



## COUNTY COMMISSIONERS

Carolina Mejia  
District One

Gary Edwards  
District Two

Tye Menser  
District Three

## BOARD OF COUNTY COMMISSIONERS

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June 16, 2022

Commissioner Hilary Franz  
Deputy Supervisor Angus Brodie  
Board of Natural Resources  
1111 Washington St SE  
Olympia, WA 98501-7007

Dear Board of Natural Resources and Commissioner Franz:

Thank you for your commitment to balancing clean air and water, wildlife habitat, and recreation with economic opportunities in Washington State through the DNR Carbon Project. We are aware of the many challenges you face as you seek to manage state forestlands, and we urge you to take a flexible, forward-thinking approach as you balance the many competing interests at issue.

DNR's own forestry data suggests that less than 7% of state forestlands managed by DNR in Thurston County (about 4,500 acres) are more than 80 years old. The Center for Responsible Forestry has estimated that there are only about 3,100 acres of "Legacy Forest" (about 4.5% of lands managed by DNR) remaining on Forest Board lands in Thurston County that are not already protected within riparian management zones or other conservation areas. We believe this is an important, scientifically-significant temporal distinction, because Legacy Forests more than 80 years old --- that originated prior to the widespread use of clearcutting and plantation forestry practices --- have structural complexity and biodiversity elements that younger forests do not. These forests have maximum ecosystem benefits for the entire community, with special ecological and cultural characteristics. They are the forests most likely to develop old-growth forest characteristics in the near term.

We are grateful that approximately 374 acres of Thurston County's older, Legacy Forest was included for protection in Phase I of the Carbon Project. As you proceed through the selection process for Phase II, we urge you to prioritize our other 3,100 acres of Legacy Forest for inclusion. Mapping of the County's Legacy Forest parcels --- along with photos and more-detailed mapping of several examples --- is included in Attachment 1.

As you can see, a majority of our remaining Legacy Forests are scheduled for cutting by 2026. This is unacceptable to our residents from a variety of perspectives, especially as we struggle to meet local climate targets in our Thurston Climate Mitigation Plan in the face of accelerating climate change. Although we are aware that you are not, generally speaking, selecting Phase II parcels based on a particular year as a data point, we nonetheless request that you give the highest priority to the Legacy Forest parcels mapped in Attachment 1. We further request that you concurrently leverage the many other tools that you have at your disposal, including the carbon offset market, and Trust Land Transfer

Program, to protect all remaining Legacy Forests in Thurston County; and that you consult closely with us as you prioritize older forests with high ecological value on State Forest Lands in Thurston County for conservation. We are particularly concerned about the potential imminent auction of the Juno, Hopscotch, and Buttercup sales within the next year, and request that you defer or modify these sales to protect the older forest within these units.

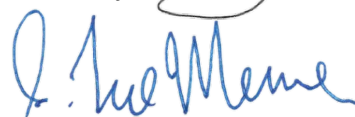
Protecting Legacy Forests is also the most sensible way to meet the goals under your Habitat Conservation Plan and Policy for Sustainable Forests, which require that the lands you manage contain 10-15% older forests by the end of the century. Although we recognize that State Forest Lands in Thurston County are not currently designated to contribute to older forest targets, your ability to meet those targets within existing conservation areas is currently being litigated in the Division 2 Court of Appeals. If the Court's decision requires that any of Thurston County's Legacy Forests will be needed to meet those goals, the aggressive projected schedule of upcoming cuts will significantly undermine that effort.

Thank you for considering our input on this issue of great interest to Thurston County.

Attest:

