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April 1, 2021

To: Board of Natural Resources
MS 47000
Olympia, WA 98504-7000

Submitted via email: bnr@dnr.wa.gov

Re: Petition to: Delay Approval of "Sauerkraut", "Farfegdougan", and "Skid Plate" Timber Sales (FPA Nos. 2422074, 2938592, and 2817874; SEPA File Nos. 21-022502, 21-020901, and 21-021702); **AND**

Initiate a Review of Other Scheduled Timber Sales Involving the Harvest of Older, Structurally Complex Forest

Dear Chair Franz and Board Members,

The undersigned are concerned that a number of timber sales scheduled for auction this year violate Board of Natural Resources (BNR) policies governing the management of structurally complex forests, and undermine Governor Inslee's plan to combat climate change. We are requesting that the BNR delay approval of the above referenced timber sales, and order DNR to initiate a review of other similar sales to ensure that they are consistent with BNR plans, policies and procedures, prior to presenting these timber sales to the Board.

DNR is obligated under the Multi-species Conservation Strategy of the 1997 Habitat Conservation Plan (HCP) to work toward maintaining "fully functioning forests" on 10 to 15 percent of lands covered by the HCP. Procedure PR 14-004-046 defines how that is to be done.

In the Policy for Sustainable Forests FEIS (DNR, 2006b), the BNR'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.¹

¹ See Policy for General Silvicultural Activity, p. 46, in Policy for Sustainable Forests (DNR, 2006a).

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 four percent** of lands collectively managed by DNR within five westside planning units (excluding the OESF) currently meet this threshold.²

It is commonly assumed, and has been stated repeatedly in written correspondence we have received from DNR, that old growth stands and structurally complex forests located in riparian management zones (RMZs); and special ecological management areas (EMAs), such as protected spotted owl and marbled murrelet habitats, Natural Resource Conservation Areas, Natural Area Preserves, and gene pool areas; will provide the fully functional habitat necessary to satisfy the 10 to 15 percent older forest target. There are about 200,000 acres in the five westside planning units, excluding the OESF, that are protected within one or more EMAs, and about another 330,000 acres contained within RMZs. However, based our analysis of the Department's combined origin forest resource inventory data, only 74,000 acres within the five westside planning units combined will be old enough to contribute to the 10 to 15 percent target by 2097. This means that less than 6% of the total land base is capable of contributing to this target *and* protected within an EMA or RMZ.³ Results are broken down by planning unit in Table 1.

DNR's combined origin forest resources inventory data, which is based to a large extent on the FRIS 2.0 DAP-based data, may under-estimate 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 30% of all EMAs and RMZs, or approximately 12% of the total land base in the five planning units, excluding the OESF, may be capable of reaching the fully functioning stage of development by 2097. The actual attainment value probably falls somewhere between 6% and 12%, and results vary widely by planning unit.

Our analysis suggests that it is **unlikely** that existing EMAs and RMZs are sufficient to meet older forest targets within the Straits, South Coast, Columbia, and South Puget Sound planning units. It is not clear if DNR is on track to meet older forest targets in North Puget Sound.

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.

² Based on DNR combined origin forest resource inventory system (FRIS) polygons, updated October, 2020.

³ Does not include losses due to natural disturbances, which are anticipated to increase in coming decades. RMZs are particularly susceptible to blowdown and loss of forest cover resulting from shallow landslides.

To date, a forest land plan has been completed for only one of the five westside planning units, excluding the OESF. 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. The Department has failed to produce this information, despite numerous requests over the past six months, and many acres of structurally complex forests have already been harvested where forest land plans are still lacking.

PR 14-004-046 further 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.***

Our observations suggest that many of the timber sale units scheduled for auction this year are already complex and multi-layered. Photographs of two of representative units (unit 2 of "Sauerkraut" and unit 2 of "Elochomotive") are attached. The above-referenced "Sauerkraut", "Farfegdougan", and "Skid Plate" timber sales are scheduled to be presented to the Board this month. These three timber sales, as represented in the attached forest practices applications and SEPA documents, will not enhance older forest conditions or contribute to the development of fully functioning forests, and should be withdrawn or modified to exclude those areas capable of contributing to older forest targets from harvest.

