



Department of Natural Resources
Environmental and Legal Affairs – SEPA Center
PO Box 47015
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SEPACENTER@DNR.WA.GOV

October 15, 2024

Attn: William Wells, Responsible Official, Olympic Region Manager

Dear Mr. Wells,

The City of Port Angeles has reviewed the Determination of Non-Significance (DNS) issued on October 2, 2024, for the Parched Timber Sale (Agreement #30-102017) and the associated Forest Practice Agreement #2617912, covering approximately 242 acres within the Elwha River Watershed. This letter serves as the City's official response to the State Environmental Policy Act (SEPA) determination.

The City of Port Angeles strongly disagrees with the issuance of the Determination of Non-Significance and formally requests that a Determination of Significance be issued instead. We further request the preparation of an Environmental Impact Statement (EIS) to comprehensively assess this proposal's potential environmental impacts.

This timber sale is of critical concern to the City because the Elwha River is the sole source of potable water for over 20,000 residents of Port Angeles, as well as over 25% of Clallam County's drinking water supply. Harvesting timber within the Elwha River Watershed poses a direct threat to our only water source, putting the health and safety of thousands of residents at risk.

As stated in Question 8, the DNS notes that a watershed analysis was not conducted as part of the determination. The omission of this crucial analysis severely undermines the assessment of potential impacts on the watershed and, by extension, the City's sole source of potable water. Without such an analysis, the determination is fundamentally flawed and incomplete.

In addition to the City's watershed concerns, this harvest has the potential to negatively impact the bi-annual North West Cup mountain biking event. This event is a critical revenue maker for our local tourism economy drawing national and international participants and visitors. The City of Port Angeles invests funds annually in support of this event.

The City has raised concerns about timber sales within the Elwha Watershed with the Office of the Commissioner of Public Lands since 2022, yet our requests for collaboration and dialogue have been met with resistance. Despite proposing a Trust Land Transfer (TLT) to protect the Elwha Watershed, our proposal was denied without meaningful consideration.



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The City remains open to solutions and long-term planning in concert with DNR that prioritizes the protection of our water supply, and we urge you to reconsider the current SEPA determination. The health and well-being of our community must take precedence. We strongly advocate for a more thorough review of the environmental risks and expect the preparation of an Environmental Impact Statement to begin promptly.

Thank you for your attention to this matter. We look forward to your timely response.

Sincerely,

Shannen Cartmel

Shannen C. Cartmel, SEPA Responsible Official
City of Port Angeles