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March 3, 2023

Scott Sargent, DNR South Puget Sound Region Manager
Via: SEPA Center
P.O. Box 47015
Olympia, Washington 98504-7015
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Re: Sure Wood timber sale – SEPA comments (File No. 23-021701)

Dear Mr. Sargent,



Thank you for the opportunity to comment on the "Sure Wood" timber sale. The above referenced timber sale would include the commercial harvest of close to 130 acres of 100-130 year old, structurally complex, naturally regenerated, mixed hardwood and conifer forest, populated by dozens of conifers that are more than 160 feet tall.¹ This timber sale is located in the Central Puget Lowland ecoregion, and area that is almost entirely dominated by tree plantations, urban areas, and suburban development.

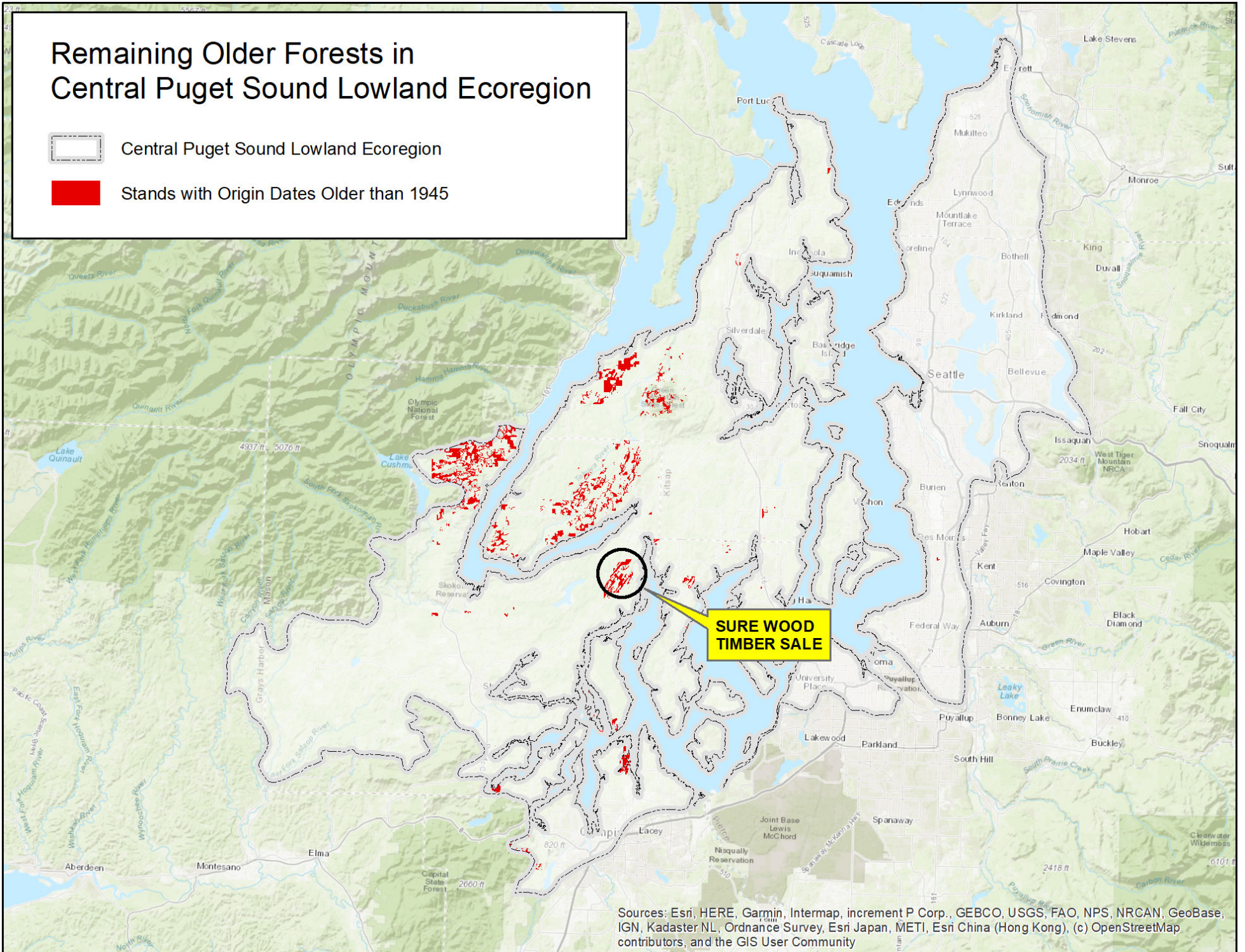
The Central Puget Lowland ecoregion is characterized by its mild, maritime climate, and undulating drift plains and well-drained, gravely soils. It occupies a continental glacial trough and includes many islands, peninsulas, and bays. Coniferous forests originally dominated the region's moraines, outwash plains, and terraces. Today, virtually none of the original, native forests remain in this region. Although the stands proposed for harvest may not meet DNR criteria for protection as old growth, these forests constitute the closest thing that remains to old growth in the Central Puget Lowland ecoregion.

