the Puget lowlands. DNR treats Scot's broom with herbicide when it competes with young seedlings in forest plantations. Currently about five percent of all harvested units in the planning unit are treated for Scot's broom. Red alder is a colonizing native tree species, playing an important natural role in riparian and upland ecosystems. Both species are known to capture and fix nitrogen from the atmosphere into root nodules, which may then be released into soils as soluble nitrates. In upland plantations on the Kitsap Peninsula, the department's goal is to establish fully-stocked conifer plantations containing only a minor component of alder, with minimal competition from Scot's broom.

The department is not aware of any studies in forested ecosystems demonstrating movement of biologically-derived nutrient sources (for example, from Scot's broom) through riparian buffers and into streams. However, we would examine new research, if available. For further discussion of water quality impacts, refer to p. 70.

## Wildlife

Subject Area: Wildlife

Issue: Managing forest structure

**Comment Summary:**

DNR should continue managing forests to provide important structural elements such as snags that are generally limited in second-growth, intensively managed forests. A discussion should be included and expanded to identify uncertainty associated with the measurement of forest attributes, with the maintenance and recruitment of snags, attributes of the forest floor and canopy closure; and the ability to actively manage forests to achieve targeted ecological conditions for spotted owls.

**Response:**

DNR's goal is for diversely structured healthy forests that include many elements. DNR foresters follow the *Management of Forest Stand Cohorts on the Westside* (PR 14-006-090, refer to Appendix E), which provides guidance for managing forest structure such as green leaf trees, snags, and down woody debris on forested state trust lands. Additional enhancements or protections in riparian areas and in more than 70,000 acres of designated northern spotted owl dispersal management areas (DNR 1997) will provide increased structural complexity to forests over time.

DNR's forest resource inventory system (FRIS) includes a standardized protocol for measuring overstory conditions, as well as snags, down woody debris, and forest understory conditions. This protocol lays out acceptable levels of measurement error in the FRIS data, and is checked regularly by DNR timber cruisers. However, some forest attributes, such as canopy closure (the amount of sky visible from under a tree or stand) or the number of canopy layers (trees at different heights) must be calculated based upon modeled output. Refer to Appendix C for a description of these calculated variables and brief discussion of uncertainty associated with these modeled attributes.

## Water Quality

Subject Area: Water Quality

Issue: Hood Canal

**Comment Summary:**

A Commenter stated that an increase in sediment runoff and nitrogen input from Belfair to Hoodspout would add to episodes of low dissolved oxygen and degraded water quality in Hood Canal. For this reason the Commenter suggested that the best plan be selected for each watershed rather than having one plan that fits the entire South Puget Sound area. However, Lynch Cove, Great Bend, and Lower Skokomish watersheds should be managed under Alternative A.

**Response:**

Through the forest land planning process, various strategies were developed to address specific localized issues. These strategies were grouped into alternatives, and modeled data produced results that were analyzed and presented in the Draft EIS (2008). DNR does not believe it would

be feasible to apply and model management alternatives at the scale of individual watersheds. However, modeled output is presented by watershed in Appendix D of this document. Note that the Lower Skokomish watershed does not fall within the South Puget Planning Unit.

## Recreation

Subject Area: Recreation

Issue: Definition

**Comment Summary:**

The term “contract services”, as described in Alternative C, needs to be described better.

**Response:**

Alternative C includes the option of expanded contract services through leases or fees to enhance site specific amenities, which have not been determined but could include leases for new recreational facilities and trails.

Subject Area: Recreation

Issue: Campgrounds & camping

**Comment Summary:**

Comments reflected concern over the decreasing camping opportunities on DNR-managed forested state trust lands. Many campgrounds situated on both state and private forests have closed over the past 30 years. Commenter requests that DNR stop catering to off-road vehicle (ORV) users and build campgrounds for non-ORV users and open all lands for primitive camping.

**Response:**

The current recreation opportunities are provided in Table 3-14, p. 86. During the 2009 legislative session, state budget cuts impacted DNR’s recreation program budget. The monies provided by the Non-Highway Off-Road Vehicle Activities (NOVA) were distributed to Washington State Parks for at least the next two-year budget cycle, which will result in some DNR-managed recreation areas having reduced services. While these reduced services are considered temporary there is no guarantee they will be restored to their previous level or reductions will not occur again in the future.

DNR’s Recreation Program is committed to providing the public a safe, enjoyable, and sustainable recreational experience while helping ensure that the type of activity allowed in an area occurs in a manner with less impact to the environment and the amount of harm to DNR’s trust lands is reduced by on-site mitigation. When DNR is unable to meet these commitments or DNR’s budget to maintain or manage facilities changes DNR must reduce services. These reductions are focused on those recreation facilities that don’t provide access to a trail system, have less than 2,000 visitors per year, and have a high maintenance cost-to-visitor ratio. Some unintended impacts to the environment could occur related to the capacity of other facilities to withstand additional visitors, or might cause one type of use to displace another in an area adjoining a site where services have been reduced.

