



*Center for Responsible Forestry
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April 28, 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 "Elochomotive" Timber Sale (FPA No. 2938615;
SEPA File No. 21-022603

Dear Chair Franz and Board Members,

We are concerned that the "Elochomotive" timber sale, scheduled for auction this summer, violates Board of Natural Resources (BNR) policies governing the management of structurally complex forests, and undermines Governor Inslee's plan to combat climate change. We request that the BNR delay approval of the above referenced timber sale, and order DNR to either withdraw or modify the sale to exclude from VRH portions of Unit 2 that qualify as structurally complex and contribute to long-term older forest targets described in the Policy for Sustainable Forests.

In the Policy for Sustainable Forests FEIS, the Board's preferred alternative "emphasizes that the 10-15 percent older-forest targets will be accomplished" within the life of the HCP. Stands that contribute to older forest targets are defined as those that are in the "niche diversification" or "fully functioning" stages of stand development (see p. 3-177). According to the FEIS for Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington, only 16,116 acres, or about one percent of state trust lands in all of Western Washington, were in the niche diversification or fully functioning stages of stand development in 2004 (see p. 4-11). About ten percent of the land base was expected to reach one of these development stages by 2067 (see p. 4-87). Our analysis suggests that these areas are disproportionately located within the OESF and North Puget Sound HCP planning units.

As stated in our February 28th letter to the Region Office, only about 14,387 acres, or approximately 5% of DNR managed forestlands within the Columbia HCP planning unit, are old enough to contribute to the 10 to 15 percent older forest target by 2097, based on recently updated DNR forest inventory data. Less than half that area is currently excluded from variable retention harvest. Unit 2 of the above referenced timber sale would include the harvest of a net total area of approximately 42 acres of structurally complex forest that has the potential to

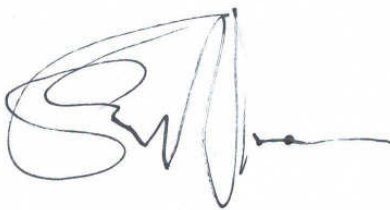
contribute to the attainment of older forest targets in the Columbia Planning Unit. The 1951 aerial photo of Unit 2 (attached) of the stand exhibits a maturing stand with no evidence of entry, suggesting that the stand may be over 100 years old.

According to the HCP (Table IV.14), at least 150 years is required for a stand to contribute to older forest targets. 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. 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 To date, no forest land plan has been completed for the Columbia planning unit.

Where existing stands are inadequate to meet older forest targets, the Policy for Sustainable Forests directs DNR to manage existing structurally complex stands to accelerate the development of older forest characteristics. Large trees are an important component of fully functioning stands. The SEPA checklist for the Elochomotive timber sale states that trees with "dominant crowns, large diameters, and large limbs were favored as leave trees to enhance wildlife potential." This is simply not true. All of the leave trees I observed in Unit 2 were less than 2 feet dbh. None of the largest trees, many of which measure **over 50 inches dbh**, are marked or tagged as leave trees. In any case, much of Unit 2 stand does not require active management, and the proposed VRH will only delay the development of older forest characteristics.

In the absence of a plan to meet older forest targets in the Columbia planning unit, we again request that the forest practices application be withdrawn or modified to exclude structurally complex areas from this sale.

Respectfully,

A handwritten signature in blue ink, appearing to read 'SK', with a horizontal line extending to the right.

Stephen Kropp
Director

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