



Legacy Forest Defense Coalition  
P.O. Box 7154  
Tacoma, WA 98417  
Phone: (360) 872-3264  
Email: info@wlfdc.org

January 2, 2024

To: Board of Natural Resources  
MS 47000  
Olympia, WA 98504-7000  
Submitted via email: bnr@dnr.wa.gov

Re: **Addendum A** to Letter of Opposition to “Carrot” Timber Sale:  
Structurally Complex Forests in the South Coast HCP Planning Unit

DNR is required under the terms of its Policy for Sustainable Forests to manage structurally complex forests to meet older forest targets.<sup>1</sup> Although DNR asserts that they will meet their older forest target in the South Coast HCP planning unit by 2100, data obtained from DNR’s Public Disclosure Office indicates that DNR has only set aside 2,631 acres of structurally complex forests in the South Coast HCP planning unit for conservation, which represents **just one percent of the South Coast HCP planning unit** that has protected, structurally complex forests that are excluded from commercial timber harvest (see Figure 1, Tables 1 and 3). Of this total, 2,064 acres (78%) are contained within stream buffers (Table 2). The maps and tables in this addendum are based on spatial data obtained from DNR’s Public Disclosure Office.

I have attached a copy of Public Disclosure request PDR No. 6554 (SDS spatial data for conservation areas in Western Washington). Please add this information to the record for the “Carrot” timber sale.

Thank you,

Stephen Kropp  
Director

---

<sup>1</sup> See Policy for Sustainable Forests, p. 46; Policy for Sustainable Forests FEIS, p. 3-177; and procedures for Managing Structurally Complex Forests to Meet Older Forest Targets (PR 14-004-046).

Table 1. Protected Structurally Complex Forests

HCP Planning Unit	Total Forested Lands Covered Under the HCP (Acres) <sup>1</sup>	Protected Structurally Complex Forests (Acres) <sup>2</sup>	Percent Protected Structurally Complex Forests
Columbia	291,100	5,815	2.0%
South Coast	261,439	2,632	1.0%
North Puget Sound	459,218	34,547	7.5%
South Puget Sound	179,426	11,625	6.5%
Straits	127,400	5,836	4.6%
OESF	273,086	46,245	16.9%
Total	1,591,669	106,699	6.7%

1. Source: DNR GIS Open Data (<https://data-wadnr.opendata.arcgis.com/datasets/wadnr::habitat-conservation-plan-lands> and <https://data-wadnr.opendata.arcgis.com/datasets/wadnr::habitat-conservation-plan-units>)
2. Source: DNR Public Disclosure Office, PDR No. 6554 (SDS spatial data for conservation areas in Western Washington)

Table 2. Protected Structurally Complex Forests in Stream Buffers

HCP Planning Unit	Protected Structurally Complex Forests in Stream Buffers (RMZ's) (BASED ON DNR SDS ANALYSIS)	
	Acres	Percent
Columbia	2,562	44%
South Coast	2,064	78%
North Puget Sound	15,762	46%
South Puget Sound	5,205	45%
Straits	2,946	50%
OESF	20,549	44%

