



WASHINGTON STATE DEPARTMENT OF  
**Natural Resources**

**2006 Forest Land Plan for Forested State Trust lands<sup>1</sup>  
in the South Puget Planning Unit**

**Responses to Public Comments received during the Scoping Process**

July 24-26, 2006

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<sup>1</sup> DNR-managed Forested State Trust lands include: Federally Granted Lands, State Forest Purchase trust lands, State Forest Transfer trust lands. Other forest lands within the planning unit include Natural Area Preserves (NAPs) and Natural Resource Conservation Areas (NRCAs).

## **NOTE TO READERS**

This document contains many references to state laws and codes. The laws are contained in the Revised Code of Washington (RCW), and Washington Administrative Code (WAC), which can be found in libraries throughout the state, and on the state of Washington website at [www.wa.gov](http://www.wa.gov)

The State Environmental Policy Act (SEPA) and details about DNR's SEPA office and Environmental Impact Statement (EIS) process can be found at [www.dnr.wa.gov](http://www.dnr.wa.gov), and click on SEPA. It also is linked to the State Department of Ecology website.

### **I. Overview**

The Washington State Department of Natural Resources (DNR) has unique obligations in managing state trust lands for the State of Washington. With the State as the trustee, the Legislature has designated DNR as manager of federally granted state trust lands, and other trust lands acquired by the state. The State acquired the granted trust lands under the Enabling Act and State Constitution when Washington became a state in 1889.

DNR manages state trust lands primarily to provide substantial revenue to specific public beneficiaries to benefit the people of Washington. Such lands provide needed revenue to construct and maintain Washington's public schools, universities, prisons, state office buildings, hospitals, fire departments and other public services in many counties. In addition, forested state trust lands also provide jobs, commodities, clean water, wildlife habitat and increasingly scarce recreational opportunities. Through the Multiple Use Act, the Legislature directed DNR to manage for multiple uses when they are not in conflict with Trust management obligations.

As steward of these lands and natural resources, DNR relies on a diverse staff of foresters, engineers, geologists, biologists, cartographers, hydrologists, soil scientists, economists, planners and others who contribute to the management of lands to achieve long-term productivity and revenue, as well as habitat and other conservation, education and recreation benefits.

DNR manages approximately 144,000 acres of trust lands and other forested state lands in the South Puget Habitat Conservation Plan (HCP) Planning Unit.

### **The Purpose of Forest Land Planning**

Forest land planning is a process in which local issues (ecological, social-cultural, and economic) are identified and then specific management strategies are developed and applied to forested trust lands consistent with DNR policy.

Forest land plans are the end-result of the planning process, based upon HCP Planning Unit boundaries. These plans are used to implement DNR's policies and procedures, and provide guidance (in the form of strategies) for DNR's on-the-ground forest management activities.

### **Initial Outreach**

There were three stakeholder workshops held in June of 2005 to discuss forest land planning. Stakeholders included recreation, environmental and timber industry organizations, all of which had been actively involved with DNR in these areas throughout previous years. Workshops were held to discuss forested state trust lands including the Elbe Hills, Tahoma, Tahuya, Green Mountain, Sherwood, Tiger Mountain, McDonald Ridge, and Grass Mountain State Forests.

A total of forty-seven stakeholders participated in three meetings located in Eatonville, Belfair and Issaquah offering local information and concerns related to the forested trust lands in this planning unit. Participants heard a presentation on the preliminary stages of planning, and then shared information with DNR, recorded directly onto forest maps. Stakeholders shared how they use local forested trust lands and showed DNR representatives the specific areas where they have concerns about current or potential future forest management.

### **The South Puget Environmental Impact Statement**

DNR will be developing an Environmental Impact Statement (EIS) for the Forest Land Plan in the South Puget HCP Planning Unit. The State Environmental Policy Act (SEPA) process was formally initiated with the scoping notice released on July 12, 2006 and followed with a series of public meetings that were held in different locations in the planning unit on the following dates.

July 25, 2006	Place: Nisqually Lodge — Ashford
July 26, 2006	Place: Mary Theler Community Center — Belfair
July 27 2006	Place: Kiwanis Club — Issaquah

## **II. Scoping Summary**

Scoping is the first formal step in preparing an Environmental Impact Statement. EIS scoping initiates public involvement in the process, and is conducted to fulfill a three-fold purpose:

1. Narrow the focus of the EIS analysis to significant environmental issues,
2. Eliminate issues that would have insignificant impacts, or that are not directly related to the proposal, and
3. Identify the range of alternatives to be analyzed in the EIS.

This summary highlights a wide range of issues that commenters have identified as potentially important and related to the proposed Forest Land Plan. It is important to note that under SEPA, only issues related to *probable significant environmental impacts* (WAC 197-11-794) will be addressed in the EIS.

This comment response document includes summaries of comments by 24 public meeting participants, and 15 written letters or emails submitted to DNR. In all, about 80 individual comments have been received regarding the Forest Land Plan for DNR-managed forest lands in the South Puget HCP Planning Unit.

The 80 comments capture diverse issues, ideas, and opinions proposed by the public to be included in the scope of the Draft EIS. Comments have been summarized by subject, and examined to determine:

1. If the issues are germane to the South Puget Forest Land Plan for state DNR-managed forests, and
2. How comments about those issues will be addressed.

