



*Center for Responsible Forestry
P.O. Box 7504, Tacoma, WA 98417
Phone: (360) 544-6510
Email: info@c4rf.org*

November 23, 2021

Jay Guthrie, DNR Northwest Region Manager

Via: SEPA Center

P.O. Box 47015

Olympia, Washington 98504-7015

sepacenter@dnr.wa.gov

Re: Bessie timber sale – SEPA comments (File No. 21-110901)

Dear Mr. Guthrie,

Thank you for the opportunity to comment on the "Bessie" timber sale. This timber sale would involve clearcutting roughly 166 acres of forest in the Lake Whatcom watershed, including up to 46 acres of natural, older structurally complex forest. As I noted in the FPA comments that I submitted to the Northwest Region Office on November 17th, the Lake Whatcom watershed is the water source for over 100,000 people living in Bellingham and the surrounding area.¹ Logging activities have been a major contributor to water quality problems, as hundreds of forested acres are harvested each year in the watershed. Whatcom County and the City of Bellingham have worked hard for many years to protect the watershed from industrial forest practices, yet despite these efforts, water quality problems persist in Lake Whatcom.

The cumulative impacts of this and other proposed timber sales in the watershed are likely to exacerbate the underlying problems facing the watershed, further undermining the resilience of the watershed to climate impacts. In the past two years, roughly 1,345 acres of forest were approved for harvest on state and private forestland, in addition to approximately 6.12 miles of new road construction.² DNR plans to harvest over 1,000 acres of state-owned public forestland within the watershed in the coming years, and roughly 519 acres of private forestland are currently being considered for future harvest.

This timber sale will involve clearcut logging on steep slopes, which dramatically increases the risk of landslides and erosion. This watershed is largely made up of the Chuckanut Sandstone Formation, which is known for its steep topography and frequent landslides. It is well established that logging activities (including road construction) increase the natural rates of landslides in Whatcom County and elevate turbidity levels in nearby streams.³ According to the

¹ Personal communication, FPA Comments, submitted by Alexander Harris to DNR Northwest Region (11/17/2021).

² Lake Whatcom Management Program 2019 Report and 2020 Report.

³ [Lake Whatcom Management Program, Geology Webpage.](#)

Department of Ecology, "historic forest practices increased the frequency and severity of mass wasting events beyond natural levels."⁴

Mass wasting and landslides have significant adverse impacts on nearby streams and their aquatic habitat. The project area includes numerous non-fish bearing streams that run year-round (Type Np) and several ephemeral, non-fish bearing streams (Type Ns). The 2004 Lake Whatcom Landscape Plan requires special logging prescriptions in the Lake Whatcom watershed that include expanded no-harvest buffers around these non-fish bearing streams. While these requirements are more protective than state forest practices regulations, it is unlikely these minimal buffers will adequately mitigate mass wasting or turbidity impacts to the watershed.

Unit 2 of this timber sale in particular consists of a diverse mosaic of patches of different species and sizes of trees. In parts of Unit 2, both cedar and hemlock are well established in the understory, an indicator that these areas have entered the later stages of stand development and are well on their way to becoming old growth.⁵ Older, lowland forests like this have the potential to play a critical role in preserving the genetic, biological, and ecological legacies of the North Puget Sound region.

The SEPA checklist states that Unit 2 of this timber sale originated "around 1900". This contradicts DNR's own best available, combined origin forest inventory data, which indicates that a large portion of Unit 2 **originated in 1876**. An old growth assessment prepared by DNR in 2007 found that one of the larger trees in Unit 2 (43 inches dbh) of this timber sale was between 100 to 115 years old, which would make it 115 to 130 years old today. Our staff measured a number trees that more than 50 inches dbh, and many more trees that were close to four feet (48 inches) dbh (see attached photographs). The largest tree we measured was nearly five feet dbh.

The Public Lands Commissioner pledged earlier this year to "reviewing state forests west of the Cascades that sprouted before 1900 to evaluate alternative uses to logging, including biodiversity, carbon storage, water quality, and recreation."⁶ DNR has implemented a new "stand origin" screening assessment for timber sales in Capitol State Forest to identify for stands that originated prior to 1900. No such assessment was conducted for the Bessie timber sale.

Logging of older, naturally complex forests in general is clearly at odds with FSC standards⁷, and the intent of the Habitat Conservation Plan (HCP) and the Policy for Sustainable forests to conserve and promote the development of older forest characteristics within the North Puget Sound HCP planning unit. This and similar timber sales in the area also undermine DNR's ability to meet their established fully functional forest targets for the North Puget Sound 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

⁴ [Lake Whatcom TMDL 2016](#).

⁵ Van Pelt, R. 2007. Identifying Mature and Old Forests in Western Washington. Washington State Department of Natural Resources.

⁶ See Seattle Times article, *Amid climate crisis, a proposal to save Washington state forests for carbon storage, not logging*, published on March 21, 2021.

⁷ See Forest Stewardship Council, 2015. FSC Principles and Criteria for Forest Stewardship, Principle 6.9, p. 15: "The Organization shall not convert natural forest to plantations" except when that conversion will "produce clear, substantial, additional, secure long-term conservation benefits in the management unit."

Conservation Strategy of the HCP to work toward maintaining or restoring "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.

Because no forest land plan has been completed for the North Puget Sound HCP planning unit, and the SEPA checklist includes no analysis of the potential role of the included forest inventory units in meeting older forest or fully functional stand structure targets, the proposed activity **violates** the Policy for Identifying and Managing Structurally Complex Forests (PR 14-004-046).

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.⁸

Furthermore, DNR's incidental take permit requires that the Department work to maintain or restore a minimum of 12% of lands covered under the HCP within the North Puget Sound HCP planning unit to fully functional conditions by 2096.⁹ According to the Intra-Service Biological Opinion, it is necessary for DNR to provide a specific 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."

According to the HCP (Table IV.14), and Table 11 of DNR's incidental take permit, 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 **only about two percent** of lands within the North Puget Sound HCP planning unit currently meet this threshold.

Ground observations by CRF staff, and a review of recent aerial photos and LiDAR data indicates that much of the forest canopy in the proposed sale is already complex and multi-layered. The timber sale as presented in the FPA 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 native forests remaining in the North Puget Sound HCP planning unit is inconsistent 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 included in the Bessie timber sale as contributing to 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 North Puget Sound HCP Planning Unit.

⁸ See Policy for General Silvicultural Activity, p. 46, *in* Policy for Sustainable Forests (DNR, 2006).

⁹ See USFWS. 1997. Intra-Service concurrence memorandum and Biological Opinion for the Washington Department of Natural Resources Habitat Conservation Plan. U.S. Fish and Wildlife Service, Lacey, WA. January, 1997, pp. 14, 22, 23, and 66.

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 North Puget Sound HCP planning unit, DNR has failed to comply with its substantive obligations under SEPA.

In the absence of a plan to meet fully functioning stand structure and older forest objectives in the North Puget Sound HCP planning unit, the forest practices application for the proposed project should either be withdrawn or modified as follows:

1. Drop Unit 2 from the sale;
2. In Unit 1, advance Variable Density Thinning (VDT) prescriptions in lieu of the Variable Retention Harvest prescriptions.
3. Expand harvest buffers on Type Np and Ns streams within the boundaries of Unit 1.

Instead of logging the oldest and most structurally complex forests that remain in the planning unit, we recommend that DNR focus on developing a management strategy to generate revenue for trust beneficiaries that protects water resources, preserves 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, and the Policy for Sustainable Forests.

Respectfully,

Alexander Harris
North Sound Coordinator
Deming, Washington