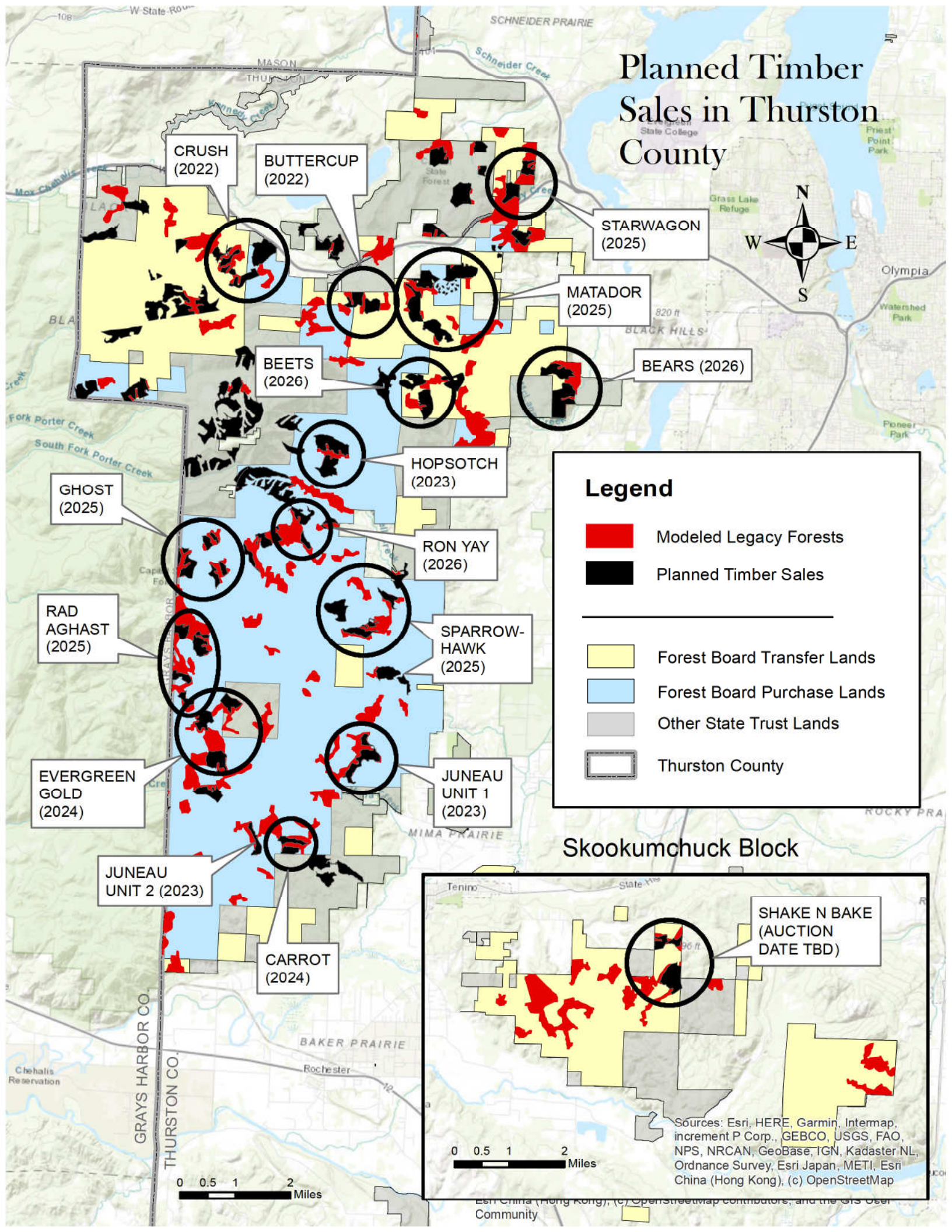
RAO (Initials)  
County Manager/Asst. County Manager

  
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Carolina Mejia, Chair

  
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Tye Menser, Vice-Chair

  
\_\_\_\_\_  
Gary Edwards, Commissioner

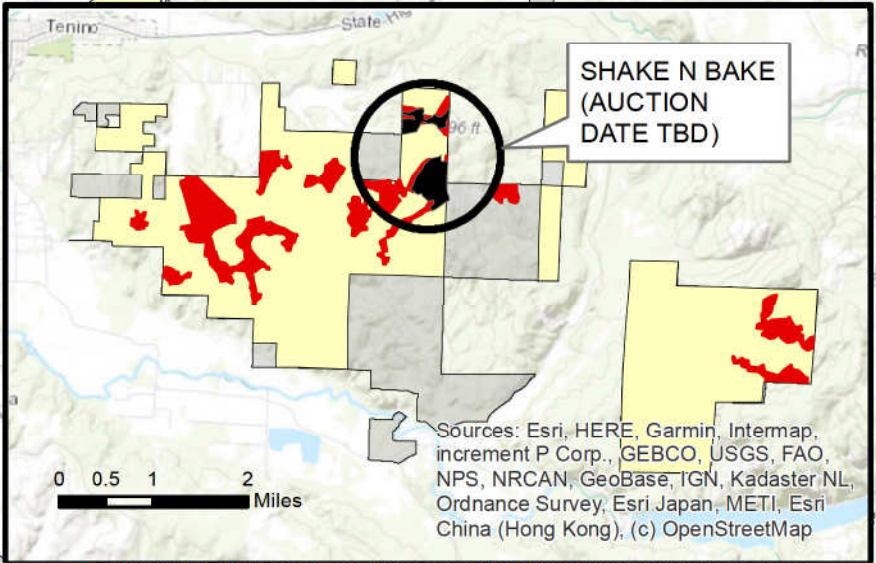
# Planned Timber Sales in Thurston County



