

Mailed to SEPA and Susan Trettevik 3/24/14 CA



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Port Townsend, WA 98368

Phil Johnson, District 1   David W. Sullivan, District 2   John Austin, District 3

March 24, 2014

SEPA Center  
Washington Department of Natural Resources (DNR)  
P.O. Box 47015, Olympia,  
Washington 98504-7015

Susan K. Trettevik, Olympic Region Manager  
Washington Department of Natural Resources (DNR)  
411 Tillicum Lane  
Forks, WA 98331

**Re:    File No. 14-031201, Mitigated Determination of Non-Significance for the Devil's Vista Timber Sale,  
Application No. 30-087244, and Forest Practice Application No. 2612813**

Dear Ms. Trettevik and DNR SEPA-responsible officials,

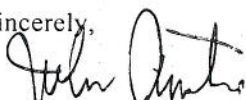
Thank you for the opportunity to comment on the above referenced proposed timber sale. This sale will have an adverse environmental effect by degrading a globally imperiled plant association - *The Douglas-fir-Western Hemlock/Pacific Rhododendron-Evergreen Huckleberry community*.

This plant association is listed as a priority 1 for conservation in DNR's Natural Heritage Plan. According to DNR's Natural Heritage ecologist Rex C. Crawford PhD, the proposed logging will "significantly degrade" this rare plant community and reduce its known viable occurrences from five to four locations worldwide.


Furthermore, DNR records document that the Devils Vista location is one of the top three best remaining examples of this community type in the world and the only viable occurrence known to occur on land managed by DNR. The other four known locations are on private or state parks land that may not provide adequate protection of the plant associations over the long term.

The Jefferson County Board of County Commissioners usually actively supports continued commercial timber management and sustainable harvest on DNR's lands: witness Commissioner Austin's public testimony in support of DNR's Bangor Harvest on the Toandos Peninsula at DNR's public meeting on Jefferson County's Coyle Peninsula at the Johnson Community Center on March 19, 2014. However, we feel that the decision by DNR to proceed with the Devil's Vista timber sale is in error given the certain adverse impacts that the timber sale would have upon this globally imperiled plant community and biodiversity; impacts that are not discussed in any depth in the SEPA documents. To protect this important plant association while keeping the School Trust financial whole, we request that DNR reconsider Jefferson County's 2012 Trust Land Transfer nomination to conserve the 415 acre of common school land as an expansion of the existing Devils Lake Natural Area.

Sincerely,

  
John Austin  
Commissioner, Dist. 3

  
Phillip Johnson  
Commissioner, Dist. 1

  
David Sullivan  
Commissioner, Dist. 2

Cc:    Peter Goldmark, Commissioner of Public Lands  
      Kyle Blum, Deputy Supervisor for State Lands