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Mona Griswold, DNR Olympic Region Manager

Via: SEPA Center

P.O. Box 47015

Olympia, Washington 98504-7015

sepacenter@dnr.wa.gov

Re: Beaver Valley timber sale - comments (File No. 21-043001)

Dear Ms. Griswold,

Thank you for the opportunity to comment on the "Beaver Valley" timber sale.

The above referenced timber sale includes the harvest of up to 212 acres of 80 to 120-year old¹ structurally complex forest that has the potential to contribute to the attainment of older forest targets in the Straits HCP Planning Unit. Because no forest land plan has been completed for the planning unit, and the SPEA checklist includes no analysis of the potential role of the included forest inventory units in meeting older forest targets, the proposed activity **violates** the Policy for Identifying and Managing Structurally Complex Forests (PR 14-004-046).

DNR is obligated under the Policy for Sustainable Forests, PR 14-004-046, and the Multi-species Conservation Strategy of the 1997 Habitat Conservation Plan to work toward maintaining "fully functioning forests" on 10 to 15 percent of lands covered by the HCP. 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. PR 14-004-046 directs DNR to develop landscape level management strategies to achieve the 10 to 15 percent older forest target during the forest land planning process that will be conducted for each HCP planning unit. **Only after the 10 to 15 percent target is met** may structurally complex forest stands be considered for harvest activities.²

According to the HCP (Table IV.14), at least 150 years is required for a stand to reach the "fully functioning" development stage. An analysis of the most recent combined origin forest resource information dataset suggests that **less than one-half of one percent (0.4%)** of lands managed by DNR within the Straits planning unit currently meet this threshold.

It is commonly assumed, and has been stated previously by the Olympic Region Office, that old growth stands and structurally complex forests located in special ecological management areas (EMAs) such as

¹ Based on origin dates reported in SEPA checklist.

² See Policy for General Silvicultural Activity, p. 46, in Policy for Sustainable Forests (DNR, 2006).

protected spotted owl and marbled murrelet habitat, NRCAs, natural areas, gene pool areas, and riparian management zones (RMZs), will provide the fully functional habitat necessary to satisfy the 10 to 15 percent older forest target. There are about 16,400 acres in the Straits HCP planning unit that are protected within one or more EMAs, and another 30,000 acres contained within RMZs. However, according to the Department's combined origin resource inventory data, only 7,021 acres are old enough to contribute to the 10 to 15 percent target within the Straits HCP planning unit by 2097. This means that less than 6% of lands managed by DNR within the planning unit are both capable of contributing to this target *and* excluded from variable retention harvest.

The combined origin data, which is based to a large extent on the FRIS 2.0 DAP-based data, may underestimate stand age for some forest inventory units, and is known to under-represent the contribution of riparian areas to older forest targets. To calculate an upper estimate of the maximum potential contribution of the EMAs and RMZs to the 10 to 15 percent target, we merged the combined origin polygons with the old plot-based data and newer 2017 DAP-based raster dataset (FRIS 3.0), by first converting the raster dataset to polygons using a pattern recognition routine in ArcGIS, and then taking the maximum value of each of the three datasets for each raster cell. Results suggest that up to 17,844 acres of land within an EMA or RMZ, representing approximately 14% of the planning unit as a whole, may be capable of reaching the fully functioning stage of development by 2097. The actual attainment value probably falls somewhere between 6% and 14%.

Based on these results, it is **not at all clear** that existing EMAs and RMZs are sufficient to meet older forest targets for the Straits planning unit.

PR 14-004-046 dictates that:

The identification and review of landscape level management strategies to achieve the 10 to 15 percent older forest target will be completed during the forest land planning process that will be conducted for each HCP planning unit.

To date, no forest land plan has been completed for the Straits planning unit. In the interim, PR-004-046 requires that any proposal to harvest structurally complex forests **must be accompanied by:** a) an assessment of forest conditions using readily available information; b) an analysis of the known landscape management strategies and; c) role of the structurally complex stand in meeting older forest targets. This information should have been provided with the SEPA checklist.

The Policy for Sustainable Forests recognizes the **conservation of biodiversity** as a "**fundamental guiding principle for sustainable forest management**."³ The HCP dictates that multi-species conservation strategy objectives be met through "forest management that provides a variety of well-distributed, interconnected habitats" in order to support the continued presence of suitable habitat for each species "over as much of its historic range as possible", thereby ensuring the "successful reproduction of wide-ranging unlisted species".

The Policy for Sustainable Forests specifically directs DNR to protect wildlife species and habitats by working to conserve biodiversity:⁴

³ See Policy on Wildlife Habitat, p. 36, Policy for Sustainable Forests (DNR, 2006).

⁴ See Intended Outcomes, p. 6, Policy for Sustainable Forests (DNR, 2006).

"An important trust objective is the conservation of upland, riparian, and aquatic wildlife species, including fish and their habitats, species listed as threatened and endangered, and non-listed species.... with a focus on ecosystem sustainability and the conservation of biodiversity across forested landscapes."

This timber sale is located in the Olympic rainshadow, which is defined by the Environmental Protection Agency as a distinct ecoregion of Western Washington. This ecoregion has been decimated by logging and contains very little old growth or native second growth forest. This and similar timber sales would eliminate the few remaining older, low elevation forest remnants within the ecoregion. Logging of the last remaining 80-to-100-year old structurally complex, low elevation forest remnants in the ecoregion is not consistent with the objectives of the HCP or the Policy for Sustainable Forests.

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.***

Parts of this sale are already complex and multi-layered, and contain large legacy trees (see photographs, below). Other parts of this sale are overstocked with competing trees and/or dense layers of shrubs, and would probably benefit from thinning or prescribed burning. Although we recognize that these stands have not been specifically designated by DNR as suitable to meet older forest targets, they certainly are capable of contributing to older forest targets and should have been so designated. The overall timber sale as presented in the FPA and SEPA checklist will not enhance older forest conditions or contribute to the development of fully functioning forests. Instead, it takes us in the opposite direction by harvesting some of the few remaining patches of structurally complex forest in the planning unit.

In the absence of a plan to meet older forest targets in the planning unit, the forest practices application for the proposed project should be withdrawn. Instead of logging the oldest and most structurally complex forests that remain in the Olympic rainshadow, we recommend that the Department focus on developing a management strategy to generate revenue for trust beneficiaries that preserves older forests, accelerates the development of fully functional forest stands, and is consistent with the requirements of the Habitat Conservation Plan, PR 14-004-046, and the Policy for Sustainable Forests.

Respectfully,

A handwritten signature in blue ink, appearing to read 'SK', followed by a horizontal line.

Stephen Kropp
Director

Photos of Units 1 and 3













