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Chapter 1

INTRODUCTION

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Chapter 1

Introduction

This chapter describes the proposed action and states the need, purpose, and objectives of this proposal. This chapter also outlines the regulatory and policy framework for the sustainable harvest calculation and state lands management, describes the analysis area, and highlights the environmental impact statement and approval process.

1.1 Proposed Action: Purpose, Need, and Objectives

The action proposed by the Washington Department of Natural Resources (DNR) is to establish a sustainable harvest level for the fiscal year 2015– 2024 planning decade for forested state trust lands in western Washington. The sustainable harvest level is the timber volume scheduled for harvest from state trust lands during a planning decade.[1,2]

The proposed western Washington sustainable harvest level will be based on current DNR policies including the *State Trust Lands Habitat Conservation Plan* (DNR 1997), referred to as the 1997 HCP, and *Policy for Sustainable Forests* (DNR 2006a) as well as all applicable local, state, and federal laws.[3]

■ Purpose of the Proposed Action

The purpose describes what DNR is trying to achieve. The purpose of the proposed action is to recalculate a sustainable harvest level consistent with DNR policies, including the *Policy for Sustainable Forests*, the 1997 HCP, and applicable local, state, and federal laws.

[1] RCW 79.10.300(5).
[2] The proposed action also includes adoption of an "End of Decade Analysis: Arrearage" policy and a revision to the Policy on Definition of Sustainability for the Sustainable Harvest Calculation. More information about these policy changes is in Chapter 2 and Appendix M and N of this FEIS.
[3] For the 1997 HCP, visit https://www.dnr.wa.gov/publications/lm_hcp_plan_1997.pdf?642gkr
For the *Policy for Sustainable Forests*, visit
https://www.dnr.wa.gov/publications/lm_psf_policy_sustainable_forests.pdf?oaq33g

Need for the Proposed Action

The need describes why DNR is seeking to accomplish the purpose:

- Revised Code of Washington (RCW) 79.10.320 requires DNR to "manage the state-owned lands under its jurisdiction which are primarily valuable for the purpose of growing forest crops on a sustained yield basis insofar as compatible with other statutory directives. To this end, the department shall periodically adjust the acreages designated for inclusion in the sustained yield management program and calculate a sustainable harvest level."

- RCW 79.10.330 states that "[i]f an arrearage exists at the end of any planning decade, the department shall conduct an analysis of alternatives to determine the course of action regarding the arrearage which provides the greatest return to the trusts based upon economic conditions then existing and forecast, as well as impacts on the environment of harvesting the additional timber. The department shall offer for sale the arrearage in addition to the sustainable harvest level adopted by the Board of Natural Resources for the next planning decade if the analysis determined doing so will provide the greatest return to the trusts."

- The *Policy for Sustainable Forests* states that "[t]he department, with Board of Natural Resources approval, will recalculate the statewide sustainable harvest level, for Board of Natural Resources adoption no less frequently than every ten years."

Objectives for the Proposed Action

DNR has four objectives for the sustainable harvest calculation. The objectives describe how the purpose and need are fulfilled. All of these objectives are based on DNR's trust mandate, the 1997 HCP, *Policy for Sustainable Forests* (described in the following section), other existing DNR policies, and applicable local, state, and federal laws.

- **Objective #1:** Coordinate with the marbled murrelet (*Brachyramphus marmoratus*) long-term conservation strategy environmental analysis so that the Board of Natural Resources can integrate the effects of the range of marbled murrelet conservation alternatives on the sustainable harvest level and arrearage.

- **Objective #2:** Incorporate new information into an updated model to calculate the sustainable harvest level. New information includes changes in the land base, changes in forest inventory, information concerning the prior decadal arrearage and its causes, changes in technology, and any updates from the finalized forest land plans for the Olympic Experimental State Forest and South Puget HCP planning units.

- **Objective #3:** Consider climate change as part of the affected environment, analyze climate change impacts and benefits of the alternatives, and identify possible mitigation measures that will reduce or eliminate any identified adverse environmental climate change impacts of the proposal.

- **Objective #4:** Ensure alternatives analyzed are reasonable, feasible, and consistent with DNR's trust management obligations, existing DNR policies, and applicable local, state, and federal laws.

What Is the Sustainable Harvest Level?

The sustainable harvest level is defined in RCW 79.10.300(5) as "the volume of timber scheduled for sale from state-owned lands during a planning decade as calculated by DNR and approved by the board." The *Policy for Sustainable Forests* establishes policies that govern the sustainable harvest calculation. DNR calculates the sustainable harvest level for each of the 20 sustainable harvest units in western Washington. DNR must calculate an estimated multi-decade level such that the mean annual timber volume for any decade should not vary up or down more than 25 percent from the level of the preceding decade for any sustainable harvest unit. The mean annual harvest level is calculated by dividing the decadal sustainable harvest level by 10. Annual variation in the harvest level is allowed so that DNR can take advantage of market opportunities. (Refer to p. 28–30 of the *Policy for Sustainable Forests* for policies guiding the sustainable harvest calculation.)

