WASHINGTON STATE DEPARTMENT OF
Natural Resources
Peter Goldmark - Commissioner of Public Lands

Forest Land Plan for the Olympic Experimental State Forest (OESF) Summary of Scoping

August 2009

There are nine sections within this Summary of Scoping. The sections are as follows:

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I. INTRODUCTION

The Washington State Department of Natural Resources (DNR) proposes to develop a Forest Land Plan for the Olympic Experimental State Forest (OESF) (the proposal)This document summarizes comments and responses to an expanded SEPA scoping process (WAC 197-11-408, 410) for the plan and EIS that has been ongoing since spring 2007The intent throughout the expanded scoping process is to utilize methods in addition to the formal SEPA scoping period to help DNR understand potential environmental impacts of the proposal. Comments received are considered equally regardless of the venue in which they were collected, whether during, preceding and following the formal expanded scoping period. Please refer to Section V below for a more detailed overview of the expanded scoping process.

Much effort has gone into addressing and refining the significant environmental issues associated with this proposal. Please refer to the OESF Forest Land Planning Project Update at www.dnr.wa.gov for a description of the work that has been done over the past year and is ongoing.

II. HISTORY OF THE OLYMPIC EXPERIMENTAL STATE FOREST

In 1989, the Commission on Old Growth Alternatives – a broad-based citizen advisory group – recommended the creation of an experimental forest on state trust lands on the west side of the Olympic Peninsula. They saw the experimental forest as a place where DNR could develop solutions to meet the compatible goals of a 'working forest' that generated revenue while providing for the conservation of diverse species by scientifically applying different harvest and planting techniques. This original OESF vision has not changed. DNR is committed to creating a unique working forest

where innovation is real; where knowledge is aggressively sought and applied; where creative ideas flourish; and where long-standing problems are solved.

In 1997, DNR signed an agreement with the US Fish and Wildlife Service and National Marine Fisheries Service creating a long-term, multiple-species Habitat Conservation Plan (HCP). The OESF was singled out as a distinct HCP planning unit with unique strategies from the other five western Washington planning units.

The OESF also has been recognized as a unique planning unit in DNR policy documents. It was included in the 1992 Forest Resource Plan as a "state forest that will be managed separately from other lands in Western Washington." The 2006 Policy for Sustainable Forests continued that recognition of the OESF as "a place to learn how to manage the forest so that habitat conservation and timber production are melded across the landscape, rather than separated into designated areas". Both the 1992 Forest Resource Plan and the 2006 Policy for Sustainable Forests also recognized the OESF as a distinct sustainable harvest unit, regardless of trust. As a result, the OESF has its own sustainable harvest level approved by the Board of Natural Resources.

III. FOREST LAND PLANNING PROJECT OVERVIEW

DNR is developing a Forest Land Plan to identify the sets of management strategies that attain DNR's management objectives for forested state trust lands within the OESF planning unit. This includes state trust ownerships throughout western Jefferson and Clallam Counties along the Olympic Peninsula.

Revenue from trust lands helps fund construction of public schools and universities, and helps fund services, mainly in the western Washington counties. State trust lands also provide wildlife habitat and opportunities for recreation and other benefits to all the people of Washington.

IV. NEED, PURPOSE AND OBJECTIVES FOR THE FOREST LAND PLAN

Need

DNR manages 264,000 acres of forested state trust lands in the OESF planning unit. DNR must implement management direction and attain specific policy objectives for forested state trust lands--directed by the Board of Natural Resources, through such guidance as the 2006 Policy for Sustainable Forests; contractual obligations, e.g., the 1997 trust land Habitat Conservation Plan (HCP); the sustainable harvest level associated with the sustainable forest management direction adopted in 2004; and the 2007 Addendum to the 2004 Final EIS on Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington and for Determining the Sustainable Harvest Level.

Identifying the landscape management strategies by OESF landscapes are needed to facilitate the implementation of individual management activities, thus helping to ensure that policy goals and other commitments are met over the short- and long-term.

Purpose

This proposed action is to identify and describe the landscape management strategies by OESF landscape that will then guide operational forest management activities to effectively and efficiently meet DNR's desired outcomes as stated in policies and other directives. These directives are defined in state and federal laws, Board of Natural Resources direction and resolutions, the Policy for

Sustainable Forests, the 1997 trust lands HCP and its amendments, and DNR procedures. The description of these landscape management strategies, by OESF landscape, will be the Forest Land Plan.

The specific requirements of DNR as a trust land manager, the specific conservation objectives and contractual commitments required by the 1997 HCP and the March 2006 Settlement Agreement (Sutherland v WEC) will be met through this planning process. The HCP commitment for landscape-level planning in the OESF will be completed through this forest land planning process and implementation of research and monitoring activities will be fully integrated with implementation of the OESF Forest Land Plan. HCP commitments for research and monitoring will be coordinated with the forest land planning process. In doing so, the goal of maintaining an un-zoned forest will guide landscape management strategies, activities, and research.

The purpose and need for this proposal are not intended to review or change existing DNR policy direction, or HCP objectives, strategies or commitments.

OESF Forest Land Planning Objectives

In order for an alternative management strategy to be considered in the OESF forest land planning process, it must be consistent with the purpose and need as stated above. The following OESF forest land planning objectives are derived from DNR policies and other directives.

- Apply all Board of Natural Resources and DNR resolutions, policies and procedures using the key principles of the trust mandate, within budgetary and administrative constraints, and according to state and federal law, including the consideration of actions in support of local economic vitality for forest management activities when they are compatible with or directly support trust objectives;
- Generate trust revenue through the sale of the timber. The current sustainable harvest approved by the Board of Natural Resources for the OESF HCP planning unit is to sell approximately 576 million board feet of timber that will generate approximately $144 million in gross revenue over a decade;
- Implement the conservation strategies to meet the conservation objectives of the HCP;
- Strive for an unzoned approach to forest management so that habitat conservation, timber production, and other management objectives are integrated across the landscape, rather than separated into designated areas;
- Facilitate implementation of research and monitoring projects designed to address key areas of uncertainty identified through the forest land planning process and development of the OESF Research and Monitoring Strategy;
- Specify forest management strategies that will best achieve the stated objectives at a landscape scale, while considering the logistical details of achieving desired outcomes in a given landscape;
- Provide for management flexibility that enables adaptive management that is responsive to current and relevant best available science, to expert opinion, and to empirical and operational observations and experience gained from implementing the plan and monitoring outcomes;
- Provide for management flexibility, professional judgment and creativity in achieving integrated conservation and commodity production across the landscape;
- Integrate relevant elements from earlier planning efforts into the OESF Forest Land Plan;
- Establish strategies that provide a long-term framework that will withstand changes in short-term plans;
- Comply with the March 2006 Settlement Agreement; and
- Reinforce open communication and transparency regarding DNR management activities.

V. STATE ENVIRONMENTAL POLICY ACT

The State Environmental Policy Act, or SEPA, is intended to inform agencies, applicants and the public during the development of environmentally sound proposals. Under SEPA, public agencies are required to evaluate the potential significant negative environmental consequences of a proposal prior to decision making. SEPA applies to actions made at all levels of government within Washington State. This section describes the scoping process that was used to gather input from the public through a formal SEPA scoping period and an expanded scoping process.

Formal Scoping

The SEPA process for OESF forest land planning was formally initiated with the issuance of a Scoping Notice on August 2, 2007. A 30-day formal comment period was provided. Scoping helps define the scope of the project and issues to be analyzed under environmental review. Scoping is the first formal step in preparing an environmental impact statement (EIS). Scoping incorporates public involvement in the process and is conducted to fulfill a three-fold purpose:

- to narrow the focus of the environmental analysis to significant issues and environmental impacts;
- to eliminate issues that would have insignificant impacts or that are not directly related to the proposal; and
- to identify reasonable management alternatives to be analyzed in the EIS.

The environmental review process helps DNR identify and evaluate potential adverse environmental impacts associated with a management proposal, determine their significance, and develop reasonable alternatives that respond to the likely significant impacts that may occur as a result of implementing the proposal. While meeting the agency's specified need and purpose for the proposal, these alternatives may be developed specifically to address significant environmental issues identified through the scoping process. This information, along with other considerations, is used by agency decision makers when determining whether to move forward or change the proposal.

During the formal scoping period from August 2 to 31, 2007, comments and suggestions were obtained by e-mail, letter, and comment card and were captured at three public meetings. Public meetings were held in Forks, Port Angeles, and Port Hadlock.

Additional information about SEPA and the EIS process is available on DNR's website at www.dnr.wa.gov.

Additional Scoping Methods Used

The formal SEPA scoping period was preceded and followed by additional efforts to gather public input to result in an expanded SEPA scoping process (WAC 197-11-408, 410) that went beyond the 30-day formal scoping period. Comments were gathered through several focused venues. The intent of expanded scoping has been to promote, encourage, and assist public participation beyond that which is normally required.

FOCUS MEETINGS

In response to provisions in the 2006 Settlement Agreement (Sutherland v. WEC), settlement partners, and other interested parties were convened in focus meetings to participate in the OESF forest land planning process. Four focus meetings were held in March, May and November 2007, and April 2008. Representatives of key stakeholder groups including trust beneficiaries, Tribes, local governments, and partners of the 2006 Settlement Agreement (settlement partners) have participated in these meetings. At the November 2007 meeting, a draft Summary of Public Scoping Comments was reviewed with the participants. At the April 2008 meeting, a draft Summary of Scoping that included draft DNR responses to the scoping comments was presented to the participants. Other

topics covered at these meetings included project planning, local knowledge mapping, forest modeling, road planning, coordination with the OESF research and monitoring planning, and development of alternatives, among other topics. Additional input from settlement partners and others since the April 2008 focus meeting has been incorporated into this Summary of Scoping.

PUBLIC WORKSHOPS

Three public workshops called "local knowledge mapping meetings" were held in June 2007 to gather input. At these workshops, attendees were invited to share their knowledge about local resource issues in the OESF as a whole, and more specifically for each of the eleven landscapes within the OESF identified in the HCP (see map at end of document). Information from about 50 participants was gathered on large maps, which are assisting DNR in developing specific management proposals for these areas and are being considered in developing OESF forest landscape management strategies.

Meeting participants included trust beneficiaries, Tribes, local governments, stakeholders, and the general public. A Summary of Input received at these meetings is available on DNR's forest land planning webpage and also is reflected in this summary of scoping.

TRIBAL MEETINGS

DNR sought government-to-government meetings with representatives of all affected tribes. DNR met with the Hoh Tribe, Lower Elwha Klallam Tribe, Makah Tribe, and Quinault Tribe. The information collected at these meetings relating to the scope of OESF forest land planning and EIS is captured in this summary.