Subject Area: Recreation

Issue: Motorized/non-motorized areas

**Comment Summary:**

Recreation users are concerned that ORV use is increasing year after year at the expense of traditional users of our state forests. For this reason, DNR should manage motorized and non-motorized recreation as separate areas. For example, designate the Tahuya State forest for ORV use but limit Green Mountain forest to non-motorized uses only.

**Response:**

DNR is finding that the demand for day use and ORV use is affecting the opportunities for non-motorized recreation at Tahuya. DNR will seek to identify locations that allow increased non-motorized use (such as Green Mountain) and ensure that these areas provide the opportunity for this form of recreation.

Subject Area: Recreation

Issue: Target shooting

**Comment Summary:**

DNR should designate official areas for target shooting. Presently users are told where they cannot shoot, but not where they can shoot.

**Response:**

DNR has determined that there are liability issues with designated shooting areas that are not managed by a club or organized program. Resources are not available for adding active shooting management at this time. DNR's new recreation rules will provide guidance for safe recreational target shooting.

Subject Area: Recreation

Issue: User groups

**Comment Summary:**

DNR should continue to use focus groups, such as those in Tahuya and Green Mountain, for input on recreational management and to review management plans. Focus groups should be established for the other forests too.

**Response:**

Focus groups are an integral part of the outreach program in DNR's South Puget Sound Region. Besides the Tahuya and Green Mountain focus groups, DNR has two others including one at Tiger Mountain and another representing the interests at Elbe Hills and Tahoma. Since 1983, DNR has had a successful advisory group at Tiger Mountain. This past year, their duties were expanded to include the entire Snoqualmie Unit, which includes most DNR-managed lands in King County. At the Elbe Hills and Tahoma state forests, the DNR has started a focus group for both 4x4 and horse use. This group has been meeting for the past three years.

DNR plans to continue to work with our partners in the South Puget planning unit. This unique relationship is key to the success of recreation and forested state trust land management.

## Scenic Resources

Subject Area: Scenic Resources

Issue: Viewsheds

**Comment Summary:**

Commenter feels like DNR has done a good job addressing viewshed issues in the Elbe-Ashford area.

**Response:** Comment noted.

## Impact Analysis

Subject Area: Impacts Analysis

Issue: Modeled output

**Comment Summary:**

Table ES-2 (2008 Draft EIS) shows a total of 211,424 acres harvested under Alternative A, exceeding the 145,000 acres in the planning unit. Does this represent cumulative stand entries over the life of the plan? The Commenter would like the difference explained.

**Response:**

Because forest stands may be harvested up to four times in a span of 100 years (refer to Chart 4-4, 4-5 and Figure 4-2), the total harvested acres (Table 4-3) is not expected to be the same as the planning unit acreage, which is explained in more detail beginning on p. 124.

Subject Area: Impacts Analysis

Issue: Fish

**Comment Summary:**

The description of Water Resource Inventory Area (WRIA) 15 in the Draft EIS is incomplete. There was no discussion of the Union, Tahuya and Dewatto rivers and the numerous creeks flowing into Hood Canal, which is the location of threatened salmonids.

**Response:**

The information on WRIA 15 was provided as an overview and was not intended as a complete description of the entire WRIA. Specific information on WRIA 15 can be found on Ecology's website at <http://www.ecy.wa.gov/biblio/wria15.html> . Additional discussion of threatened salmonids has been included on page ## within this document.

## Alternatives

Subject Area: Alternatives

Issue: New Alternative

**Comment Summary:**

Commenter suggests a new alternative be developed somewhere between Alternative B and C because the combination of the two would provide the greatest level of economic, environmental, and social benefits.

**Response:**

The final preferred alternative contains elements from each of the alternatives analyzed in the Draft EIS.

## Trust Land Revenue

Subject Area: Trust Land Revenue

Issue: Maximize revenue

**Comment Summary:**

A Commenter felt that the South Puget Forest Land Plan should 1) meet or exceed assigned harvest/revenue targets, 2) maximize efficiencies and economics, 3) identify additional harvest/revenue opportunities that may provide relief if future planning should other HCP planning units reveal harvest or revenue shortfalls not presently anticipated.

**Response:**

An EIS analyzes the environmental impacts and will be used by decision-makers, along with other relevant considerations or documents in making final decisions on this proposal. DNR continues to seek diverse types of revenue production from state trusts lands. Over time, leases for communications towers, wind energy and other revenue sources have added value to the forested trust portfolio. We will continue to do so.

Subject Area: Trust Land Revenue

Issue: Harvesting and markets

**Comment Summary:**

When timber prices are low, like in today's market, DNR should postpone harvesting until timber prices are up again to produce maximum revenue generation; which would eliminate the need for an annual harvest level.

**Response:**

An important tenet of DNR's trust management responsibility is to provide a steady stream of revenue to trust beneficiaries (refer to the 2006 *Policy for Sustainable Forests for the Policy on Definition of Sustainability for the Sustainable Harvest Calculation*, p. 29). Beneficiaries rely on anticipated revenue in any given year, so producing an annual harvest level is important for meeting trust responsibilities. The sustainable harvest calculation policy allows DNR the flexibility to vary annual harvest levels by up to 25 percent in order to avoid soft markets and take advantage of better market conditions.