The sustainable harvest level is a non-project action and does not authorize any specific timber sales. Once adopted, the sustainable harvest level will be used by DNR to plan and offer for sale harvests within the analysis area, consistent with DNR policies and applicable local, state, and federal laws. DNR will still conduct environmental review of site-specific timber harvests subject to the State Environmental Policy Act (SEPA).

The department is also required by RCW 79.10.330 to conduct an analysis of any arrearage volume resulting from the previous planning decade (fiscal year 2005–2014) to determine the best course of action. For purposes of this analysis, arrearage volume is the difference between the planned sustainable harvest level and the actual harvest level in a planning decade.[4] The purpose, need, and objectives for this proposal combine the arrearage analysis with the calculation of a sustainable harvest level.

DNR's proposed sustainable harvest level does not govern the management of lands owned or managed by other landowners in western Washington. DNR's sustainable harvest level only applies to the management of state trust lands.

[4] The definition of arrearage in RCW 79.10.300(1) is a cumulative calculation dating back to 1979, while RCW 79.10.330 requires a decadal analysis.

1.2 Regulatory and Policy Framework

State trust lands in western Washington are subject to a variety of federal, state, and local laws, as well as policies adopted by the Board of Natural Resources (Board). All management activities, including timber harvests and road construction, must comply with these laws and policies.

1997 Habitat Conservation Plan

Forest management activities on DNR-managed lands in western Washington are subject to the 1997 HCP and associated incidental take permits.[5] The 1997 HCP is a long-term land management plan that is authorized under the Endangered Species Act (ESA) and prepared in partnership with the federal services.[6] The 1997 HCP describes how DNR meets ESA Section 10 criteria with a suite of habitat conservation strategies focused on northern spotted owl, marbled murrelet, salmon, and riparian obligate species, as well as other unlisted species, in conjunction with timber harvest and other forest management activities.[7] These strategies range from passive (for example, protect unique habitats such as cliffs) to active (for example, thin forests to speed development of habitat). Through these 1997 HCP conservation strategies, DNR offsets the potential harm of forest management activities on individual members of a species by providing for conservation of the species as a whole.

Policy for Sustainable Forests

The *Policy for Sustainable Forests* is DNR's guiding set of policies for the management and stewardship of forested state trust lands. The policy describes DNR's obligations for managing forestlands on behalf of the state trusts and establishes specific policies around economic performance, forest ecosystem health and productivity, and social and cultural benefits. The *Policy for Sustainable Forests* works to support implementation of the 1997 HCP. The multiple benefits from state trust land management are discussed in the *Policy for Sustainable Forests*; policies are grouped into major categories that address key aspects of sustainable forest management including economic performance, forest ecosystem health and productivity, and social and cultural benefits (DNR 2006a, p. 25–50).

[5] In this document, the term "incidental take permit" refers to all of the following: DNR's original incidental take permit [PRT 812521] issued by USFWS in 1997, amendments to that permit in 1998 and 1999, and an incidental take permit [PRT 1168] issued by NOAA in 2009 for six types of salmon stocks.
[6] 16 U.S.C. 1531 *et seq*.
[7] ESA Section 10 (a)(2)(B); 16 U.S.C. §1539 (a)(2)(B).

State Forest Practices Act

In 1974, the Legislature passed the Forest Practices Act (Act), which regulates activities such as growing and harvesting timber on all non-federal forestlands in the state, including forested state trust lands.[8] The Forest Practices Board adopts forest practices rules that implement the Act.[9]

In 1999, the Legislature directed the Forest Practices Board to amend the rules to be consistent with the April 1999 Forests and Fish Report.[10] The objectives of that report are to protect public resources, focusing on water quality, salmon habitat, federally listed species, and other aquatic and riparian resources. The Legislature also directed the governor to seek assurances from federal agencies so that compliance with the forest practices rules would satisfy federal requirements under the Endangered Species Act (ESA).[11] In 2001, the Forest Practices Board amended the rules and, in 2006, the U.S. Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) approved the programmatic *Forest Practices Habitat Conservation Plan* and associated incidental take permits to conserve fish and amphibian species. The Forest Practices HCP provides ESA incidental take coverage for all forest landowners through the state's Forest Practices program.

Specific forest practice rules apply to forest practices covered by an HCP like the 1997 State Trust Lands HCP.[12] DNR has obtained approval for substitution of certain 1997 HCP requirements.[13]

State Trust Lands

As a trust lands manager, DNR must follow the common law duties of a trustee. Two of these duties were defined in the 1984 landmark decision *County of Skamania v. State of Washington*: 1) a trustee must act with undivided loyalty to the trust beneficiaries to the exclusion of all other interests, and 2) a state's duty as trustee is to manage trust assets prudently (DNR 2006a, p. 15). Refer to the *Policy for Sustainable Forests*, p. 9–16, for a description of DNR's trust management duties.