The decision to specifically target this rare forest ecosystem for commercial logging defies the objectives of the State Trust Lands Habitat Conservation Plan, violates established Board policies and procedures, and undermines efforts to reduce the risk of catastrophic wildfires and combat climate change. The continued, systematic elimination of virtually all remaining natural, forests in the Puget Sound lowlands constitutes perhaps the most urgent environmental crisis in our state, and is scientifically, financially, and economically indefensible.

¹ Based on LiDAR, DNR forest inventory data, and SEPA checklist for the Sure Wood timber sale.

Remaining Older Forests in Central Puget Sound Lowland Ecoregion

-  Central Puget Sound Lowland Ecoregion
-  Stands with Origin Dates Older than 1945



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

The Board of Natural Resources and DNR recognized during the habitat conservation planning process in 1997 that large contiguous landscapes of mature and old growth forest habitat, upon which many species of concern depend, were absent across much of its forested land base. According to the HCP (Table IV.14), and Table 11 of the 1997 Biological Opinion for the HCP, at least 150 years is required for a stand to reach the "fully functional" development stage. DNR's own analysis suggests that no more than three percent of state trust lands managed by DNR in Western Washington currently meet this threshold; and no more than 3.5% of forests within any of DNR's five west side planning units (excluding the OESF) may be classified as "older forests".²

To provide the habitat necessary to avoid further adverse impacts to these species, DNR made repeated commitments to restore old growth forests³ across 10-15% of each HCP planning unit in Western Washington. For example, DNR is obligated under the Policy for Sustainable Forests, the Department's procedures for Identifying and Managing Structurally Complex Forests (PR 14-004-046), and the Multi-species Conservation Strategy of the HCP to work toward maintaining or restoring "fully functional" or "old growth-like" forests across 10-15% of lands covered by the HCP. DNR commonly refers to the 10-15% target as the "older-forest target". In the Policy for Sustainable Forests FEIS, the Board's preferred alternative "emphasizes that the 10 to 15 percent older-forest targets will be accomplished" within 70 to 100 years.

The 1997 Biological Opinion for DNR's HCP anticipated that the Department would work to maintain or restore a minimum of 12% of lands covered under the HCP within the Northwest HCP planning unit to fully functional conditions by 2096. According to the 1997 Biological Opinion, it is necessary for DNR to provide a minimum percent of fully functional forest to "ensure that stand structural stages not provided by other conservation strategies of the HCP are present in the HCP area." The agency has abdicated those commitments by clearcut logging thousands of acres of structurally complex forest every year — a class of rare future old growth specifically identified for protection in DNR's Policy for Sustainable Forests.

