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May 2, 2023

To: Board of Natural Resources
MS 47000
Olympia, WA 98504-7000
Submitted via email: bnr@dnr.wa.gov

Re: Letter of Opposition to:
On the Line, Lost and Found, Nuggets, Hodag, and Plumb Bob timber sales

Dear Chair Franz and Board Members,

We are writing to urge the Board to **put an end to** the continued **destruction of the oldest and most biodiverse lowland forests** in Western Washington, by denying approval of the On the Line, Lost and Found, Nuggets, Hodag, and Plumb Bob timber sales. We estimate that these timber sales would collectively result in the commercial logging of 310 acres of rare, naturally regenerated, carbon-rich, and structurally complex forests. The decision to target these forests for commercial logging defies the objectives of the State Trust Lands Habitat Conservation Plan, violates established Board policies and procedures, and undermines efforts to reduce the risk of catastrophic wildfires and combat climate change.

The timber sales you are being asked to approve this month are located in the **best** of the **few remaining older forests** in the Lower Snoqualmie, and Chehalis River watersheds, and along the north Olympic coast (see representative photographs, attached). There is no policy, plan, or procedure that requires DNR to clearcut these forests, and nothing that specifically requires or compels DNR to prioritize these forests for commercial harvest at this time. **DNR cannot possibly assert that these timber sales are in the best interest of the beneficiaries**, because they have made no attempt to analyze other alternatives, or examine the extent to which deferring harvest of older forests might affect long-term revenue.

In March, the Assistant Deputy Supervisor for Uplands defended the decision to prioritize these forests for commercial harvest by repeating the common assertion that nearly half of all forestlands managed by DNR have already been protected or set aside for conservation.

This is simply not true. Only about 17% of state forestlands managed by DNR in Western Washington have been truly set aside for conservation; and a majority of those forests are not

mature, structurally complex forests, but younger forests that were clearcut logged, often sprayed with herbicides, and replanted with nursery-grown Douglas fir cultivars between 1950 and 1980. When DNR asserts that half of all state forestlands have been set aside for conservation, they are including many areas that are either managed on extended rotations, or will be available for commercial harvest in the future, including spotted owl dispersal habitat, potentially unstable slopes, and areas that are currently inaccessible to logging equipment. DNR also classifies and takes credit for stream buffers as conservation areas, regardless of their size. Narrow, 50-100 foot stream buffers on small, non-fish bearing streams were never intended to function as conservation areas or provide suitable wildlife habitat for sensitive or riparian dependent species.

The Board of Natural Resources and DNR recognized during the habitat conservation planning process in 1997 that large contiguous landscapes of mature and old growth forest habitat, upon which many species of concern depend, were absent across much of its forested land base. According to the HCP (Table IV.14), and Table 11 of the Biological Opinion, at least 150 years is required for a stand to reach the "fully functional" development stage. DNR's own analysis revealed that no more than three percent of state trust lands managed by DNR in Western Washington currently meet this threshold; and no more than 3.5% of forests within any of the five west side planning units (excluding the OESF) may be classified as "older forests".[1]

To provide the habitat necessary to avoid further adverse impacts to these species, DNR made repeated commitments to provide old growth forests[2] across 10-15% of each HCP planning unit in Western Washington. For example, DNR is obligated under the Policy for Sustainable Forests, the Department's procedures for Identifying and Managing Structurally Complex Forests (PR 14-004-046), and the Multi-species Conservation Strategy of the HCP to work toward maintaining or restoring "fully functional" or "old growth-like" forests across 10-15 percent of lands covered by the HCP. DNR commonly refers to the 10-15% target as the "older-forest target". In the Policy for Sustainable Forests FEIS, the Board's preferred alternative "emphasizes that the 10 to 15 percent older-forest targets will be accomplished" within 70 to 100 years.

The 1997 Biological Opinion for DNR's HCP anticipated that the Department would work to maintain or restore a minimum of 12% of lands covered under the HCP within the Northwest HCP planning unit to fully functional conditions by 2096. According to the Intra-Service Biological Opinion, it is necessary for DNR to provide a minimum percent of fully functional forest to "ensure that stand structural stages not provided by other conservation strategies of the HCP are present in the HCP area."

The agency has abdicated those commitments by clearcut logging thousands of acres of structurally complex forest every year — a class of rare future old growth specifically identified for protection in DNR's Policy for Sustainable Forests.

[1] See Table 5, Estep & Buffo. 2021. Identifying Stands to Meet Older Forest Targets in Western Washington.
[2] DNR's Addendum to the FEIS for the 2007 (page 2) sustainable harvest calculation describes forests in the niche diversification and fully functional stages of stand development as "old-growth like" forests.