# Figure 1. Protected Structurally Complex Forests In South Coast HCP Planning Unit

**Source:** DNR Public Disclosure Office, PDR No. 6554 (SDS spatial data for conservation areas in Western Washington)

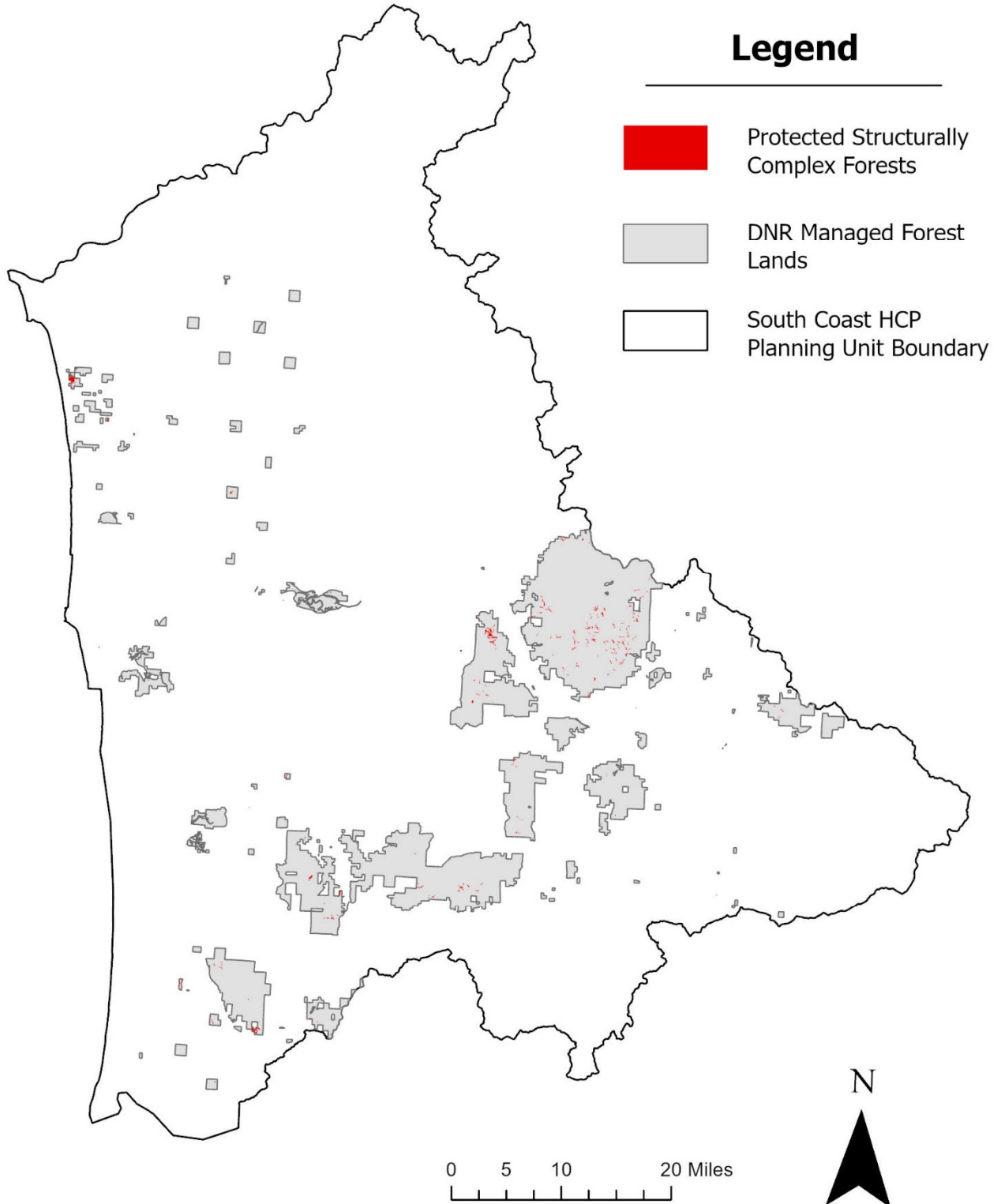


Table 3. Protected Botanically Diverse and Older Forests in the South Coast HCP Planning Unit