This Final Environmental Impact Statement (FEIS) refers to "state trust lands" or "trust lands" to describe the following trusts defined under state law and managed by DNR to provide revenue to specific trust beneficiaries. The term "state trust lands" used in this FEIS refers to:

- **State Lands** (RCW 79.02.010(14)): Shortly before Washington became a state in 1889, Congress passed the Omnibus Enabling Act of 1889 (25 U.S. Statutes at Large, c. 180 p. 676) to grant the

[8] RCW 76.09.
[9] RCW 76.09.030 and .040.
[10] RCW 77.85.180.
[11] RCW 77.85.190.
[12] WAC 222-16-080(6)(i)(Exempting forest practices consistent with HCP from Class IV-Special classification); WAC 222-12-041(3)(a) (Use of HCPs for aquatic resources).
[13] DNR Proprietary HCP Substitution Agreement for Aquatic Resources within the OESF Planning Unit, 2008; DNR Proprietary HCP Substitution Agreement for Aquatic Resources, Five West-side Planning Units, Excluding the OESF, 2008; DNR Proprietary HCP Implementation Agreement for the Northern Spotted Owl, 2008; and DNR Proprietary HCP Implementation Agreement for the Marbled Murrelet, 2014, Five West-side and the Olympic Experimental State Forest Planning Units.

territory more than 3 million acres of land as a source of financial support for named beneficiaries, primarily for public schools and colleges. Unlike states that sold many of their federally granted lands early in the 1900s, Washington retained ownership of most of these lands and continues to manage them to provide revenue and other benefits to the people of Washington (DNR 2006a). These lands are called State Lands.

- **State Forest Lands** (RCW 79.02.010(13)): DNR manages two categories of State Forest Lands. *State Forest Transfer Lands* were acquired by 21 counties in the 1920s and 1930s through tax foreclosures. Unable to manage these mostly harvested and abandoned lands, counties deeded them to the state to manage as state trust lands. In exchange for the deed transfer, the county and taxing districts in which the land is located are given most of the revenue from timber sales and other revenue-producing activities. *State Forest Purchase Lands* were either purchased by the state or acquired as a gift. State Forest Lands are used primarily for forestry, forever reserved from sale, and are managed similarly to federally granted trust lands.

Two other trusts are located within the analysis area, covering significantly fewer acres:

- **Community College Forest Reserve** (RCW 79.02.420): In addition to the State Lands and State Forest Lands, DNR also manages more than 3,200 acres of forestlands for community colleges. The Community College Forest Reserve was established by the Legislature in 1996. Monies for DNR to purchase the properties were first appropriated that year.

  These lands, located near urban areas, form a buffer between other working forests and suburban uses. The properties are managed for sustained timber production, but special consideration is given to aesthetics, watershed protection, and wildlife habitat. Revenues go to a special fund for building and capital improvements on community college campuses.

- **King County Water Pollution Control Division State Trust Lands**: DNR manages more than 4,300 acres of state trust lands for the benefit of King County and its Wastewater Treatment Division. These lands were transferred to DNR for management through an agreement with the county in June 1995 and are managed for long-term forestry, the same as other state trust lands. Some of the county's biosolids will be applied to these lands where soils and locations are appropriate.

■ Other Related Laws and Policies

DNR complies with all other applicable local, state, and federal laws. Some examples include the Shoreline Management Act,[14] which is intended to protect valuable shoreline resources, and the state and federal Clean Water Acts,[15] which establish the basic structure for regulating discharges of pollutants into the waters of the United States. The state and federal Clean Air Acts[16] and certain local laws also affect the management of state trust lands. Chapter 3 summarizes the applicable laws and policies for each element of the environment evaluated for impacts.

[14] RCW 90.58.
[15] 33 U.S.C. §1251 *et seq*. (1972); RCW 90.48.
[16] 42 U.S.C. §7401 *et seq*. (1970); RCW 70.94.

1.3 Analysis Area

The analysis area is all DNR-managed forestlands in western Washington. Western Washington is defined in this FEIS as lands in the Columbia, North Puget, Olympic Experimental State Forest, South Coast, South Puget, and Straits HCP planning units (Figure 1.3.1). This area includes about 1.4 million acres of forested (1.5 million acres, including forested and non-forested areas) state trust lands (Table 1.3.1).

The sustainable harvest level is set only for state trust lands in western Washington. However, other forestlands managed by DNR where harvest does not occur, such as Natural Area Preserves and Natural Resource Conservation Areas, are included in the analysis area because they contribute to meeting ecological objectives. For example, Natural Resource Conservation Areas contain northern spotted owl habitat that contributes to the conservation strategy for northern spotted owl defined in the 1997 HCP (p.1–38). This FEIS uses "DNR-managed lands" to refer to forested state trust lands as well as other forestlands managed by DNR.