### **III. Summary of Comments Received and Responses to them**

#### **A. ISSUES TO BE CONSIDERED IN DEVELOPMENT OF A FOREST LAND PLAN FOR FORESTED STATE TRUST LANDS IN THE SOUTH PUGET HCP PLANNING UNIT**

#### **FOREST STRUCTURE AND VEGETATION**

**Timber Harvest Strategies.** Some commentors assert that the harvest level under the 2004 Board of Natural Resources resolution # 1134 should be the harvest level used during the planning process. Some expressed concern that the Board of Natural Resources (Board) may feel pressure due to threats of lawsuits to increase harvest levels beyond (the current) “sustainable” rate. They urged DNR to “stand firm” in its present harvest calculation. Some commentors recommended DNR continue to maximize the amount of land that is actively managed for economic, ecological and social benefits consistent with the HCP and 2006 settlement agreement. Others suggested that the sustainable harvest needs to be applied locally instead of statewide for the sustainability of wildlife and social values. Other commentors urged DNR to work cooperatively with stakeholders to achieve sustainable management; still other participants suggested that DNR stop logging the remaining forested lands.

**Response:** One objective of the Forest Land Planning process is to implement the Sustainable Harvest Level within this Planning Unit, utilizing the Board-approved 2004 harvest level as the baseline. The Sustainable Harvest Level will not be applied at the management unit level but the harvest impacts will be modeled and assessed on a watershed basis. Board decisions are based upon sound economic and scientific research

principles; these decisions will not be changed because of “threats” of any kind.

DNR forest management is internally governed by three dominant mandates:

1. *The trust mandate*: Forested state trust lands are to be held in trust to provide funds for specific beneficiaries. The requirement of undivided loyalty to each trust beneficiary is fundamental to all policies and activities regarding trust lands. This principle stipulates that trust lands and their assets cannot be used to benefit others at the expense of the trust beneficiaries without compensation, no matter how laudable the cause as stated in *County of Skamania v. State of Washington*, 102 Wn.2d 127,685 P.2d 576. Integral to the concepts of both sustained yield (RCW 79.10.300-.340) and sustainability is stability of benefits to future generations.
2. Under the *1997 Habitat Conservation Plan* DNR manages for ecological concerns, including long-term species and habitat protection at the HCP planning area scale. The HCP will govern management until 2067, with the possibility of additional extensions.
3. *2006 Policy for Sustainable Forests* examines DNR’s management strategy for forested trust lands, which focuses on social, economic and ecological issues.

DNR uses these mandates for balanced and sustainable decision-making, thereby focusing on both short-term and long-term visions. DNR’s external relationships policy states, “In carrying out its management activities, the department will actively communicate and promote collaboration with trust beneficiaries; Tribes; local, state and federal governments; stakeholders; and the public.”

As trust managers, DNR intends to provide revenue to the trust beneficiaries through a sustainable even flow of timber to be harvested from forested trust lands, both today and in the future.

Forest management strategies will be assessed for potential environmental impacts in the EIS.

**Tiger Mountain Harvesting Levels.** Commenters want DNR to maintain a 60 year rotation, harvesting no more than 1/6 of the forest every 10 years to uphold Tiger Mt. as a forested open space area while maintaining a working forest.

**Response:** Integration of the Tiger Mt. Plan is expected. However, additional strategies may be utilized while others are eliminated due to inconsistency in laws, policies or procedures since the original plan was developed.

Forest management strategies will be assessed for potential environmental impacts in the EIS.

**Environmental.** Some commentors stated DNR's environmental and habitat protection goals are essential to provide continued revenue-generating and public use opportunities. DNR needs to recognize all of the values of the forest. DNR should be aware of how its actions affect adjacent landowners. Commentors also believe DNR should mitigate for the poor logging practices of adjacent landowners.

**Response:** Consistent with the fiduciary standards governing trust management, the purpose of the *Policy for Sustainable Forests*<sup>2</sup> is to conserve and enhance the natural systems and resources of forested state trust lands managed by DNR to produce long-term, sustainable income, and environmental and other benefits for the people of Washington. Forest Land Planning is designed to implement agency goals (policy, contractual obligations, and procedures) through the development of forest management strategies.

DNR's silvicultural strategies and treatments are the means for achieving multiple outcomes, e.g. revenue generation, wildlife habitat, forest health, riparian habitat and wildfire prevention. Although silvicultural treatments are carried out on a site-by-site approach, broader outcomes are set through other policies and plans that consider the landscape scale impacts and mitigation measures. Treatments are prescribed to guide the progression of stand development to achieve outcomes and enhance forest structural diversity across the landscape (2006 Final EIS PSF page 1-8).

Currently, SEPA checklists are developed for each timber sale and adjacent landowners are contacted.

Cumulative impacts will be analyzed in the EIS.

## **WILDLIFE**

**Wildlife Concerns.** DNR-managed lands are a home to wildlife species and their protection is important. DNR needs to figure out how to integrate recreation and local users with wildlife needs. McDonald Ridge has had reported wolf and wolverine sightings.