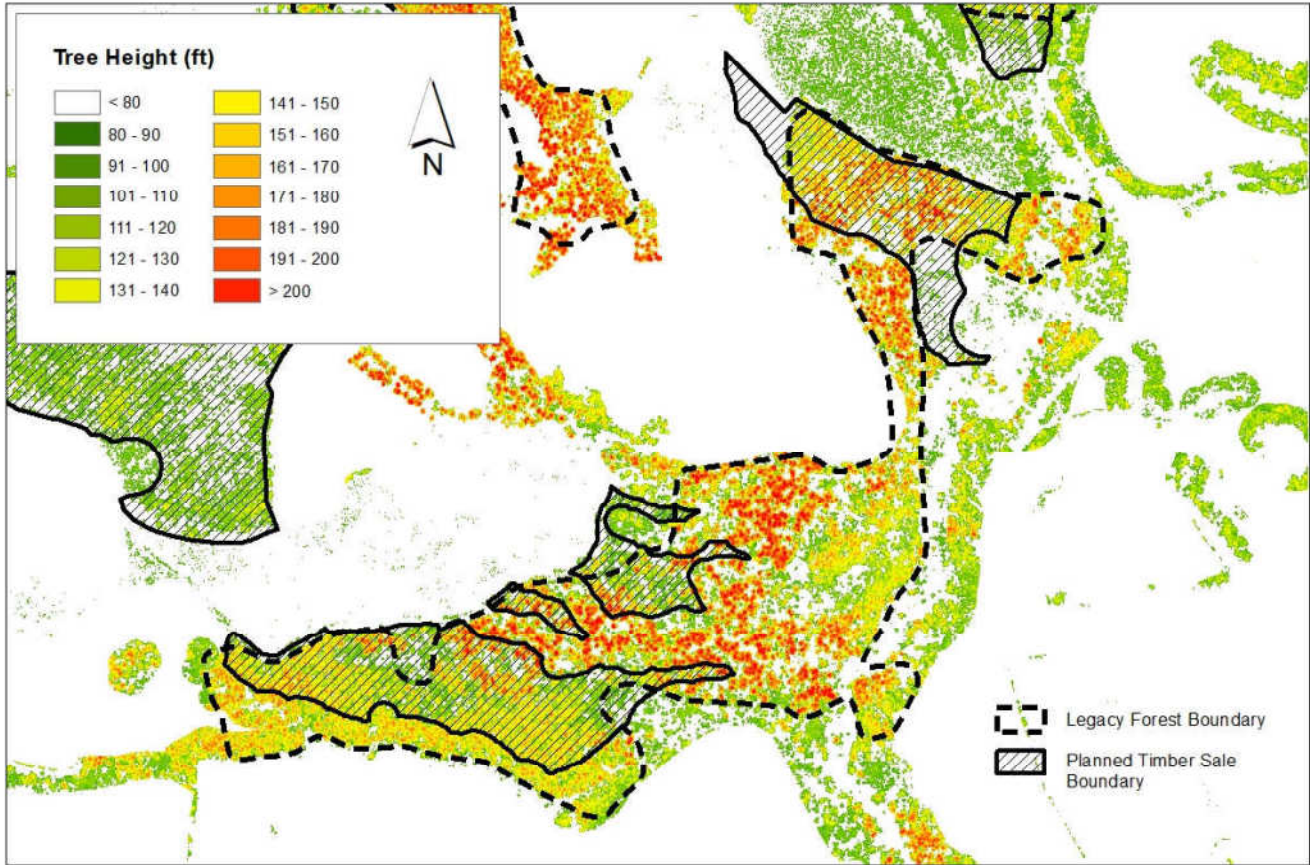
**Legend**

- Modeled Legacy Forests
- Planned Timber Sales
- Forest Board Transfer Lands
- Forest Board Purchase Lands
- Other State Trust Lands
- Thurston County

