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Bill Wells, Olympic Region Manager
Department of Natural Resources
Via: SEPA Center sepacenter@dnr.wa.gov
1111 Washington Street SE
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RE: Comments on SEPA File No. 24-100802

Dear Mr. Wells,

The Center for Responsible Forestry submits the following comments regarding the Alley Cat Timber Sale #104800 (SEPA File No. 24-100802, FPA #2618519/#2618524). To summarize, CRF is opposed to the Department of Natural Resources's (DNR) current harvest proposal, especially the even-aged prescriptions in complex mature stands that constitute the majority of the sale.

1. Elwha Watershed Restoration and Habitat Protection

The Federal Government has dedicated over \$327 million toward restoring the Elwha Watershed after the removal of its dams, aiming to revive the ecosystem and support the recovery of species that depend on it. The State must align its forest management strategies with these broader restoration efforts. Logging in the Alley Cat Timber Sale area threatens to disrupt critical habitat within the watershed, directly conflicting with the progress made. While the Washington Supreme Court allows DNR broad discretion in managing state forests, such management should take into account ecological health in a way that aligns with the goals of the State Environmental Policy Act (SEPA). SEPA mandates fostering environmental harmony, protecting ecosystems from damage, and promoting public health and welfare (RCW § 43.21C.010). The City of Port Angeles and community members have already raised concerns about logging older forests in the Elwha River Watershed, following the controversial “Aldwell” timber sale. These issues must be addressed as part of the decision-making process for the Alley Cat sale.

2. Environmental Responsibilities and Legal Framework

The State’s responsibility in managing public lands includes the obligation to act in accordance with environmental protection laws. SEPA requires that any actions by DNR avoid harm to ecosystems and promote the long-term well-being of both the environment and the communities

dependent on it (RCW § 43.21C.010). Given the substantial risks posed by logging in sensitive areas like the Alley Cat Timber Sale, DNR must ensure that its operations comply fully with these requirements. Any failure to mitigate potential environmental harm could result in lasting negative impacts on local wildlife, water resources, and community welfare.

3. Ecological Importance of Older Forests

There is increasing concern among local communities and government officials regarding the logging of older, structurally complex forests. These forests provide a wide range of essential ecological services, such as carbon sequestration, biodiversity support, water regulation, and erosion prevention. Logging these forests would significantly reduce their ability to perform these functions. Additionally, converting them into monoculture plantations would further degrade their resilience to environmental changes and natural disturbances. Protecting older forests is critical for maintaining the health and stability of ecosystems, and their removal would have long-term negative consequences.

4. Compliance with Forest Conservation Policies

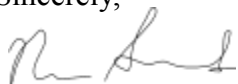
DNR's management of older forests is governed by multiple policies, including the Habitat Conservation Plan (HCP) and the Policy for Sustainable Forests. Both require that a minimum of 10-15% of each planning unit consists of "fully functional" or older forests, typically at least 150 years old and characterized by attributes similar to old-growth. Additionally, DNR's internal guidelines (PR 14-004-046) mandate the inventorying and protection of structurally complex forests until a proper management plan is in place. Despite these obligations, the Alley Cat Timber Sale is proposed in a planning unit where the required forest management plan has not been developed. According to DNR's own data, less than 1% of the planning unit consists of forests over 150 years old, and only 5% of structurally complex forests are protected from logging. Proceeding with the Alley Cat sale under these circumstances would violate these conservation guidelines and put the region's ecological health at further risk.

Conclusion

Given the extensive federal investment in restoring the Elwha Watershed, the importance of older forests for ecosystem health, and the lack of compliance with forest protection policies, the Alley Cat Timber Sale should be reconsidered for alternative management. Prioritizing long-term ecological resilience and community welfare over short-term logging revenues would better align with both state and federal environmental goals.

Thank you for considering this SEPA comment.

Sincerely,



Nina Sarmiento
Olympic Region Coordinator
The Center for Responsible Forestry