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June 8, 2021

Eric Wisch, DNR Pacific Cascade Region Manager

Via: SEPA Center

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Olympia, Washington 98504-7015

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Re: Serenity Now timber sale – SEPA comments (File No. 21-052503)

Dear Mr. Wisch,

Thank you for the opportunity to comment on the "Serenity now" timber sale.

This timber sale would clearcut close to 150 acres of naturally regenerated hemlock and punch a hole through one of the largest remaining roadless areas in the Lower Columbia River basin. The abundance of large, 4-6 foot diameter snags within these units suggests that the forest in which the timber sale is located burned in a stand-replacing fire that occurred in the early 1900's. The area is currently dominated by an emerging cohort of ~ 110-year old hemlock. There are also a handful of very large old-growth legacy Douglas fir trees, located down near the bottom of the draw that runs through unit 3, that survived the fire (see photographs below).

Although it appears that over 50% of DNR managed lands within the Cougar SOMU have been classified as high quality nesting, sub-mature, or Type A or B owl habitat, the most recent DNR forest inventory data indicates that many of the sub-mature stands, which comprise the majority of owl habitat within the SOMU, have been logged within the past 60 years. Parts of units 3 and 4 of the proposed timber sale are located within an area that has been classified as high quality "Type A" owl habitat. Only 2,300 acres, or approximately 20% of the lands managed by DNR within the Cougar SOMU, have been classified as Type A or high quality owl nesting habitat. The proposed timber sale therefore targets some of the best available spotted owl habitat in the SOMU for harvest. The stands included in the proposed timber sale are also some of the oldest stands in the SOMU. According to the SEPA checklist, the stands within units 1, 3, and 4 range from 80 and 117 years in age. The most recent DNR forest inventory data indicate that there are currently only about 520 acres within the Cougar SOMU that are over 80 years old. The proposed timber sale would further reduce the near-term availability of high quality nesting, roosting, and foraging habitat within the SOMU. Although the timber sale may comply with the letter of the HCP, it seems inconsistent with the intent of the HCP and other DNR policies intended to promote the development of suitable spotted owl habitat.

It appears that the units proposed for harvest have never been logged. Forest Stewardship Council standards prohibit the conversion of natural forests to plantations. Although the areas contained within proposed timber sale may not meet DNR criteria for protection as old growth, the clearcutting of century-old, naturally regenerated forests is clearly at odds with FSC standards, and the intent of the HCP and the Policy for Sustainable forests to conserve and promote the development of older forest characteristics within the Columbia HCP planning unit. Old growth forests are characterized in part by an abundance of large standing dead trees and downed logs. The stands proposed for harvest likely contain a higher number of large snags and downed logs per acre than many old growth forests on DNR managed lands in the North Cascades. Snags are generally removed during logging operations to protect the safety of the crew. The few snags and downed logs that are left behind tend to desiccate or dry out when exposed to the sun and wind, diminishing their value to organisms that depend on them for habitat.

This and similar timber sales in the area also undermine DNR's ability to meet their established older-forest target for the Columbia HCP planning unit. 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 "fully functional forests" on 10 to 15 percent of lands covered by the HCP. DNR commonly refers to the 10 to 15 percent 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.

PR 14-004-046 directs DNR to develop landscape level management strategies to achieve the 10 to 15 percent older-forest targets 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

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 percent** of lands within the Columbia planning unit currently meet this threshold.

It is commonly assumed, and has been stated previously by the Pacific Cascade Region Office, mostly recently during a presentation to the Board of Natural Resources on June 1st, 2021, that old growth stands and structurally complex forests located in special ecological management areas (EMAs) such as spotted owl and marbled murrelet habitat, NRCAs, and natural 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 a total of almost 48,000 acres in the Columbia planning unit that are protected within one or more EMAs, and another 82,000 acres contained within RMZs. However, according to the Department's combined origin resource inventory data, only 14,387 acres are old enough to contribute to the 10 to 15 percent target within the Columbia HCP planning unit by 2097. This represents about 5% of DNR managed forestlands within the planning unit. Not only does this fall far short of the 10 to 15 percent target, according to data obtained from the Public Disclosure Office, the Region currently has plans to sell 1,935 additional acres of timber in this age class over

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

the next ten years. This would bring the percentage of the landscape that is capable of reaching the fully functioning stage of development by 2097 down to 4%. Our calculations indicate that only about half of that area, or approximately 7,521 acres (less than 3% of the planning unit as a whole), is protected within an EMA or RMZ.

The combined origin data, which is based to a large extent on the FRIS 2.0 DAP-based data, is known to under-estimate stand age in the Columbia planning unit, and 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 34,714 acres of land within an EMA or RMZ, representing approximately 12% 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 3% and 12%.

Based on these results, it is **not at all clear** that existing EMAs and RMZs are sufficient to meet older-forest targets for the Columbia HCP 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 Columbia HCP planning unit. In the interim, PR-004-046 dictates 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. DNR made no attempt, in its SEPA checklist or elsewhere, to document how and why the proposed timber sale complies with these procedures.

The FPA indicates that the units of this sale are to be treated as even-aged harvest units.

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.***

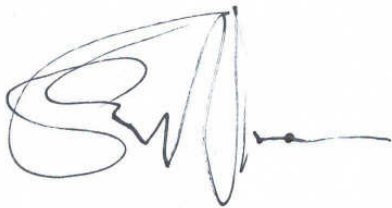
As described above, the forests proposed for harvest already contain an abundance of large diameter snags and downed logs. The timber sale as presented in the FPA and SEPA checklist will not enhance older forest conditions or contribute to the development of fully functional forests.

Finally, there is a popular hiking trail that runs through unit 3 of this timber sale that is not mentioned anywhere in the SEPA checklist or depicted anywhere on the timber sale maps. Recreation is listed as an element of the environment under WAC 197-11-444, and DNR has made no attempt to consider or mitigate for potential long-term impacts of the timber sale on recreation, as required on page 23 of the checklist, question 12(c).

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 native forests remaining in the Columbia HCP planning unit is clearly at odds with Board of Natural Resources approved policies and procedures intended to preserve and promote biodiversity and the development of fully functional forests. Although DNR has not designated the lands targeted for harvest by this timber sale as suitable to meet older-forest targets, they obviously have the potential to contribute to the attainment of the 10 to 15 percent fully functional forest target in the Columbia HCP Planning Unit. For all of the reasons cited above, it is clear that this timber sale has probable, significant impacts to the environment necessitating preparation of an EIS. Because no forest land plan has been completed for the planning unit, and the SPEA checklist includes no analysis of the direct, indirect, or cumulative impacts of this and other planned timber sales in the Columbia HCP planning unit on DNR's ability to meet the 10 to 15 percent target, DNR has failed to comply with its substantive obligations under SEPA.

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 Columbia HCP planning unit, we recommend that DNR 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', with a horizontal line extending to the right.

Stephen Kropp
Director

Photos of Units 3 and 4





