



Lisa Wood
SEPA/NEPA Coordinator, WDFW Regulatory Services Section
600 Capitol Way North, Olympia, WA 98501-1091

Via email: SEPAdesk2@dfw.wa.gov

RE: DNS 14-028: MANAGEMENT STRATEGY FOR WDFW FORESTS

Dear Ms. Woods:

The American Forest Resource Council (AFRC) would like to submit these comments on the DRAFT Management Strategy for the Washington State Department of Fish and Wildlife's Forests. AFRC represents over 60 forest product businesses and forest landowners in the western United States. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands. Many of our members have their operations in communities which these lands and potential projects are tributary to and the management on these lands ultimately not only enhances the viability of their businesses, but also the economic health of the communities themselves. Additionally many of our member's employees enjoy the opportunities for recreation and hunting these wildlife areas provide.

I am pleased to see much of this document is founded in scientific data and research to develop the management guidelines for WDFW lands. Through the use of scientifically based guiding principles it is hoped that management on WDFW lands will be less about social perceptions and more based on science and the need for the forest stands and the habitat goals of the agency.

However, I do have a few concerns. The first is in the process used to identify "suitable management areas" (pg 32) and the use of accessibility or the lack of it to determine viability. It would seem if the goal is to "restore" habitat across the landscape then all areas, other than those excluded in steps one and two should be included. Perhaps a better solution would be to apply a ranking of qualified areas based on accessibility. Then during economic analysis, areas with high management costs related to access can be placed lower on the priority list pending economic conditions allowing their viability. As stated on page 33; "Economic viability is a critical factor that changes over time....." thus potentially allowing the agency to treat the maximum number of acres over time. Some of these areas may truly be non-viable from an economic standpoint due to access and will fall off the management list, but would it would be beneficial to use an economic analysis to rule them out.

924 Capitol Way South, Suite 103
Olympia, Washington 98501
Tel. (360) 352-3910 • Fax (360) 352-3917

I feel the term “interdisciplinary input” should be defined or explained more clearly than is currently found on page 43. With the discussion of concerns over “social and political viability” in various places in the document, it would help to identify upfront, the stakeholders potentially involved in this input. While specific groups will change over time the types of stakeholders will most likely remain relatively constant. This input will hopefully minimize the negative impacts from social and political concerns regarding projects. While the use of logging to conduct management activities seems to fall into the category of potential social and political viability, I would suggest adding prescribed fire to these concerns. Air quality impacts from prescribed fire may also fall into this area of concern and ultimately influence the methods WDFW uses to maintain these forests.

One final area of concern is the general tone that previous forest management is degrading or harming the lands now under WDFW management. An ownership/manager change who has a different management objective than the previous owner/manager does not inherently make the previous management goals negative, just different. This tone can be found in Table 1 and in the discussions of conditions found in Section 1.8. While it is acknowledged that WDFW habitat goals may differ from commercial forestry goals, previous commercial management has created stands which need management to alter their characteristics to be more in line with WDFW goals.

Thank you for the opportunity to comment and we look forward to working further with WDFW on their forest management projects.

Sincerely,

A handwritten signature in cursive script that reads "Matt Comisky".

Matt Comisky

Washington Manager

American Forest Resource Council