**Response:** As addressed in the 1997 HCP, public use of DNR-managed forest lands will continue to be guided by applicable regulations and Board policies. Within this framework, public use may occur at designated sites

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<sup>2</sup> Washington State Department of Natural Resources policies approved by the Board of Natural Resources through a Draft EIS issued June 2005 and Final EIS issued July 2006.

or in a more dispersed fashion throughout the state ownership. Under certain conditions, public use may be restricted or denied, as provided for in applicable regulations and policy.

While neither DNR nor the Washington Department of Fish & Wildlife has documented wolverine or wolf sightings in this area, if sightings were documented, DNR would follow conservation measures required by the 1997 HCP.

Impacts to wildlife from recreational activities will be assessed for potential environmental impacts in the EIS.

## **CULTURAL RESOURCES**

**Cultural Resource Impacts.** Archaeological resources can be affected by timber harvest, road construction and associated activities. How will DNR ensure project areas are surveyed prior to project commencement, or ensure that cultural resources will be identified and protected? Is the DNR's current cultural resource policy being fulfilled in the South Puget Planning Unit? What strategies are being used to develop a cultural resources department? And is DNR implementing a cultural resource training program for non-cultural resources staff?

**Response:** DNR follows specific procedures to identify, evaluate, and protect archaeological, historic, and cultural sites as directed by Board of Natural Resources policy and state law. Likely archaeological, cultural, or historic sites are identified through: consultation with the potentially affected tribe(s); reports containing site data from Department of Archaeology and Historic Preservation, accessed thru DNR's TRAX database; or on-site inspection by a cultural resource technician or forester. When a cultural resource is identified, the DNR archaeologist visits the site and develops a recommended course of action. DNR continually works with the Department of Archaeology and Historic Preservation.

Special consideration is given to the historical and cultural concerns of Native American tribes. DNR conducts ongoing relations with Washington's tribes as one government to another, consistent with the Centennial Accord and Washington's governance by separate independent state officials. DNR recognizes the sovereign status that has been accorded Washington's federally recognized Native American tribes. Moreover, the Board's cultural resources policy directs DNR to identify and protect significant historical and archaeological sites (consistent with state and federal law), and to actively communicate and collaborate with tribes regarding culturally significant areas. DNR recognizes it is in the best interest of all parties to identify and resolve issues and concerns.

Training for recognizing cultural resources is provided to DNR field staff on an ongoing basis to augment the efforts of our single archaeologist. Additionally, each region has a cultural resource technician in the field. DNR would like to increase the amount of staff working with cultural resources if funding were available.

The environmental impacts associated with cultural resources will be assessed in the South Puget Forest Land Plan EIS.

## **PUBLIC USE**

**Recreation General.** Commentors suggest that DNR not add any more uses, maintain existing trail systems, and use only 2 percent of the land base for trails, facilities and parking. Comments encouraged DNR to manage some areas differently, but keep the existing uses on Tiger Mt. Some believe that certain uses are not compatible with others and some use areas should be separated (motorized vs. non-motorized) but they encourage DNR to promote recreation. Some areas (i.e. horse parks, ORV areas, ski trails) are preferred over multiple use areas because they are built for specific uses. Others would like DNR to increase use and open up more areas because some are seasonally closed. Commentors request that DNR develop a 10-year plan on how to manage future growth and recreation in the area.

**Response:** DNR only will add more uses when in the best interest of the trust, and where supported. Within the South Puget Planning Unit, DNR has 322 miles of designated trails for both motorized and non-motorized recreational users. DNR will continue to maintain trails and add, move or remove them to comply with HCP commitments, enhance public safety or protect resources. In addition, DNR also supports “dispersed recreation” — recreation occurring throughout DNR ownership but not in designated recreation areas (trails, campgrounds). Examples include hunting, mushroom and berry picking, pleasure driving, etc. Collaboration between DNR, the public, user groups, other landowners, and other agencies and organizations is critical for providing safe public access and recreation opportunities on forested state trust lands; controlling negative effects of designated or dispersed public access; and meeting trust objectives.

The Policy states that when managing public access and recreation use on forested state trust lands, DNR will protect trust interests and seek to balance economic, ecological and social concerns by evaluating the following on a landscape or case-by-case basis:

- Cost and benefit to the trust;
- The physical condition of the area in a landscape context, including neighboring landowners;



- The characteristics of the users, including their degree of organization; and
- The reasonable availability of financial, staff and other resources for sustainable, long-term management.

The Policy is consistent with the Multiple Use Act which states, “If such additional uses are not compatible with the financial obligations in the management of trust land they may be permitted only if there is compensation from such uses satisfying the financial obligations (RCW 79.01.128)”.

The compatibility of both designated and dispersed uses with trust objectives is a function of the physical location of the use, its intensity, the availability of users, and DNR staff and resources to manage the use. In some cases, both types of uses must be mitigated, redirected, limited, or eliminated to ensure compatibility with trust objectives.

The dispersed and designated recreation opportunities will be assessed for potential environmental impacts in the EIS.