NON-PROJECT REVIEW FORM

Under SEPA, 'non-project' proposals are those, such as plans, that are not actual on-the-ground construction or modifications to the environment. This OESF planning project is therefore a non-project proposal. Proposed on-the-ground projects resulting from this plan—such as timber sales or road construction—will go through their own individual SEPA environmental review.

Prior to the formal SEPA scoping period in August 2007, DNR prepared a Non-project Review Form that included the specific HCP conservation objectives, strategies, and other trust obligations—including the March 2006 Settlement Agreement. The Non-project Review Form helped set the overall context for planning in the OESF, identify the legal and policy sideboards, and begin identifying and documenting issues up-front to ensure integration of SEPA at the early stages of planning.

VI. SUMMARY OF COMMENTS AND RESPONSES

This summary includes comments that were submitted during the expanded SEPA scoping process. This process included the formal SEPA scoping period; local knowledge gathered at the 2007 public workshops; correspondence between DNR and the settlement partners; and information from meetings with the affected Tribes and the focus meeting participants. The majority of comment categories follow the organization of policies in the Policy for Sustainable Forests, a key Board of Natural Resources policy document for managing forested state trust lands. The major policy categories in the Policy for Sustainable Forests include Economic Performance, Forest Ecosystem Health and Productivity, Social and Cultural Benefits, and Implementation. The summary also covers some additional categories: Need, Purpose and Objectives; Trust Manager; OESF Background; Unzoned Forest; Land Transactions; Modeling; Compliance with Current Law and Legal Obligations, Recommended Alternatives, and Miscellaneous. The comments are summarized to the extent practicable; where two or more comments were the same or of similar content, the comments were summarized in one bullet. Where two or more bullets were of related content, they are grouped

together under one category description. The responses are crafted to cover the scope of the bulleted summary statements for each of the comment categories and descriptions.

Need, Purpose and Objectives

The following comments deal primarily with the scope and adequacy of the planning process.
Comment(s):

Comments that deal with elements of the plan:

- It is important for the OESF forest land plan to more fully comply with the HCP regarding "experimental".
- It is important that the OESF forest land plan be clear that it's a business plan with several aspects as such and to discuss how revenue will be provided while managing within environmental constraints.
- The planning process should fully and fairly implement the March 2006 Settlement Agreement.

Response:

DNR intends to meet two primary purposes through the OESF Forest Land Plan: to meet the commitments of the HCP—specifically for those required in terms of landscape plans, the conservation objectives and strategies, and an experimental approach; and to integrate other requirements of the Policy for Sustainable Forests—including generating trust revenues well meeting the requirements of the March 2006 Settlement Agreement and the 2007 Addendum to the sustainable harvest calculation.

Comments that deal with the six management processes recommended in the HCP:

- It is important for the OESF forest land plan alternatives to include a timeline for full implementation including all six management processes listed on page IV.82 of the HCP, the management structure necessary to achieve full implementation, and the sources of funding to accomplish full implementation. At a minimum, a framework should be established in the OESF forest land plan for integrating the six management processes including deadlines for development and adoption. There is a concern that the commitment to prepare a landscape plan for the OESF will not be met through the forest land planning process because the "unified effort" envisioned in the HCP (HCP, pg. I.14) is not being pursued as evidenced by the Non-project Review Form listing of items preliminarily determined not to be required as part of the OESF forest land plan.
- Discussions and a draft document resulting from "visioning" meetings with the settlement partners, centered around the six management processes, that are not available to the public should not be used for public hearings or included in a formal management plan.

Response:

Six management processes were recommended for effectively implementing integration of production and conservation, including research and monitoring. These processes were expected to be methods that reach the vision expressed for the OESF in the HCP. All are currently part of ongoing DNR management and will be described as OESF implementation actions, especially those related to research and monitoring. All recommended management processes will be addressed in the Forest Land Plan. An OESF Research and Monitoring Strategy will be developed concurrently with the Forest Land Plan.

Comments that deal with the need to meet the objectives:

- There is a concern that the HCP conservation objectives 3-6 for the OESF listed on pages IV.81-82 have been explicitly excluded without explanation and that documentation of the complete history of the evolution of the OESF is paramount to establishing the scope.
- There are concerns that alternatives must be analyzed for achieving HCP objectives for the OESF, which have currently been excluded from the Scoping Notice.

- It is important for the analysis to identify the probability of the alternatives to meet legally required resource objectives of the HCP.
- There is a concern that the proposed landscape plan for the OESF makes changes to the requirements of the HCP and the Policy for Sustainable Forests because it does not fulfill DNR's commitments to follow the HCP. The consequence will be a likely failure to meet the resource objectives of the HCP

Response:

The six conservation objectives identified on pages IV.81-82 provided a framework for developing the OESF HCP conservation strategies discussed throughout chapter IV. Six management processes were recommended for effective implementation of integrating production and conservation, including research and monitoring. An OESF research and monitoring strategy will be developed concurrently with the forest land plan.

The EIS will assess the potentially significant environmental impacts associated with implementing landscape management strategies to meet DNR policy objectives, including the 1997 HCP conservation objectives. Alternatives included in the EIS will be assessed for their ability to achieve the DNR policy objectives. DNR fully intends to meet its HCP conservation commitments.

The forest land plan will include a discussion of the regulatory framework within which the forest land plan is being developed. Also see response to Other/Compliance with Current Law.

Changes to the scope of the proposal are discussed in Section VII below.

Comments that deal with language quoted from the HCP:

- Several comments quoted language from the 1997 HCP and its Draft and Final EISs, and proposed that it be included in the scope of the OESF forest land plan and EIS.

Response:

Most of the quotes contained within these comments were from material in the HCP that support specific HCP conservation objectives and strategies. These conservation objectives and strategies are already included within the scope of the OESF forest land planning process.

Comments that deal with data and other anticipated results listed in the HCP:

- There are concerns that the OESF Forest Land Plan, on its present course, will be inadequate and not in compliance with the HCP, because some of the HCP requirements are perceived as not currently being met by what was included in the Scoping Notice. These include: stand structure distributions as listed on page IV.180 of the HCP; the riparian strategy of a research and monitoring program integrated with on-the-ground riparian protection; expected average widths and functions of riparian buffer protection for both interior and exterior riparian buffers; and protection of Type 5 streams.

Response:

DNR will work with the federal services to make sure that the landscape management strategies described in the OESF Forest Land Plan will meet the letter and the intent of the 1997 HCP. At the time of adopting the HCP, the referenced numbers or distributions in a particular table of the HCP were an anticipated outcome of implementing the HCP strategies. However, for any given set of strategies, anticipated outcomes were often dependent on the quality of data and modeling tools available in 1996 at the time the HCP was being developed. Since 1996, DNR has acquired more accurate inventory information and other data. A current assessment of the long-term outcomes of reasonable alternatives based on current resource inventories and data—such as Lidar where available, and based on more advanced modeling tools such as the Forest Vegetation Simulator (FVS) and sophisticated multi-objective decision making models such as Remsoft Spatial Planning System—will provide DNR with an updated expectation of what implementation of the HCP strategies are likely to produce in terms of

meeting the HCP conservation objectives. General and specific statements in the HCP about the anticipated outcomes of implementing HCP strategies, e.g., the percent of area by forest stand stage listed on page IV.180 of the HCP, will be reviewed and compared to forest land planning modeling results as part of this planning process and EIS. For example, the EIS will assess whether the proportion of land area in certain stand stages of development or structures as listed in the HCP tables are likely to be met as a result of implementing the reasonable alternatives.

An OESF Research and Monitoring Strategy is being developed concurrently with the Forest Land Plan to help integrate research and monitoring with the plan. The research and monitoring program will include activities integrated with on-the-ground riparian protection.

The following comment deals with the planning horizon.

- The range of alternatives and associated analyses should focus on the restoration phase of the OESF northern spotted owl HCP conservation strategy.

Response:

The HCP conservation objectives and strategies are intended to balance the phase for long-term maintenance and enhancement of northern spotted owl with the earlier phase centered on restoration of the habitat. Consequently, attention must be paid to both phases for restoring and then maintaining northern spotted owl habitat. Nevertheless, greater attention will be paid to developing landscape management strategies in the first few decades when assessing the ability to implement the plan.

Trust Manager

The following comments deal with the duties of the DNR as a trust manager

Comment(s):

- It is important that the OESF Forest Land Plan have a complete discussion of the trust mandate, the relationship to these lands, and that it be in the front of the document so that all other considerations are made within this context.
- There is a concern that the phrase "….without unduly favoring present generations…" needs to be defined in terms of the common law duties of a trustee.
- There is a concern that state forest trust language is missing from Attachment "A" of the Scoping Notice.

Response:

There will be a discussion of the trust management responsibilities in the EIS and the OESF Forest Land Plan. The missing state forest trust language has been identified in section VII. Changes to Scope at the end of this document and will be corrected in the EIS.

Economic Performance

The 'Economic Performance' policy category within the Policy for Sustainable Forests includes comments related to DNR's economic management of forested state trust lands and the production of sustainable revenue for each trust beneficiary, i.e. revenue production and financial performance, including activities and commodities to be considered in producing revenue from forested state trust lands.

FINANCIAL DIVERSIFICATION:

The following comments deal primarily with DNR's obligation to earn revenue from the management of trust lands.

Comment(s):

- Alternatives to the sale of logs are needed to ensure the survival of public schools, hospitals, fire districts, etc., without the additional income from the sale of logs.
- DNR should allow the flexibility to develop revenue-generating recreation developments and other non-timber opportunities, which do not damage public resources or the conservation objectives of the OESF, but only after full public review and hearings under the State Environmental Policy Act.
- DNR should develop a program to value ecosystem services in the OESF, in anticipation of revenue and credits given to carbon sequestration, clean water, flood storage, fish and wildlife production, and non-timber forest products. These values should be incorporated into the balance of timber sale assessments.
- It is important to consider the opportunity for some OESF mature forests to serve as carbon sequestration banks.
- The planning process should identify additional opportunities to maximize revenue for trust beneficiaries and harvest volumes for timber purchasers. The analysis by DNR indicating that additional revenues and/or timber volumes might be reasonably and responsibly achieved over what is targeted in the sustainable harvest calculation should be pursued by DNR.
- The OESF forest land plan should seek to identify additional harvest and revenue opportunities that might provide relief if future planning in other HCP planning units reveals harvest and/or revenue shortfalls not presently anticipated.
- There is a concern that the OESF forest land plan discusses how the forest's experimental element meshes with the requirement to optimize revenue.
- There is a concern that prudent management requires optimization of revenue within the existing legal framework.

Response:

Under the 'Financial Diversification' policy in the Policy for Sustainable Forests, DNR is guided to consider viable ways to produce revenue to supplement income from sale of forest products. DNR recognizes that flexibility to capture opportunities regarding non-timber revenue is important in managing forested state trust lands.