DNR is required under the terms of its Policy for Sustainable Forests to manage structurally complex forests to meet older forest targets.[3] Data obtained from DNR's Public Disclosure Office last year indicates that DNR has only set aside 2,631 acres of structurally complex forests in the South Coast HCP planning unit for conservation. That represents **just one percent of the South Coast HCP planning unit** that has structurally complex forests that have been set aside for conservation. The Nuggets timber sale is located in the South Coast HCP planning unit, and would result in the loss of an estimated 53 acres of rare, structurally complex forest that is needed to meet older forest targets.

Data obtained from DNR's Public Disclosure Office indicates that DNR has only set aside 5,836 acres of structurally complex forest in the Straits HCP planning unit for conservation, which represents **less than 5% of the Straits HCP planning unit** that has protected, structurally complex forests that are excluded from commercial timber harvest. The Lost and Found and On the Line timber sales are located in the Straits HCP planning unit, and would result in the loss of an estimated 194 acres of structurally complex forest.

The situation isn't much better in the South Puget Sound HCP planning unit. Data obtained from DNR's Public Disclosure Office indicates that DNR has only set aside only 11,625 acres of structurally complex forest in the South Puget Sound HCP planning unit for conservation, which represents **just 6.5% of the South Puget Sound HCP planning unit** that has protected, structurally complex forests that are excluded from commercial timber harvest. The Plumb Bob and Hodag timber sales are located in the South Puget Sound HCP planning unit, and would result in the loss of an estimated 64 acres of rare, structurally complex forest that is needed to satisfy the objectives of the HCP and Policy for Sustainable Forests, and meet older forest targets, and the destruction of an imperiled plant community.

There are many wildlife species that depend on structurally complex habitat for survival. For example, the conservation of suitable breeding, foraging, and nesting habitat for the northern goshawk, Vaux's swift, pileated woodpecker, myotis bats, Pacific fisher, and olive-sided flycatcher, are dependent upon the "large contiguous landscapes of mature and old growth forest" that the 1997 HCP is "expected" to provide.[4] Other representative species that require structurally complex forest habitat include the brown creeper, northern pygmy owl, Townsend's warbler, red tree vole, northern flying squirrel, and black bear.[5] DNR's "cut it now" and "grow it later" approach to habitat conservation defies common sense, and jeopardizes the viability of species that are already at risk of becoming listed as threatened or endangered.

DNR's commitments to restore old growth forests to Western Washington, along with the threats posed by climate change, demand that the agency move away from the antiquated practice of targeting the oldest remaining forests for commercial harvest.

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[3] See Policy for Sustainable Forests, p. 46.

[4] See DNR. 1997. Final Habitat Conservation Plan, pp. III-78 – III-99.

[5] See DNR. 2019. Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington, Final Environmental Impact Statement.

DNR often argues that it has no choice but to harvest structurally complex forests, because it lacks the inventory in its younger plantation forests to meet annual sustainable harvest targets. This is not true either. **In most counties of Western Washington, structurally complex forests represent a small fraction of the total number of acres of marketable timber eligible for harvest.** Moreover, DNR cannot choose to ignore its own policies and the terms and conditions of its HCP to generate more revenue, regardless of how much of their inventory may or may not be available for commercial harvest in each age class.

DNR's PR 14-004-046 directs DNR to develop landscape level management strategies to achieve the 10-15% older forest target during the forest land planning process that will be conducted for each HCP planning unit. PR 14-004-046 is the mechanism DNR developed to ensure compliance with the 10-15% older and fully functional forest objectives of the Policy for Sustainable Forests and its related State Trust Lands HCP. The Procedure lays out a step-by-step plan, which entails identifying existing structurally complex forest stands that will grow into older forests, designating those forests in a mapping database, and protecting them from logging until the planning area's forest goals are met. Only after the 10-15% target is met may structurally complex forest stands be considered for harvest activities. DNR completely ignored these procedures, and never identified, mapped, designated, or protected structurally complex forests as required.

All of the timber sales referenced above are to be treated using even-aged harvest. However, PR 14-004-046 dictates that:

> *Harvest activities in older forest and other structurally complex stands designated as suitable to meet older forest targets must enhance the older forest condition.*

The above referenced timber sales, as presented to the Board, will not enhance older forest conditions or contribute to the development of fully functional forests.

