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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. 24-100201

Dear Mr Wells,

The Center for Responsible Forestry submits the following comments on the “Tree Well” timber sale #104820 (SEPA File No. 24-100201, FPA #2618493). 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. Impact on the Elwha Watershed and Drinking Water Supply

The Elwha watershed has undergone major restoration efforts, including the removal of dams and other environmental projects. Unit 3 of the “Tree Well” timber sale, which is located in the Little River watershed, poses significant risks to these efforts. This area is critical for the recovery of endangered species, including salmon, and plays a role in sequestering carbon. Moreover, the Little River watershed provides the primary drinking water source for Port Angeles, supplying over 25% of Clallam County. Logging in this sensitive region could undermine both the ecological recovery and the drinking water supply. The City of Port Angeles and community members have already raised concerns about logging older forests in the Elwha River Watershed. These issues must be addressed as part of the decision-making process for unit 3 of the Tree Well sale.

2. Legal Obligations and Environmental Responsibilities

While the Washington Supreme Court has recognized DNR’s authority to manage state forest lands, this management must consider long-term environmental impacts. Under SEPA, DNR is required to ensure that its actions prevent harm to ecosystems and human welfare (RCW § 43.21C.010). Logging in the “Tree Well” sale area without proper consideration of these impacts could violate these obligations.

3. Threats to the Marbled Murrelet

Units 1 and 2 of the “Tree Well” sale are located near active nesting areas of the threatened Marbled Murrelet. Despite DNR holding permits that allow incidental harm to endangered species, logging near these critical habitats increases the risk of disturbing or destroying nests. Habitat loss is the primary reason for the Marbled Murrelet's continued decline in Washington. Allowing logging to proceed in this area would further disrupt their recovery and undermine the goals of the Marbled Murrelet Long-Term Conservation Strategy.

4. Non-Compliance with Forest Protection Policies

The protection of structurally complex forests on state lands is governed by a set of policies, including the Habitat Conservation Plan (HCP) and the Policy for Sustainable Forests. The HCP, developed in consultation with the U.S. Fish and Wildlife Service, requires 10-15% of each planning unit to consist of “fully functional” forests, generally at least 150 years old and with characteristics similar to old-growth. The Policy for Sustainable Forests has similar targets for “older forests.”

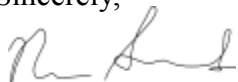
In addition, DNR’s internal policy, PR 14-004-046, requires the agency to inventory structurally complex forests, create a management plan, and avoid logging these areas until the plan is implemented. The "Tree Well" sale is located in the Straits planning unit, where DNR has not developed the required forest plan. In fact, data from DNR indicates that less than 1% of the Straits unit consists of forests over 150 years old, and only 5% of the planning unit’s structurally complex forests are protected from logging. Despite not meeting these requirements, DNR is moving forward with logging structurally complex forests in the “Tree Well” sale area.

Conclusion

Given the ecological importance of the forests in the “Tree Well” sale area, the lack of a management plan for structurally complex forests, and the significant risks to endangered species and water resources, we strongly urge DNR to reconsider this timber sale. A more balanced approach that prioritizes long-term environmental health and resilience over short-term economic gain would better serve the region’s ecological and human communities.

Thank you for considering this SEPA comment.

Sincerely,



Nina Sarmiento
Olympic Region Coordinator
The Center for Responsible Forestry