Development of new agency-wide programs, such as that required for the marketing of commercial recreation or ecosystem services on forested state trust lands, is outside the scope of the OESF Forest Land Plan and EIS. This may be an evolving interest to DNR and may be pursued through a statewide review for a potential ecosystem services program on forested and other state trust lands. Providing flexibility for taking advantage of such a program if and when it becomes available will be discussed in the EIS.

One of the goals of planning is to ensure that policy objectives and outcomes are achieved at the HCP planning unit level. 'Economic Performance' is one of the four major policy categories in the Policy for Sustainable Forests and works in conjunction with the other three policy categories to fulfill the objectives of trust land management (Policy for Sustainable Forests Final EIS, June 2006). These four categories establish the policy framework that integrates the benefits of habitat protection, use of state trust lands and production of revenue for trust beneficiaries. These policies will guide the development of the OESF forest land plan and EIS, and are included explicitly in the criteria used to evaluate reasonable alternatives.

Identifying any potential for additional revenues and/or harvest opportunities—above those anticipated from the sustainable harvest level approved by the Board of Natural Resources—will be an outcome of analyzing and evaluating the landscape management strategies. Inherent in

forest land planning is the objective to assess the ability to achieve the amount of harvest (and associated revenue, depending on market conditions) established by the Board in the calculation of the sustainable harvest.

The following comments deal with DNR's approach to managing for special forest products.

Comment(s):

- A strong special forest products program is important to offset the increased costs of environmentally sensitive and reduced timber harvest activities in the OESF.
- Acquiescing to an entirely demand-driven approach to marketing special forest products, including theft of special forest products, results in harvesters setting their value. This is inconsistent with other DNR-managed programs, such as timber sales, and should be addressed.
- The OESF provides a research opportunity to develop strategies specifically aimed at developing and enhancing the value of non-timber forest products that should be pursued.
- Research is important to counter the viewpoint that harvest of non-timber forest products is damaging to the environment and to understand how harvest of special forest products should be controlled in terms of the effects on the forest ecosystem.
- It is important to organize, schedule and track permitting of special forest product harvesting in light of potential impacts to wildlife foraging areas.
- A strategy/education program for salal harvesting is needed, including addressing the need to leave areas free of garbage.
- Not allowing over-harvesting of wildlife forage, in particular deer and elk forage, is important in the management of DNR's special forest products program. Inventorying and mapping issuance of special forest products permits would be helpful.

Response:

See response above regarding financial diversification. Development of an expanded special products program (mostly floral and Christmas greens), which would include both marketing and research, is currently not feasible when setting priorities for the use of available resources (staff and budget). DNR's current direction in the OESF is to offer non-exclusive special forest products permits that are important to local harvesters. Although DNR does not have current plans to expand the emphasis of special forest products in the OESF forest land plan, the special forest products program currently is identified as an issue that will be discussed in the EIS and forest land plan.

The following comments deal with management of hardwoods.

Comment(s):

- Hardwood timber supply for state processors is important as a very valuable resource which supplies significant dollars to the economy. It is also important in terms of species diversity and commodity production along riparian areas and flats adjacent to riparian areas.
- Red alder has been treated in the past as a weed species and needs more attention.

Response:

DNR recognizes the significance of managing hardwoods in its western Washington silvicultural strategies. Red alder is no longer treated as a weed species in the OESF and will be managed for its habitat and economic values along with other tree species. The impact of the proposed landscape management strategies on tree-species acres and distribution, including hardwoods, will be discussed in the EIS and the forest land plan.

FINANCIAL ASSUMPTIONS:

The following comment deals with a Board of Natural Resources resolution that identifies specific criteria for managing forest state trust lands.

Comment(s):

- The plan should describe how it is complying with the "Bergeson Principles" adopted by the Board of Natural Resources in 2004 specifically in terms of using net present value as a management criterion.

Response:

The use of Net Present Value is discussed in the Financial Assumptions Policy of the Policy for Sustainable Forests. The "Bergeson Principles" were the foundation for the policy objectives on pg. 3 of the Policy for Sustainable Forests. The "Bergeson Principles" were introduced and adopted by the Board in Resolution 1110 date February 17, 2004 and included principles, criterion, and objectives in modeling the sustainable harvest calculation and subsequent implementation of the Sustainable Harvest preferred alternative. The second objective in Resolution 1110 is to align all department-created policies, procedures, and tasks with Board approved policies to ensure flexibility, optimize the Net Present Value, and achieve other asset management objectives in support of DNR's fiduciary responsibilities. Although a description of the principles will not be included in the EIS or the OESF forest land plan, Board of Natural Resources resolutions are one of the primary factors in guiding the development of management strategies in the OESF forest land planning to be evaluated in the EIS. 'Net Present Value' will be one of several criteria used for evaluating the alternatives and is reflected in the "OESF Forest Land Planning Objectives" in Section III above.

DEFINITION OF SUSTAINABILITY FOR THE SUSTAINABLE HARVEST CALCULATION:

The following comment deals with the current constraints on the setting of the sustainable harvest level.

Comment(s):

- The sustainable harvest level for the OESF should be set "regardless of trust" (Policy for Sustainable Forests p.29).

Response:

This restatement of the Policy for Sustainable Forests 'Definition of Sustainability' for the Sustainable Harvest Calculation regarding the OESF is a basic assumption of modeling the landscape management strategies.

RECALCULATION OF THE SUSTAINABLE HARVEST LEVEL:

The following comments deal with the achievement of targets in the Sustainable Harvest Level.

Comment(s):

- The draft plan needs to discuss timber/revenue production, sustainable harvest/revenue, and how targets will be achieved, including the role of hardwoods in meeting targets.
- The plan needs to be clear on volumes harvested in the past as compared to targets, and how the plan will allow for catching up on unachieved harvest volume targets if this occurs in the future.
- It is also important to understand that the folding in of arrearage into future decadal volume targets does not comply with the trust management duty of intergenerational equity between beneficiaries.
- DNR is encouraged to incorporate innovation in the planning process and to continue to seek ways that maximize the amount of land that is actively managed for economic, ecological, and social benefits.
- It is important to discuss how key principle 1 of the "Bergeson Principles" to manage as much of the land base as possible is being met in the OESF forest land plan.

Response:

One of the stated objectives of OESF forest land planning is to accomplish the sustainable harvest level approved by the Board of Natural Resources for the OESF. Managing for hardwoods is addressed above under Financial Diversification.

Arrearage is not currently identified as an issue that will be addressed in the EIS because the purpose of OESF forest land planning is to identify and describe the land management strategies in the OESF landscape that will guide operational forest management activities through implementation of DNR's policies and other directives. The OESF forest land planning process is not intended to review or change existing DNR policy direction, HCP objectives, strategies, or commitments.

One of the objectives identified for preparing the OESF forest land plan is to "strive for an unzoned forest approach so that habitat conservation and timber and other commodity production are melded across the landscape, rather than separated into designated areas." Managing as much of the land base as possible is consistent with the HCP OESF 'unzoned' forest management approach objective and is one of several criteria for assessing alternatives in the OESF EIS. It is also embedded in the Policy for Sustainable Forests. (See policy objective #7 on page 3 of the Policy for Sustainable Forests).

Forest Ecosystem Health and Productivity

The Forest Ecosystem Health and Productivity category in the Policy for Sustainable Forests includes comments related to DNR's management and maintenance of the ecological health of forested state trust lands, i.e., elements of the forest ecosystem that are important to ecological objectives and long-term health and productivity of trust assets.

FOREST HEALTH:

The following comments deal with forest health as it relates to species selection, stand composition, forest disease, and invasive species.

Comment(s):

- Managing the spread of Swiss needle cast and phellinus root rot by matching species to the site such as alder, Sitka spruce, and western hemlock is important.
- A strategy for a thriving, healthy forest and diversity of species is needed. Trigger points for intervention (e.g., due the insect infestation) need to be determined.
- The plan also needs to address invasive plant species and roads and consider work already done.
- Setting aside old growth downgrades forest health, because it is in decline in terms of negative growth and inhospitable to most wildlife.
- It is important to recognize the contribution of off-site plantings to the spread of Swiss needle cast.

Response:

Forest health currently is identified as a potential significant environmental issue for discussion in the OESF EIS. Forest health is a high priority on state-managed trust lands, as is evident in the Forest Health Policy of the Policy for Sustainable Forests. The policy is broad and includes forest disease along with appropriate site selection for tree species. The policy also includes consideration of noxious weeds, insect infestations, animal damage, and other similar threats to trust assets. Forest health also is considered and addressed, as needed, through the implementation of the General Silvicultural Strategy policy in the Policy for Sustainable Forests at both the stand and landscape levels.

To the extent that effects from diversity of species on the long-term health of the forest can be anticipated—in terms of tree species and forest stand composition—species diversity will be discussed in the EIS and forest land plan.

The following comments deal specifically with the effects of climate change.

Comment(s):

- It is important to do more in terms of recognizing and accounting for potential changes in climate and, for example, providing refugia for plants and animals more than is currently formulated in the OESF.
- Protected habitat for wildlife and a designated carbon dioxide "green" filtration area is needed.
- Unhealthy stands are more susceptible to shifts in climate.

Response:

DNR is aware of and shares concerns regarding the effects of potential changes in climate on forest health and ecosystems. Efforts to address this risk on forested state trust lands currently are being discussed at the statewide scale, and management issues will continue to be addressed in this broader venue. At this time, there are no plans to address this issue at a regional or HCP planning unit scale, such as the scale of the OESF. Nevertheless, DNR's programmatic responses to climate change will inform research and monitoring and adaptive management in the OESF as more is learned over time about the direction and magnitude of climate change at various spatial and temporal scales.

DNR recognizes the possible benefits and impacts of forest management on mitigating the effects of CO2 emissions in the environment. This mitigation currently is not identified as an issue to be addressed in the draft EIS.

Also refer to response under *Economic Performance/Financial Diversification.*

CATASTROPHIC LOSS PREVENTION:

The following comments deal with salvage operations and response to a catastrophic loss.

Comment(s):

- It is important to plan for the potential of a catastrophic loss, i.e., the potential loss of resources and habitat should be captured (e.g., the potential loss due to wide spread blow down in riparian zones).
- It is important to develop salvage operations that do not degrade habitat.
- Efficient marketing and sale of blow down is important.
- Salvage should not be allowed in old-growth, old-forest, structural, marbled murrelet, or riparian habitat, unless guided by a site-specific plan, to return the stands to a biologically and structurally diverse condition, replenishing any old or new deficiencies in snags, large diameter downed wood, and legacy trees. Site plans must have effectiveness and validation monitoring that informs future enhancement or harvest activities in each stand, based on research-based metrics that come from reference stands.
- A prescription was provided for implementing a variable retention harvest after a catastrophic or other endemic event that takes a stand out of habitat conditions.