Table 1.3.1. Land Ownership in Western Washington (Forested and Non-Forested)

Land within western Washington		Acres
Total land regardless of ownership		19,465,123
	Acres	Percent
US Forest Service, USFWS, and National Park Service land	5,647,041	29%
DNR-managed land	1,572,544	8%
Private and other	12,245,538	63%

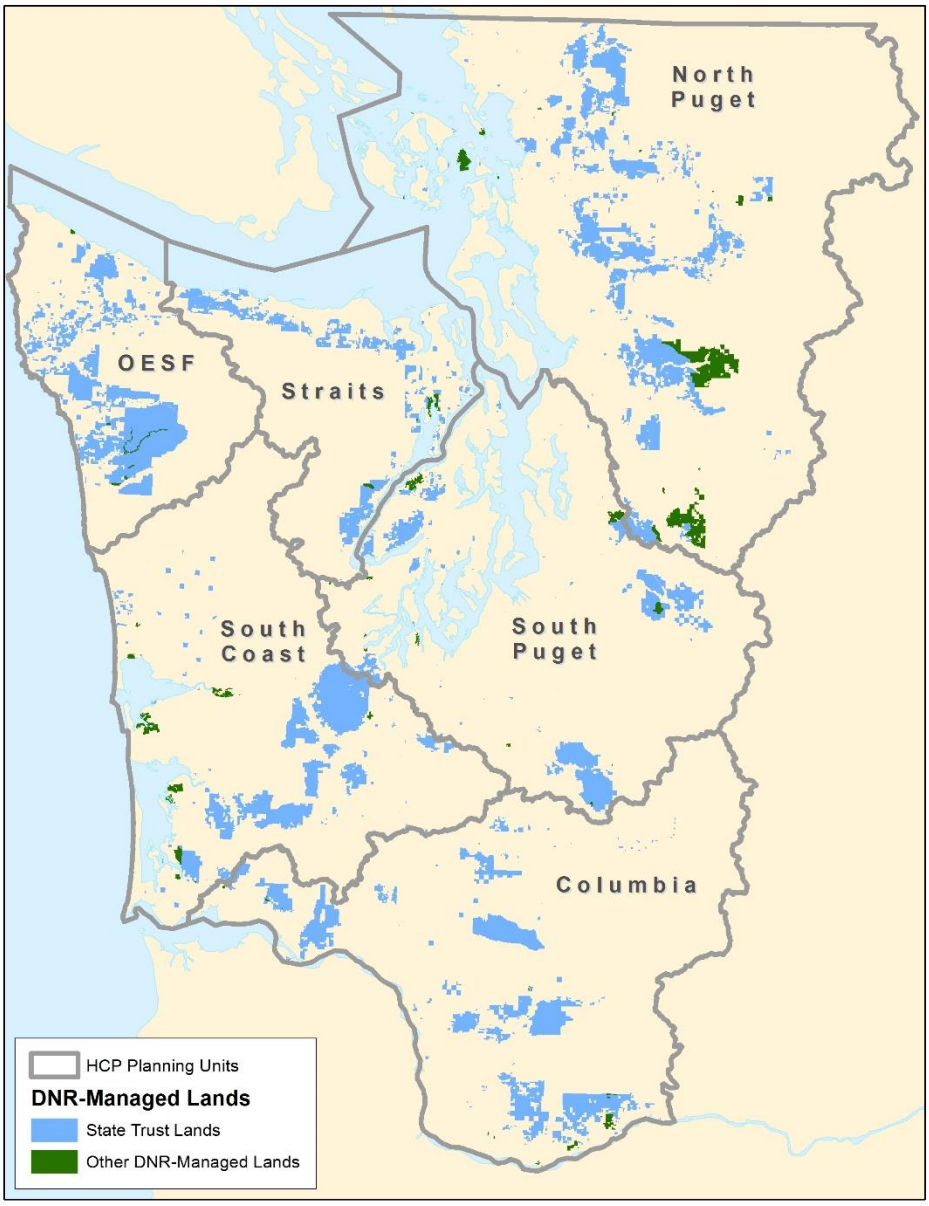
As a result of the regulatory and policy framework described in the preceding section, the analysis area is comprised of both areas managed for forest cover and areas where harvest may occur. Thinning may occur in some areas managed for forest cover but not others, depending on policy or law. Areas managed for forest cover are managed for wildlife habitat or other ecological values and include Natural Area Preserves, Natural Resource Conservation Areas, riparian areas, lands in stream and wetland buffers, areas managed for northern spotted owl or marbled murrelet habitat, certain potentially unstable slopes,[17] and areas with a range of operational difficulties. The alternatives differ in area in each category due to differences in the marbled murrelet long-term conservation strategy (Table 1.3.2).

[17] Management on or near potentially unstable slopes as determined by office and field assessments by a qualified expert. Refer to Chapter 3.1 for more information.

Table 1.3.2. Distribution of Lands by Management Category
(Refer to Chapter 2 for a detailed description of the alternatives; sums may not equal totals due to rounding)

	Lands where even-aged management may not occur (acres)	Lands where even-aged management may occur (acres)	Total (acres)
Alternative 1	685,000	779,000	1,465,000
Alternative 2	678,000	787,000	1,465,000
Alternative 3	709,000	756,000	1,465,000
Alternative 4	709,000	756,000	1,465,000
Alternative 5	818,000	646,000	1,465,000
Alternative 6	698,000	767,000	1,465,000

Figure 1.3.1. DNR-Managed Lands in Western Washington



What Are Sustainable Harvest Units?

