



**CENTER FOR
RESPONSIBLE
FORESTRY**



**Conservation
Northwest**

Keeping the Northwest Wild



**WASHINGTON
CONSERVATION
ACTION**



**Olympic
Forest
Coalition**



WASHINGTON FOREST LAW CENTER



RE SOURCES



**SIERRA
CLUB**
WASHINGTON STATE

October 21st, 2024

Dear Members of the Board of Natural Resources,

At your next meeting, on Election Day 2024, your timber sales packet will contain 11 timber sales that have some portion of structurally complex older forest. You likely know that the fate of these older forests is a key issue in the race for the next Commissioner of Public Lands.

These sales are: Cabbage Patch, Juneau, Carrot, Alley Cat, Four Score, Parched, Tree Well, Shift the Paradigm, Sylvan Pearl, Luna Tix, and Last Crocker Sorts Resale.

We think it is exceptionally poor governance to rush 11 older forest timber sales for approval at the end of this administration, thereby denying a new administration the ability to develop solutions that manage these stands for long-term ecological health and ensure fair treatment of trust beneficiaries.

Clear-cutting such stands, an act which takes little time and provides temporary financial benefit, will render these important deliberations moot and set back the goals in your Policy for Sustainable Forests of landscapes with 10-15% structurally complex older forests by several decades. Harvesting these older stands will also cause net CO₂ emissions which will not be re-absorbed on a meaningful timescale to prevent climate damages.

There are many possible solutions to derive income for beneficiaries while maintaining these forests for their carbon and ecosystem integrity benefits. The Thurston Board of County Commissioners, for example, is explicitly asking for the opportunity to develop a plan for its Forest Board Lands, yet you are being asked to approve three sales that they do not want harvested at this time. When a beneficiary is explicitly asking for more time, why wouldn't you grant it?

Likewise, the City of Port Angeles is asking for the protection of the forests in the Elwha Watershed because the Elwha River provides the city's drinking water supply, and because of the critical role these forests play in salmon recovery and climate protection. The community is working on a major initiative to seek protection of this ecologically sensitive area and is requesting that DNR not proceed with harvesting older forests in the Elwha Watershed at this time.

In addition, the Last Crocker Sorts Resale was the subject of a legal appeal in Jefferson County Superior Court in which the court granted a preliminary injunction against the sale, an injunction that became moot when DNR withdrew the sale rather than allow the ruling to set a precedent. Rather than work to re-configure the sale to remove the older forest portion, DNR is offering it for sale in the same form that was successfully challenged in court. This gamesmanship is an incredible injustice to the citizens who took the time and resources to timely obtain judicial review of the underlying old forest legal issue. These citizens now have to start all over again.

Finally, the State Legislature has invested \$2.5 million in a process, DNR's Forest Carbon and Management Workgroup, to examine potential alternative management pathways that allow for conservation of older forests without harming wood supply and providing predictable revenue for beneficiaries by for example, conducting more commercial thinning and gradually lengthening harvest rotations on managed lands. The data used to model forest outcomes will include the acres of structurally complex older forests that would be harvested if these sales are approved, impacting the accuracy of the work group's recommendations. The group's recommendations are forthcoming in June, 2025, another reason to wait on these sales and use the results in future deliberations. It makes no sense to be logging the very types of forests the legislature tasked this work group to analyze for their carbon benefits.

We ask that you remove these 11 sales from your November sales packet until the next administration can work with you to chart the appropriate course.

Thank you for your consideration.



Brel Froebe
Executive Director
Center for Responsible Forestry



Rachel Baker
Forest Program Director
Washington Conservation Action



Paula Swedeen, Ph.D.
Policy Director
Conservation Northwest



Kaia Hayes
Land and Water Policy Manager
RE Sources



Patricia Jones, PhD
Executive Director
Olympic Forest Coalition



Peter Goldman
Director
Washington Forest Law Center



Mariska Kecskés
Public Lands Organizer
Sierra Club Washington