



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

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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 “Freedom” Timber Sale:  
Structurally Complex Forests in the Columbia 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 Columbia HCP planning unit by 2100, data obtained from DNR’s Public Disclosure Office indicates that DNR has only set aside 5,815 acres of structurally complex forests in the Columbia HCP planning unit for conservation, which represents **just two percent of the Columbia 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, 2,562 acres (44%) 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 “Freedom” timber sale.

Thank you,

Stephen Kropp  
Director

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<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 Columbia HCP Planning Unit

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

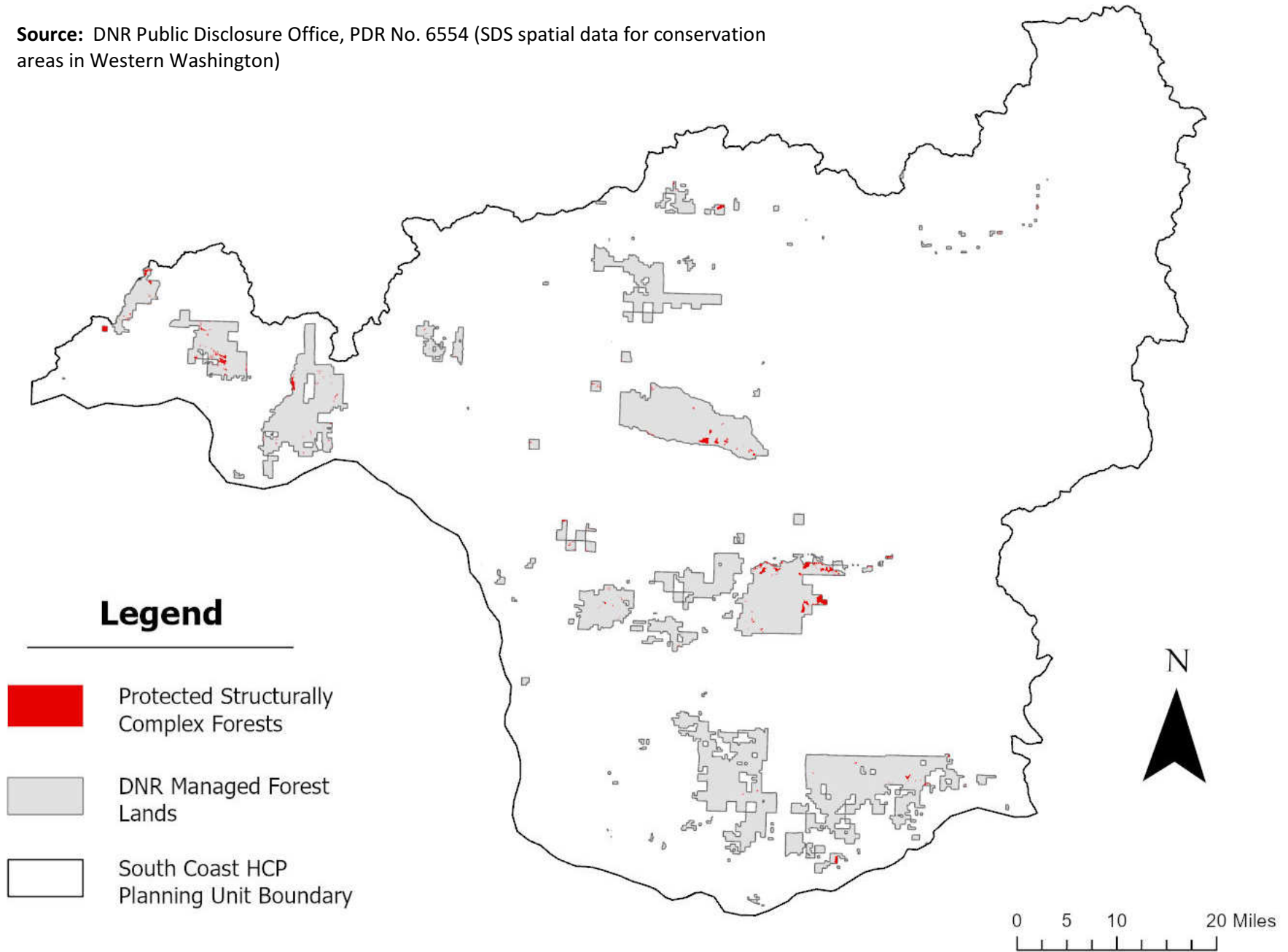


Table 3. Protected Botanically Diverse and Older Forests in the Columbia HCP Planning Unit