**Source:** DNR Public Disclosure Office, PDR No. 6554 (SDS spatial data for conservation areas in Western Washington)

FID	AOI	HCP_UNIT	SDS	ACRES	YEAR
0	2	S. COAST	BD	5.182244683	2021
1	2	S. COAST	BD	10.98350679	2021
2	2	S. COAST	BD	15.3716258	2021
3	2	S. COAST	BD	5.479313692	2021
4	2	S. COAST	BD	7.27752635	2021
5	2	S. COAST	BD	12.95623874	2021
6	2	S. COAST	BD	7.479790816	2021
7	2	S. COAST	BD	27.5547662	2021
8	2	S. COAST	BD	35.63604294	2021
9	2	S. COAST	BD	12.91910117	2021
10	2	S. COAST	BD	10.10420404	2021
11	2	S. COAST	BD	5.899129948	2021
12	2	S. COAST	BD	8.295183742	2021
13	2	S. COAST	BD	5.697978063	2021
14	2	S. COAST	BD	6.163003712	2021
15	2	S. COAST	BD	9.152671088	2021
16	2	S. COAST	BD	17.53298075	2021
17	2	S. COAST	BD	5.801142569	2021
18	6	S. COAST	BD	5.160259599	2021
19	6	S. COAST	BD	11.40993859	2021
20	6	S. COAST	BD	6.707640193	2021
21	6	S. COAST	BD	6.633476934	2021
22	6	S. COAST	BD	5.807645385	2021
23	6	S. COAST	BD	27.16073129	2021
24	6	S. COAST	BD	5.058607684	2021
25	6	S. COAST	BD	20.25282878	2021
26	6	S. COAST	BD	6.303472993	2021
27	6	S. COAST	BD	5.384015857	2021
28	6	S. COAST	BD	5.328742598	2021
29	6	S. COAST	BD	15.29682452	2021
30	6	S. COAST	BD	5.05713166	2021
31	6	S. COAST	BD	6.860813859	2021
32	6	S. COAST	BD	5.335409331	2021
33	6	S. COAST	BD	8.607298676	2021
34	6	S. COAST	BD	5.67395969	2021
35	6	S. COAST	BD	5.989867909	2021
36	6	S. COAST	BD	6.564766508	2021
37	6	S. COAST	BD	6.883237169	2021
38	6	S. COAST	BD	6.487855818	2021
39	6	S. COAST	BD	300.2020167	2021
40	6	S. COAST	BD	9.687966791	2021
41	6	S. COAST	BD	8.624205819	2021
42	7	S. COAST	BD	6.183032141	2021
43	7	S. COAST	BD	5.344446706	2021

44	7	S. COAST	BD	30.28784394	2021
45	7	S. COAST	BD	83.28209699	2021
46	7	S. COAST	BD	7.353858212	2021
47	7	S. COAST	BD	19.00315659	2021
48	7	S. COAST	BD	9.236813	2021
49	7	S. COAST	BD	5.732298965	2021
50	7	S. COAST	BD	8.40350159	2021
51	7	S. COAST	BD	16.05291013	2021
52	7	S. COAST	BD	15.36129772	2021
53	7	S. COAST	BD	8.100516804	2021
54	7	S. COAST	BD	12.88289042	2021
55	7	S. COAST	BD	6.389704081	2021
56	7	S. COAST	BD	9.230412402	2021
57	7	S. COAST	BD	10.55103395	2021
58	7	S. COAST	BD	22.31617986	2021
59	7	S. COAST	BD	8.427005633	2021
60	7	S. COAST	BD	6.786191811	2021
61	7	S. COAST	BD	8.779804122	2021
62	7	S. COAST	BD	5.138978275	2021
63	7	S. COAST	BD	31.04859811	2021
64	7	S. COAST	BD	5.389920681	2021
65	7	S. COAST	BD	44.52957424	2021
66	7	S. COAST	BD	5.386486463	2021
67	7	S. COAST	BD	6.599676932	2021
68	17	S. COAST	BD	6.131686704	2021
69	17	S. COAST	BD	6.11024055	2021
70	17	S. COAST	BD	5.828724403	2021
71	23	S. COAST	BD	20.65573024	2021
72	23	S. COAST	BD	8.132925468	2021
73	23	S. COAST	BD	18.04985983	2021
74	23	S. COAST	BD	8.201690625	2021
75	23	S. COAST	BD	9.336864053	2021
76	23	S. COAST	BD	9.547830282	2021
77	23	S. COAST	BD	15.73257328	2021
78	23	S. COAST	BD	18.45471302	2021
79	23	S. COAST	BD	8.645835818	2021
80	23	S. COAST	BD	5.455890797	2021
81	23	S. COAST	BD	15.07768507	2021
82	23	S. COAST	BD	26.10890523	2021
83	23	S. COAST	BD	10.44487821	2021
84	23	S. COAST	BD	7.369561445	2021
85	23	S. COAST	BD	24.88765454	2021
86	23	S. COAST	BD	5.257846345	2021
87	23	S. COAST	BD	32.96939939	2021
88	23	S. COAST	BD	6.134908646	2021
89	23	S. COAST	BD	5.145967834	2021
90	23	S. COAST	BD	25.50962321	2021
91	23	S. COAST	BD	16.51438362	2021
92	23	S. COAST	BD	15.84888547	2021
93	23	S. COAST	BD	6.198544907	2021
94	23	S. COAST	BD	8.646979022	2021
95	23	S. COAST	BD	7.490885062	2021