DNR is required under the terms of its Policy for Sustainable Forests to manage structurally complex forests to meet older forest targets.⁴ Although DNR anticipates that they will meet their older forest target in the South Puget Sound HCP planning unit by 2100, data obtained from DNR's Public Disclosure Office indicates that DNR has only set aside only 11,625 acres of structurally complex forest in the South Puget Sound HCP planning unit for conservation, which represents **just 6.5% of the South Puget Sound HCP planning unit** that has protected, structurally complex forests that are excluded from commercial timber harvest.⁵

There are many wildlife species that depend on structurally complex habitat for survival. For example, the conservation of suitable breeding, foraging, and nesting habitat for the northern goshawk, Vaux's swift, pileated woodpecker, myotis bats, Pacific fisher, and olive-sided flycatcher, are dependent upon the "large contiguous landscapes of mature and old growth forest" that the 1997 HCP is "expected" to provide.⁶ Other representative species that require structurally

² See Table 5, Estep & Buffo. 2021. Identifying Stands to Meet Older Forest Targets in Western Washington.

³ DNR's Addendum to the FEIS for the 2007 (page 2) sustainable harvest calculation describes forests in the niche diversification and fully functional stages of stand development as "old-growth like" forests.

⁴ See Policy for Sustainable Forests, p. 46.

⁵ Based on spatial data obtained from DNR's Public Disclosure Office.

⁶ See DNR. 1997. Final Habitat Conservation Plan, pp. III-78 – III-99.

complex forest habitat include the brown creeper, northern pygmy owl, Townsend's warbler, red tree vole, northern flying squirrel, and black bear.⁷ DNR's "cut it now" and "grow it later" approach to habitat conservation defies common sense, and jeopardizes the viability of species that are already at risk of becoming listed as threatened or endangered.

DNR's PR 14-004-046 directs DNR to develop landscape level management strategies to achieve the 10-15% older forest target during the forest land planning process that will be conducted for each HCP planning unit. PR 14-004-046 is the mechanism DNR developed to ensure compliance with the 10-15% older and fully functional forest objectives of the Policy for Sustainable Forests and its related State Trust Lands HCP. The Procedure lays out a step-by-step plan, which entails identifying existing structurally complex forest stands that will grow into older forests, designating those forests in a mapping database, and protecting them from logging until the planning area's forest goals are met. Only after the 10-15% target is met may structurally complex forest stands be considered for harvest activities. DNR completely ignored these procedures, and never identified, mapped, designated, or protected structurally complex forests as required.

All of the timber sales referenced above are to be treated using even-aged harvest. However, PR 14-004-046 dictates that:

Harvest activities in older forest and other structurally complex stands designated as suitable to meet older forest targets must enhance the older forest condition.

The Sure Wood timber sale, as described in the SEPA checklist, will not enhance older forest conditions or contribute to the development of fully functional forests.

The Policy for Sustainable Forests and associated HCP implementation procedures constitute DNR's plan for implementing the HCP, and also serve as mitigation for timber harvest on lands covered by the HCP. Commercial harvest of the oldest and most biologically diverse lowland forests remaining in Western Washington is inconsistent with Board of Natural Resources approved policies and procedures intended to preserve and promote biodiversity and the development of older or fully functional forests. Although DNR has not designated the lands included in these timber sales as contributing to older-forest targets, DNR's own analysis indicates that structurally complex forests that have been designated for this purpose represent only 6.5% of all forestlands managed by DNR the South Puget Sound HCP planning unit. The above-referenced stands in the Sure Wood timber sale obviously have the potential to contribute to the attainment of older forest targets and should be managed for that purpose.

Furthermore, data obtained from DNR's Public Disclosure Office suggests that a majority of the lands that DNR has designated as contributing to fully functional stand structure objectives are located within riparian buffers. As illustrated in Addendum A of the Joint Petition CRF submitted to the BNR in 2021, counting these areas toward older-forest targets is misleading, because they are rarely excluded from logging after they have been ground-truthed.⁸

⁷ See DNR. 2019. Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington, Final Environmental Impact Statement.

⁸ See Joint Petition to the Board of Natural Resources, April 1, 2021.