Sustainable harvest units are smaller landscapes within the analysis area. Sustainable harvest levels are calculated for each of these sustainable harvest units. The *Policy for Sustainable Forests* (DNR 2006a, p. 29) divides western Washington into 20 sustainable harvest units (refer to Table 1.3.3, Table 1.3.4, and Figure 1.3.2). The units are:

- The Olympic Experimental State Forest (OESF), regardless of trust.
- The Capitol State Forest, regardless of trust.

- Each of the 17 county beneficiaries of State Forest Transfer Lands separately (excluding those lands in the OESF or Capitol State Forest).
- All of the federally granted trusts and State Forest Purchase Lands in western Washington together, with the exception of the OESF and Capitol State Forest.

Policies and laws apply in the same manner to each sustainable harvest unit.

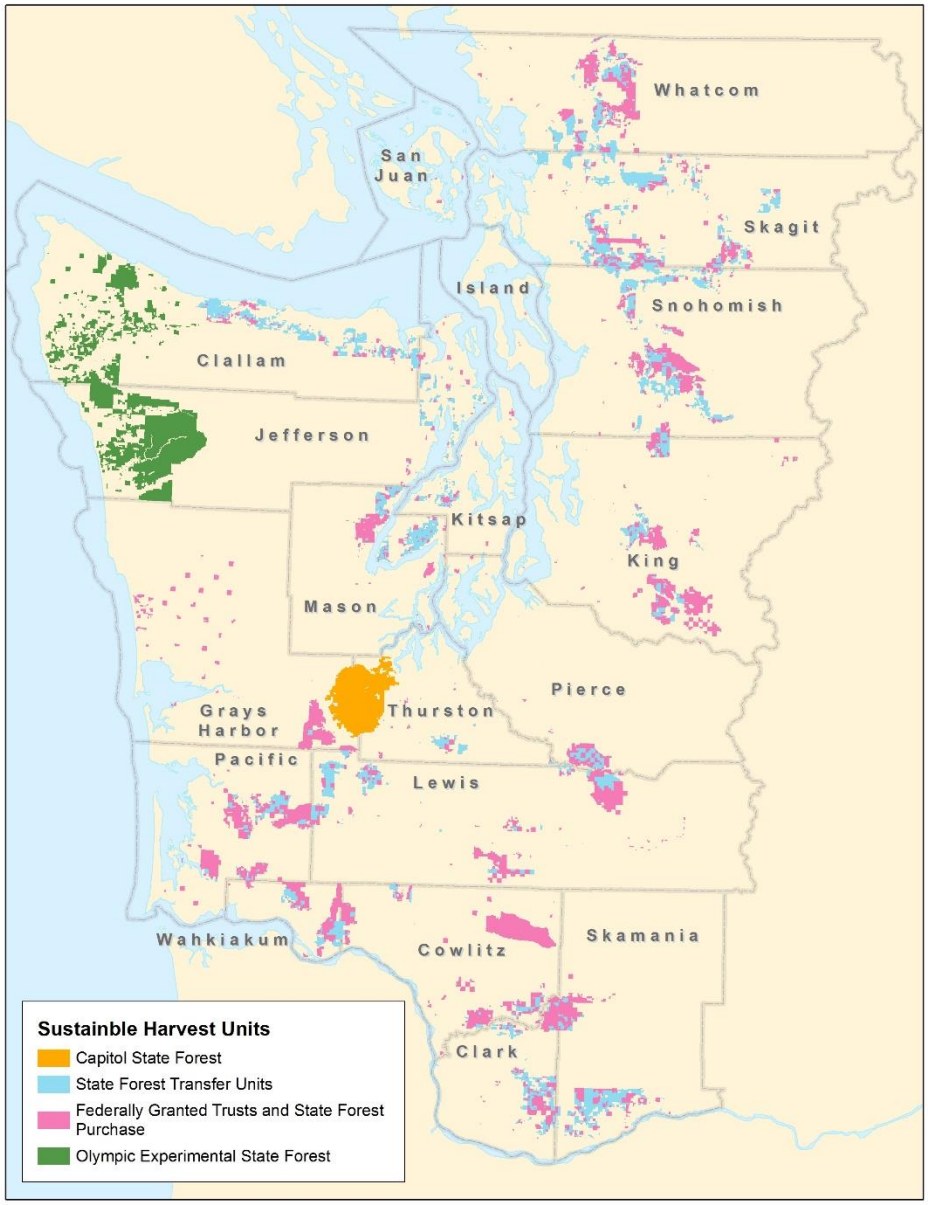
Table 1.3.3. Sustainable Harvest Units (Values may not sum to totals due to rounding)

Category	Sustainable harvest units	Forested acres	Percent of total forested acres
All trusts within these geographic areas	OESF	255,000	19%
	Capitol State Forest	90,000	7%
Federally granted trust and State Forest Purchase Lands	Federally granted trusts and State Forest Purchase Lands outside of the OESF and Capitol Forest	593,000	43%
State Forest Transfer Lands	Clallam County (outside of the OESF)	48,000	3%
	Clark County	25,000	2%
	Cowlitz County	10,000	1%
	Grays Harbor County (outside of Capitol Forest)	600	<1%
	Jefferson County (outside of the OESF)	14,000	1%
	King County	21,000	2%
	Kitsap County	7,000	1%
	Lewis County	38,000	3%
	Mason County	26,000	2%
	Pacific County	14,000	1%
	Pierce County	8,000	1%
	Skagit County	80,000	6%
	Skamania County	35,000	3%
	Snohomish County	59,000	4%
	Thurston County (outside of Capitol Forest)	7,000	0%
	Wahkiakum County	12,000	1%
	Whatcom County	28,000	2%
Total		1,372,000	100%