## Skookumchuck Block

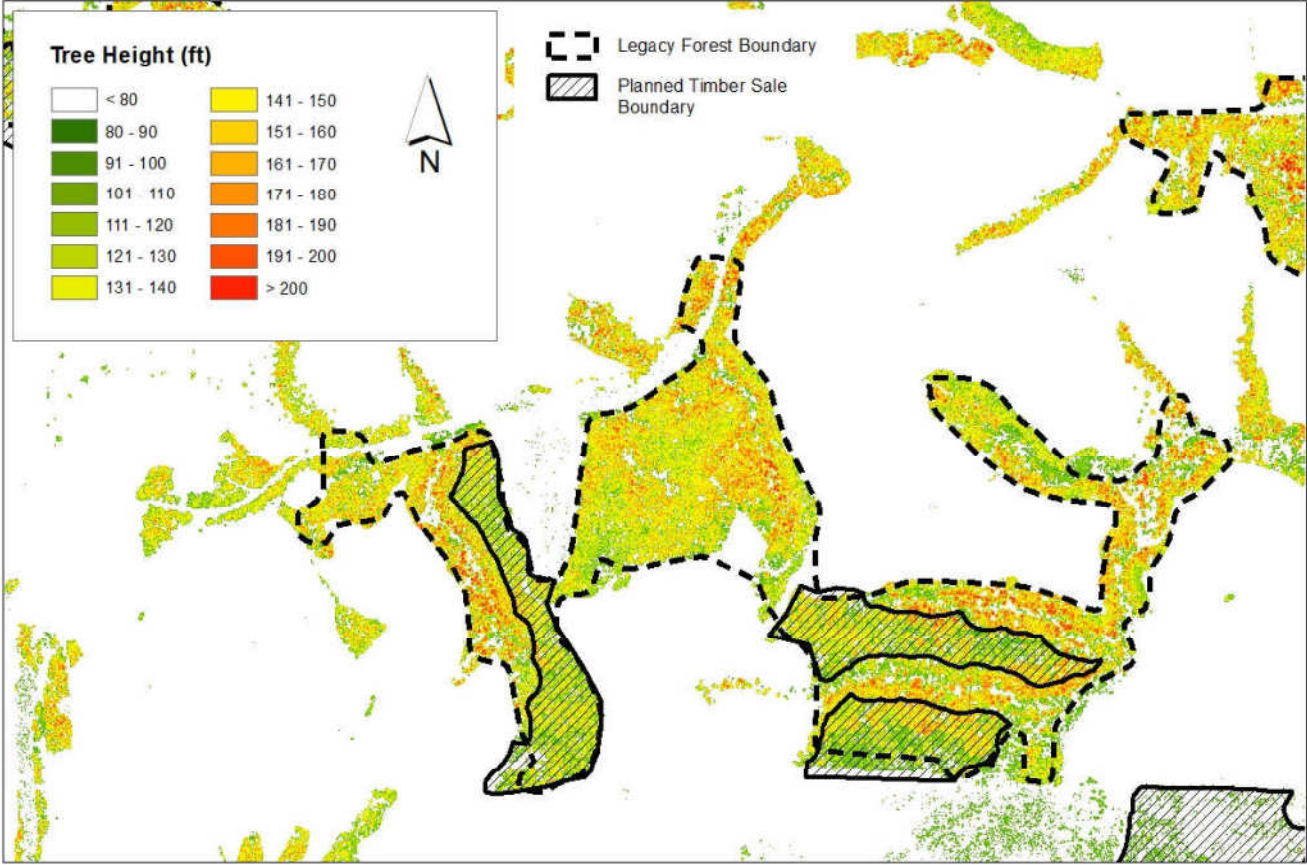


# Sparrow-Hawk Timber Sale (2025)



