

3.6 LAND USE AND LAND MANAGEMENT RECOMMENDATIONS

3.6.1 Land Conversions

Issue: Conversion of existing private forest and agricultural land for development can affect impervious surface and stormwater runoff, aquifer recharge and instream flows, surface and ground water quality, and habitat quantity and quality.

Existing Conditions and Current Actions

WRIA 18 is experiencing a long-term trend in land conversion from agricultural and forest use to rural residential and urbanizing centers, particularly in East WRIA 18. Growth management planning by both the Cities and the County is intended to direct growth towards areas around existing municipalities that have capital infrastructure and provisions for urban services. Local plans (consistent with state GMA policies) have been adopted to help direct development to areas where services are already provided. However, previously subdivided parcels can develop regardless of GMA planning and zoning.

City and County comprehensive planning documents were developed between 1991 and 1995. These planning documents are scheduled for review and update by the end of 2004. The following land use plans and development regulations bear on land conversions (see Section 1.3.4):

- City of Port Angeles, City of Sequim, Clallam County Comprehensive Plan, and Clallam County Regional Plans
- City of Port Angeles, City of Sequim, Clallam County Zoning Ordinances
- Clallam County Critical Areas Ordinance
- City of Sequim Environmentally Sensitive Ordinance
- City of Port Angeles Critical Areas Ordinance
- City of Port Angeles, City of Sequim, and County land division codes/sub-division regulations
- City of Port Angeles and City of Sequim stormwater management plans and forthcoming Clallam County stormwater ordinance
- City of Port Angeles, City of Sequim and County Shoreline Master Programs

Desired Conditions and Outcomes

- City of Port Angeles, City of Sequim, and County plans and codes are examined, updated, coordinated, and (to the extent practical) refined to take into account the goals and objectives of this Watershed Plan and to meet state and federal laws for protection and recovery of listed species, stormwater management, and other natural resources requirements.
- Forest and agricultural land conversions do not exacerbate problems with water quality, habitat, stormwater runoff, and groundwater recharge.

Recommendations

- A. Clallam County: Clallam County should include a review of the Watershed Plan recommendations in its revision to its Comprehensive Plan and Regional Plans, Zoning Ordinance, and other plans and codes, and should make these consistent to greatest extent practicable.
- B. City of Sequim: The City of Sequim should include a review of the Watershed Plan recommendations in its revisions to its Comprehensive Plan, Zoning Ordinance, and other plans and codes, and should make these consistent to the extent practicable.
- C. City of Port Angeles: The City of Port Angeles should include a review of the Watershed Plan recommendations in its revisions to the Comprehensive Plan, Zoning Ordinance and other plans and codes, and should make consistent to the extent practicable.
- D. The City of Port Angeles: City of Sequim and Clallam County should incorporate Low Impact Development (LID) techniques into development requirements where possible.

BOX 1: DQ PLAN RECOMMENDATIONS REGARDING IRRIGATED LAND CONVERSION

These DQ Recommendations were originally developed to address Irrigation Water Management. They are included here because of their current relevance to conversion of agricultural and forest land to urban uses.

C.4 Converted irrigated lands should be carefully planned to improve the availability of water for instream flow and avoid negative impacts on the river ecosystem. The viability of agricultural lands is critical to the well-being of the community. If future conversion occurs on some irrigated lands, the new uses should be carefully planned to improve the availability of water for instream flows and to avoid negative impacts on the river ecosystem.

C.4.1: Conversion of agricultural land requires land use reevaluation to provide for efficient water uses.

C.4.1.1 The County should improve ordinances to require best management practices (BMPs), performance standards and total-irrigated-acreage-allowances and adopt their proposed drainage design manual.

- a. Develop a manual for BMPs incorporating both water quality and conservation components for all golf courses in the DQ project area.

C.4.1.2 Subject any lands converted from agricultural use to any conditions previously established including priority or conservation management strategies developed by the districts and companies.

C.4.1.3 Develop performance standards for lands converted to residential development, specifying design and water efficiency management strategies.

- E. Other specific areas: In instances where the Watershed Plan suggests more restrictive land use controls (e.g., areas of high risk for hydraulic continuity), the

geographic area should be defined in Comprehensive Plans, and maximum recommended densities proposed.