Table 1.3.4. DNR-Managed Lands in the Analysis Area

Category	Forested acres	Percent
All sustainable harvest units	1,372,000	94%
Other lands (including natural areas)	93,000	6%
Total	1,465,000	100%

Figure 1.3.2. Western Washington State Trust Lands Sustainable Harvest Units
(Individual units for State Forest Transfer Lands in each county are not shown separately)



1.4 EIS and Approval Process

The sustainable harvest calculation is a non-project action. Non-project actions include the adoption of plans, policies, programs, or regulations that contain standards controlling the use of the environment or that regulate or guide future on-the-ground actions (WAC 197-11-704(2)(b)).[18]

Project Scoping

On January 29, 2015, DNR issued a Determination of Significance and Public Scoping Notice for the proposal to establish a sustainable harvest level for the fiscal year 2015–2024 planning decade for forested state trust lands in western Washington, indicating that an environmental impact statement (EIS) would be prepared (Figure 1.4.1). This notice opened a scoping period that ran from January 29, 2015, to February 27, 2015. Scoping is the first formal step in preparing an EIS and initiates public comment.

In the scoping notice, DNR provided information during two webinars. One webinar was held live on February 12, 2015. A second webinar was recorded and made available for public viewing on DNR's website starting February 9, 2015. A webinar is a public meeting held over the internet. The webinar discussed four topics: the environmental review steps required by the State Environmental Policy Act (SEPA), background on the purpose of scoping, how to make effective comments to DNR during the scoping period, and sustainable harvest calculation proposal information. During the webinar, participants could make comments. DNR saved these comments. DNR also received and saved comments submitted in writing during the comment period. All the comments received were reviewed and considered in the development of the analyses in the Draft Environmental Impact Statement (DEIS). More information about the scoping period and comments received is in Appendix A.

Based on comments received in the scoping process, DNR determined the need to consider the following elements of the environment in the DEIS:

- Earth: Geology and Soils
- Climate
- Aquatic Resources
- Vegetation
- Wildlife

[18] Future management actions depend, in part, on the decisions made during this planning process, but no specific on-the-ground activities are designed as part of this process.

Development of the DEIS

Following scoping, DNR developed a set of management alternatives. The alternatives represent meaningful management options to decision makers and incorporate, where appropriate, the ideas and concerns expressed by oral and written comments from the public and stakeholders.

DNR then prepared the DEIS in 2016. In the DEIS, DNR analyzed a reasonable range of alternatives to identify potential environmental impacts under SEPA. The DEIS did not specify a preferred alternative for the sustainable harvest level.

Figure 1.4.1. EIS and Approval Process

On December 2, 2016, notice of availability of the DEIS was issued in compliance with SEPA, initiating a 90-day public comment period. DNR received over 1,300 comments during this comment period. Comments came in the form of individual letters, form letters, emails, and comment cards that were submitted during four public meetings. Some commenters supported one of the alternatives analyzed, some suggested new alternatives, and others suggested changes to what was analyzed in the DEIS and what should be included in subsequent analysis. Refer to Appendix L for summaries of comments received on the DEIS and DNR's responses to those comments.

Development of the FEIS

A considerable portion of the text from the DEIS was used in this FEIS. Some data changes were made as well (refer to "Changes between the DEIS and the FEIS" at the end of this chapter as well as Appendix F). Additionally, several appendices were updated and new appendices were added, including summaries of comments received on the DEIS and DNR's responses to those comments (see Appendix L).

DNR reviewed and considered all comments received on the DEIS to prepare this FEIS.

Who Is the Decision Maker?

DNR's decision maker for establishing the sustainable harvest level is the Board of Natural Resources. Board approval is required by RCW 79.10.300 and 79.10.330, as well as the *Policy for Sustainable Forests* (p. 29). The Board will be responsible for selecting a final alternative plus any proposed mitigation. The Board may adopt an alternative in its entirety or it may combine elements of different alternatives. Although the final selected alternative may not be identical to any alternative in this FEIS, it will be within the range analyzed.

Approval Process

Once the FEIS is published, the Board will select a harvest level based on an alternative or combination of components of two or more alternatives. The Board will consider the potential environmental impacts of the alternatives; the ability of the alternatives to meet DNR's purpose, need, and objectives as described in the FEIS; and the potential financial impacts of the alternatives on the trusts. The adoption of a marbled murrelet long-term conservation strategy and a sustainable harvest level will occur concurrently since the harvest level is influenced by the long-term strategy. For more detail on the marbled murrelet conservation strategy process, refer to the *Final Environmental Impact Statement for a Long-Term Conservation Strategy for the Marbled Murrelet* (DNR 2019a).

