



Legacy Forest Defense Coalition
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May 7, 2025

Scott Sargent, Pacific Cascade Region Manager

Via: SEPA Center

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Olympia, Washington 98504-7015

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Re: Turnover Timber Sale – SEPA comments (File No. 25-042301)

Dear Mr. Sargent,

We estimate that units 2 and 4 of the Turnover timber sale would clearcut approximately 60 acres of mature, structurally complex forests greater than 75 years old. DNR's SEPA checklist for this project incorrectly states that these stands originated in 1950 and 1953 respectively, however aerial images taken in 1952 show that the area contained a young stand meaning that it likely originated in the 20s or 30s.

The decision to specifically target this rare forest for commercial logging defies the objectives of the State Trust Lands Habitat Conservation Plan; violates established Board policies and procedures; undermines efforts to reduce the risk of catastrophic wildfires and combat climate change; and violates FSC standards.¹ The continued, systematic elimination of virtually all remaining natural, lowland forests in Southwestern Washington constitutes perhaps the most urgent environmental crisis in our state, and is scientifically, financially, and economically indefensible.

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 Biological Opinion, at least 150 years is required for a stand to reach the "fully functional" development stage. To provide the habitat necessary to avoid further adverse impacts to these species, DNR made repeated commitments to

¹ 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."

restore old growth forests² 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 each HCP planning unit to fully functional conditions by 2096. According to the Intra-Service 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.³ DNR asserts in the SEPA checklist for the Turnover timber sale that a landscape assessment completed in September, 2024 demonstrates that the "structurally complex **and other suitable stands** designated to be managed for older-forest targets are projected to develop into older-forest structure that meets or exceeds this threshold by 2090" [emphasis added]. DNR Procedures specifically require DNR to designate and set aside structurally complex forests across at least 10 percent of the planning unit. Neither the SEPA checklist, nor the 2024 landscape assessment, contain any information on the distribution of structurally complex forests within the Columbia HCP planning unit, or any information on the role of structurally complex forests in meeting the Older Forest Target for the Columbia HCP planning unit as required. Nor do the SEPA checklist or 2024 landscape assessment indicate what (if any) structurally complex forests have been identified and designated to meet the Older Forest Target for the Columbia HCP planning unit.

Although DNR anticipates that they will meet their older forest target in the Columbia HCP planning unit by 2090, data obtained from DNR's Public Disclosure Office indicates that DNR has only designated 5,815 acres of structurally complex forest in the Columbia HCP planning unit to be managed to meet its older forest target, which represents **just two percent of the Columbia HCP planning unit** that has protected, structurally complex forests that are excluded from commercial timber harvest.

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,

² 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.

³ See Policy for Sustainable Forests, p. 46.

are dependent upon the "large contiguous landscapes of mature and old growth forest" that the 1997 HCP is "expected" to provide.⁴ Other representative species that require structurally complex forest habitat include the brown creeper, northern pygmy owl, Townsend's warbler, red tree vole, northern flying squirrel, and black bear.⁵ 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.

The timber sale referenced above is 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 above referenced 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 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 this timber sale as contributing to older-forest targets, DNR's own analysis indicates that structurally complex forests that have been designated for this purpose represent only 2% of all forestlands managed by DNR in the Columbia HCP planning unit. The stands proposed for harvest have been classified by DNR as Maturation II, which are by definition structurally complex. These stands obviously have the potential to contribute to the attainment of older forest targets and should be managed for that purpose.

⁴ See DNR. 1997. Final Habitat Conservation Plan, pp. III-78 – III-99.

⁵ See DNR. 2019. Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington, Final Environmental Impact Statement.

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 and areas that have been classified as potentially unstable slopes. As illustrated in Addendum A of the Joint Petition that I 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.⁶

A strategy that relies so heavily on riparian corridors and unstable slopes 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.⁷ 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.⁸ 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

⁶ See Joint Petition to the Board of Natural Resources, April 1, 2021.

⁷ See Rambo, T. R. 2001. Decaying logs and habitat heterogeneity: implications for bryophyte diversity in western Oregon forests. *Northwest Science* 75: 270-277.

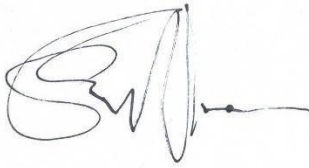
⁸ See Hagar, Joan C. 2007. Wildlife species associated with non-coniferous vegetation in Pacific Northwest conifer forests: A review," in *Forest Ecology and Management*, Vol. 246, pp. 108-122.

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's commitments to restore old growth conditions 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 targeting the oldest remaining forests in Southwestern Washington for commercial logging, 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 state's commitment to combat climate change.

Respectfully,

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

Stephen Kropp
Director