F. Jurisdictions should explore joint land use planning by watershed.¹

3.6.2 Development in Sensitive Areas

Issue: Land development in river corridors and along marine shorelines can adversely affect watershed resources. In riparian areas, development can alter riparian vegetation buffers (vital to properly functioning stream conditions), remove sources of large woody debris and stream shading, lead to streambank erosion and result in the placement of bank hardening. New development also can lead to drilling multiple exempt wells in hydraulic continuity with rivers and may adversely affect critical aquifer recharge zones. These changes may cumulatively affect instream flows, stream geomorphology and functioning, and habitat for salmonids and other aquatic and riparian species. Development on aquifer recharge areas can impact groundwater quality and quantity. Development in floodplains can jeopardize human safety, including on neighboring parcels, and can impair river processes.

Existing Conditions and Current Actions

Habitat and stream physical conditions are discussed in Chapter 2, and recommendations related to these areas are presented, by river or stream, in Chapter 3. Exempt well regulation is discussed in Section 2.3; related recommendations are presented in various sections of Chapter 3. In the Dungeness watershed, a program for riparian land protection and purchase from willing landowners has been initiated by the Dungeness River Restoration Work Group. Properties have been identified for purchase from willing sellers in the River's End area near the mouth of the Dungeness River, an area subject to frequent flooding. The land protection and purchase program would allow landowners to be compensated for their land, and/or encourage landowners to donate conservation easements so that permanent protection and restoration work may occur. Funding sources have been identified for purchases in the river corridor (e.g., SRF Board, IAC).

Clallam County adopted a Critical Areas Ordinance (CCC Title 27.12) in 2000. The City of Port Angeles adopted an Environmentally Sensitive Areas Protection (Chapter 15.20) in 2000. The City of Sequim established Environmentally Sensitive Areas Protection within City Municipal Code (Title 18.80 of the Zoning Code) in 1997. City and County Shoreline Master Programs have also been adopted (see Appendices).

A Dungeness River Flood Control Management Plan was written in 1990 and is currently being updated. Many of the non-structural and flood control methodologies and Initial Structural Modification Sites still apply to the Dungeness River and will be carried forward

¹ An example is "Alternative Futures Analysis" and Sub-Area Planning - In 2002, Kitsap County led an "alternative futures" analysis of the Chico Creek watershed. Alternative Futures is a natural resource assessment approach for guiding community planning and natural resource protection at the watershed scale, one that spans jurisdictional lines. Results from this analysis will be incorporated into the sub-area planning process for the Chico Creek basin. Kitsap County will also be incorporating alternative futures analysis into their Barker Creek Sub-Area Planning Process in the near future.

in the amended plan, which is intended to integrate habitat restoration plans and current actions.

Desired Conditions and Outcomes

- Local jurisdictions' land use plans and codes limit development impacts to riparian and nearshore function to the maximum extent feasible.
- The amended Dungeness River Flood Hazard Management Plan is endorsed and implemented.
- Actions taken to protect riparian lands benefit salmon recovery and other natural values.
- Cooperation with willing sellers and jurisdictions removes houses and physical infrastructure from the floodplain where practicable and cost-effective.
- Existing riparian land is protected from further impacts and encroachment.
- Environmentally sensitive areas are protected from development that would degrade natural resources or expose human life or property to unacceptable risk.

Recommendations

- A. Land use plans: County and cities should critically review their plans and development regulations as they relate to development in floodplains and along marine shorelines, with the objective of revising them as necessary to insure long-term habitat protection and flood hazard reduction.
- B. Permanent protection: The City of Port Angeles, City of Sequim, Clallam County and the Tribes should partner with non-profit conservation organizations such as the North Olympic Land Trust, to purchase properties and/or conservation easements along stream and river corridors, marine shorelines, and other environmentally sensitive areas.
- C. Incorporate Watershed Plan Recommendations: The objectives, policies and recommendations of the Watershed Plan should be incorporated into the Clallam County, City of Port Angeles and City of Sequim sensitive area ordinances and policies, land use codes and other plans as they are periodically updated. Tribes should consider doing the same.
- D. Flood Hazard Management Plan: The amended Dungeness River Flood Hazard Management Plan should be incorporated as an ongoing element of the WRIA 18 Watershed Plan (see *Section 3.3.7 for flood hazard management recommendations*).²
- E. Protect Areas of High Risk for Hydraulic Continuity or Groundwater Mining: Local jurisdictions should enact land use controls limiting density of development in areas of high risk for hydraulic continuity or groundwater mining, or require the use of alternative water sources subject to other provisions contained in this plan³.