**Advisory Committees & Partnerships.** Commentors believe that DNR should explore the use of its multi-stakeholder groups — like the one for Tiger Mountain — to be a part of the plan development, Best Management Practices development and the adaptive management component. Others suggested that the Tahuya focus group is an excellent model for community recreational groups and encouraged DNR to continue to foster this working model. Commentors suggested that DNR partner with land trust and conservancy organizations to acquire lands and conservation easements to mitigate for environmental impacts. Others urged DNR to keep the scope of the planning narrow enough so as not to exclude local involvement and interest.

**Response:** DNR recognizes the importance of partnering with stakeholders and other governmental agencies, as well as providing information to the public; and DNR will continue to do so. DNR now participates in educational efforts, works with land trusts and conservancy organizations and the Forest Land Planning process is designed to be narrow enough to include local involvement.

See also “Timber Harvest Strategies” and “User Group” response.

**User Groups.** Some felt there needs to be more emphasis on recreation and building recreation partnerships. DNR does a poor job at working with recreation groups and needs to do more partnership building. DNR is understaffed for public outreach, recruiting, and managing volunteers strategically. Some suggested that the Forest Land Plan needs to integrate recreation groups into the overall management plan, including multi-stakeholder groups to provide input on best management practices and adaptive management.

**Response:** DNR will consider strategies to provide more communication between diverse groups that use DNR-managed land. Public input into this planning process began during the summer of 2005 and will continue until a plan is completed; however DNR is responsible for development and implementation of its management activities.

The purpose of Forest Land Planning is to develop strategies that guide implementation of Board policies. DNR's *Policy for Sustainable Forests*, contains a policy adopted in July 2006 concerning external relationships, which states:

“In carrying out its management activities, the department will actively communicate and promote collaboration with trust beneficiaries; Tribes; local, state and federal governments; stakeholders; and the public.”

Staffing continues to be an issue; see also “Funding” and “Timber Harvest Strategies”

**Commercial Recreation.** Commentors felt that commercial users who make money from the use of DNR-managed lands should be made to pay fully for the impacts they have on state forested trust lands (i.e. roads, trail maintenance, staff coordination time, etc). The public should not be supporting private businesses that profit from utilizing these lands. Others feel that commercial users should be required to provide volunteer hours like user groups do for planned events. Some commentors felt commercial recreation should be allowed to generate income on state trust lands for commercial enterprises. Others felt commercial recreation needs to be regulated and addressed. Some said that all state trust forest users should be paying to use DNR-managed land, because recreation causes environmental impacts, which cost money to fix.

**Response:** DNR recognizes that commercial use of public facilities is a growing issue and will be soliciting input from other agencies, private companies and the public to resolve this issue.

Commercial recreation will be incorporated into the range of reasonable alternatives that will be analyzed in the EIS.

**Motorized Uses.** In the Tahuya State Forest it was suggested that DNR protect the Tahuya River Trail from motorized users due to the unique ecosystem. Others want DNR to quit accommodating new recreational uses and limit motorized recreation.

**Response:** Impacts from motorized uses will be assessed in the EIS.

**Non-Motorized Uses.** In the Elbe/Tahoma area users want DNR to maintain the non-motorized uses because they seem to reduce vandalism to the ski huts while limiting air and noise pollution. Non-motorized recreation should be encouraged to maintain some forest areas for solace and quiet experiences.

**Response:** Impacts from Non-motorized uses will be assessed in the EIS.

**Hunting.** People want DNR to keep lands accessible to hunters, begin to work with hunting groups to establish partnerships, and increase hunting access. It was suggested that DNR should open locked gates during hunting season to help older people who have a hard time accessing areas in which they used to hunt. There should be increased education and communication about areas for handicapped hunters and these areas should be expanded.

**Response:** DNR participates in the Road Access Entry Program that gives access to disabled hunters to drive into areas normally gated. This program is a partnership of state agencies and private timber owners. DNR will investigate additional strategies for hunter access, or additional Americans with Disabilities Act (ADA) accommodations. DNR, along with other state agencies, meets the ADA requirements on all new facilities that are constructed. DNR, in cooperation with many state and federal agencies, publishes the “Accessible Outdoor Recreation Guide,” which lists accessible recreational sites across the state. The guide is available on-line at [www.parks.wa.gov/ada-rec/](http://www.parks.wa.gov/ada-rec/)

See also “Access” response.

**Parking.** DNR should evaluate the types and need for parking facilities over the entire planning unit.

**Response:** In the EIS, DNR plans to look at the roads and trail system within the planning unit, which includes existing parking facilities. This will help DNR decide what long-term forest management should look like. ‘Nonproject’ SEPA actions, such as Forest Land Plans, are generally broad in scope. They set direction for future ‘project’ actions — proposed on-the-ground actions — which may include new road construction, timber harvests, or parking facility construction. A specific activity, like the construction of a parking facility, is analyzed separately as a “project” for potential negative impacts prior to construction. The design of a parking facility is considered a capital improvement, and is addressed in an individual recreation plan.

**Ski Huts.** Volunteers should continue to maintain the trails to the Mount Tahoma Trails Association ski huts. DNR should continue to keep the area closed to vehicles year-round through gating.

**Response:** Managing access on the road system in the Elbe/ Tahoma Block is important for recreation, wildlife and user safety.