Response:

Salvage for responding to various circumstances regarding material losses due to natural and other causes currently is identified as an issue that will be discussed in the EIS. However, needed research and monitoring regarding issues related to salvage harvesting in response to catastrophic or endemic events are being considered in the OESF Research and Monitoring Strategy priority setting. The Research and Monitoring Strategy is being coordinated with the OESF Forest Land Plan as listed in the planning objectives in Section IV.

The department has recently developed guidance for treating stands meeting habitat conditions prior to an endemic or catastrophic event that have been altered through such events, including development of site-specific plans. This will be discussed in the EIS.

More generally, the EIS will evaluate the potential impacts of catastrophic loss on the environment (water, earth, air) and the ability (or lack of) for DNR to respond to any negative impacts caused by DNR management strategies or natural events.

OLD-GROWTH STANDS IN WESTERN WASHINGTON:

The following comments deal with management of Old Growth—not to be confused with 'Old Forest Habitat' under the HCP or 'Older Forest' under the Policy for Sustainable Forests.

Comment(s):

- It is important to recognize that old-growth is not the best habitat for wildlife and that old-growth are not healthy forests.
- Old second growth is not the same as old-growth. It is important to emphasize and provide for the long term characteristics of old-growth forests in the strategies.
- It is important to recognize that management of productive forest lands in the OESF would include the harvest of the significant volume of old-growth in the OESF.
- Setting aside old-growth on state trust land downgrades trust revenue and forest health.

Response:

The Policy for Sustainable Forests (PSF 2006) limits activities in old-growth stands. To meet the research objectives of the OESF, harvest of old growth is authorized under the 'Old-Growth Stands in Western Washington' policy (PSF 2006). In addition, an occasional old-growth tree is harvested to meet a cultural resources need. In either case, the management of old growth is expected to be very limited in scope and scale. Managing in old-growth is an issue that will be discussed in the EIS and forest land plan. The Forest Land Plan will assume that management activities in old-growth will be consistent with the Board of Natural Resources' direction in the Policy for Sustainable Forests.

WILDLIFE HABITAT:

The following comments deal with the development of habitat for ESA-listed and non-listed species.

Comment(s):

- With respect to declining elk, deer, cougar, and bird populations in the OESF and other non-ESA-listed species, it is important to concentrate on species that require openings and early seral environments over those that require late succession forests and recognize that second growth is a better condition than old-growth for wildlife.
- Elk in the OESF have the lowest body fat of any other herd in the state, and this affects pregnancies, calving, and survival of yearlings over winter.
- It is important for the plan to review the concentration on species primarily dependent on "old forests" and to examine the effect of the larger landscape including managed forests in all stages of development and their effects on threatened and endangered and other species of concern.
- DNR should allow financially infeasible timber management activities, i.e., below-cost sales and pre-commercial thinning, to achieve habitat improvements over the mid- or long term, or to restore habitat damaged by previous timber management.

Response:

The relative merits of the alternative management strategies to achieve the 'even apportionment' objective in the HCP will be discussed in the EIS. One of the 1997 HCP primary conservation objectives in the OESF is achieving an "unzoned" forest—objective #4, "To learn to integrate older forest ecosystem values and their functions with commercial forest activities assuming, as a working hypothesis, that landscapes managed for a fairly even apportionment of forest cover

among stands in all stages of development, from stand initiation to old growth, will support desirable levels of both commodities and ecosystem functions" (DNR HCP p. IV.82).

DNR conducts ongoing management activities, such as pre-commercial thinning, that achieve habitat objectives over the long-term as part of its normal investment in implementing the HCP conservation strategies.

The following comments deal with marbled murrelet habitat.

Comment(s):

- It is recommended that existing marbled murrelet habitat not yet surveyed be deferred so that it will contribute to the 20 percent and 40 percent minimums or until it is surveyed and determined not to have murrelet activity.
- There is a concern that the recommendations of the Science Team Report be followed.
- It is recommended that one or more of the alternatives should include a conservation strategy for marbled murrelets that mimics the conservation strategy for northern spotted owls in the OESF.

Response:

Current management of the OESF avoids harvest of sites that are mapped as occupied and reclassified marbled murrelet habitat. The development of the Long-term Conservation Strategy for Marbled Murrelet is an ongoing range-wide separate process required by the 1997 HCP. Importantly, key areas identified in the marbled murrelet science team recommendations are already protected under the current Interim Strategy.

When developing the OESF Forest Land Plan, DNR is being careful not to predispose the outcome of that separate National Environmental Policy Act (NEPA) EIS process, including following the recommendations of the Science Team Report. It is important that current conservation strategies continue to be employed in the OESF Forest Land Plan, with the intention of replacing them once the long-term conservation strategy is developed. Until then, comments are being forwarded to the Marbled Murrelet Long-term Conservation Strategy process for consideration. The OESF forest land planning EIS will assess the potential impacts the proposed landscape management strategies might have on marbled murrelet habitat.

The following comments deal with northern spotted owl habitat.

Comment(s):

- Since the 20/40 thresholds are stated as "minimum" standards, the Department should explain if and how the OESF will be managed to remain above these thresholds and discuss an anticipated timetable for reaching the minimum standards.
- Upon achieving old forest habitat goals pertaining to northern spotted owls and marbled murrelets, there shouldn't be any need for silvicultural experiments in old forest habitat.
- Fragmentation of current and developing older forest wildlife habitats should be minimized when planning timber harvests.

Response:

The '20/40 northern spotted owl habitat thresholds' are an explicit objective and evaluation criteria for assessing the proposed landscape management strategies and therefore their attainment and maintenance will be described in the OESF Forest Land Plan.

Currently, impact to northern spotted owl habitat as a result of the proposal has been identified as a potentially significant environmental issue to be analyzed in the EIS.

A landscape management strategy of restricting silvicultural experiments in old forest habitat is outside the scope and would be inconsistent with the 'unzoned' forest objective in the OESF forest land planning objectives."

The following comments deal with in-stream habitat.

Comment(s):

- In-stream and adjacent to in-stream habitat areas are important to the Makah Tribe, because they need restoration to address degraded fish habitat, such as Chinook and resident cutthroat.
- Collaboration with other parties on design and implementation of in-stream and adjacent to in-stream restoration projects in the Clallam River and Sekiu landscape planning units should be emphasized. It is important that these occur in areas that are not current sales and conducted as adaptive management and pilot projects.
- It is important to consider existing maps of in-stream habitat in the Hoh River for the Willy Huel landscape planning unit to determine restoration projects.
- Working with the Tribes in efforts to restore spawning sockeye habitat to the tributaries of Lake Ozette is needed.
- It is important to consider in-stream habitat that is significant to the Hoh Tribe when determining restoration priorities in the Upper Clearwater landscape planning unit.
- The Quinault Tribe is interested in placing manmade in-stream fish habitat in the upper reaches of the Quinault River.
- The Quinault Tribe is pursuing restoration of blueback (sockeye) habitat in Lake Quinault regarding historical spawning habitat that have been lost to development over the years.

Response:

DNR recognizes the importance of in-stream restoration as a component of the habitat restoration effort. Maintaining and aiding restoration of aquatic systems are fundamental objectives of the riparian conservation strategy as noted in the August 2007 Scoping Notice. DNR continues to work with Tribes and others to identify restoration efforts.

Currently, impacts to watershed and riparian functions, which affect instream habitat, have been identified as potentially significant environmental issues to be analyzed in the EIS. In addition, the Department is developing watershed assessment models for analyzing the cumulative impacts of the proposal in the EIS. Also see response to Watershed Systems.

Other comments regarding fish follow.

Comment(s):

- Fish and shellfish communities all depend on healthy forests.
- Sockeye habitat and fish populations are degraded, which are an ancestral traditional subsistence fishery of the Makah Tribe.
- The timber industry regulated and with minimal development, is better for fish than real estate and better than urban/suburban development in particular.
- It is important to specifically include “fish” anywhere “wildlife habitat” is mentioned.
- The Quinault Tribe is interested in maintaining the historical stocks of wild Coho salmon in the Queets River System. Population monitoring is in place.

Response:

Currently, impacts to fish habitat have been identified as a potentially significant environmental issues to be analyzed in the EIS. In addition, the DNR acknowledges the benefit of healthy forests to marine ecosystems, including shellfish communities.

WATERSHED SYSTEMS:

The following comments deal with watershed assessments.

Comment(s):

- It is important to review and consider the Sol Duc, North Fork Calawah, and East/West Dickey watershed analyses when proposing DNR planning and management activities.
- It is important to consider the relevancy of watershed analyses conducted by all stakeholders, in particular the assessments, syntheses, causal mechanisms, hazard calls, prescriptions, restoration recommendations, and other pertinent information, to the OESF planning process.

- The importance of water resource management, including sources of snow accumulation and melt needs to be considered. There are concerns about the availability of water and population increases.
- It is important to educate the public regarding the need for water retention.
- The 12-step procedure needs to be updated with procedures and models relevant to individual forest practices activities and local information including all users.

Response:

Maintaining and aiding restoration of aquatic systems for water, fish and wildlife are objectives of DNR's riparian conservation strategy as noted in the August 2007 Scoping Notice. DNR is reviewing existing watershed analyses and other pertinent watershed assessments, including the 12-step procedure, for relevancy to the development of the OESF Forest Land Plan and EIS. DNR is incorporating current information from existing watershed analyses and developing a watershed assessment tool based on the most up-to-date local information. The watershed assessment tool is intended to help schedule activities and to analyze the cumulative effects of the reasonable alternatives on riparian functions and processes.

RIPARIAN CONSERVATION:

The following comments deal with the protection and management of riparian areas.

Comment(s):

- There are concerns for having a fully protected stream network. It is important to follow HCP prescribed buffer widths until research indicates that changes are needed and justified, and buffer widths should not be reduced.
- There is a concern that interior core buffers are both site-specific and should also meet the average buffer widths in HCP Table IV.5.
- There is a concern that the acres and percentages listed in HCP Table IV.12 for the 264,000 acres of the OESF be met.
- Several issues have been raised with interpretation of the HCP for interior-core and exterior buffers. There are concerns that the outcomes specified in the HCP in terms of acres and percentage of land base in buffer categories should be met.
- Concerning the potential for harvest activities in the interior-core buffers and the need for evaluation of potential activities through landscape-level assessments for meeting riparian conservation objectives, the strategy for interior-core buffers should first be measured at an on-site scale, and then rolled-up to the landscape scale in order to meet the conservation objectives.
- There are concerns for the amount of experimentation in exterior buffers such that the conservation objectives are not compromised.
- It is important to specify buffer widths for headwater Type 5 streams.
- There is a concern for the protection and buffering of Type 5 streams consistent with HCP requirements.
- There are concerns that the watershed assessment procedure outlined in the 1997 HCP is not compromised, but is strengthened and implemented within the full intent and purpose outlined in the 1997 HCP for determining the level of management activities that will achieve minimal impact to the environment.
- Wetlands protection should meet the proposed standards in Table IV.9 on page IV.120 of the HCP.