² DQ Recommendation C.11.2.3

³ DQ Recommendation C. 11.2.3

- F. Transfer of Development Rights from Sensitive Areas:** Local jurisdictions may consider, on a case-by-case basis, allowing transfer of development rights to receiving areas not within designated critical areas or environmentally sensitive areas, subject to Comprehensive Plans and zoning codes.
- G. Critical Aquifer Recharge Areas:** In future County and City Comprehensive Plan updates, policies to mitigate impacts to groundwater quality, supply, and management should be maintained or upgraded in sewage and Critical Areas/Environmentally Sensitive Areas codes. The consolidation of parcels in such areas should be encouraged.

3.6.3 Interaction Between Septic and Wellhead Zones of Control

Issue: Zones of control are required around septic systems and wellheads. Problems arise when exempt wells are drilled near existing on-site septic systems on neighboring properties, or near property lines where zones of control encroach on neighboring properties. Similarly, the installation of a septic system establishes a de-facto restriction on well drilling that may encroach on neighboring properties. These actions may constrain the ability of neighbors to use or develop their land. This problem cannot be alleviated by the strategy of drilling to deeper aquifers for groundwater supply.

Existing Conditions and Current Actions

The Washington Department of Health (DOH) requires a 100-foot radius of control around public water supply wellheads; the Department of Ecology requires a 100-foot setback from sources of contamination for single private wells (not more than one connection). Ecology has the authority to regulate the location of wells relative to potential sources of contamination, but is not empowered to regulate the location of wells relative to property boundaries for the purpose of land use management. Health regulates the sanitary control zones of public water systems, with the exception of those regulated under the County's Joint Plan of Operations. Clallam County reviews and approves building permits, and enforces the 100-foot set back for septic systems from wells.

Typically wells are drilled before the County receives a building permit application. The County states that it does not have the capability to require where wells (of all types) may be sited and would need a delegation of authority from the State to do so. The Washington Departments of Health and Ecology both state that no further delegation authority is needed to empower Clallam County to regulate the siting of wells. The Department of Health has already delegated well-siting authority to Clallam County for Group A and Group B public system wells. Ecology has statutory authority to regulate well drilling (e.g., RCW 18.104; WAC 173-160), parts of which cannot be delegated to counties. The County may enact further local regulations to control the siting of individual wells for single family or two-party residences. Several counties throughout the state (Pierce County, for example) have enacted ordinances to control well siting and have educated local well drillers to provide notice to the County before they drill.

Desired Conditions and Outcomes

- Clallam County exercises oversight on well drilling in three dimensions: on ground surface to assure that wells are located with proper setbacks to assure

wellhead protection and allow development on neighboring parcels, and at depth to direct well drilling to deeper aquifers where hydraulic continuity is an issue. (See Section 3.1.4 (C) for exempt well regulation recommendations.)

Recommendations

A. New residential well drilling oversight:

1. Clallam County, the Washington departments of Health and Ecology, and Office of Community Development should meet to determine their respective roles and authorities with the objective of delegating or acting as needed to provide all needed authorities to allow the siting of septic systems and wells to be combined under County review and approval during the building permit approval process.
2. To the extent allowed under statute, and as funding permits, explore delegation of needed authorities to Clallam County to regulate new well construction. The departments of Ecology and Health should periodically review the County's actions under delegated authorities to ensure proper compliance.
3. Clallam County should enact ordinances to the extent needed to exercise any current County powers to regulate the siting of wells and assure that zones of control for wells and septic systems do not encroach upon neighboring properties. This should address separation of wells from property lines and from septic systems and other sources of contamination.
4. In consultation with the well-drilling industry, Clallam County should enact an ordinance requiring well drillers to obtain County approval before any well construction activity is undertaken. The location of a proposed well should be identified to the County before approval to drill is granted.
5. A proactive public information and education program should be launched to explain to the public the need for these regulations and their substance.
6. The key message should be: "permit first, drill second."
7. Target audiences include property owners, commercial developments, Realtors, title companies, septic designers and well drillers.
8. The County should work to identify problem areas using GIS and maps. (Problem areas are identified as lots too small for adequate setbacks for both well and septic system.) The County's Permit Plan system should be linked to this GIS.