The Policy for Sustainable Forests and associated HCP implementation procedures constitute DNR's plan for implementing the HCP, and also serve as mitigation for timber harvest on lands covered by the HCP. Commercial harvest of the oldest and most biologically diverse lowland forests remaining in Western Washington is inconsistent with Board of Natural Resources approved policies and procedures intended to preserve and promote biodiversity and the development of older or fully functional forests. Although DNR has not designated the lands included in these timber sales as contributing to older-forest targets, DNR's own analysis indicates that it will not come close to meeting their older forest targets in the South Coast HCP planning unit within 70 years, and that less than 10% structurally complex forests have been set aside for conservation in the Straits and South Puget Sound HCP planning units. These stands obviously have the potential to contribute to the attainment of older forest targets and should be managed for that purpose.

Furthermore, data obtained from DNR's Public Disclosure Office suggests that a majority of the lands that DNR has designated as contributing to fully functional stand structure objectives are located within riparian buffers and areas that have been classified as potentially unstable slopes. As illustrated in Addendum A of the Joint Petition CRF submitted to the BNR last year, counting

these areas toward older-forest targets is misleading, because they are rarely excluded from logging after they have been ground-truthed.[6]

A strategy that relies so heavily on riparian corridors and unstable slopes to meet older-forest and fully functional stand structure objectives will result in a fragmented landscape that is subject to edge effects, lacks interior forest habitat, lacks large conifers, and is often dominated by alder and other early successional or invasive species. We believe this approach is both unrealistic, and inconsistent with the intent of the Multispecies Conservation Strategy and the objectives of the Policy for Sustainable Forests.

There is still much we do not understand about the ecology of native Pacific Northwest forests and the organisms that are found there. According to Lindenmayer and Franklin (2002):

> *"Effects of human disturbance on biodiversity are poorly known, and some impacts may be irreversible. Others such as synergistic and cumulative effects can be extremely difficult to quantify or predict…. [and] for some species will probably never be known… Ultimately, this makes large ecological reserves valuable as 'safety nets' relatively free from human disturbance."*

It is well established that rotting snags and logs found in these older forests provide tunnels, dens, and nesting cavities required by many organisms, from spotted owls to land snails and springtails. Dead and dying trees are used by a broad array of both vertebrates and invertebrates for foraging and nesting, and roosting. They also provide essential habitat for many species of mushrooms. A study of Douglas fir forests in western Oregon found that large logs in advanced stages of decay had the richest bryophyte flora of any forest substrate.[7] These features are very difficult to restore in managed forests. Despite our best efforts to retain these structures during harvest, much of this habitat is lost when these forests are logged. Natural forests also contain significant components of non-commercial tree species such as silver fir, spruce, cottonwood, alder, and big leaf maple. Some wildlife species have been found to be either strongly associated or dependent on specific tree species.[8] When these species are logged and replaced with commercial nursery conifer seedlings, the species that depend on them may be lost as well.

Older, native forests can also contribute to the productivity of working forests or plantations. For example, small mammals including voles, shrews, and squirrels that find refuge in older forests may disseminate spores of mycorrhizal fungi to forests managed for timber production. Natural parasites and predators found in mature or structurally complex forests may also play an important role in preventing or limiting pest outbreaks in managed stands.

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[6] See Joint Petition to the Board of Natural Resources, April 1, 2021.

[7] See Rambo, T. R. 2001. Decaying logs and habitat heterogeneity: implications for bryophyte diversity in western Oregon forests. Northwest Science 75: 270-277.

[8] See Hagar, Joan C. 2007. Wildlife species associated with non-coniferous vegetation in Pacific Northwest conifer forests: A review," in Forest Ecology and Management, Vol. 246, pp. 108-122.

It is unlikely that counties will be dependent on timber revenue 20 years from now in the same way they are today. A new carbon market is rapidly emerging, and soon it is going to be more profitable to leave these older trees in the ground than cut them down. New laws and policies intended to combat climate change are likely to create many more jobs in restorative forestry, fire risk reduction, and ecologically-based forest management 20 years from now on state forest lands than there are in timber sale contracts today. DNR took an encouraging first step toward transitioning to a carbon-based model with their recent "carbon project", which will "protect some of our most ecologically and culturally valuable forests, while generating millions of dollars in revenue for the schools, colleges, and critical local services that state trust lands support."

Instead of logging the oldest and most biodiverse lowland forests that remain in Western Washington, we recommend that DNR focus on developing a management strategy to generate revenue for trust beneficiaries that conserves older forests, accelerates the development of fully functional forests, and is consistent with the requirements of DNR's Habitat Conservation Plan, the Intra-Service Biological Opinion for the HCP, PR 14-004-046, the Policy for Sustainable Forests, and the country's commitment to combat climate change.

Respectfully,

Stephen Kropp
Director