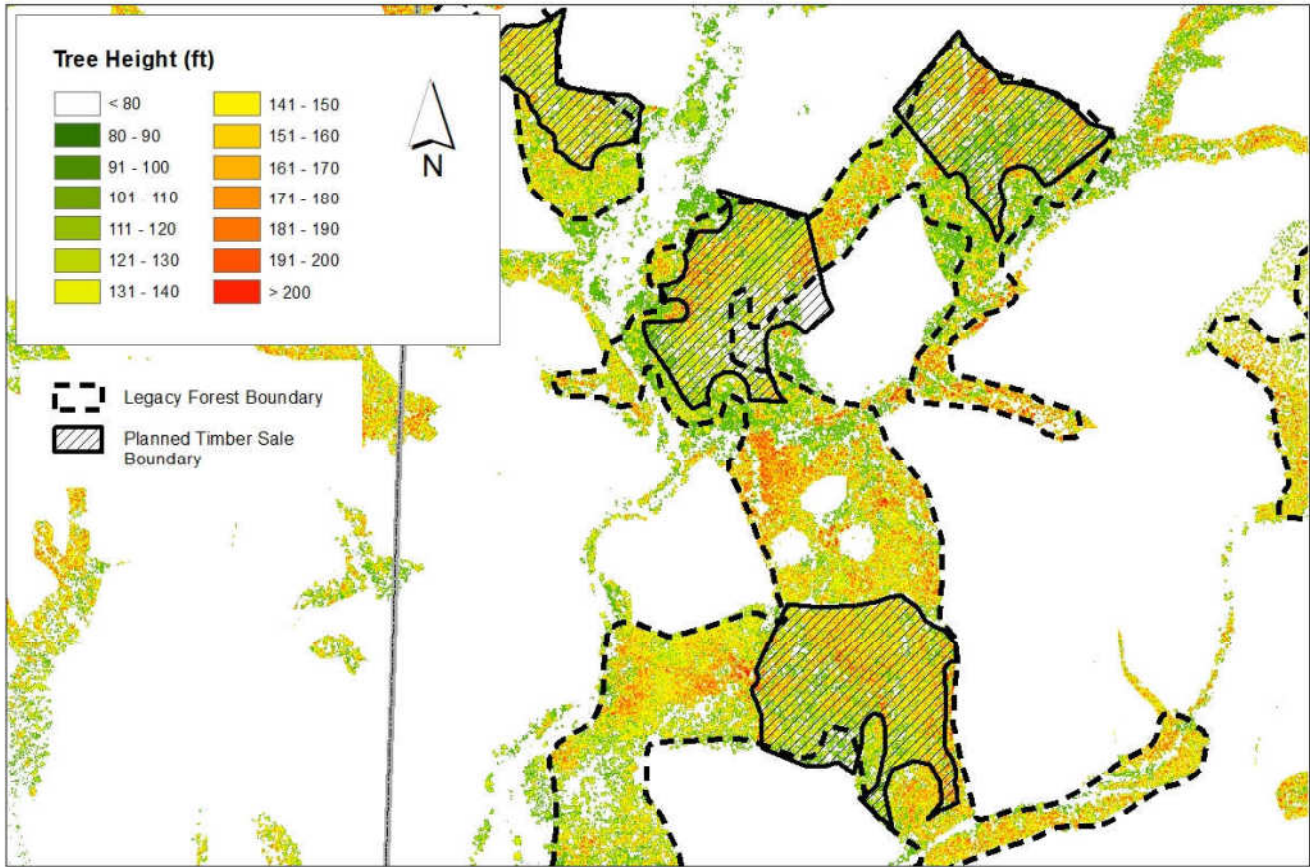


# Carrot & Juneau Timber Sales (2023-2024)





# Evergreen