



July 26, 2017

To:
Members of Stellerwood Association,
Kahler Glen Home Owners Association,
and additional interested parties
via email

Subject: Comments received on Forest Practices Applications #2706275 and 2706294
Landowner: Weyerhaeuser Company

Thank you for the comments and information you have submitted, concerning these two Forest Practices Applications (FPAs). We understand that that these proposed projects are of great concern to the local community, as evidenced by the number of e-mails and letters we have received as formal comments.

The Washington State Department of Natural Resources (DNR), under Revised Code of Washington (RCW) 76.09 and Washington Administrative Code (WAC) 222, is charged with reviewing, classifying, approving or disapproving, and complying FPAs submitted by landowners on all non-federal lands in Washington State. Forest Practices Rules and DNR procedure require a strict methodology in this process, with both office and field reviews to ensure protection of public resources and public safety, per RCW and WAC.

FPAs are reviewed, in office, utilizing a variety of Geographic Information System (GIS) data layers, searching for potential slope stability concerns, proximity to typed waters and/or wetlands, presence of any known Threatened, Endangered, or Sensitive species (Federal and/or State listing), proximity to Department of Health (DOH) spring water systems and wells, and presence of known archaeological or historic sites or districts. Next, the FPA is field reviewed by the local Forest



July 26, 2017
Page 2 of 4

Practices Forester as well as the Landowner, representatives of Washington State Departments of Fish and Wildlife, and Ecology, affected Native American tribes, and any DNR Forest Practices technical specialists (Licensed Engineering Geologists, Engineers, etc.) the Forester requires to adequately review it. Finally, the Forester, utilizing all the information provided, approves, with or without site-specific conditions, or disapproves the FPA.

Many of the formal comments we have received, regarding these proposed projects, speak to the following concerns:

1. **Slope Stability:** The office review, and first of two field reviews, did not find any proposed harvest on or in Rule Identified Landforms (RIL's) that triggered reclassification and additional information needs, per WAC 222-16-050 (1)(d) Classes of Forest Practices "Class IV – special". The proposed timber harvest is near several RILs, but no harvest or other activity is proposed within/on them.
2. **Stream Protection:** We have field verified the typing and buffers of all streams in FPA #2706275 (roads only), and the streams in FPA #2706294 (general harvest). The stream typing is correct, and the Riparian Management Zones (RMZs) are as prescribed in rule for each stream type.
3. **Avalanche Hazard:** After review of the FPA site. with technical experts from DNR's Forest Practices Science Team, DNR has determined that the avalanche hazard is low due to the protection of convergent Rule Identified Landforms. The nearby slopes that have recently produced avalanches have no trees within the steep convergent areas, whereas forest cover will be maintained in steep convergent areas under the submitted proposal. DNR has requested a post-harvest Avalanche Mitigation Plan from Weyerhaeuser, to provide for the public safety of homes located directly downhill of the proposed harvest. Once that plan is finalized, DNR's Technical Expert will review it for completeness and adequacy, and then incorporate it into the FPA.
4. **Reforestation:** There are no reforestation requirements under the roads only FPA 2706275, as the only area harvested under this FPA will be road right-of-way, and the general harvest FPA 2706294 will be replanted, per WAC 222-34-020 Required reforestation – East of Cascades Summit. DNR Forest Practices Foresters will review the site post-harvest to ensure reforestation requirements are met.



July 26, 2017

Page 3 of 4

5. Road Construction and Maintenance: WAC 222-24 provides standards and guidelines for water crossing structures, managing surface sediment, and construction techniques. Both FPAs adhere to applicable standards. Again, DNR Forest Practices Foresters will ensure compliance with the rules via site visits during construction and periodically thereafter as long as the road is not formally abandoned.
6. Fire Hazard: WAC 332-24-650 Extreme fire hazard requiring abatement designates when a landowner is required to abate slash. During operations, DNR Wildfire Staff will ensure that Weyerhaeuser adheres to this WAC, as well as applicable Industrial Fire Precaution Level (IFPL) regulations.
7. Aesthetics and Recreation: Neither of these are regulated under Forest Practice rules.
8. "Big Red": this locally iconic Ponderosa pine is actually located just north of these FPA's, on USFS property, and is not within either harvest boundary.
9. Wildlife and Fish impacts: Forest Practices rules protect impacts to threatened and endangered species, per WAC 222-16-080. For endangered salmonids, adherence to the Forest Practices rules provides Federal Habitat Conservation Plan (HCP) protection to the landowner. Habitat and wildlife corridors are provided within the leave areas dictated by rule (RMZ and RIL). Additionally, Forest Practice Rules require retention of wildlife reserve trees and green recruitment trees. The amount of trees identified as remaining post-harvest is well above the rule required minimum for both the even-aged and uneven-aged harvest units.
10. Timing and Process: DNR is required to process and classify FPAs within 48 hours of receipt. The process requires a 14 day public comment period before a decision can be issued. DNR has to render a decision within thirty calendar days after official receipt of the FPA. We are considering all comments in our review, even those submitted after the official comment period had closed. DNR cannot require a private landowner to plan its harvest cycles in conjunction with federal agencies or adjoining landowners.

DNR is required to approve FPAs that are in compliance with the rules, and to disapprove those that are not. In light of this, especially for issues not regulated by Forest Practices, I would suggest that you contact Weyerhaeuser Company directly.



July 26, 2017
Page 4 of 4

Both FPAs are scrupulously reviewed and, so far, have met regulatory requirements. The roads only FPA (#2706275) was approved, on July 14, 2017, with conditions to ensure road stability and prevent culvert failure, as this was the last work day prior to its Decision Due Date of July 15. A second field review, to finish reviewing the general harvest FPA (#2706294) was held on Thursday, July 20, with its Decision Due Date of July 28.

Again, thank you for your valuable input regarding both of these FPAs. If you have any additional information, or questions, regarding these FPAs, please contact Marty Mauney, the local Forest Practices Forester for Chelan County, or myself at (509) 925-8510.

Sincerely,

A handwritten signature in blue ink that reads "Wyatt Leighton". The signature is written in a cursive, flowing style.

Wyatt Leighton
Assistant Region Manager
Wildfire and Forest Practices
Southeast Region DNR