

Dear Commenters,

Thank you for commenting on the April 21, 2014 Draft Management Strategy for the Washington State Department of Fish and Wildlife's Forests. As many of you had identical or similar comments the following response has been prepared to address your common concerns.

Concern #1: Reduced habitat protections

Comment: The following concern was expressed regarding the bold sentence within the below draft vision statement "This proposed directive would create a new management objective for state wildlife areas. If this policy were adopted, forests in state wildlife areas would be managed, among other things, to generate income and for the purpose of timber-related jobs. This new policy runs counter to longstanding preeminent fish and wildlife and habitat protections. The shift in policy from protecting and perpetuating habitat to also authorizing public asset liquidation to fund department activities is likely to significantly and adversely impact the environment."

Vision Statement: *WDFW preserves, protects and perpetuates its forests as fish and wildlife habitat while providing sustainable fish and wildlife recreational and commercial opportunities. **These forests also serve as sources of timber-related jobs and revenue that supports wildlife area management. To ensure that habitat is protected, WDFW forests will generally be managed for high ecological integrity.***

Response: The plan and its associated vision statement were written to reflect the agency's long held mission and goals (http://www.wdfw.wa.gov/about/mission_goals.html). In no way is the document intended to alter the agency's commitment to protecting wildlife nor shift priorities from wildlife conservation to revenue generation. In fact, statements on pages 33 and 35 make clear that projects must be ecologically justified and that economics is a secondary consideration.

Unfortunately, the intent of the statement "These forests also serve as sources of timber-related jobs and revenue that supports wildlife area management" was misinterpreted to think that the document would require WDFW forests to serve as revenue sources. That sentence was not intended to trump the sentence preceding it, rather clarify a desire to develop management regimes (especially in dry forests where public safety and smoke management concerns conflict with wildfire use and prescribed fire) where ecologically justifiable projects can pay for themselves and help support the local economy rather than act as a persistent, overwhelming drain on limited resources.

To eliminate confusion and concern WDFW is dropping the second sentence from the vision statement so that the vision statement reads as follows. *WDFW preserves, protects and perpetuates its forests as fish and wildlife habitat while providing sustainable fish and wildlife recreational and commercial opportunities. To ensure that habitat is protected, WDFW forests will generally be managed for high ecological integrity.* WDFW, however, will strive to manage its forests in such a way that projects to restore or maintain ecological integrity generate rather than lose money and support local economies, which is consistent with our mission and goals (http://www.wdfw.wa.gov/about/mission_goals.html) when *Goal 1: Conserve and protect native fish and wildlife* is the primary driver of our management actions.

Concern #2: Protecting late successional conditions

Comment: Although the Forest Strategy outlines a desire for late-successional conditions in many forest types, it must provide explicit direction in the section "Forest Management Strategy 2.0" to ensure existing late-successional conditions are protected and perpetuated by retaining and recruiting trees, snags, and down logs greater than 20" diameter unless incompatible with ecological goals or public safety.

Response: WDFW recognizes the importance of mature forests, large trees, snags and downed logs. Accordingly, WDFW has long championed for their protection. The majority of WDFW projects are specifically designed to accelerate the development of mature forests with large trees where forests are currently overstocked with small trees due to fire suppression or plantation forestry practices under previous management. Likewise, many WDFW projects are designed to protect existing large trees in degraded forests from uncharacteristically intense wildfire, insect outbreaks, disease and competition associated with degraded conditions. While WDFW is committed to the development and retention of large trees, it does not believe that a one-size-fits-all 20 inch diameter cap is appropriate for the 23 different forested ecological systems that it manages. WDFW prefers to establish protections on a project by project basis to match the ecological goals and public safety needs of particular sites.

To clarify the agency's position on protecting mature forests the following language will be added the "Desired Future Conditions" section of the document.

Forests will be managed to restore and maintain ecological integrity by restoring forests to their historic ranges of variability. This includes the eventual attainment of late seral forests conditions in proportions consistent with historic ranges of variability. To that end, most WDFW projects will promote the accelerated development of late-seral forests. Likewise, the agency will selectively retain dominant trees within existing late seral forests consistent with historic ranges of variability. Removal of large trees, however, may be necessary when:

- *Trees pose safety hazards.*
- *Prolonged fire suppression is resulting in*
 - *desired plant communities to be displaced (i.e. Fir trees overtopping pines, oaks, aspen and prairies) or*
 - *large tree densities above historic ranges of variability.*

Concern #3: Landscape analysis to effectively restore ecosystem processes such as fire and other natural disturbances.

To ensure effective and efficient management of public forests, the Forest Strategy must require scientifically rigorous landscape-scale analysis to identify and prioritize forest restoration projects.

Response: WDFW recognizes the importance of a landscape analyses and is working in that direction as quickly as data and resources allow. To this end, WDFW is collaborating with other large landowners. Meanwhile, WDFW acts on best available information.

Thank you again for your input.

Sincerely,

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