Gold Timber Sale (2024)



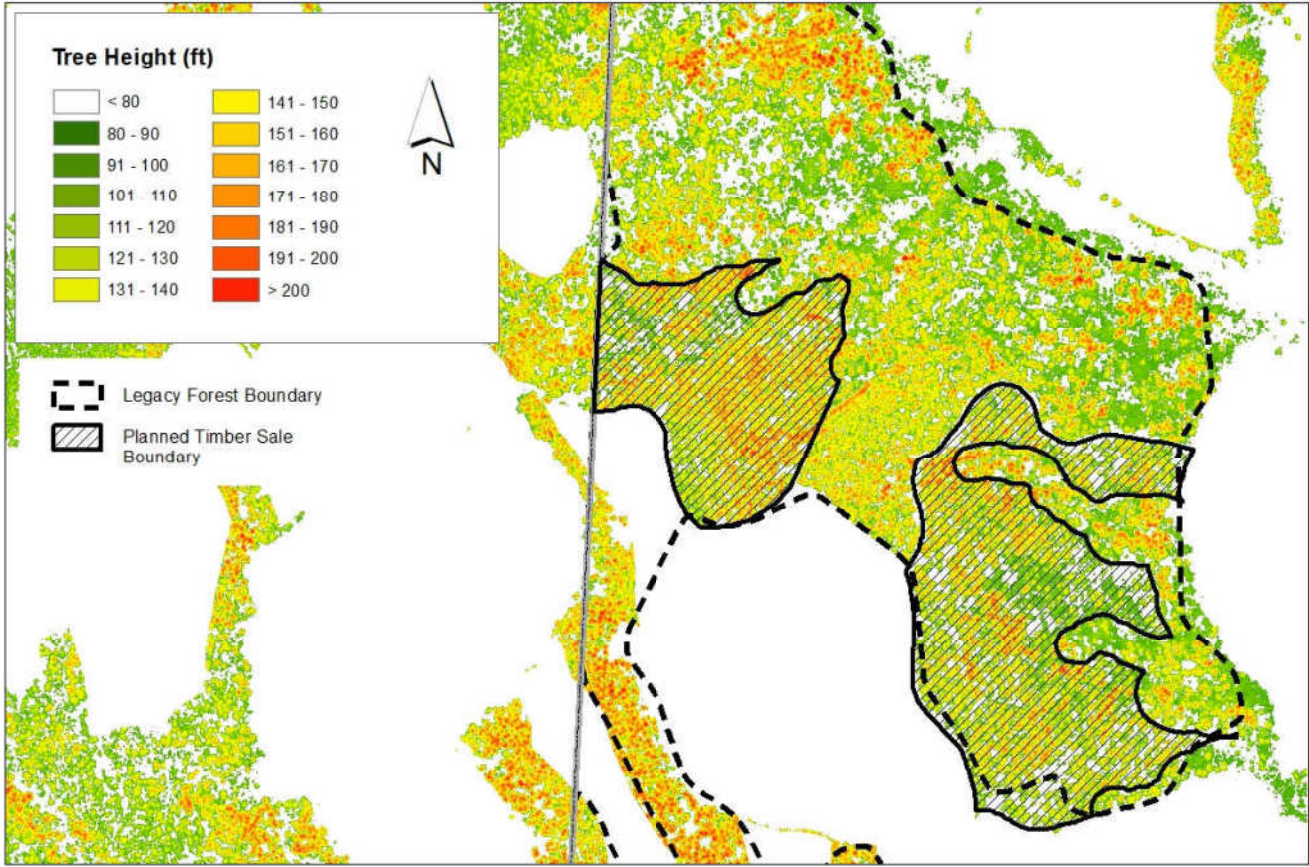