Text Box 1.4.1

What Is the Board of Natural Resources?

The Board of Natural Resources (Board) was established when the DNR was created in 1957. The Board sets policies ensuring that the acquisition, management, and disposition of the lands and resources in DNR's care are based on sound principles and consistent with applicable laws. The Board approves timber sales and the sale, exchange, or purchase of state trust lands, and also establishes the sustainable harvest level for forested state trust lands. Any change to DNR policies regarding these actions requires Board approval.

Membership in the Board is set by state statute and includes: the Commissioner of Public Lands; the Governor of Washington or designee; the Washington Superintendent of Public Instruction; a county commissioner from a county with state trust lands; the Director of the School of Environmental and Forest Sciences at the University of Washington; and, the Dean of the College of Agriculture, Human, and Natural Resource Sciences at Washington State University.

Will the Sustainable Harvest Level Affect Other DNR Planning Processes?

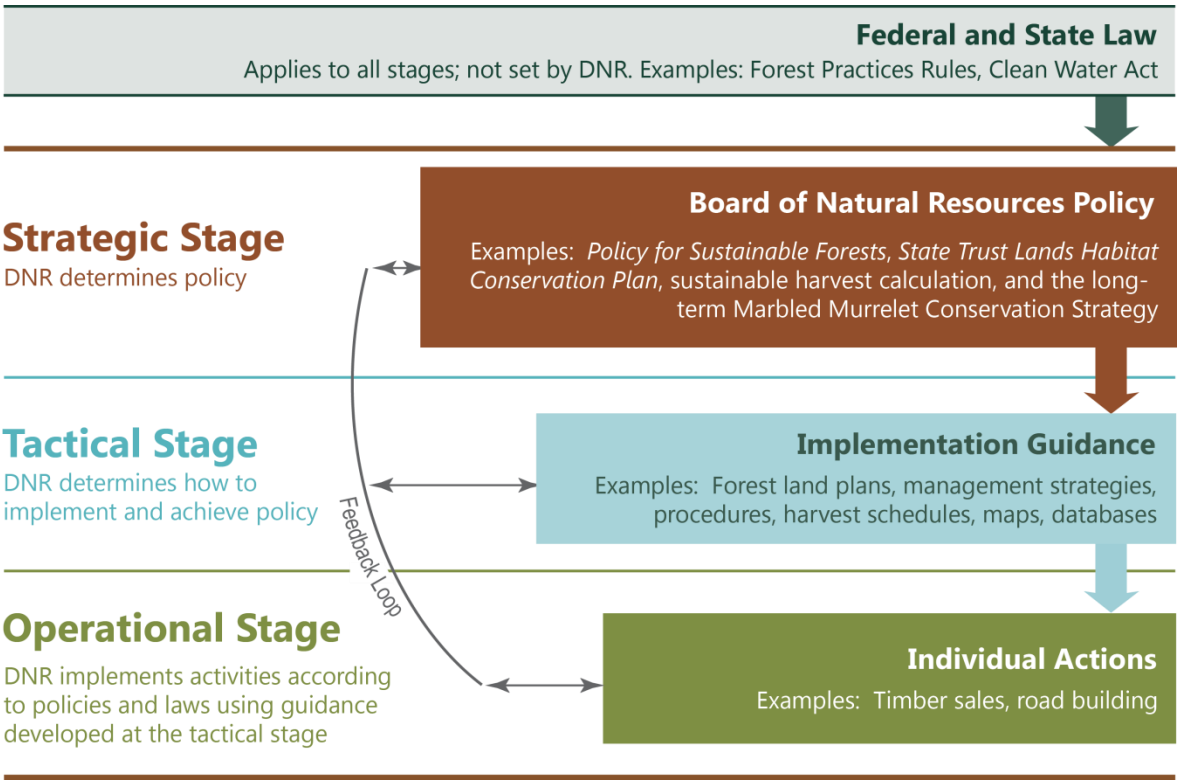
The sustainable harvest level will affect certain planning processes, but others will not be affected. To understand why and how, it is important to understand DNR's planning process. This process has three stages: strategic, tactical, and operational (Figure 1.4.2).

The first phase is called **strategic** because it involves developing policies that define DNR's basic operating philosophy, establish standards, and provide direction upon which subsequent decisions can be based. Examples of policies include the 1997 HCP and the Policy for Sustainable Forests. Another

example of a policy is the sustainable harvest calculation. All of these policies require approval from the Board.

Consistent with Objective #1, the sustainable harvest calculation incorporates the marbled murrelet alternatives into the alternatives analyzed in this FEIS. The sustainable harvest calculation will not change the murrelet strategy. However, the marbled murrelet long-term conservation strategy may affect both harvest volumes and the placement of harvests on the landscape. Once the USFWS makes a final determination to approve DNR's application for amendment of the 1997 HCP (refer to Appendix Q of DNR 2019a), and issues an amended incidental take permit, the Board will decide whether to accept the permit terms and conditions (thus adopting the marbled murrelet long-term conservation strategy), and the associated sustainable harvest level. The Board will also consider adopting the End of Decade Analysis: Arrearage policy and revisions to the Policy on Definition of Sustainability for the Sustainable Harvest Calculation within the *Policy for Sustainable Forests*.