Volunteers from Mount Tahoma Ski Trail Association are critically important to the success of the ski trail system. The value of volunteers is in the ownership and stewardship they bring to the trail system. Volunteers' hard work is integral to keeping a valuable trail system open to the public. DNR welcomes the continued support of volunteers on the ski hut system and throughout Elbe State Forest.

See also "Roads" response.

**Trails.** Consider the importance of multi-user trails to the public. On Tiger Mountain, the trail density is maximized so that no new trails should be approved or new uses accommodated. Tiger Mountain can't absorb more trails without adverse impacts on current users and the environment. Other commentors want DNR to re-route trails around areas that are being logged.

**Response:** Multi-use trails, trail density and decisions related to approved new uses of existing trails are created for specific areas during the development of recreation plans.

Environmental impacts related to trail density will be assessed in the EIS.

**Uses.** DNR must evaluate impacts of certain recreational uses because motorized uses, mountain bikes and horses cause significant trail damage in Western Washington. Other commentors believe motorcycles must stay on paved roads, and that bicycles must stay off trails used by hikers and horses. If trails cannot be maintained or cost too much to maintain properly then DNR should close them to further use. Still other commentors would like DNR to increase saddle stock use on timber lands and determine placement of additional overnight facilities through solicitation of public comment, Best Management Practices, and adaptive management. In the McDonald ridge area, landowners have worked hard to limit illegal access and would like appropriate recreation uses to be developed in surrounding areas.

**Response:** Strategies will be developed regarding different recreation types and will be analyzed in the EIS.

See also "Trail" response.

## **SCENIC RESOURCES**

**Viewsheds.** Tiger Mountain and the Tahoma/Elbe State Forests are areas of visual concern due to high use road corridors (I-90 National Scenic Byway, Highway 706) and tourism. Special attention should be made to lessen the visual impacts of forestry activities in these areas. DNR should continue selective

logging in the viewsheds like they do on Tiger Mountain because certain user groups use these examples to educate the public on the viability of working forests.

**Response:** DNR will consider whether there are visual impacts of management activities and will design appropriate mitigation strategies based on whether impacts are of local or regional significance as follows:

- For *local* visual impacts, DNR generally will mitigate visual impacts through design and application of other land management requirements;
- For *regional* visual impacts, DNR will develop additional strategies to mitigate impacts. DNR will assess the cost/benefit to the trust(s) of prudent expenditures to mitigate visual impacts, in light of public concerns.

When in the best interest of the affected trust(s), DNR will consider transfer of ownership of significant scenic areas, when compensation to the affected trust(s) is secured.

Strategies for visual impacts will be developed and analyzed in the EIS.

## **IMPACT ANALYSIS**

**Climate Change.** Impacts from global warming, like climate change, must be factored into planning and how it will change forest species composition and cover over the next 50 years. The potential impacts of hotter summers should be evaluated. DNR should try to get into the carbon market. DNR should analyze global climate change, increases in drought, invasive species, fire threat, and forest health in the EIS.

**Response:** Washington and other western states are participating in a federal grant to examine how the 2.1 million acres of forested trust lands and 8.5 million acres of private forestland could be used to reduce greenhouse gas that comes from vehicles, electric power generated by fossil fuels, and other CO<sup>2</sup> sources.

This project is part of the Global Climate Change Initiative studying “carbon sequestration,” in which trees remove carbon from the air as part of their natural respiration and store the carbon in the wood as standing trees or in structural lumber. Greenhouse gas emitters would then purchase “carbon credits” from forestland owners. The carbon balance for current management of forested state trust lands is thought to be positive considering the carbon in the forest and in structural wood products produced from the forest. This is especially true when accounting for the

reduction of structural materials with more carbon-intensive production, such as steel or concrete.

## **TRUST LAND REVENUE**

**Revenue Production.** Some commentators urged DNR to continue acquiring new lands to increase funds for local counties. Other local sole proprietors want brush lease areas increased and leases at an affordable daily rate, especially for Mason County. Some comments urged DNR to continue to follow the trust mandate of producing revenue in order to keep the land base as a working forest that can provide benefits to wildlife and society instead of being transferred or converted to other (non-forest) uses.

**Response:** DNR strives to manage lands more effectively, to improve value, increase potential for earning income, and reduce financial risks to the trusts. Land transactions (sales, replacement purchases, or exchanges) help meet these goals. DNR seeks the right mix of land assets to manage, selectively repositioning trust lands where appropriate. DNR sells or exchanges out of lands that are isolated or ineffective to manage and using those proceeds, acquires replacement trust lands with higher long-term income potential.

DNR will continue to use its discretion to manage replacement acquisitions, transfers and exchanges of trust lands in order to provide current and future generations with the greatest long-term benefit through each transaction. DNR will manage those lands in a manner that best fulfills these goals within the existing statutory, contractual, and regulatory framework.

Brush picking leases for floral and other products are fully integrated with DNR's forest management and are compatible with long harvest rotations and the timber sales program. Lease values are set by public auction and currently earn public schools and other state trust beneficiaries about \$7 dollars an acre, per year. Multi-year leases provide better brush conditions, are less risky for pickers and result in higher values for the trusts. Like the timber sale program, DNR manages brush leases in order to receive the greatest revenue to the trust beneficiaries, while attaining conservation objectives.