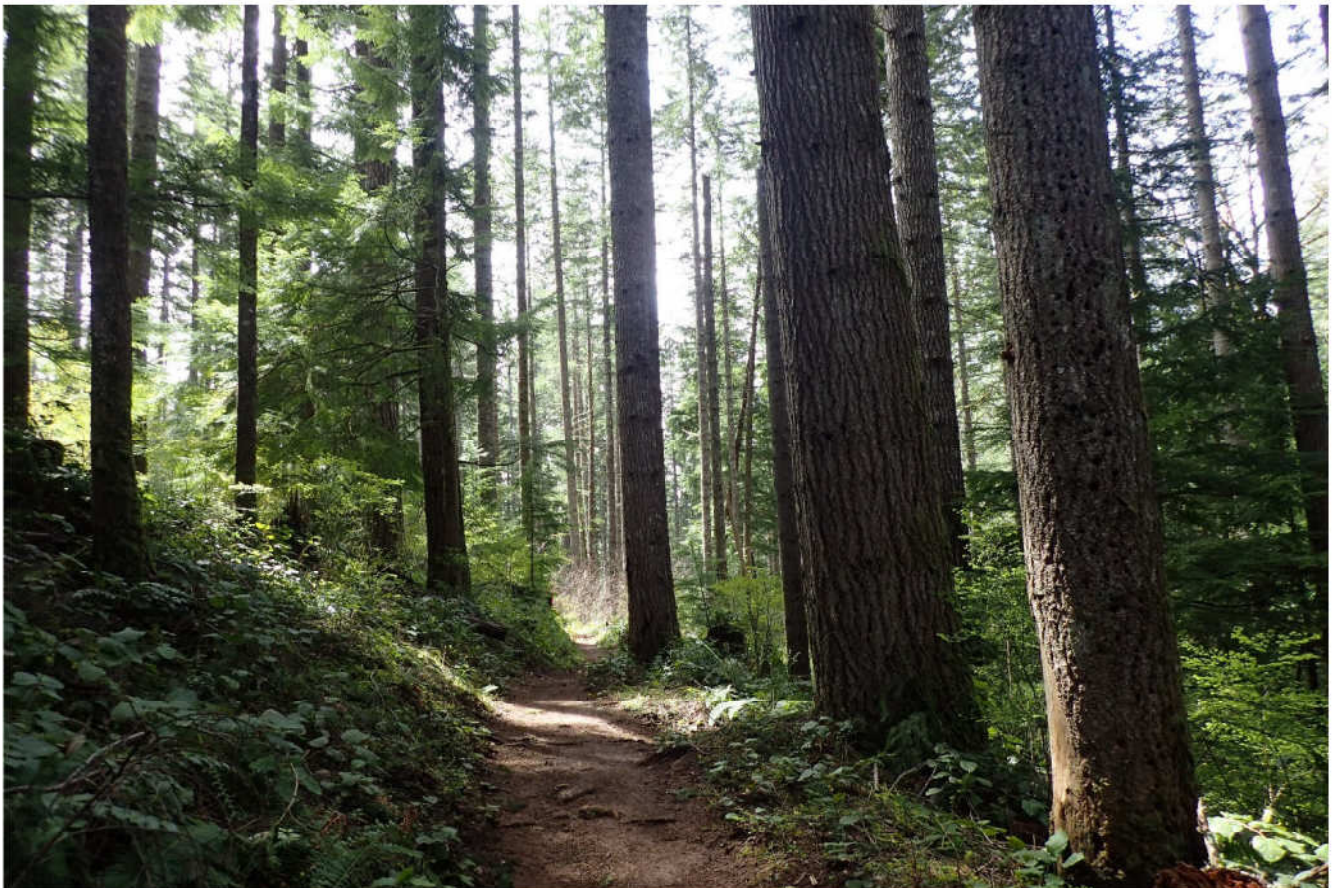
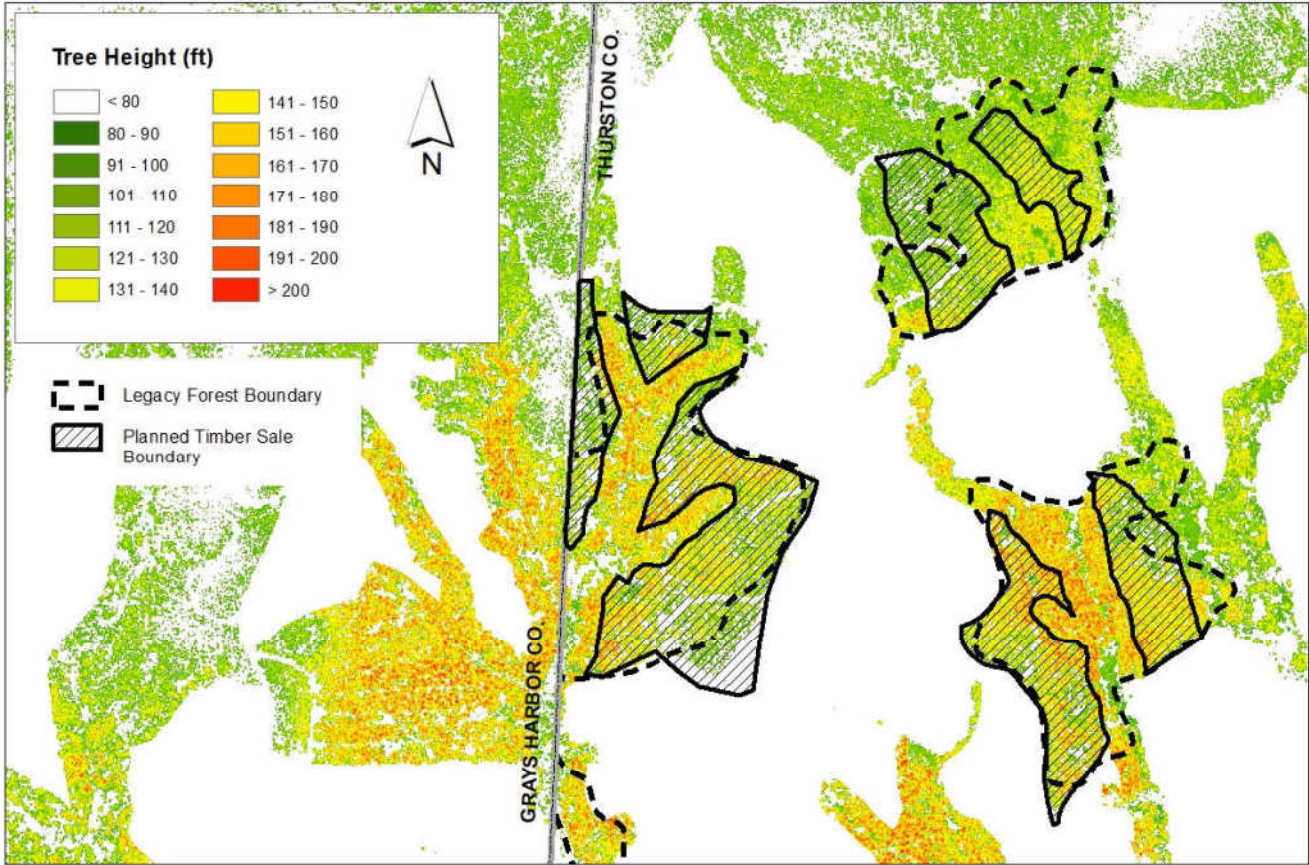
# Rad Aghast Timber Sale (2025)