To ensure that other planned timber sales are consistent with Board policies and HCP implementation procedures, we further call on the BNR to:

1. Uphold and enforce the PR 14-004-046 requirement that DNR identify and review landscape level management strategies to achieve the 10 to 15 percent older forest target for each HCP planning unit.
2. Direct DNR to develop a protocol or procedure for classifying stands as structurally complex or fully functioning.
3. Direct DNR to clarify the procedure used for determining if a stand is capable of contributing to older forest targets.
4. Enforce the General Silvicultural Policy provision that prohibits structurally complex forest stands from being considered for harvest activities before the 10 to 15 percent target is met.
5. Uphold and enforce the PR 14-004-046 requirement 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.
6. Direct the DNR to initiate a review of other VRH units scheduled for auction this year that exhibit characteristics of structurally complex forests, including those listed in Table 2.

7. Direct DNR to develop a protocol or procedure for determining if stands that are proposed for harvest are capable of contributing to broader conservation objectives as described in the HCP.

Finally, we call on the BNR to direct DNR to more carefully consider impacts of proposed timber sales on biodiversity. Conservation of biodiversity is a core objective of both the HCP and the Policy for Sustainable Forests. The Policy for Sustainable Forests recognizes the **conservation of biodiversity** as a "**fundamental guiding principle for sustainable forest management.**"⁴

The multispecies conservation strategy of the HCP specifically directs DNR to provide suitable habitat for "unlisted animal species of concern and other unlisted animal species". The strategy names a total of 62 animal species of concern, but allows that other species are likely to be added to the list, because it is "difficult to predict which species are at the brink of 'at risk'". In practice, DNR has assumed that areas set aside to provide habitat for listed species are sufficient to meet the needs of unlisted species, and that any stands located outside of these areas are "available for the full spectrum of timber harvest activities". But it is not clear that any attempt has been made to evaluate the extent to which existing reserves actually provide the habitat necessarily to maintain viable populations of unlisted species of concern described in the multispecies conservation strategy. Nor is it clear that there has been any attempt to evaluate the extent to which current management practices are consistent with the intent of the multispecies conservation strategy to conserve biodiversity across the landscape.

Lindenmayer and Franklin (2002) argue that this vital management objective is often ignored or misunderstood by resource managers, who often appear to assume that certain approaches, such as dispersed or variable retention harvest, can be applied uniformly in all places. The authors further argue that wood production goals have often been set at levels that are not consistent with maintaining desired levels of biodiversity. As explained above, existing reserves established to provide critical habitat for the spotted owl and marbled murrelet, where they exist on state trust lands, do not necessarily provide sufficient habitat to meet the needs of other species. Each species has its own unique habitat requirements, and the use of indicator or keystone species as biodiversity surrogates is no longer generally accepted as a valid strategy for ensuring that the habitat requirements of other species of concern are met.

Lindenmayer and Franklin describe the overarching principle of biodiversity conservation as the maintenance of landscape heterogeneity, and recommend that any conservation reserve network "should sample the full range of species, forest types, communities, and ecosystems from throughout their geographic ranges." The authors argue that existing reserve systems are "almost always an unrepresentative sample of the range of environments, biomes, biogeographic provinces, plant communities, forest types, and rare taxa that occur in a region," in part because they tend to be concentrated at high elevations and in areas with steep slopes, low productivity, and low vertebrate diversity.

⁴ See Policy on Wildlife Habitat, p. 36, Policy for Sustainable Forests (DNR, 2006a).

DNR currently relies heavily on riparian reserves to meet ecological management objectives. Although it has been estimated that 60 percent of 480 species of wildlife in Washington State occur in wooded riparian zones, Lindenmayer and Franklin argue that "universal reliance on streamside buffers has the undesirable effect of fragmenting upland habitats and creating a landscape that has a high level of structural contrast between riparian and upland habitats." The authors observe that numerous organisms, including many birds, depend heavily on structurally complex transitional zones between riparian and upland forests; and argue that conservation reserve systems consisting of only riparian buffers may not provide suitable habitat for wide-ranging species, or organisms that occupy upland areas or ridge tops during part of the year.

We call on the Board to direct DNR to conduct a thorough review of the extent to which current sustainable harvest targets are compatible with multispecies conservation strategy objectives, and to examine whether the existing reserve system provides the habitat necessary to meet the intent of the multispecies conservation strategy and related DNR policy objectives.