B. Collaborative action: Clallam County, the Department of Ecology and the Department of Health should join in a coordinated program to fund, implement, and enforce well drilling oversight, within the statutory authorities granted to these agencies. The Department of Health currently implements a program in conjunction with Clallam County to fund and enforce well siting and drilling for Group A and Group B water systems.

1. Authorities to pursue this program should be clearly determined before proceeding. Any authorities that require delegation should be so assigned.

2. Funding for the program should be pursued cooperatively.
3. The Department of Health may provide technical assistance to Clallam County for training, public outreach, siting, and enforcement proceedings for the control of individual and two-party wells. However, the Department of Health does not have the statutory authority to provide funding for regulatory programs that seek to control wells other than those associated with Group A or Group B water systems.
4. Training, siting and enforcement of wellheads and setbacks should be collaboratively pursued.

C. Well database: Clallam County should enter well data into a three-dimensional database, integrating geo-referenced groundwater withdrawal data compiled for the ground model in East WRIA 18 and the Ecology well data base. Show well location on ground surface relative to setbacks for wellhead protection and existing septic system zones of control, and at depth relative to known aquifers.

3.6.4 WRIA 18 Boundaries

Issue: WRIA 18 includes two major drainages and has been divided into two Planning Units for watershed planning (East WRIA 18, the Dungeness River watershed area, and West WRIA 18, the Elwha-Morse watershed areas). It is difficult to do watershed planning with the boundaries as currently drawn. Eastern WRIA 18 does not include Sequim Bay and its associated drainages despite the hydrologic and geologic connection of this area to the Dungeness River watershed. These areas also have historically fallen within the planning responsibility of Clallam County and the Jamestown S'Klallam Tribe (see Chapter 1, Box 3). In recognition of that history, an Intergovernmental Agreement has formalized WRIA 18 responsibility for these areas in watershed planning. A change in WRIA boundaries would make permanent this assignment of responsibilities.

Existing Conditions and Current Actions

WRIA 18 boundaries do not include Sequim Bay or its associated drainages (other than Bell Creek, which drains to the northernmost portion of Sequim Bay), all of which fall within Clallam County.

Desired Conditions and Outcomes

- Plans, policies, monitoring, and data are coordinated in East WRIA 18 to full advantage by including Sequim Bay and the drainage areas for Jimmycomelately Creek, Dean Creek, Johnson Creek, Chicken Coop Creek and other small unnamed Sequim Bay drainages (and Miller Peninsula within Clallam County) within the boundaries of WRIA 18.
- East WRIA 18 and West WRIA 18 are separated into two WRIs, focusing on their major drainages (Dungeness River and Elwha River).

Recommendations

A. Separate WRIs: The Washington Department of Ecology is requested to explore, as funding is available, the separation of WRIA 18 into two WRIs: the Elwha River Planning Area and the Dungeness River/Sequim Bay Planning Area

because the two areas have different environmental conditions and water resource issues.

- B. Dungeness River/Sequim Bay WRIA Boundaries:** The Washington Department of Ecology is requested to explore, as funding is available, changing the boundary between WRIA 17 and the new WRIA created for the Dungeness River Planning Area to include Sequim Bay and the drainage areas for Jimmycomelately Creek, Dean Creek, Johnson Creek, Chicken Coop Creek and other small unnamed Sequim Bay drainages, as well as the Clallam County portion of Miller Peninsula.

3.6.5 Water Conservation in Land Development

Issue: Development regulations provide one opportunity to encourage water conservation methods. Water conservation methods which may be dealt with in development regulations include landscaping standards that promote the use of native plants with low water consumption, and landscaping/water use requirements for golf courses (which typically have high irrigation demands).

Existing Conditions and Current Actions

Clallam County does not currently have water use or landscaping standards for golf courses or other high water consumption land uses. The City of Port Angeles does not have standards, nor does it regulate water use for golf course. The City of Sequim considers golf courses, parks, and playgrounds “special use” uses, meaning it requires specific approval of the City Council; water use is not a part of the approval criteria.

Incentives to conserve water may not be effective on leased or rental properties, where the landowner and/or water right owner may not be aware of actual water use.

Desired Conditions and Outcomes

- Local jurisdictions’ land use documents and codes encourage/require low outdoor water use options, including design and landscaping standards for golf courses and other high-consumption outdoor water uses.
- Local jurisdictions’ plans and codes consistently encourage low water use for all uses.