# Ghost Timber Sale (2025)



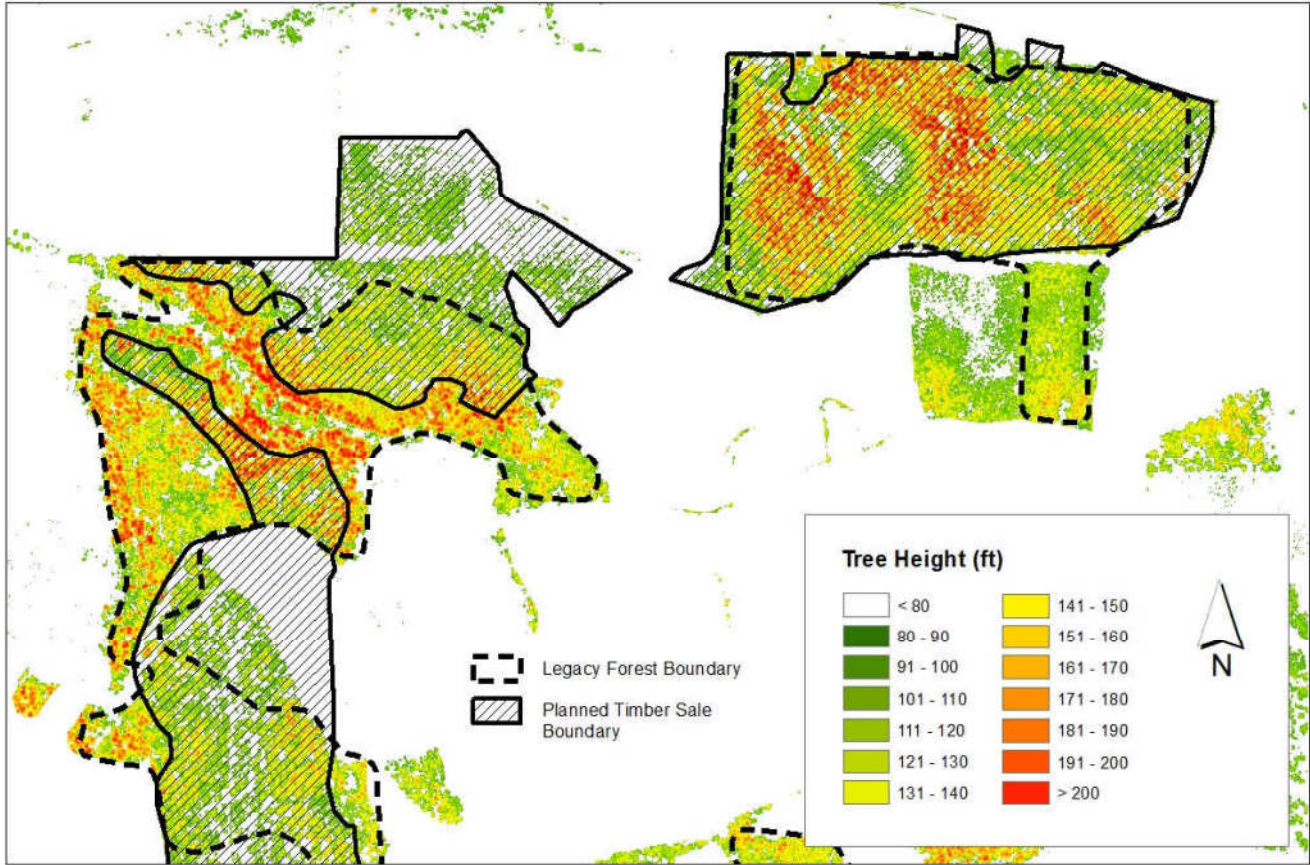








# Matador Timber Sale (2025)







# Ron Yay Timber Sale (2026)

