



Center for Responsible Forestry
PO Box 7504
Tacoma WA 98417
info@c4rf.org

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Bill Wells, Olympic Region Manager
Department of Natural Resources
Via: SEPA Center sepacenter@dnr.wa.gov
1111 Washington Street SE
PO Box 47015
Olympia, WA 98504-7015

RE: Comments on SEPA File No. 24-100202

Dear Mr. Wells,

The Center for Responsible Forestry submits the following comments regarding the Parched Timber Sale #102017 (SEPA File No. 24-100202, FPA #2617912). 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. Policy Violations and Failure to Protect Older Forests

DNR is required to follow several key conservation policies, including the Habitat Conservation Plan (HCP) and the Policy for Sustainable Forests, both of which aim to protect older, structurally complex forests. These forests should make up 10-15% of each planning unit, and they play a critical role in maintaining biodiversity, storing carbon, and providing resilience to the forest ecosystem. However, DNR has not yet established a plan for meeting these requirements in the Straits planning unit, where the Parched Timber Sale is located. Their own data shows that only 5% of this planning unit contains protected, older forests, falling far short of what is needed. Without the proper protections in place, allowing logging to continue in these areas violates DNR's obligations and threatens the ecological integrity of this forest.

2. Landslide Concerns and Climate Change Implications

In areas logged previously, there are growing concerns about increased landslide risk. The 2011 harvest of "Joyce Dry Sorts" in the same area serves as a case study—ten years later, a landslide occurred, triggered by a major storm. This raises critical questions about the long-term stability of logged areas and how soon forests can recover after harvest. While it's generally expected that logged areas regain stability after about 12 years, this event occurred after just 10 years, suggesting that these areas remain vulnerable to extreme weather for longer than anticipated.

This vulnerability is likely to increase as climate change brings more intense and frequent storm events. Given DNR's requirement to factor in climate change in its planning, it's crucial that future logging, including the Parched Timber Sale, be reexamined to account for the risks posed by shifting climate patterns coupled with steep slopes.

3. Impact on Federal and Local Restoration Efforts

The federal government has spent over \$327 million on restoring the Elwha River Watershed following dam removals, which has been a major environmental initiative. DNR's logging activities, particularly when they affect older, structurally complex forests, could undermine these efforts. Logging in critical habitat areas runs counter to the goals of these large-scale restoration projects. The Washington Supreme Court grants DNR considerable discretion over forest management, but it's essential that these decisions align with the State Environmental Policy Act (SEPA), which mandates avoiding environmental harm and ensuring long-term ecological sustainability (RCW § 43.21C.010). Local communities and city governments, including those in Port Angeles, have raised concerns about the risks of logging in sensitive watershed areas. It's crucial that DNR's actions support, rather than contradict, ongoing environmental restoration.

4. Threat to *Whipplea modesta* and Biodiversity Loss

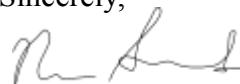
The Parched Timber Sale area is home to the rare plant species *Whipplea modesta*, which is critically imperiled in Washington State. Logging, along with road construction and other related activities, is likely to cause significant damage to its habitat. Currently, the sale configuration offers no buffer zone to protect this species, despite its importance being recognized in the state's Natural Heritage Plan. *Whipplea modesta* is not represented in DNR's Natural Area system, yet it has been identified as a priority for conservation. Destroying this plant's habitat without offering any protective measures would be a major blow to biodiversity in the region. The potential loss of this rare species calls for the DNR to reconsider the sale's boundaries and impact on vulnerable plant populations.

Conclusion

The Parched Timber Sale poses serious concerns related to policy violations, increased landslide risks, impacts on long-standing restoration efforts, and threats to a critically imperiled species. Given the sale's potential to cause long-term environmental damage, DNR should reassess its approach, taking into account the ecological risks and the value of preserving these forests for future generations. A sustainable path forward should prioritize conservation and resilience over short-term economic benefits.

Thank you for considering this SEPA comment.

Sincerely,



Nina Sarmiento
Olympic Region Coordinator
The Center for Responsible Forestry