Response:

Applying interior and exterior riparian buffers is a fundamental strategy for achieving the riparian conservation objectives in the HCP as noted in the August 2007 Scoping Notice. DNR works closely with the US Fish & Wildlife Service and National Marine Fisheries in interpreting and implementing the intent of the HCP. This includes interior- core and exterior buffers.

Currently, impacts to riparian functions and processes have been identified as potentially significant environmental issues to be analyzed in the EIS.

The acres and percentages listed in Table IV.12 will be reviewed and compared to forest land planning modeling results as part of the OESF forest land planning process.

Since the restoration and maintenance of riparian areas serve as an HCP conservation objective of both "…promoting a long-term integration of resource use and conservation" (HCP pg. IV.81) and as a "…foundation around which management activities and upland conservation strategies are constructed" (HCP pg. IV.81), the consideration of riparian buffers will continue to be done in the context of larger landscapes, while also addressing site- and stand-level issues.

Research that addresses the experimental approach associated with the exterior buffer HCP conservation strategy will be developed pursuant to the OESF Research and Monitoring Strategy. The percentage of area where research is applied will be limited by the availability of resources, i.e., time and dollars.

Also see response above under Watershed Systems regarding the development of a watershed assessment tool. Although the 12-step watershed assessments only are required by the HCP prior to landscape planning, DNR is developing a watershed assessment process to help determine location and size of riparian buffers, including those for Type 5 streams.

HCP wetlands strategies will be implemented and will be common to all alternatives consistent with the proposed protection in Table IV.9 on page IV.120 of the HCP.

Social and Cultural Benefits

The Policy for Sustainable Forests category 'Social and Cultural Benefits' includes comments related to the direct role that forested state trust lands play in the lives of Washington's residents, i.e. public access and recreation, cultural resources, visual impacts, and local economic vitality.

PUBLIC ACCESS AND RECREATION:

The following comments deal with public access and recreation.

Comment(s):

- There is a concern that the risks (environmentally, socially and financially) far outweigh the benefits of an Off Road Vehicle park/site development and should not be developed in the OESF.
- It is important to consider how the OESF forest land plan will meet the obligation for public use and recreation.
- It is important to coordinate with other agencies on meeting recreation demand.
- Providing some areas where All Terrain Vehicles are accommodated is necessary. Recommend coordinating with the United States Forest Service to manage the All Terrain Vehicle use on Federal lands.
- Construction of multiple use trails for all recreation types is needed.
- Developing trails for mountain bike users is important.
- Gates and tank traps should be constructed in a way that allows for horse bypass.
- Concerned about recreational horse trail access and limitations/regulations on the use in the OESF, and particularly in the Dickodochtedar landscape planning unit. Recommend that DNR does not limit the size of participants in a group ride. It is very detrimental to the group and is too restrictive.
- Would like to see an access agreement for non-motorized use across DNR lands for the Olympic Discovery Trail to continue from Port Townsend to Forks.

- Concerned that trails will be eliminated after logging. Recommend that trails be identified and protected, or reestablished after logging.
- Prohibiting motorized vehicles, timber harvesting, hunting and fishing, development, and allowing limited access to sensitive areas, i.e., beaches, streams and lakes, is important.

Response:

DNR currently lacks funding to pursue development of recreational facilities in the OESF. DNR's primary recreation focus is to provide a primitive experience in a natural setting through trails, trailhead facilities, and rustic camping facilities. At the minimum, DNR likely will continue its current recreation program consistent with the Public Access and Recreation policy in the Policy for Sustainable Forests, as well as the policies regarding Financial Diversification, Forest Roads and other related agency policies. DNR will continue to emphasize education for recreational users, enforcement efforts to deter inappropriate uses, engineering, and using best management practices to address resource damage.

Currently, impacts to public access and recreation have not been identified as potentially significant environmental issues and therefore are not planned to be analyzed in the draft EIS.

VISUAL IMPACTS:

The following comments deal with mitigation of visual impacts.

Comment(s):

- Beauty strips along roads are dangerous in the OESF and particularly in the Queets landscape planning unit. Recommend leaving no beauty strips.
- Efforts to appease the public's aesthetic objections to even-aged forestry are harmful to forest production, fire control, and almost every goal of forest management, and are probably not successful in calming protestors of cutting trees.

Response:

Currently, visual impacts have not been identified as potentially significant environmental issues and therefore are not planned to be analyzed in the draft EIS. Furthermore, safety issues regarding beauty strips are more appropriately addressed when site-specific management actions are proposed.

LOCAL ECONOMIC VITALITY:

The following comments deal with local economic vitality and social impacts.

Comment(s):

The 1st set of comments deal with the consideration of revenue distribution and local economic impacts as a result of timber harvest revenues from DNR managed lands:

- There is a concern that what goes on in the OESF is a major factor influencing the local economy. The strategies that are developed can and will have an impact on local communities and trust beneficiaries. Although commitments to the direct trust beneficiaries may on the surface be a primary concern, it will be imperative to understand the secondary impacts of the strategies to the local community. A socio-economic impact analysis can disclose both the primary and secondary impacts and benefits, including those on local mills. It is important to identify and mitigate any negative economic impacts of the OESF forest land plan to trust land beneficiaries, citizens and communities of tradeoffs made that provide environmental protection in excess of HCP requirements.
- It is important to provide an accurate discussion of the journey and flow of income to the local economy.
- Overlaying junior taxing districts on landscape planning unit maps to facilitate assessment of potential revenue by taxing district would be helpful for local planning.
- Review and consideration of the reports submitted regarding the social and economic impacts of the timber decline in Olympic Region from 1989-2003 and consideration of these issues when developing the OESF forest land plan are important.

- It is important to recognize the importance of this OESF forest land plan to DNR and the 2006 Settlement participants, but more importantly to the larger community affected by it.

Response:

DNR recognizes the importance of the relationship between trust land management and local economic vitality. When making decisions, the Local Economic Vitality policy in the Policy for Sustainable Forests allows DNR to consider local economic vitality that is compatible with or directly supports trust objectives

Currently, impacts to local economic vitality has not been identified as a potentially significant environmental issue and will therefore not be analyzed in the draft EIS.

The 2nd set of comments deal with the concern for a stable flow of timber harvest and revenue from DNR-managed lands:

- Increased harvests are needed on Clallam County lands. Smaller sales would help to provide a stable cash flow to the county.
- Annual production levels and anticipated revenue by trust and taxing district, especially for state forest lands, is important to consider in an economic analysis.
- Long-term stability to contractors is important to consider in terms of making the necessary long-term investments in equipment and operations based on a level of certainty that provides for these investments.
- Reliable, sustainable funding of junior taxing districts, such as Hospital District #1, that rely on non-operating funds to support and expand services is important to provide needed services, such as healthcare.
- Stable and predictable revenue flows for the next 20 years from the Reade Hill, Goodman Hill, and Willy Huel landscape planning units will be necessary to pay off the currently planned Quileute Valley School District bond proposal.
- Stable and sustainable harvest levels are needed to provide sources of wood supply to support local mills.
- Stable and sustainable timber harvest levels are needed to provide sources of wood supply to support family wage jobs.

Response:

The flow of timber harvest and associated revenues within landscapes will be presented in the OESF Forest Land Plan. By Board of Natural Resources policy, the relevant sustainable harvest unit is the OESF. Further splitting of the OESF sustainable harvest unit into separate, State Forest trust county units or landscape units in order to ensure predictable revenue flows to local communities would likely reduce overall OESF sustainable harvest and trust revenue, and is outside the scope of the EIS and forest land plan.

The 3rd set of comment(s) deal with marketing future timber supplies, including size of timber:

- It will be important to understand how older forests will be managed post-2014 and how much and what size of timber will be marketed.
- The ability for industry to process logs does not need to be addressed in the forest land plan. The industry is able to adapt to what is marketed so that local mills can know what to expect for processing.

Response:

One of the OESF forest land planning objectives is to "Generate trust revenue through the sale of the timber. The current target for the OESF HCP planning unit is to generate approximately $144 million in gross revenue over a decade from the sales of approximately 576 million board feet of timber." The 576 million board feet is considered the sustainable level to be harvested over the 10 years, but the $144 million is an estimate based on anticipated market conditions at the time the sustainable harvest was calculated, which is outside the control of DNR. The OESF forest land planning process will determine, at the HCP planning unit level, how and where to best achieve the targets based on current inventories, HCP conservation objectives and strategies, OESF forest land planning objectives, and other DNR policies and procedures. This applies to how older forests will be managed both prior to and post-2014, as well as to how much timber will be marketed.

Implementation

The Implementation category in the Policy for Sustainable Forests includes comments related to carrying out key elements of management of forested state trust lands, and implementing practices on the ground, i.e., research and monitoring, silvicultural, roads, transactions, and reporting and modifying actions of the plan.

FOREST LAND PLANNING:

The following comments deal with the HCP planning objective which addresses planning for the eleven designated landscape planning units in the OESF, as well as the intent of the adaptive management and SEPA review sections in the Forest Land Planning policy in the Policy for Sustainable Forests .

Comment(s):

- A landscape plan must be prepared for each of the eleven designated landscapes. They can then be shown as a combined effort for the whole OESF.
- It is important to recognize, consistent with the Policy for Sustainable Forests Forest Land Planning policy, that forest land planning supports adaptive management and that SEPA is the mechanism to identify the impacts and bring that to the public and the Board of Natural Resources.

Response:

The OESF Forest Land Plan will cover 11 individual landscape planning units as defined in the 1997 HCP Chapter IV.E. Olympic Experimental State Forest Planning Unit and presented in the attached map. The OESF Forest Land Plan will describe the landscape management strategies and represent strategies for each of the eleven individual landscape planning units. However, individual strategies may be tailored to areas smaller or larger than the individual landscape planning units defined in 1997, depending on the local circumstances and the issue being addressed.

The 'Forest Land Planning' policy in the Policy for Sustainable Forests guides the development of forest land planning along with other policies, procedures, resolutions, and legal contracts. Through forest land planning, strategies can be refined through adaptive management to increase the likelihood of meeting desired outcomes. The forest land planning policy commits to utilizing SEPA to accomplish the objectives of preparing forest land plans, and to help identify their impacts and bring that information to the Board of Natural Resources and the public. The EIS will analyze potentially significant adverse environmental impacts resulting from the OESF forest land planning proposal.