## Social and Economic Concerns

Subject Area: Social/Economic Concerns

Issue: Contract harvesting

**Comment Summary:**

A Commenter expressed concern that increased contract harvesting in Alternatives B and C may limit other possible harvest systems which may have higher future revenue outputs. Instead, the

Commenter would like to see a presentation of DNR's silvicultural goals and different ways to achieve them, rather than relying on contract logging throughout the life of the plan.

**Response:**

Contract harvesting provides more flexibility in management than lump sum sales, due to fundamental differences between these two approaches. In some instances, DNR is better able to achieve its multiple objectives using contract harvesting. For example, contract harvesting can provide flexibility to change a harvest prescription on-site in order to achieve habitat objectives; or it may enable DNR to market individual products directly, providing enhanced current revenue to trust beneficiaries. Refer to p. 20 for additional discussion of DNR sale types.

Engrossed Senate Bill 6166, passed in 2009, increased the statewide percentage from 10 to 20 percent resulting in the part of the alternative being eliminated.

Subject Area: Social/Economic Concerns

Issue: Preferred alternative

**Comment Summary:**

A Commenter was concerned about why Alternative B rather than C was chosen, given the clear economic benefits of Alternative C. For example, from Table ES-1, Alternative C appears to achieve the greatest economic value for trust beneficiaries. Over the first decade, Alternative C would harvest 136 million board feet more timber and generate \$37 million more, with \$39 million more in long-term revenue (as measured in net present value) over the life of the plan. However, the wood supply forecast described in Figure C-7 (Draft EIS Appendix C) shows little material difference in harvest volume removed between Alternatives B and C.

**Response:**

DNR's responsibility as trust manager is to produce both short- and long-term income for the trust beneficiaries. Each alternative and each component of the alternatives must meet DNR's legal and policy mandates, including federal and state laws, Board of Natural Resource Policies, and the trust lands Habitat Conservation Plan. Contained in these is a blend of economic, environmental and social objectives. To accomplish all three of these well, the final preferred alternative contains elements from each of the alternatives analyzed in the Draft EIS.

Subject Area: Social/Economic Concerns

Issue: Jobs and local economies

**Comment Summary:**

DNR should evaluate the potential economic contributions to local communities when selecting the final preferred alternative. Using scale factors developed by University of Washington's Rural Technology Initiative, Alternative C would yield over 1,000 more direct jobs, \$179 million more in direct economic outputs, over 5,000 more in total employment, \$218 million more in gross product value and \$24 million more in state and local tax receipts during the first decade than would Alternative B.

**Response:**

While SEPA does not require economic analyses as part of an environmental review, decision-makers often consider economic information when making a decision about a project. This also is true of DNR's management of forested state trust lands. DNR's *Policy on Local Economic*

*Vitality* (DNR, 2006, p. 44) states the department may take action to support local economic vitality when they are compatible with or directly support trust objectives. While Alternative C appears to provide the highest economic benefits (Table ES-1 and Appendix C), it was not identified as the preferred alternative because it does not meet the department's social and environmental land management objectives as well as Alternative B.

## Other

Subject Area: Other

Issue: Draft EIS document style and layout

Comment Summary:

Commenters liked the Draft EIS style, layout, and format and felt it was superior to previous EIS documents published by DNR. Generally, the question and answer format was effective at explaining key issues, while appendices provided enough details for both technical and lay audiences.

**Response:** Comment noted.

Subject Area: Other

Issue: Purpose of planning

**Comment Summary:**

A Commenter expressed concern that DNR's land management professionals be allowed the latitude to implement the sustainable harvest operationally by tailoring it to local conditions, and that planning instruments should be constructed to help rather hinder them in accomplishing this task.

**Response:**

The department shares the Commenter's desire to empower region staff to carry out DNR's forest management objectives. The South Puget Forest Land Plan is meant to provide needed strategies to assure staff that important outcomes will be met, while maintaining flexibility on-the-ground.

The policy that addresses Forest Land Planning (DNR 2006b p. 45) describes important elements of the planning process, including development of forest management strategies that will produce desired outcomes by location, which can be applied at various geographic scales. Local region staff has contributed essential information to develop these strategies, which will be applied operationally.

Subject Area: Other

Issue: Implement Settlement Agreement

Comment Summary:

Commenter emphasized the importance of the department fully implementing all the terms and conditions of the Sustainable Harvest Lawsuit Settlement Agreement.

**Response:**

DNR concurs with the general statement above.

## Northern Spotted Owl

Subject Area: Northern Spotted Owl

Issue: Revise the Northern spotted owl habitat designation

**Comment Summary:**

One Commenter felt that the northern spotted owl requirements should be phased out of South Puget Sound state forests, especially the Tahuya and Green Mountain since these two areas don't support any spotted owls.

**Response:**

There are no northern spotted owl designated Nesting Roosting Foraging (NRF) or Dispersal Management Areas within the Tahuya or Green Mountain areas, so no owl analyses were conducted for these areas. Map 3-5, p. 109 provides reference to where designated NRF and Dispersal Management Areas are located.