Recommendations

Section 3.1.7 contains water conservation recommendations, including low water use landscaping recommendations (Part I). Also Box 1 (above) includes pertinent DQ recommendations related to golf course water conservation (DQ Recommendation C.4.1.1 a).

- A. Local jurisdictions should review** land use plans and codes to identify opportunities to reduce water consumption on golf courses and other high-consumption water uses. Local jurisdictions should develop BMPs for golf courses and these other high-consumption water uses that are sensitive to local conditions.

1. The review should consider both new and existing development.
2. Opportunities to integrate water quality and water quantity management should be sought.
3. Opportunities to use reclaimed water for irrigating golf courses, public parks and other appropriate high-demand outdoor water uses should be encouraged.
4. Open space benefits of water-efficient irrigated agriculture should be promoted.

B. Develop performance standards for lands converted to residential development, specifying design and water efficiency management strategies.⁴

3.6.6 Forest Lands Management

Issue: Timber harvest and forest management practices may increase and accelerate delivery of sediment to rivers and streams. Practices associated with forest management activities can also negatively impact stream temperatures, large woody debris recruitment, altering stream channel structure and network, fish passage, barriers, hydrology, wetlands and riparian habitat conditions. Conversion of forest land into non-agricultural uses also has the potential to reduce water quality and riparian habitat by increasing sedimentation and peak flows and historically has reduced shade and large woody debris recruitment. Sediment delivery has been increased above natural levels by both acute events (such as landslides, which may occur naturally or in response to human-caused alterations of the landscape) and by chronic sediment delivery associated with exposed, unstable slopes and with timber-related activities such as forest roads and timber harvest.

Existing Conditions and Current Actions

Forest land management activities (including timber harvest) are regulated by a variety of regulatory, policy and planning processes that are unique to the various land ownerships. All of these are mandated to use “best available science” to minimize, eliminate or mitigate for forest management activities that could impact water quality or riparian habitat. They all are based on broad public involvement and consideration of feasible alternatives through the SEPA or NEPA Environmental Impact Statement processes. Except where the conversion of timberland to alternative uses is proposed, the codes, ordinances, policies, plans and administrative procedures of local jurisdictions generally default to these regulatory, policy and planning efforts.

Different timberland ownerships have water quality and protection strategies that address site-specific conditions and needs. US Forest Service lands are managed under the Northwest Forest Plan, Best Management Practices and Federal Watershed Analyses. The Dungeness River is designated a Tier 1 Key Watershed, as identified in the Aquatic Conservation Strategy of the 1993 USFS Forest Plan (FEMAT) due to the presence of at-risk stocks of anadromous fish within the range of the northern spotted owl. Tier 1 watersheds are managed to create riparian reserves to maintain and protect stream and riparian habitat, and require watershed assessments for planning future protection, management and restoration practices. In addition, in East WRIA 18, the USFS

⁴ DQ Recommendation C.4.1.3

completed the *Dungeness Watershed Analysis* (1995, updated 2003), which includes sediment and wetland modules. Management and protection strategies of Federal lands in the upper Dungeness watershed fall under the requirements of the Forest Plan and Dungeness Watershed Analysis. Nine Aquatic Conservation Strategy (ACS) objectives are listed in the amended Forest Plan. The USFS is an associate member participating in both the Dungeness River Management Team and the Dungeness River Restoration Work Group. The Forest Service works with representatives of State, local and Tribal governments and other affected parties throughout the watershed to comply with the requirements of the Endangered Species Act and meet the objectives of other watershed management plans.⁵

State Trust Lands are managed under the 1992 Forest Resource Plan, the Habitat Conservation Plan that covers riparian species, and the State Watershed Analyses in the state forest practices code. WDNR forest practices follow the Forest and Fish Rule and the Timber-Fish-Wildlife (TFW) guidance. Budget cuts have eliminated the WDNR service forester providing technical support to small landowners.

Privately owned forest lands are managed under the state forest practices legislation and rules that were recently revised to directly address water quality and riparian dependent species habitat. On a very site specific basis these rules identify and consider risks associated with hydrologic changes (peak flows), wetlands, unstable land forms and the cumulative effects of forest land management. They were co-adopted by the State Department of Ecology as water quality protection measures under the state and federal water quality protection legislation. They are now in the process of being adopted by the federal Fish and Wildlife Service, National Marine Fisheries Service and Environmental Protection Agency as a Programmatic Habitat Conservation Plan under the Endangered Species Act.