Figure 1.4.2. DNR's Planning Process



The second stage in DNR's planning process is called **tactical** because it involves determining how to implement and achieve DNR policies. At this stage, DNR may develop specific management strategies, maps, databases, models, or other items designed to achieve specific policy objectives. DNR may also develop comprehensive documents called forest land plans through which DNR determines the best way to implement the full suite of DNR policies in a given planning unit. To date, DNR has completed forest land plans for the South Puget HCP planning unit (DNR 2010) and the OESF HCP planning unit (DNR 2016b). Consistent with Objective #2, the sustainable harvest alternatives will incorporate both forest land plans.

Text Box 1.4.2

After the Sustainable Harvest Level Is Adopted, Will Individual Projects in the Analysis Area Still be Reviewed Under SEPA, National Environmental Policy Act (NEPA), and Other Laws?

Yes, unless they are exempt under state or federal law. As a non-project action under SEPA, the sustainable harvest level is not site-specific. Supplemental review of site-specific projects such as timber sales, recreation site development, and major leases and easements will occur under SEPA (and if a federal project, under NEPA) and any other applicable local, state, or federal laws.

Site-specific activities such as individual timber sales are designed at the **operational** stage of planning using the guidance developed at the tactical stage. Management activities must comply with all applicable local, state, and federal laws as well as policies developed at the strategic stage.

Review under SEPA occurs at each stage of planning. Policies are evaluated at the strategic phase, forest land plans are reviewed at the tactical stage, and most site-specific projects or actions, such as individual timber sales, are evaluated at the operational stage as they are proposed.[19]

Changes Between the DEIS and the FEIS

DNR made a number of changes to the FEIS based in part on comments received on the DEIS, comments received on the *Draft Environmental Impact Statement for the Long-Term Conservation Strategy for the Marbled Murrelet* (DNR 2016c) and the *Revised Draft Environmental Impact Statement for the Long-Term Conservation Strategy for the Marbled Murrelet* (DNR 2018), and direction from the Board.

- **DNR's Preferred Alternative (Alternative 6)**: DNR developed this alternative with direction from the Board and in response to comments received on the DEIS, as well as comments on the marbled murrelet DEIS and RDEIS. The marbled murrelet long term conservation strategy in this alternative reflects the strategy that DNR submitted to USFWS in the form of an HCP amendment (Amendment) in support of an amendment to DNR's incidental take permit (refer to Appendix Q of DNR 2019a). Alternative 6 is described in detail in Chapter 2 of this FEIS.

- **Data Updates**: DNR updated its data for this analysis. These data changes affect all of the alternatives in this FEIS. Refer to DNR 2019a Chapter 1 and Appendix O for more information.

- **Model Updates**: DNR updated several of the constraints used in the model that calculates the sustainable harvest level. These updates include updated inventory data, adjusted yields, and changes to northern spotted owl habitat development and management. These and other updates are described in detail in Appendix F of this FEIS.

- **Policy on Arrearage proposed addition to the *Policy for Sustainable Forests***: At the November 7th, 2017, Board of Natural Resources meeting, the Board directed staff to develop a policy on how to consistently calculate and address arrearage. The End of Decade Analysis: Arrearage policy proposed addition to the *Policy for Sustainable Forests* is based on the approach DNR used to develop the arrearage analysis presented to the Board. It has been incorporated into the sustainable harvest level arrearage options for the 2015-2024 planning decade. More information about this policy is in Chapter 2 and Appendix M of this FEIS.

- **Updates to the *Policy for Sustainable Forests***: Clarifications to the Policy on Definition of Sustainability for the Sustainable Harvest Calculation are proposed on how much the harvest level may fluctuate within and between decades. Specific language is in Appendix N of this FEIS.

[19] Some actions are exempt from SEPA review by statute or rule. Refer to RCW 43.21C.037 (Exempting Class I, II, or III forest practices defined in WAC 222-16-050—includes precommercial thinning and tree planting); WAC 332-41-833 (Exempting certain small timber sales); WAC 197-11-800, 830 (SEPA categorical exemptions for minor activities).

What Is in the Other Chapters of This FEIS?

- **Chapter 2**, "The Alternatives," describes the six alternatives in detail, with information about how the alternatives were developed and data comparing the alternatives to one another.
- **Chapter 3**, "Affected Environment," describes the affected environment. Elements of the natural and built environment likely to be affected by the alternatives are summarized, and the chapter provides baseline conditions against which the FEIS will evaluate potential impacts from the alternatives.
- **Chapter 4**, "Environmental Consequences," describes the environmental consequences and analyzes the potential impacts from the different alternatives on the elements of the environment described in Chapter 3.
- **Chapter 5,** "Cumulative Effects," provides a synthesis of the potential cumulative effects of the alternatives and other activities, actions, and trends taking place within the analysis area.
- **Chapter 6**, "Literature Cited," identifies the materials and sources referred to throughout this FEIS.
- **Chapter 7**, "Key Definitions," defines terms used in this FEIS.