



Department of Natural Resources  
Environmental and Legal Affairs – SEPA Center  
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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 Tree Well Timber Sale (Agreement #30-104820) and the associated Forest Practice Agreement #2618493, covering approximately 272 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.

Additional mitigation is recommended to ensure that peak season use of the foothills trail is not interrupted. The City of Port Angeles hosts an annual Big Hurt event which utilizes the foothills trail in late September of each year. This event is an important economic driver for Downtown Port Angeles. The City invests taxpayer dollars in the success 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.



**PORT ANGELES**  
WASHINGTON, U.S.

DEPARTMENT OF  
COMMUNITY & ECONOMIC DEVELOPMENT

The City remains open to solutions and long-term planning in concert with DNR that prioritize 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