Forested trust lands serve many functions, including helping to fund public institutions; providing wildlife habitat and numerous other conservation benefits; and protecting sensitive resources, recreation areas, and visual areas. Ultimately, however, as trust manager, DNR must balance management of the trust assets in the best interest of the beneficiaries (near term and long term) within all current legal obligations. As such, DNR must maintain forested trust lands in a productive capacity. Offering

local sole proprietors brush lease areas at an affordable daily rate would not be cost effective.

**School Construction.** Commentors thought DNR should increase thinning harvests of forests to increase school construction funding.

**Response:** The decision to thin a forest stand is always tied to the management objectives for individual stands within the context of landscapes over time. Only a small proportion of DNR stands will be available for thinning harvests at any point in time. Thinnings generally are targeted for areas needing habitat enhancement.

Finally, if not carefully applied, thinning today may economically favor the present generation over future generations, which would violate the “intergenerational equity” tenet of DNR’s trust mandate — the notion that one generation cannot be favored over other generations relative to financial benefits.

Various harvest strategies and thinning intensities will be analyzed in the EIS.

## **SOCIAL AND ECONOMIC CONCERNS**

**Enforcement.** An increase in funding for law enforcement officers is needed due to the increasing numbers of users and illegal activities (dumping, speeding, illegal ORV use). Putting more paid and volunteer rangers on the ground as education and enforcement personnel would help keep peace and secure property. DNR needs to increase and improve coordination with local law enforcement and local fire districts. Some commentors would like DNR to increase non-motorized uses but, only if law enforcement is increased too, while others suggested that violators’ volunteer time instead of paying fines. DNR should increase and improve coordination with local law enforcement and local fire districts.

**Response:** DNR has requested additional Legislative funding for law enforcement efforts. DNR also continues to work with volunteers to manage and maintain trails, campgrounds and trailheads.

DNR has many responsibilities in managing 3 million upland acres of state-owned trust lands in Washington. By state law, these lands provide revenue for state schools and universities, and other state institutions through timber sales and land leases. Also, because these are public trust lands, DNR is mandated to provide opportunities for recreation.

With the mandate comes an obligation to protect the public, DNR employees and the business needs of the agency. The DNR Law

Enforcement Section includes seven Natural Resource Investigators for DNR's six regions statewide. Enforcement involves:

- Monitoring recreation to avoid injuries and property damage
- Checking and monitoring permits
- Investigating accidents
- Controlling vehicular speed
- Preventing theft of natural resources such as timber, bear grass, salal, cedar boughs, and wood for making musical instruments

This program is heavily committed to resource protection, whether it is preventing meth labs and marijuana growth, or battling wildfires from potentially spreading onto private or public lands.

**Illegal Activities.** DNR should adopt a stringent approach for dealing with illegal activities (i.e. meth labs, garbage dumping, and vandalism) and give maximum fines to violators. DNR should utilize new technologies to catch violators, like surveillance planes. Some commentors thought DNR should place dumpsters at access points as an approach to stop illegal dumping. Others thought partnerships with counties could provide free dumpsters. DNR needs staff dedicated to controlling illegal activities in order to be effective. There should be specific volunteer or service hours for the public to help out on DNR-managed lands.

**Response:** While surveillance planes are an interesting prospect, they likely would be cost prohibitive. Placing dumpsters at access points may reduce illegal dumping but would likely invite additional people to dump waste. Forested State Trust Lands are not for dumping.

See also "Enforcement" response.

**Forest Land Plans.** Commentors suggested the South Puget Forest Land Plan should address the role of volunteers. They also would like them to be coordinated with NRCA plans and other area plans like Tiger Mountain where interested parties want DNR to keep the 60-year harvest rotation and other values of the 1986 *Tiger Mountain Plan*. Others want DNR to implement the Forest Land Plan once it is developed and not deviate from it. The plan should document top priorities (i.e. forest health, resource protection) to guide how lands will be managed. DNR should not submit to special interests, recreational demands or other pressures that could potentially damage the resource. Others felt that through this planning process DNR should be able to achieve the assigned sustainable harvest calculation volume and revenue targets while maximizing efficiencies and economics. Additionally, they suggested the planning process may reveal revenue shortfalls not currently anticipated and should be mitigated by identifying additional harvest and revenue opportunities.



Some felt planning should be done on a longer time horizon — 70, 100 or 200 years — in order to address environmental impacts over longer time-frames.

**Response:** Volunteers give DNR the ability to accomplish additional goals, specifically related to recreational uses (i.e. trail maintenance, garbage clean-up and forest watch partners). Volunteers will be addressed in specific recreation plans, developed by the recreation program.

As Forest Land Plans are developed, DNR will integrate previous planning work, like portions of the *1986 Tiger Mountain Plan*, as appropriate.

The specific purpose of developing a Forest Land Plan is to implement the Board's direction (policies, procedures, guidance) in a transparent manner so that special interests, recreational users and others can clearly understand why DNR is implementing a certain management strategy. Forest Land Planning is designed to achieve the sustainable harvest level within each of the planning units. If, through this planning process potential changes to the sustainable harvest level are necessary, the Board will be briefed and potential changes discussed. While the planning effort is designed to provide guidance for the next 10 to 20 years and beyond, computer modeling of proposed management alternatives provides information more than 70-100 years into the future.