**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	7	COLUMBIA	BD	155.50	2021
1	7	COLUMBIA	BD	8.33	2021
2	7	COLUMBIA	BD	5.48	2021
3	7	COLUMBIA	BD	7.79	2021
4	7	COLUMBIA	BD	21.94	2021
5	7	COLUMBIA	BD	13.18	2021
6	7	COLUMBIA	BD	17.56	2021
7	7	COLUMBIA	BD	8.73	2021
8	7	COLUMBIA	BD	14.74	2021
9	7	COLUMBIA	BD	20.11	2021
10	7	COLUMBIA	BD	56.42	2021
11	7	COLUMBIA	BD	138.35	2021
12	11	COLUMBIA	BD	13.52	2021
13	11	COLUMBIA	BD	8.28	2021
14	11	COLUMBIA	BD	15.69	2021
15	11	COLUMBIA	BD	22.43	2021
16	11	COLUMBIA	BD	12.83	2021
17	11	COLUMBIA	BD	8.56	2021
18	11	COLUMBIA	BD	5.73	2021
19	11	COLUMBIA	BD	6.66	2021
20	11	COLUMBIA	BD	9.35	2021
21	11	COLUMBIA	BD	17.81	2021
22	11	COLUMBIA	BD	8.63	2021
23	11	COLUMBIA	BD	12.23	2021
24	11	COLUMBIA	BD	5.13	2021
25	11	COLUMBIA	BD	9.57	2021
26	11	COLUMBIA	BD	10.95	2021
27	11	COLUMBIA	BD	36.77	2021
28	11	COLUMBIA	BD	9.38	2021
29	11	COLUMBIA	BD	7.63	2021
30	11	COLUMBIA	BD	12.75	2021
31	11	COLUMBIA	BD	226.52	2021
32	11	COLUMBIA	BD	8.77	2021
33	11	COLUMBIA	BD	6.36	2021
34	11	COLUMBIA	BD	15.75	2021
35	11	COLUMBIA	BD	12.56	2021
36	11	COLUMBIA	BD	5.03	2021
37	11	COLUMBIA	BD	20.56	2021
38	11	COLUMBIA	BD	5.19	2021
39	11	COLUMBIA	BD	34.49	2021
40	11	COLUMBIA	BD	10.71	2021

41	11	COLUMBIA	BD	8.07	2021
42	11	COLUMBIA	BD	40.96	2021
43	11	COLUMBIA	BD	14.91	2021
44	11	COLUMBIA	BD	10.62	2021
45	11	COLUMBIA	BD	51.23	2021
46	11	COLUMBIA	BD	32.27	2021
47	11	COLUMBIA	BD	309.07	2021
48	11	COLUMBIA	BD	6.74	2021
49	11	COLUMBIA	BD	16.80	2021
50	11	COLUMBIA	BD	5.36	2021
51	11	COLUMBIA	BD	63.42	2021
52	11	COLUMBIA	BD	18.39	2021
53	11	COLUMBIA	BD	10.03	2021
54	11	COLUMBIA	BD	5.12	2021
55	11	COLUMBIA	BD	13.68	2021
56	11	COLUMBIA	BD	6.26	2021
57	11	COLUMBIA	BD	12.67	2021
58	11	COLUMBIA	BD	8.14	2021
59	11	COLUMBIA	BD	23.55	2021
60	11	COLUMBIA	BD	8.85	2021
61	11	COLUMBIA	BD	13.25	2021
62	11	COLUMBIA	BD	12.63	2021
63	11	COLUMBIA	BD	57.18	2021
64	11	COLUMBIA	BD	10.17	2021
65	11	COLUMBIA	BD	6.17	2021
66	11	COLUMBIA	BD	32.61	2021
67	17	COLUMBIA	BD	6.87	2021
68	17	COLUMBIA	BD	5.87	2021
69	17	COLUMBIA	BD	20.23	2021
70	17	COLUMBIA	BD	146.67	2021
71	17	COLUMBIA	BD	12.86	2021
72	17	COLUMBIA	BD	19.64	2021
73	20	COLUMBIA	BD	13.00	2021
74	20	COLUMBIA	BD	15.68	2021
75	20	COLUMBIA	BD	5.49	2021
76	20	COLUMBIA	BD	5.09	2021
77	20	COLUMBIA	BD	45.05	2021
78	20	COLUMBIA	BD	5.56	2021
79	20	COLUMBIA	BD	8.30	2021
80	20	COLUMBIA	BD	5.54	2021
81	20	COLUMBIA	BD	45.29	2021
82	20	COLUMBIA	BD	39.23	2021
83	20	COLUMBIA	BD	69.17	2021
84	20	COLUMBIA	BD	25.23	2021
85	20	COLUMBIA	BD	5.94	2021
86	20	COLUMBIA	BD	19.18	2021
87	20	COLUMBIA	BD	265.27	2021
88	20	COLUMBIA	BD	100.17	2021
89	20	COLUMBIA	BD	107.67	2021
90	20	COLUMBIA	BD	44.36	2021

