

## Cronin Forestry

To: DNR

From: Mike Cronin CF

Date: 10/07/16

RE: Proposed expansion of Dabob and Devils Lake preserves

I am writing to oppose the expansion of these two areas. I am a Certified Forester (#1964) and have operated Cronin Forestry since my retirement from DNR In 2006. I retired as Straits District Manager and spent all but the first 5 years of my 31 year DNR career as a local forester in East Jefferson County (EJC). I am intimately familiar with the forest lands under consideration.

In 2009 a proposed land exchange between the Department of Natural Resources (DNR) and Pope Resources created a great deal of community concern about the future of forest lands in EJC. County commissioner John Austin asked interested parties including myself, OFCO representative Connie Gallant, Peter Bahls of NWI, Sarah Spaeth of JLT and several other community members to convene as a Public Lands Advisory Group to consider the long term future of DNR lands in EJC. We met regularly for several months to consider the specific attributes of each DNR managed parcel in EJC and to agree on a preferred future for each of these parcels. In 2011 we submitted a report entitled:

### **FOREST FOR THE FUTURE**

#### **An asset management strategy for state-owned forests in east Jefferson County**

This report included recommendations for the long-term future for each of the parcels considered. Preferred futures for each parcel included either: Trust Land Transfer (TLT), Community Forest, exchange to private landowner, exchange to USFS, or DNR hold and manage. It was sent to Commissioner Goldmark and the group met with the commissioner on several occasions to discuss the issue. A large part of the forest land proposed for the expansion of the Dabob Bay Natural Resources Conservation Area (NRCA) is within the "Silent Lake" block addressed in the 2011 report. The consensus recommendation in 2011 was for DNR to hold and manage these lands.

As DNR's Unit Forester in EJC I was involved in the original 1984 designation of the Dabob Natural Area Preserve (NAP). It was proposed to protect the unique and rare salt marsh plant community on the sand spits of Tarboo Bay. I was in favor of this designation and it has been successful in its objective. The removal of more of these well managed, second- and third-growth forests from the working forest base will provide no better protection to critical resources than the current designation. To believe that removal is needed is a no confidence vote in the DNR Habitat Conservation Plan (HCP). Replacement of trust land parcels may reimburse the trust but it cannot be seen as maintaining the working forest land base. On DNR managed trust lands the HCP has been in place nearly two decades and forests regenerated after harvest under those rules exhibit a considerably higher level of structural complexity than similar aged private forests. There are no longer directly comparable forest lands to replace them.

As a consulting forester I represent family forest landowners who will only hold and forgo developing their forest property as long as it can return reasonable revenue. As the working forest land base is reduced, lumber mills close and construction of new mills is unlikely. These lost market opportunities will only hasten conversion of forest lands.

The unique and valuable bog with the older age forest surrounding Devils Lake is well protected by the hydrographic boundary of the original Natural Area designation and I have enjoyed regular visits to this beautiful place for over 35 years. I was involved in and supported the original boundary and I support the inclusion of the very steep slopes between the bay and the powerline, but the idea that it would be “simpler to just take it all” does not seem right. The Douglas-fir/western hemlock/Pacific rhododendron/ evergreen huckleberry plant community is adequately represented in the area and does not need further protection. The managed third-growth forests in the rest of Section 36 should continue to be managed trust lands in combination with adjacent working forests. Please show a little faith in your own management before rushing to remove ever more acreage to “protect” it.

Thank you for the opportunity to comment.

Mike Cronin CF