The combination of high demand for home sites, low timber values and increasing regulatory cost (for example road maintenance and abandonment plans for small forest landowners) has created a strong incentive for forest landowners to convert (or sell) to other uses. Recent implementation of various landowner assistance, conservation easement and riparian land purchase programs has reduced this incentive to convert for a small number of forest landowners. State forest practices legislation and rules require forest landowners to declare their desire to convert from forest land use. This declaration allows the county to administer these forest practice conversions under its own promulgated regulations. A variety of critical area protection measures promulgated by Sequim, Port Angeles and Clallam County provide water quality and riparian habitat protection measures when forest land is converted into non-forest use (see Chapter 1).

Desired Conditions and Outcomes

- State and Federal forest land management practices continue to be followed and improved, reducing long-term effects on WRIA 18 watershed resources.
- Forest land conversions are managed to reduce long-term effects on WRIA 18 watershed resources.

⁵ Forest Ecosystem Management Assessment Team, 1993. Forest Ecosystem Management: An Ecological, Economic and Social Assessment. U.S. Department of Agriculture – Forest Service and other Federal agencies.

- The combination of State and Federal forest practices and local management of forest land conversions have the following outcomes:
 - Sediments volumes delivered to rivers and streams are reduced to natural levels to the extent feasible or practicable.
 - The biological effects of fine sediments to sensitive species and lifestages are reduced.
 - Aggradation and braiding in the Dungeness River are reduced.
- Sediment pulses during critical times (sensitive species and lifestages) are avoided.

Recommendations

A. Federal Forest Land: On federal forest lands maintain and continue implementation of USFS plans and best management practices.

1. WRIA 18 supports the implementation of the restoration and remediation opportunities identified in the 2003 update to the 1995 *Dungeness Watershed Analysis* .
2. The Dungeness River is a Key Watershed, as designated by the USFS. Standards and guidelines (Aquatic Conservation Strategy of the 1993 Forest Plan) which pertain to federal forest land within the Dungeness watershed should be upheld and supported.
3. Clallam County should support the use of Resource Advisory Committee funds available under Title II of the Secure Rural Schools and Community Self Determination Act of 2000 (PL 106-393) for road maintenance of USFS roads.
4. Recommend the Dungeness/Greywolf Rivers down to Forest Service boundary for designation as Wild and Scenic Rivers.⁶

B. State Regulated Forests

1. Washington DNR should become involved in watershed planning through the recommended West WRIA 18 Watershed Council, DRMT and DRRWG.
2. State funding should be allocated to implement new forest practices regulations that require road maintenance and abandonment planning on private forest lands.

C. Class IV Conversions: Clallam County should become lead agency to close gaps that may exist in managing sediment when WDNR forest lands undergo Class IV conversions from commercial forest to non-forest lands.

⁶ DQ Recommendation R.13.1, modified

D. Incentives

1. WDNR, Clallam County, EMMT, and DRMT should cooperatively develop landowner incentives, and land conservation tools (such as conservation easements and open space designation) to protect tributaries and streams on private forest land and to manage forest land conversions to development.
2. WDNR should work with the West WRIA 18 Watershed Council and DRMT and Clallam Conservation District to help identify and support landowner assistance programs.

E. Clearing and Grading: All WRIA 18 local governments should regulate clearing and grading activities for sediment control within their authority.

F. Offroad Vehicle Use: Recreational vehicle use areas should be managed to protect natural drainage, slopes, and water quality. Sediment delivery to streams and disturbance of wildlife from ORV activities should be minimized.

G. Funding:

1. Clallam County should encourage those who want to convert forest land to seek funding for water quality and riparian habitat improvement from sources such as the Clallam Conservation District or the North Olympic Salmon Coalition.
2. Coordinating with the WDNR Small Forest Landowner Office, all applicable funding sources should be explored for implementation of the new RMAP program. Information, technical assistance and financial incentives should be provided for small forest landowners not required to prepare and implement RMAPs.
3. Restore funding for the WDNR service forester or equivalent programs to provide technical assistance to small forest landowners.

Note: former Sections 3.6.6 H and I and alternative language (concerning forest practices and cumulative impacts to hydrology) were placed into Appendix 3-A, Remaining Issues, during the final stage of plan approval.