GENERAL SILVICULTURAL STRATEGY:

The following comments deal with DNR silvicultural and landscape strategies.

Comment(s):

The 1st set of comments deal with even-aged management of forest stands:

- Even-aged management supported by longer rotations based on maximizing mean annual increment, not on interest rate sensitive discounted cash flow, is important for DNR as a leader.
- Leadership in supporting even-aged management by explaining how longer rotations, reducing clear-cut size, and artificial edge boundaries can result in harvesting only 1% of an area on a 100-year cycle, or .05% on a 200-year cycle, etc. per year is important.
- Leadership in supporting even-aged management by reducing clear-cut size and artificial edge boundaries, i.e. straight lines on curved land, is important.
- Even-aged forestry is almost universally nature's way. Forestry experiments reinforce that concept.

Response:

The HCP conservation objectives and strategies are designed to achieve an "unzoned" approach to forest management in the OESF. Guiding the development of the unzoned approach are six conservation objectives, one which specifically addresses the arrangement of stand development across the landscape: "(4) To learn to integrate older forest ecosystem values and their functions with commercial forest activities assuming, as a working hypothesis, that landscapes managed for a fairly even apportionment of forest cover among stands in all stages of development, from stand initiation to old growth (Oliver and Larson 1990) will support desirable levels of both commodities and ecosystem functions." This conservation objective implies even-aged management, but with considerable structural diversity at the stand level in some advanced stages of development. The restoration and maintenance of northern spotted owl and riparian habitats, and the range, intensity and spatial design of silvicultural practices to achieve the HCP conservation objectives will be described in the OESF Forest Land Plan proposal. The EIS will analyze potentially significant adverse environmental impacts resulting from the OESF forest land planning proposal.

The 2nd set of comments deal with effects of wind on forest stands:

- Storms, topography, ground saturation, and stand conditions are all important considerations when factoring in the influence of wind on stands and forest development.
- The risk of wind throw should be incorporated into scheduling state lands operations in riparian (and wind) buffers.
- Large trees have been left in Section 1, Township 28N, Range 2W and many (a large percentage) have blown down. Harvest of large trees is important to avoid blow down.

Response:

Based on current information, DNR will attempt to incorporate the risk of wind throw for predicting the effects of wind on different harvesting patterns in the Draft EIS, particularly along riparian areas.

The 3rd set of comments deal with innovative silviculture:

- The use of innovative techniques should be linked directly to Research and Monitoring.
- It was stated that the OESF harvest strategies should differ from the HCP, because it is experimental.
- A detailed alternative was recommended for developing a modeling framework for modeling biodiversity pathways in the OESF (Conservation Caucus 10/13/08).

Response:

A detailed alternative recommended for developing a modeling framework for modeling biodiversity pathways in the OESF will not be considered for the Draft EIS. Nevertheless, the OESF forest land planning proposal will describe employing innovative silviculture techniques,

including biodiversity pathways, for restoring and maintaining habitat, and coordinating application of these techniques with research and monitoring. DNR expects to incorporate different silvicultural and harvest strategies into management practices at both the stand and landscape levels because of the unique nature of the OESF relative to other HCP planning units. Finally, the OESF Forest Land Plan is being designed to help incorporate both experimentation on the ground and adaptive management.

Incorporating the risk of wind throw into simulation modeling is an example of linking the design of silvicultural practices informed by research and monitoring. The OESF Research and Monitoring Strategy, currently being developed and being coordinated with the plan, addresses the effectiveness of innovative silvicultural techniques for restoring and maintaining habitat. Literature reviews will be conducted and best available science will be used in assessing silvicultural techniques.

The 4th set of comments deal with thinning:

- Alternatives to cable thinning need to be considered to achieve economic objectives.
- Care needs to be taken where cable thinning is done to prevent windthrow.
- It is important to specify how many thinning entries might be made under each rotation.

Response:

The impacts of thinning as a strategy to maintain healthy forests and develop wildlife habitat will be addressed in the EIS. The number and type of intermediate thinning practices that could occur between stand initiation and final harvest is determined by the objectives and strategies (site-specific and landscape) for a particular stand or area, and likely will be discussed in the EIS. However, the tactical, operational method (e.g., cable thinning) that might be employed is outside the scope of this proposal.

The last comment concerns professional management decision making by DNR foresters:

- DNR foresters need to retain the flexibility and latitude to manage trust lands as the professional trust manager.

Response:

The current objectives listed in Section IV of the OESF Forest Land Plan stress the importance of maintaining the flexibility and utilizing the judgment of forest managers when responding to current and new information, expert opinion, and other observations and experience.

FOREST ROADS:

The following comments deal primarily with the construction and maintenance of DNR roads.

Comment(s):

- It is important to discuss how the requirement for comprehensive road-maintenance plans will be met in the OESF, i.e., to limit new road construction to where it is an absolutely necessary means of access, as well as making the OESF more experimental by not building new roads.
- It is important to review the current requirements for types of rock and sources of rock required for new road construction, because it increases the costs of road construction and the effect it is having on bidding.

Response:

Currently identified as issues for discussion in the EIS are impacts related to the use of roads anticipated to be needed to accomplish scheduled management activities. Road impacts are integral to watershed assessments and will be incorporated into the watershed assessment tool currently under development for evaluating impacts to the environment in the EIS that may result from the alternative management strategies. Also see the response above under Watershed Systems.

Although prohibition of new road construction is outside the scope of the OESF Forest Land Plan, the 'Forest Roads Policy' (PSF 2006) includes minimizing the extent of the road network consistent with other Board of Natural Resources policies.

Road construction standards—for types and sources of rock required for new road construction—relates to contract issues for day-to-day agreements necessary to implement the activities under the Forest Land Plan. As such, the substance or details of contracts are outside the scope of the OESF forest land plan.

RESEARCH:

The following comments deal with research and monitoring, and adaptive management.

Comment(s):

- Well-designed adaptive management monitoring linked to management activities is important for tracking forest habitat, including interior forest habitat in riparian and other areas. It is important to include effectiveness, research, and compliance monitoring components and information management.
- It is important to define/discuss in the OESF forest land plan what the experiment is, the purpose of the experiment, and the status of the experiment.
- There is a concern that the OESF address the specific adaptive management requirements of the HCP Implementation Agreement and follow the structure described in the HCP Handbook to cover all components of aquatic, marbled murrelet and northern spotted owl habitat, forest stand condition and trajectories, and compliance with the State's Clean Water Act, for each of the eleven Planning Units.
- It is important to recognize consistent with the Policy for Sustainable Forests Forest Land Planning policy that forest land planning supports adaptive management and that SEPA is the mechanism to identify the impacts, and bring that to the public and the Board of Natural Resources.
- There is a concern that the OESF forest land plan's research and monitoring focus be enlarged from single species management to multi-species ecosystem management.
- It is important to use information learned in the OESF to amend the objectives/strategies already in the HCP and that results from experimentation be peer-reviewed and implemented on other DNR managed lands.
- There is a concern that the experimental nature of the OESF be incorporated into the OESF forest land plan.
- Previous research in the OESF, particularly in the Copper Mine landscape planning unit, should possibly be replicated or used to establish monitoring sites. Research on status and trends should be considered using these research sites.
- The monitoring program should include riparian inputs, functions, and stream channel/habitat condition and response to land use, climate, flow, and mass wasting. It should also include substrate and habitat condition in streams and wetlands receiving run-off from roads or mass wasting inputs. Forest practices should be designed to respond to actual conditions.
- Relative to maintaining or increasing biological diversity in the OESF, it was recommended that a rigorous adaptive management program be developed to test and validate management assumptions, evaluate their effectiveness at meeting biological diversity objectives, and measure compliance.

Response:

The major objective of research and monitoring is to provide assessments as to whether the DNR's 'multispecies' HCP is meeting its conservation objectives. The OESF forest land planning process is integral to informing the development of objectives for research and monitoring in the OESF. Furthermore, many HCP research and monitoring goals and priorities will be supported through the implementation of the OESF Forest Land Plan. The coordination between them will be discussed and clarified in the Draft EIS and plan.

The experimental component will be provided through coordination of OESF Forest Land Plan implementation with the research and monitoring planning and implementation, and will be discussed in the EIS and the forest land plan. An OESF Research and Monitoring Strategy is being developed in concert with the forest land planning effort. However, alternatives for research and monitoring are not being considered for analysis in the Draft EIS.

EXTERNAL RELATIONSHIPS:

The following comments deal with DNR's working relationships with others and interfacing with the public.

Comment(s):

- It is important to educate the public on OESF activities and to coordinate with other agencies in providing recreation and environmental education.
- It is important to discuss the relationship of the Olympic Natural Resource Center to the OESF and the relationship between the DNR and the University of Washington's College of Forest Resources.
- There is a concern that the forest land plan allow for inter-agency ID teams to guide management decisions, e.g., decisions regarding habitat that may be in-between structural stages of development, and also that existing local government responsibilities and resources be utilized.
- The success of the OESF will depend on true partnerships being formed to meet common goals.
- It is important for DNR to work with third parties to support active stream restoration.
- Working collaboratively with the county, Tribes, and others to proactively map and eradicate noxious weeds, especially knot weeds, is important.
- Interest was expressed for the DNR to Partner with the Olympic Timber Town on the development of an Olympic Timber Town Museum, a working museum located on the west end of Port Angeles,

Response:

DNR appreciates the concern for effective external relationships in carrying out its mission and duties. Although discussing any specific relationship between DNR and another party is not within the scope of the Forest Land Plan and EIS, external relationships will continue to be addressed within the 'External Relationships' policy of the Policy for Sustainable Forests, and likely will be discussed in the OESF Forest Land Plan. These types of potential commitments and recommendations to coordinate with external parties do not need analysis in the EIS; however, DNR will continue to consider partnerships with others on a case-by-case basis. DNR will engage in those that may maximize efficiency and effectiveness of achieving mutual goals and objectives.

IMPLEMENTATION, REPORTING AND MODIFICATION:

The following comments deal with anticipating changes, periodic assessments of the plan and the potential need for course corrections.

Comment(s):

- It is important to consider the relationship between the HCP and the federal northern spotted owl recovery plan. Would any changes in the federal recovery plan prompt any changes in the HCP, e.g. if the United States Forest Service were to change current areas dedicated to the northern spotted owl or pull back on some areas currently dedicated to the northern spotted owl, would this lead to changes in DNR's HCP? How do conservation support areas mesh with the federal recovery plan?
- The OESF forest land plan needs to contain specific requirements that will guide drafters, participants, and future readers during the implementation phase.
- It is important to start considering now how the forest will be managed if the owl is no longer present in the OESF in 2014.
- It will be important to periodically assess whether the OESF forest land plan is meeting its objectives once it is completed.