Feedback and communications components of a forest land plan provide important information to develop, modify and adapt plans to achieve the desired short- and long-term outcomes; and to guide appropriate refinements to those outcomes and the strategies developed to help achieve them. Deviations from the plan are based on these feedback mechanisms as well as new science or other information. As issues are brought forth such as forest health, management strategies will be developed to address specific concerns.

**Roads.** Commentors expressed a desire to limit the amount of roads to help wildlife, decrease illegal activities (with decreased access), and reduce noxious weed problems, because users transport noxious weeds into forests. Roads come with certain responsibilities to manage them correctly.

**Response:** Roads, if not properly managed, have the potential to cause increased costs and risks by damaging the environment or providing opportunities for illegal activities on forested state trust lands. DNR carefully weighs the impacts of forest roads with regard to environmental protection, public use and forestland management needs. Where appropriate, roads are abandoned and DNR uses alternative harvest systems to minimize forest road density (roads/square mile).

Road maintenance and abandonment plans are a requirement under WAC 222-24, the state Forest Practices Rules that govern forestry roads. DNR continues to develop and implement its road maintenance and abandonment plans for state DNR-managed forests. Additionally, road management policy and guidance is given in the 2006 *Policy for Sustainable Forests Final EIS* (3-186), and DNR's 1997 *Habitat Conservation Plan* (IV.62, 65-68).

Road densities will be assessed in the EIS.

## **OUTSIDE PROJECT SCOPE**

**Notification.** The notice of the Ashford scoping meeting was published in the Eatonville paper the same day as the meeting, some advanced notice might have resulted in a higher attendance.

**Response:** We attempt to send out news releases at least 14 days before a public meeting, but we cannot guarantee that a newspaper will publish our meeting information.

For the July 25, 26 and 27 Forest Land Planning meetings, the news release was sent out on Monday July 17. The deadline for the weekly Eatonville 'Dispatch' newspaper is Thursday for the next Wednesday's publication. We sent it on Monday, missing the previous Thursday's deadline for a longer notification time. The meetings were published in many daily and weekly newspapers in the planning area, but not convenient for the Ashford readers. We apologize for the short notice.

**Olympic Experimental State Forest (OESF).** A number of stakeholders are interested in an expedited schedule for planning in the OESF as originally contemplated under the HCP. During Fiscal Year (FY) 06, only about 30 million board feet (MMBF) of the assigned 90 MMBF of timber targeted for Olympic Region was auctioned by DNR. This shortfall represents about \$15 million in net revenues that were not received by the various trust beneficiaries for that region, and about \$6 million in management funds that were not received by DNR. The American Forest Resource Council recognizes this situation is not likely to improve until OESF planning is completed, and that this planning cannot proceed until the South Puget planning is first completed. The council strongly encourages DNR to expedite the South Puget planning process to allow the OESF planning process to begin as soon as possible.

**Response:** DNR has assembled another planning team for the OESF planning project to begin the process prior to the South Puget plan being completed. Public meetings to gather local information are anticipated sometime during spring 2007.

**School Funding.** Commentors felt that Washington State needs to change the way school construction is funded. By finding alternative funding sources like Fortune 500 corporations to fund school construction, DNR would have less pressure to manage state trust lands for revenue production, especially due to rising land and construction fees. There should be on-going education of the public and legislature about timber revenue not being sufficient to fund school construction.

**Response:** Most state trust lands were granted by the federal government to Washington at statehood in 1889, to help support the new state's public institutions such as schools and universities. The nature of these trusts was established in the state Constitution, and statutes. DNR does not have the authority to change the school funding structure; this can only be accomplished by the State Legislature.

About 546,000 acres, or about 26 percent of the 2.1 million acres of forested state trust lands managed by DNR, are the State Forest Lands (formerly known as State Forest Board Lands). The State Forest Transfer trust lands, were acquired by the state in the 1920s and 1930s from 21 counties that had gained the lands through tax foreclosures from landowners that had harvested then abandoned the 'useless' barren lands. State Forest Lands also are intended to help maintain a viable forestry industry in the state

In exchange for the deed transfer, the county and junior taxing districts in which the land is located are given a significant portion of the revenue from timber sales and other activities on these lands. In addition, a portion of the total revenue goes to the state general fund, earmarked for public K-12<sup>th</sup> grade education.

**DNR Management.** DNR should establish a buffer zone one-half mile wide along its boundaries to protect adjacent lands from development.

**Response:** This is outside the authority of DNR.

See also "Trust Mandate" response.

**Trust Funds.** Commentors found it hard to justify school trust money paying for public uses like recreation when they should only be used for continued forest management.

**Response:** The Board of Natural Resources approved the notion that a minimal amount of the DNR land manager's time — as they move around the landscape in carrying out their duties — could be used to manage public use within state trust forests. See "Trust Mandate" and "Revenue Production" responses.