Respectfully,

Stephen Kropp, Director
Center for Responsible Forestry

Connie Gallant, President
Olympic Forest Coalition

Mike Town, State Forest Chair
Sierra Club

Peter Goldman, Attorney at Law
Washington Forest Law Center

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Cascadia Wildlands

Kurt Beardslee, Executive Director
Wild Fish Conservancy

References:

Lindenmayer, D.B., Franklin, J.F. 2002. *Conserving Forest Biodiversity: A Comprehensive Multiscaled Approach*. Island Press, Washington, DC.

Washington Department of Natural Resources (DNR). 1997. *Final habitat conservation plan*. Olympia, Washington.

Washington Department of Natural Resources (DNR). 2006a. *Policy for Sustainable Forests*. Olympia, Washington.

Washington Department of Natural Resources (DNR). 2006b. *Final Environmental Impact Statement on the Policy for Sustainable Forests*. Olympia, Washington.

Washington Department of Natural Resources (DNR). 2007. *Procedure PR 14-004-046, Identifying and Managing Structurally Complex Forests to Meet Older Forest Targets (Westside)*. Olympia, Washington.

Table 1. Contributing Forest by Planning Unit (Best Available Data) ⁴

PLANNING UNIT NAME	TOTAL AREA (THOUSANDS OF ACRES)	PROTECTED FOREST (ALL AGES)			PROTECTED FOREST (CONTRIBUTING) ³			
		EMAs ¹ (THOUSANDS OF ACRES)	RMZs ² (THOUSANDS OF ACRES)	TOTAL (%)	EMAs ¹ (THOUSANDS OF ACRES)	RMZs ² (THOUSANDS OF ACRES)	TOTAL (%)	GOAL (%)
South Coast	261	29	66	36%	2	2	1%	10-15%
Columbia	291	36	71	37%	8	1	3%	10-15%
South Puget Sound	179	16	52	38%	6	4	6%	10-15%
North Puget Sound	459	101	114	47%	37	7	10%	10-15%
Straits	127	16	30	37%	7	2	7%	10-15%

¹ Includes protected spotted owl habitat (high quality nesting and Type A and B), murrelet habitat (SHA's, known occupied sites and buffers), NRCA's, natural areas, protected old growth, and gene pool areas). Balds, caves, and cliffs are not counted because they do not contribute to older forest targets.

² Riparian management zones (mapped by DNR).

³ Contributing stands must be at least 80 acres in size and old enough to qualify as fully functioning by 2097. It is assumed that it takes at least 150 years for a forest to enter the fully functioning development stage.

⁴ Based on DNR "combined origin" forest resources inventory system (FRIS) data, updated October, 2020.

Table 2. Timber Sales that Include Harvest of Older Forest Scheduled for Auction in 2021

Name/Region	Units	Origin Dates	Max Tree Ht (feet)
<u>Olympic Region</u>			
Beaver Valley	1, 2, 3, 4	1921-1966	196
Ode to Joyce	1, 2, 3, 4	1867-1939	217
On the Line	1, 2, 3	1894-1955	210
Salty View	1, 2, 3, 4	1927-1954	185
Coyle Sorts	4	1936-1948	212
Silver Lining	1, 2	1956-1965	179
<u>South Puget Sound Region</u>			
Flat Top	2, 3, 4, 5	1913-1948	172
Sauerkraut	1, 2, 3	1936-1962	198
Bluehorse	1, 2, 3	1933-1948	189
Carbonara	1	1949	190
Prospero	1, 2	1925-1964	201
School Bus	4, 6	1946-1958	215
Crush	1, 2, 3, 4, 5	1933-1958	195
Copper Ridge	1	1947-1956	180
Capra	3	1950-1962	176
<u>Southeast Region</u>			
Blacktip	2, 4, 5	1865-1923	180
<u>Northwest Region</u>			
Cecil	2	1910-1947	173
Longmont	1	1882	210
Archangel	1, 2	1917	209
Bessie	1	1876-1926	212
Frontal	4	1916-1956	190
Skid Plate	2	1958-1965	194
<u>Pacific Cascade Region</u>			
Michigan Trotter	1, 2, 3	unknown	180
Farfedgougan	1, 2, 3, 4, 5	1942-1968	167
American Pharoah	1, 2	1966-1968	178
Serenity Now	4	1948-1966	183
About Time	1	1942	185
Green Thomas	1, 2	1926-1950	197
Cat Game	1	1934-1962	210
Secret Squirrel	1, 2, 3, 4, 6	1948-1963	200
Spittoon Sorts	2, 3	1948-1951	187
Elochomotive	2	1941-1967	195
Point Blank	1, 2, 3, 4, 5, 6	1926-1945	208