- The OESF forest land plan should include a status report on the estimates of the types of silvicultural activities anticipated during the 1st decade of the HCP, Table IV.15 on page IV.211 of the HCP.
- Planning needs to begin now for management subsequent to end of the 2006 Settlement Agreement in terms of Northern Spotted Owls and their current status.
- It will be necessary prior to continuing or rolling forward any of the requirements of the 2006 Settlement Agreement, to do a complete analysis of how the requirements would meet the trust mandate, the HCP, and the OESF provisions, including an economic impact analysis to the beneficiaries.

Response:

DNR and the federal services considered the spatial arrangement of habitat and other conservation values being provided on federal lands when developing the HCP conservation objectives and associated conservation strategies for the OESF. At this time, it is not possible to speculate how changes in the federal recovery plan, or changes to management on federal lands, might affect the long-term management of the OESF, including any potential amendments to DNR's HCP.

The OESF Forest Land Plan will include specific silvicultural and forest management strategies, while also promoting flexibility, creativity, and professional judgment. (See Planning Objectives in Section IV p. 3.)

DNR recognizes that it cannot adequately anticipate every future event that might affect the practicality and relevance of the OESF Forest Land Plan at any particular time. One of DNR's objectives is to establish strategies that will endure over time, while striving to achieve the objectives of the OESF plan, the Policy for Sustainable Forests, and the trust lands HCP. As changes are needed to meet DNR's policy objectives, those will be considered. Research, monitoring and adaptive management also will play a strong role in informing future guidance and management activities throughout the OESF, including assessing whether the OESF forest land plan is meeting its objectives. Also, see response under Research.

The OESF Forest Land Plan will include a report on the types of silvicultural activities that have occurred during the 1st decade of the HCP, as well as those expected to occur in the next decade.

The Settlement Agreement expires in 2014. Unless changed at a later date, provisions of the Settlement Agreement will be assumed to terminate in 2014 for the purpose of OESF forest land planning. The status of the northern spotted owl at that time will be incorporated into adaptive management to address DNR objectives, including implementing the HCP conservation objectives.

Other

The following comments do not fall clearly into any of the previous Policy for Sustainable Forests policy categories.

OESF BACKGROUND:

The following comments deal with the historical perspective of the OESF.

Comment(s):

- There is a concern that the significance of the HCP on this planning process be discussed in the OESF forest land plan.
- The key event in the history of the OESF was the signing of the HCP, a legally binding document, which clearly states a special role for the OESF.
- It is important to reaffirm promises made over the past 10+ years regarding the OESF.

- It is important that the OESF forest land plan discuss the trail of actions, etc. over the past 20 years, so the public will understand the importance of driving the process to a conclusion.
- A complete history of the evolution of the OESF beginning with the Commission on Old Growth through the adoption of the HCP is needed to understand the unique role of the OESF in the HCP and the problems with the current scoping process.

Response:

DNR will include a discussion of the history of the forest in the OESF Forest Land Plan and Draft EIS—the process and events leading up to this forest land plan, and the current context for preparing a the plan. However, the primary purpose of planning is to provide a road map, beginning now, for achieving identified objectives in the near term and into the future.

UNZONED:

The following comments deal with the "unzoned" approach to managing the OESF.

Comment(s):

- An important goal is to define how to reach the vision of "unzoned" by the end of the Settlement Agreement in 2014 without any need for a transition period. To reach the goal of an unzoned approach will require that DNR consider, in the OESF forest land plan, requirements of the Settlement Agreement that will expire at the end of the agreement in 2014.
- It is important for the OESF forest land plan to recognize that the ultimate goal is that zones will be lifted and that any OESF parcel can be silviculturally managed to achieve HCP objectives.

Response:

Striving for the unzoned forest will be the approach taken during the development of the OESF Forest Land Plan. To achieve the goal of integrating production and conservation across the landscape, the northern spotted owl conservation strategy in the OESF, in particular, is based on an "unzoned forest" concept—that is, a forest in which no special zones are set aside exclusively for either species conservation or commodity production. However, the HCP recognized that the distinction between zoned and unzoned is not absolute. For example, the HCP recognized that riparian areas will be treated almost like "zones", because they are linked to relatively fixed physical features on the landscape. The proposal and alternatives' relative merits will be assessed for their ability to achieve the unzoned forest objectives. The proposal and any alternative will include the scheduled termination of the 2006 Settlement Agreement in 2014.

LAND TRANSACTIONS:

The following comments deal with trust land transactions (sales, purchases, and exchanges).

Comment(s):

- There is a concern that the OESF forest land plan describes how it will comply with the 2004 "Bergeson Principles" for principle 3: reposition trust lands unsuited for revenue production.
- The Dickodoctedar landscape planning unit needs to be blocked-up. Recommend developing a strategy for blocking up this landscape.
- If lands are exchanged out of the Dickodoctedar landscape planning unit, it is important that the exchange include lands to be replaced in the Dickodoctedar.
- Recommend transferring the small block of land in the Kalaloch landscape planning unit to the Hoh Tribe.

Response:

Specific areas for future transactions and their impacts are generally too speculative to analyze and are not in the scope of the proposal.

MODELING:

The following comments deal with the use of forest modeling in developing the forest land plan and EIS.

Comment(s):

- Models save time and money and are ideal for projections in a number of arenas. It is important that models used for analysis fit the OESF and that model results also be ground-truthed.
- Models that inform landscape plans must be relevant to local conditions and uses, based on real inventories instead of broad and general assumptions, and must be updated and peer reviewed.
- It is important to record and report on what the modeled rotation lengths actually are.

Response:

DNR appreciates the need for relevant and transparent models that minimize error due to the potential for inappropriate application. Key assumptions made in modeling will provide focus for monitoring implementation of the OESF Forest Land Plan. DNR works with models that are well recognized as state-of-the-art for forest modeling, informed by the most up-to-date inventory and lidar information where available, and which can forecast expected outcomes over time, based on specific modeling inputs. These models will incorporate information on existing conditions and environmental impact thresholds. However, models are just models—excellent tools to compare approaches, but should not be seen as the on-the-ground absolute reality.

COMPLIANCE WITH CURRENT LAW AND LEGAL OBLIGATIONS:

The following comments deal with DNR compliance with current law and legal obligations.

Comment(s):

- There is a concern that DNR's compliance with the Forest Practices Act is not meeting the requirements of the Clean Water Act, State Water Quality Standards and anti-degradation requirements, and that the adaptive management process include compliance with the State's Clean Water Act, in addition to meeting the HCP conservation objectives.
- There is a concern that the Endangered Species Act is counterproductive to responsible trust land management.
- It's important for the forest land plan to address current law.
- The HCP, a contract, takes precedence over the Policy for Sustainable Forests, a policy document.
- Other comments stated the need to comply with the requirements of current listings under the Endangered Species Act.

Response:

A discussion will be included in the EIS describing the regulatory framework within which DNR operates. Compliance with current laws and legal obligations is a basic assumption and requirement of all management alternatives. Guidance within the Policy for Sustainable Forests is intended to meet and be consistent with all of the legal and contractual obligations under which DNR manages state trust lands.

RECOMMENDED ALTERNATIVES:

The following comments deal with recommendations for reasonable alternatives.

Comment(s):

- Several alternatives including a "Comprehensive Landscape Plan" alternative were recommended that incorporate all elements of a unified effort as stated on pg. I.14 of the HCP. These would also include specific requirements of the 2006 Settlement Agreement, adaptive management as outlined in the Federal Services HCP Handbook, maps of and protection of riparian interior and exterior core buffers that meet the standards and widths expected in the HCP, protection of Type 5 waters per the HCP, and the stand structure objectives at year 100

as listed in Table IV.14 on pgs. IV.179-180 of the HCP.[1] A detailed alternative was also recommended for developing a modeling framework for modeling biodiversity pathways in the OESF (Conservation Caucus 10/13/08).

Response:

DNR will consider alternatives to be analyzed in the Draft EIS to address any potentially significant adverse environmental impacts from proposed harvesting and silvicultural practices. Alternatives considered will be expected to meet the purpose and need and have a reasonable potential for achieving the objectives listed for the OESF Forest Land Plan. A close review and screening of the elements and issues is being done to identify potentially significant adverse environmental impacts that would drive the development of EIS alternatives.

MISCELLANEOUS COMMENTS NOTED:

The following comments did not fit other categories but are nevertheless worth noting.

Comment(s):

- There is a concern that a glossary be included that includes stand structural and habitat definitions, examples (e.g., structural diagrams) and the differences between the terminology used.
- It is important to understand that the OESF is not a project, but a program.
- There is a concern and preference that the final OESF forest land plan be a separate document from the final EIS.
- A definition of “best available science” needs to be articulated.
- It is important to recognize concerns with how overly burdensome requirements in contracts increase bidding prices and cause unnecessary increases in the bidding to cover what are perceived to be non-essential requirements.
- It is important to consult governments in advance of public and stakeholder meetings.
- It is important to establish regulations for public meetings i.e. have time limits for comments and start the program on time.
- It is important to analyze and disclose the cost of public meetings (staff time, materials, etc.) for the public to determine if the meetings are necessary.
- Development of short documentaries and media productions that have examples of integrated silviculture is needed.
- There are a number of other comments and recommendations, most of which provided encouragement and other factual data, for DNR to be aware of as the process moves forward.

Response:

Terminology relevant to the analysis of environmental impacts and the description of alternatives will be defined in the OESF EIS per WAC 197-11-425.

Relative to the OESF being a project or a program, the OESF is a distinct HCP Planning Unit made up of 264,000 acres in Western Clallam and Jefferson counties. Management in the OESF is made up of several DNR programs.

The development of the OESF Forest Land Plan is the underlying proposal for which a Draft EIS is being prepared. DNR is striving to meet the intent of SEPA to fully integrate the requirements of SEPA with the development of the OESF Forest Land Plan through an expanded scoping process discussed in Section V. The ultimate form of the OESF Forest Land Plan is yet to be determined.

[1] The specific details of these proposals are included in the verbatim comments on file with the Department. The suggested alternatives essentially cover and summarize many of the concerns listed earlier in this summary of scoping regarding several conservation objectives, anticipated stand structure and riparian results from modeling age class distributions at the time the HCP was adopted, and the six HCP recommended management processes that were previously preliminarily identified as not being required in the development of the OESF forest land plan (Non-project Review Form 8/17/07).

Best available science will continue to be considered by DNR and others as the OESF Forest Land Plan is developed and implemented. However, defining "best available science" falls outside the scope of the plan. There can be many meanings and interpretations of this term that may be applicable. To determine what "best available science" is for a specific project will ultimately be a management decision that is reviewed on a case-by-case basis. Best available science is identified in the OESF Forest Land Plan objectives in Section IV as necessary to preserve management flexibility and enable adaptive management.