91	20	COLUMBIA	BD	64.17	2021
92	20	COLUMBIA	BD	13.97	2021
93	20	COLUMBIA	BD	25.42	2021
94	20	COLUMBIA	BD	5.41	2021
95	20	COLUMBIA	BD	37.50	2021
96	20	COLUMBIA	BD	9.79	2021
97	20	COLUMBIA	BD	32.06	2021
98	20	COLUMBIA	BD	26.35	2021
99	20	COLUMBIA	BD	5.34	2021
100	21	COLUMBIA	BD	15.32	2021
101	21	COLUMBIA	BD	31.23	2021
102	21	COLUMBIA	BD	6.02	2021
103	21	COLUMBIA	BD	25.08	2021
104	21	COLUMBIA	BD	20.00	2021
105	21	COLUMBIA	BD	8.23	2021
106	21	COLUMBIA	BD	6.86	2021
107	21	COLUMBIA	BD	7.28	2021
108	21	COLUMBIA	BD	7.48	2021
109	21	COLUMBIA	BD	10.15	2021
110	21	COLUMBIA	BD	10.07	2021
111	21	COLUMBIA	BD	11.35	2021
112	21	COLUMBIA	BD	22.85	2021
113	21	COLUMBIA	BD	6.76	2021
114	21	COLUMBIA	BD	264.40	2021
115	21	COLUMBIA	BD	27.55	2021
116	21	COLUMBIA	BD	440.79	2021
117	21	COLUMBIA	BD	22.38	2021
118	21	COLUMBIA	BD	8.20	2021
119	21	COLUMBIA	BD	14.58	2021
120	21	COLUMBIA	BD	8.06	2021
121	21	COLUMBIA	BD	56.85	2021
122	21	COLUMBIA	BD	70.81	2021
123	21	COLUMBIA	BD	8.68	2021
124	21	COLUMBIA	BD	119.88	2021
125	21	COLUMBIA	BD	155.04	2021
126	21	COLUMBIA	BD	7.22	2021
127	21	COLUMBIA	BD	34.05	2021
128	21	COLUMBIA	BD	21.03	2021
129	21	COLUMBIA	BD	72.38	2021
130	21	COLUMBIA	BD	624.96	2021
131	21	COLUMBIA	BD	79.02	2021
132	21	COLUMBIA	BD	29.15	2021
133	21	COLUMBIA	BD	59.54	2021
134	21	COLUMBIA	BD	6.04	2021
135	29	COLUMBIA	BD	6.23	2021
136	29	COLUMBIA	BD	118.24	2021
137	29	COLUMBIA	BD	6.56	2021
138	29	COLUMBIA	BD	5.17	2021
139	29	COLUMBIA	BD	39.53	2021
140	29	COLUMBIA	BD	8.79	2021

141	29	COLUMBIA	BD	6.38	2021
142	29	COLUMBIA	BD	5.27	2021
143	29	COLUMBIA	BD	6.33	2021
144	29	COLUMBIA	BD	6.71	2021
145	29	COLUMBIA	BD	87.66	2021
146	29	COLUMBIA	BD	10.26	2021
147	29	COLUMBIA	BD	26.51	2021
148	29	COLUMBIA	BD	22.36	2021
149	30	COLUMBIA	BD	17.44	2021
150	30	COLUMBIA	BD	19.20	2021

**TOTAL  
ACRES**            5815.43