A strategy that relies so heavily on stream buffers to meet older-forest and fully functional stand structure objectives will result in a fragmented landscape that is subject to edge effects, lacks interior forest habitat, lacks large conifers, and is often dominated by alder and other early successional or invasive species. We believe this approach is both unrealistic, and inconsistent with the intent of the Multispecies Conservation Strategy and the objectives of the Policy for Sustainable Forests.

There is still much we do not understand about the ecology of native Pacific Northwest forests and the organisms that are found there. According to Lindenmayer and Franklin (2002):

"Effects of human disturbance on biodiversity are poorly known, and some impacts may be irreversible. Others such as synergistic and cumulative effects can be extremely difficult to quantify or predict.... [and] for some species will probably never be known... Ultimately, this makes large ecological reserves valuable as 'safety nets' relatively free from human disturbance."

It is well established that rotting snags and logs found in these older forests provide tunnels, dens, and nesting cavities required by many organisms, from spotted owls to land snails and springtails. Dead and dying trees are used by a broad array of both vertebrates and invertebrates for foraging and nesting, and roosting. They also provide essential habitat for many species of mushrooms. A study of Douglas fir forests in western Oregon found that large logs in advanced stages of decay had the richest bryophyte flora of any forest substrate.⁹ These features are very difficult to restore in managed forests. Despite our best efforts to retain these structures during harvest, much of this habitat is lost when these forests are logged. Natural forests also contain significant components of non-commercial tree species such as silver fir, spruce, cottonwood, alder, and big leaf maple. Some wildlife species have been found to be either strongly associated or dependent on specific tree species.¹⁰ When these species are logged and replaced with commercial nursery conifer seedlings, the species that depend on them may be lost as well.

Older, native forests can also contribute to the productivity of working forests or plantations. For example, small mammals including voles, shrews, and squirrels that find refuge in older forests may disseminate spores of mycorrhizal fungi to forests managed for timber production. Natural parasites and predators found in mature or structurally complex forests may also play an important role in preventing or limiting pest outbreaks in managed stands.

It is unlikely that counties will be dependent on timber revenue 20 years from now in the same way they are today. A new carbon market is rapidly emerging, and it may soon be more profitable to leave these older trees in the ground than cut them down. New laws and policies intended to combat climate change are likely to create many more jobs in restorative forestry, fire risk reduction, and ecologically-based forest management 20 years from now on state forest lands than there are in timber sale contracts today. DNR took an encouraging first step toward transitioning to a carbon-based model with their recent "carbon project", which will "protect some of our most ecologically and culturally valuable forests, while generating millions of dollars in

⁹ See Rambo, T. R. 2001. Decaying logs and habitat heterogeneity: implications for bryophyte diversity in western Oregon forests. *Northwest Science* 75: 270-277.

¹⁰ See Hagar, Joan C. 2007. Wildlife species associated with non-coniferous vegetation in Pacific Northwest conifer forests: A review," in *Forest Ecology and Management*, Vol. 246, pp. 108-122.

revenue for the schools, colleges, and critical local services that state trust lands support." However, our own independent analysis found that Phases I and II of the carbon project combined, would at the most protect only about 1,400 acres of the older, structurally complex, lowland forest. This is less than half of the more than 3,000 acres of structurally complex forest that DNR is currently clearcut logging every year.

DNR's commitments to restore old growth forests to Western Washington, along with the threats posed by climate change, demand that the agency move away from the antiquated practice of targeting the oldest and most carbon-dense forests that remain for commercial harvest. Instead of logging these rare islands of structural and biological diversity, we recommend that DNR focus on developing a management strategy to generate revenue for trust beneficiaries that conserves older forests, accelerates the development of fully functional forests, and is consistent with the requirements of DNR's Habitat Conservation Plan, the Intra-Service Biological Opinion for the HCP, PR 14-004-046, the Policy for Sustainable Forests, and the Governor Inslee's commitment to combat climate change.

Respectfully,

A handwritten signature in black ink, appearing to read 'SK', with a horizontal line extending to the right.

Stephen Kropp, Director
Legacy Forest Defense Coalition