Contract negotiations are outside the scope of the OESF Forest Land Plan and EIS.

Although local government notification is a part of the SEPA process, and is also within DNR general guidelines and practices for notifying interested parties, meeting management is outside the scope of the OESF Forest Land Plan and EIS.

DNR recognizes the possibilities afforded by different venues, including media, in addressing education and communication. However, these are not issues that need analysis in the EIS.

This concludes the Summary of Comments and Responses. The following section discusses changes to the scope in terms of specific 1997 HCP conservation objectives, the overall OESF forest land planning objectives and other legal commitments.

VII. CHANGES TO THE SCOPE

The following list includes changes to the original Scoping Notice issued August 2, 2007. In the Non-project Review Form dated 8/17/08 (refer to discussion in Section V.), delineation was made between those HCP commitments required to be addressed through forest land planning and those that, although required, may be addressed through other parallel efforts such as the OESF Research and Monitoring Strategy. As a result of scoping, the commitments identified in the Non-project Review Form —and detailed below as potentially being addressed through other processes—have been reviewed and will be addressed to the extent practicable in conjunction with the EIS and OESF Forest Land Plan. One commitment that will not be addressed in the plan or other parallel efforts is the 100-year modeling (unrelated to HCP conservation objectives and strategies) stated in the March 2006 Settlement Agreement.

To review the current scope for all of the commitments being addressed, this document needs to be combined with the Determination of Significance/Scoping Notice dated August 2, 2007 and located at DNR's website at www.dnr.wa.gov.

OESF Forest Land Planning Objectives

The following objective has been removed from Section IV. Need, Purpose and Objectives of the OESF forest land plan due to a decision to incorporate strategies for integration of the six management processes in the forest land planning process, rather than having a separate "visioning" group working on those processes:

- Coordinate with the broader OESF visioning discussions on the six recommended management processes identified in the HCP on page IV.82 and consider strategies that are within the need, purpose, and objectives of this OESF Forest Land Plan as recommendations become available.

Trust Manager

The discussion regarding DNR as manager of state trust lands in the original August 2007 Scoping Notice omitted discussion of DNR's responsibility for managing State Forest Lands. The Scoping Notice included Federally Granted Lands, but not State Forest Lands that are lands acquired from counties through transfer or were purchased from private landowners or the county. This will be corrected in the EIS and the Forest Land Plan.

Habitat Conservation Plan Conservation Objectives and Other Legal Commitments

The following riparian conservation objectives and other commitments were listed in the 8/17/07 Non-project Review Form as commitments not required to be addressed in the OESF Forest Land Plan. They, therefore, were not included in the August 2007 Scoping Notice. They have been reviewed and reconsidered as likely to be addressed in some manner in the EIS and the plan. Although they will not likely be addressed completely by the EIS, portions of them may be.

Efforts to achieve the objectives identified below could fall within a range of approaches; some may be addressed through the EIS and the Forest Land Plan while others may be addressed through parallel efforts such as development of the OESF Research and Monitoring Strategy. However, they are being coordinated, and on-the-ground operational activities implementing research and monitoring will occur through implementation of the OESF forest land plan. In addition, specific elements for achieving the objectives and strategies defined below may be determined to have SEPA coverage under existing environmental documents. This review will occur as the Draft EIS is developed.

The following Habitat Conservation Plan contractual commitments related to the riparian conservation strategies are verbatim and are listed in the order they appear in the HCP.

- One of five components identified for seeking to meet the riparian conservation strategy is to establish a research and monitoring program integrated with on-the-ground riparian protection (HCP, IV.109)
- Type 5 channels with a potential for delivering water, wood, sediment, nutrients, and energy to the channel network will be protected from the active channel margin outward to the topographic break in slope on either side of the channel, as well as upstream to the channel initiation point and downstream to the channel confluence (HCP, IV.111-112). In addition, streams listed as Type 9 (unclassified) or streams not in DNR's hydrology databases will be treated similarly. Type 4 or 5 streams documented to contain fish that are proposed or candidates for federal listing will be treated as Type 3 waters.
- The riparian strategy treats the design and the layout of the exterior buffer in two ways:
    1) it intends light partial harvests, tailored to local landform and meteorological conditions, as an initial management approach;
    2) it relies on experiments, from which DNR can gain new knowledge to improve management techniques in riparian forests (HCP, IV.112)
- Harvest and other management activities in the experimental exterior buffers, therefore, could follow any one of a series of experimental designs that will be replicated across the landscape to ensure statistical significance of experiment results (HCP, IV.112)
- Experimental approach: Foresters and managers will select from a number of experimental designs for the exterior buffer and apply the chosen design to the management area of interest. The designs for the outer buffer will be developed by DNR with input from others such as the Olympic Natural Resources Center and Timber-Fish-Wildlife Agreement cooperators and approved by DNR...The process will be documented and monitored closely (HCP, IV.117-118)

VIII. ISSUES WITHIN THE SCOPE

The following issues are identified as in scope as part of the OESF forest land planning proposal:

- A description of the riparian habitat management strategies,
- A description of the northern spotted owl habitat management strategies,
- A description of the marbled murrelet habitat management strategies,
- A description of the old-growth management strategies,
- A description of the innovative silviculture management strategies (including hardwood management),
- A description of projected harvest volume, revenue, management costs and expected net present value over time (ten decades),
- A description of projected forest development stages, northern spotted owl habitat classes, age class over time (10 decades),
- Description of the integration of six management processes,
- A description of the linkage with research and monitoring and the adaptive management process,
- A description of road management strategies, including construction, maintenance, planning, and use, and
- A description of carbon storage.

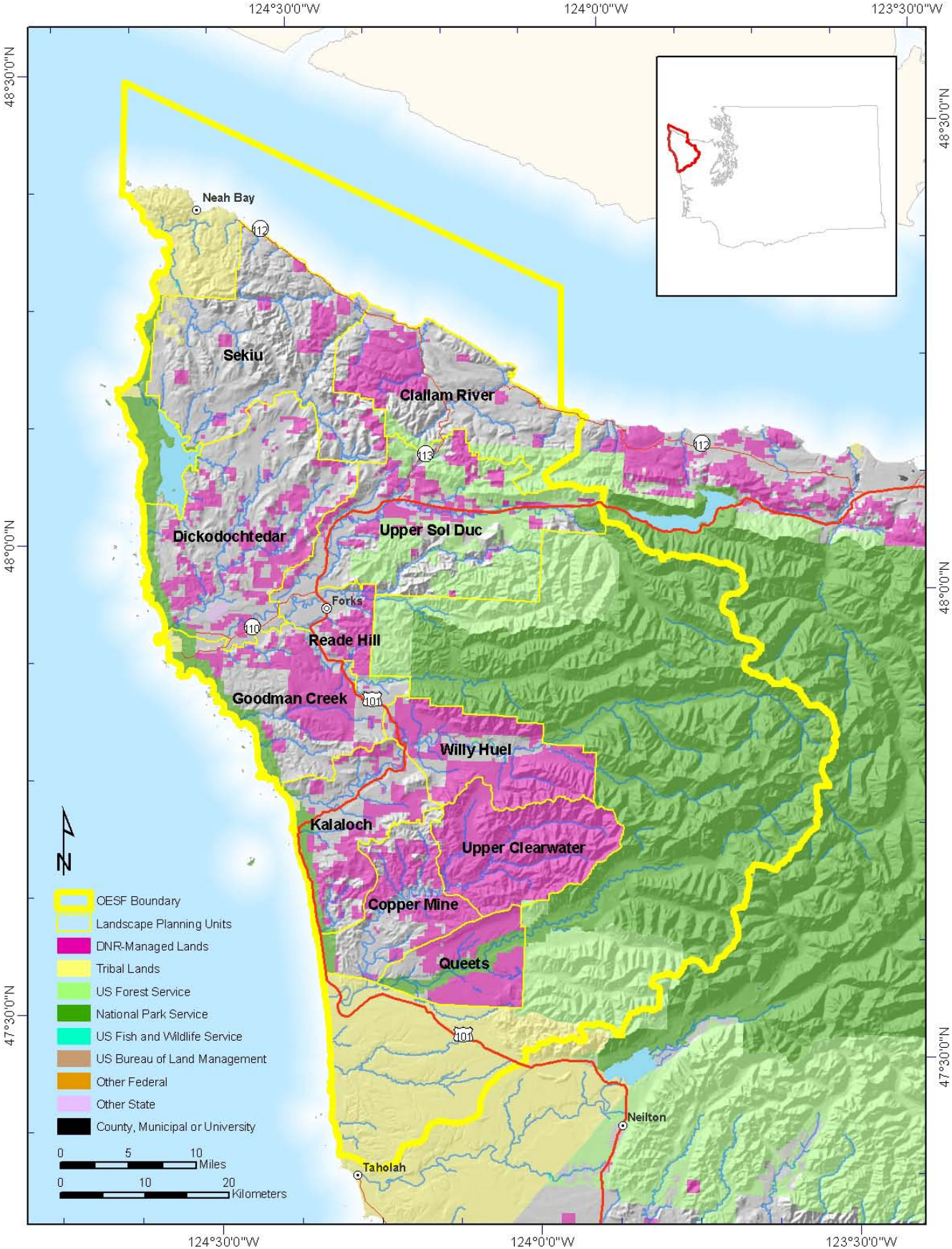
The following are areas of the environment that have been identified as having the potential for significant adverse environmental impacts as a result of implementing the proposal and therefore will be analyzed in the Draft EIS:

- Forest health, including impacts of climate change,
- Riparian systems, water quality, water quantity, fish habitat (including Bull trout habitat) and watershed systems,
- Soil and slope stability,
- Wildlife habitat, including northern spotted owl habitat, marbled murrelet habitat, and elk and deer habitat, and
- Cultural resources.

IX. ISSUES OUTSIDE THE SCOPE OF THE PLAN AND EIS

The following issues currently are identified as outside the scope of the EIS and forest land plan:

- Arrearage,
- Changing Policy for Sustainable Forests policy on sustainable harvest units,
- Revenue distribution to the counties and junior taxing districts,
- Socio-economic analysis of alternatives or affects on local economic vitality,
- Marketing of commercial recreation or ecosystem services,
- Affects on public access and recreation,
- Management if a change in ESA status of northern spotted owl or marbled murrelet,
- Mitigating the effects of CO2 emission in the environment,
- 100-year innovative silviculture modeling project,
- Defining “best available science”,
- Product sales and contracts and negotiations,
- Tactical, operational thinning methods,
- Prohibiting new road construction,
- Silvicultural research restrictions in old forest habitat,

- Public meeting management, and
- Specific relationships between the OESF and ONRC and other parties.

OLYMPIC EXPERIMENTAL STATE FOREST
HABITAT CONSERVATION PLAN PLANNING UNIT