**Education.** In the Elbe/Tahoma area users suggested education and awareness will help to insure vehicle security while out on recreation trails. In all parts of the planning unit, educational programs about forestry and forest products are needed. Others want informational signage describing DNR's mission and trust responsibilities to inform users that recreation is a necessary secondary activity. Other educational tools include media tours and press releases explaining the benefit of forest harvesting, natural history, and wildlife. In Tiger Mountain, visitors should come away from their first visit understanding why Tiger is not a park, but a 'working forest'.

**Response:** Educational learning opportunities are outside the scope of this Forest Land Planning effort. However, DNR continues working with its established collaborative processes. DNR staff are aware that many levels of understanding exist regarding forest management activities on forested state trust lands. DNR is working with other agencies and educators on educational programs and will continue to work with the public through various forms of public outreach and environmental education. Communication tools will include the web, interpretive signs, brochures, lessons, publications and other media.

See also "Advisory Committees" and "User Group" responses.

**Funding.** With increasing public use and increasing recreational facilities DNR needs a reliable funding source for the recreation program, rather than depending strictly upon grant funding. Some suggestions to increase DNR revenue are to consider excluding activities that may not generate income, explore user fees for specific activities, charge fees to all users and follow the United States Forest Service prototype for user fees. Some commentators thought users should pay fees in specific areas for recreational uses as a way to fund the recreation program, while others thought that user fees needed to be very specific and charged for specific uses. Still others thought user fees restrict certain patrons from using the forest. In order to maximize sparse recreation fund benefits, decisions on where and how to allocate trail use and trail dollars should be a part of the plan. Future plans must include a means for identifying an annual funding source to manage recreational assets.

**Response:** While recreational funding sources are outside the scope of Forest Land Planning, DNR's goal is to establish a long term funding source that is stable and sustainable to support public access and recreation on DNR-managed state trust lands. In the interim DNR continues to depend on funding from the Legislature, grants and volunteers to support the program.

**Forest Health:** Commentors urged DNR to use thinnings as a fire management tool in the NRCAs (Tiger and Rattlesnake) because of the fuel build-up over the years along with strong north winds. Fire management and fuels reduction is

needed on all DNR-managed lands to prevent wildfires from spreading. Other commentors feel that within the NRCAs DNR should conduct thinnings to reduce fire fuels and to ensure forest health. The public will support DNR as they conduct these forest health activities.

**Response:** The West Tiger Mountain Natural Resources Conservation Area (NRCA) is within the purview of this plan, however the Rattlesnake Mountain Scenic Area (also an NRCA) is not, and thus it will not be addressed as part of this plan.

Managed by DNR's Natural Areas Program, NRCAs are conservation areas that protect outstanding examples of native ecosystems, geologic features, habitat for endangered, threatened and sensitive plants and animals, and scenic landscapes.

DNR trust managers do not make decisions about land and resource management within state NRCAs. In the future, the Natural Areas Program ecologists might conduct analysis that would lead them to the decision to alter the forest structure within an NRCA, at which time they would consult a variety of experts, including DNR foresters, to plan silvicultural activities to restore forest ecosystems.

**Access.** Commentors are interested in keeping the Elbe/Tahoma area snow parks closed to car traffic so people can enjoy the ski hut system. In general, commentors do not want DNR to give away public access to state trust lands as part of land transactions; and DNR should protect and purchase public access now.

**Response:** Motorized access to the ski huts will continue to be closed in the Elbe/Tahoma area. Purchase and exchange of state forest trust lands is outside the purpose and need of this EIS.

Since the passing of the Multiple Use act 35 years ago, DNR has completed land exchanges encompassing more than a half million acres of forestland in Western Washington. The result of this large repositioning effort has been to consolidate or "block up" DNR-managed lands to achieve management cost reductions through increased efficiency. DNR's partners in these exchanges have typically been large forest landowners or the federal government. Since increased options for access to trust lands are very valuable to trust managers, through transactions DNR generally seeks to acquire access and does not allow a decrease in access to the lands.

Exchanges are carried out to better position the trust land base with the regulatory constraints of maintaining the state land and commercial forest base. As with all transactions, exchanges are subject to approval by the Board of Natural Resources.

Currently, DNR is assessing its lands to determine where the public can legally access trust lands by vehicle. The assessment will result in a web based map which the public can use to view locations of access to forested state trust lands.

Elbe and Tahoma State Forests were expanded by land exchanges in the past 20 years. This legacy is why we have these areas under DNR-managed state ownership for current and future generations to enjoy. DNR is an active player with local land trusts to identify and protect forest lands in the Elbe and Tahoma area from conversion to non-forest uses.

**Natural Resource Conservation Areas and Natural Area Preserves.** DNR should increase the size of state NRCAs and NAPs to protect all sensitive species impacted by forestry activities.

**Response:** Increasing the size of the NRCAs and NAPs is outside the scope of this EIS. Natural Areas are acquired through gift or purchase from a willing seller. Fair market value is paid for those state school trust lands transferred to natural area status so that replacement properties could be acquired to 'keep the trust whole'.

Most of the Natural Area Preserves were initially identified, inventoried and proposed for protection by the Washington Natural Heritage Program.

Selection criteria for NRCAs are based on considerations established by the Legislature in the NRCA Act, including scenic and ecological values. Once an NRCA site has been nominated and approved, a public hearing is held to obtain public comment on a proposed boundary. The final boundary is approved by the Commissioner of Public Lands.