96	23	S. COAST	BD	11.03300159	2021
97	23	S. COAST	BD	13.89920072	2021
98	23	S. COAST	BD	7.336368727	2021
99	23	S. COAST	BD	11.63627387	2021
100	23	S. COAST	BD	17.69059478	2021
101	23	S. COAST	BD	21.12657467	2021
102	23	S. COAST	BD	9.377617635	2021
103	23	S. COAST	BD	7.588106895	2021
104	23	S. COAST	BD	24.47775688	2021
105	23	S. COAST	BD	41.10748079	2021
106	23	S. COAST	BD	9.082168103	2021
107	23	S. COAST	BD	6.970518996	2021
108	23	S. COAST	BD	10.04144114	2021
109	23	S. COAST	BD	5.571067816	2021
110	23	S. COAST	BD	9.197739635	2021
111	23	S. COAST	BD	23.30092977	2021
112	23	S. COAST	BD	5.682281159	2021
113	23	S. COAST	BD	8.103288808	2021
114	23	S. COAST	BD	9.799830881	2021
115	23	S. COAST	BD	6.092446329	2021
116	23	S. COAST	BD	17.66973335	2021
117	23	S. COAST	BD	22.94005714	2021
118	23	S. COAST	BD	5.55224993	2021
119	23	S. COAST	BD	28.39578205	2021
120	23	S. COAST	BD	10.84606284	2021
121	23	S. COAST	BD	30.28532011	2021
122	23	S. COAST	BD	8.622528139	2021
123	23	S. COAST	BD	23.61854758	2021
124	23	S. COAST	BD	39.01351046	2021
125	23	S. COAST	BD	7.952371336	2021
126	23	S. COAST	BD	10.75244907	2021
127	23	S. COAST	BD	33.33899768	2021
128	23	S. COAST	BD	6.553653771	2021
129	23	S. COAST	BD	5.074971438	2021
130	23	S. COAST	BD	10.39776364	2021
131	23	S. COAST	BD	17.54250963	2021
132	23	S. COAST	BD	5.78402708	2021
133	23	S. COAST	BD	5.593905617	2021
134	23	S. COAST	BD	7.459500526	2021
135	23	S. COAST	BD	16.06554031	2021
136	23	S. COAST	BD	13.34029074	2021
137	23	S. COAST	BD	30.3796153	2021
138	23	S. COAST	BD	32.98017957	2021
139	23	S. COAST	BD	16.32237469	2021
140	23	S. COAST	BD	6.062557496	2021
141	23	S. COAST	BD	13.83395305	2021
142	23	S. COAST	BD	54.63969587	2021
143	23	S. COAST	BD	17.40660405	2021
144	23	S. COAST	BD	34.77905461	2021
145	31	S. COAST	BD	32.50056483	2021
146	31	S. COAST	BD	20.4181422	2021
147	31	S. COAST	BD	19.16481142	2021

148	31	S. COAST	BD	9.476545696	2021
149	31	S. COAST	BD	152.9481098	2021
150	32	S. COAST	BD	8.351263814	2021
151	32	S. COAST	BD	17.26758662	2021
152	32	S. COAST	BD	6.133812642	2021
153	32	S. COAST	BD	6.611769406	2021
154	32	S. COAST	BD	6.853335468	2021
155	32	S. COAST	BD	20.60781344	2021
156	32	S. COAST	BD	6.261907215	2021
157	32	S. COAST	BD	19.98648031	2021
158	32	S. COAST	BD	5.039062102	2021
159	32	S. COAST	BD	5.816457357	2021
160	32	S. COAST	BD	13.59288218	2021
161	32	S. COAST	BD	20.37940553	2021
162	32	S. COAST	BD	10.36960349	2021

**TOTAL ACRES      2631.752118**