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Board of Commissioners
Connie Beauvais, *President*
Steven Burke, *Vice President*
Colleen McAleer, *Secretary*
Executive Director
Karen Goschen

October 16, 2018

Ms. Hillary Franz
Commissioner of Public Lands
SEPA Center
PO Box 47015
Olympia, Washington 98504-7015

RE: Comments on the Revised Environmental Impact Statement for the Long-Term Conservation Strategy for the Marbled Murrelet

Introduction:

The Port of Port Angeles's responsibility under its enabling legislation is to promote economic prosperity for Clallam County which spans the northern portion of the Olympic Peninsula. The forest products industry continues to play a vital role in the economy of the North Olympic Peninsula and, provided an adequate supply of timber is available, has wonderful opportunities for growth into the future. The Port provides shipping, handling, logistical and barge support to serve the industry's needs for sorting and transporting logs throughout Clallam County, the Olympic Peninsula and across Puget Sound.

Past decisions on the management of federal and state lands have reduced the supply of timber on the Olympic Peninsula, with dramatic, and long-lasting impacts to our economy and communities. Nonetheless, the wood products sector has enormous potential in Clallam County. The sector currently contributes 1,446 jobs and \$78 million in income annually to Clallam County.

Port customers are pioneering integrating carbon fiber recycled from aerospace manufacturing into mass timber products. Promising research is underway with Western Hemlock that could lead to new uses and markets for the species.

Bringing these exciting technologies to scale will require a reliable supply of timber from public and private lands.

Additionally, the Port of Port Angeles is a junior taxing district that is a beneficiary of DNR trust revenues. The Port receives between \$75,000-\$100,000 per year from DNR trust revenues

The Port of Port Angeles requests that the comment period on the Revised Environmental Impact Statement be Extended to Allow for Analysis and Public Review of the Economic and Timber Harvest Impacts

Due to the importance of the forest products sector in Clallam County, and as a beneficiary of DNR trust revenues, the Port has been actively engaged in the Board of Natural Resources' process for updating the Long-Term Conservation Strategy (LTCS) for the Marbled Murrelet.

The Port is disappointed that the Revised Draft Environmental Statement (RDEIS) for the LTCS does not contain updated analysis of timber sale or economic impacts by county.

Nearly all management options under consideration in the RDEIS include adding new encumbrances on DNR trust lands in Clallam County. Our Port and our community will be adversely, and uniquely, impacted under many of the alternatives being examined in the RDEIS.

Accordingly, we request:

- The DNR complete a thorough economic and timber harvest impact analysis of all the alternatives under consideration by county.
- That the analysis be made available to the public.
- That the comment period for the RDEIS be extended so that the public can review and comment on the analysis.

The analysis must include impacts to trust beneficiaries, including Junior Taxing Districts, in the regions that will be uniquely impacted by many of the alternatives under consideration. A "state-wide" analysis is not adequate because of the differential impacts in the areas where new encumbrances on land management are under consideration.

Thank you for considering these comments. The Port of Port Angeles looks forward to working with the DNR to complete this difficult project.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Goschen".

Karen F. Goschen
Executive Director