



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 “Last Crocker” Timber Sale:  
Structurally Complex Forests in the Straits 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 2090, data obtained from DNR’s Public Disclosure Office indicates that DNR has only set aside 5,836 acres of structurally complex forests in the Straits HCP planning unit for conservation, which represents **just five percent of the Straits 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, 2,946 acres (50%) 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 “Last Crocker” 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 Straits HCP Planning Unit

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

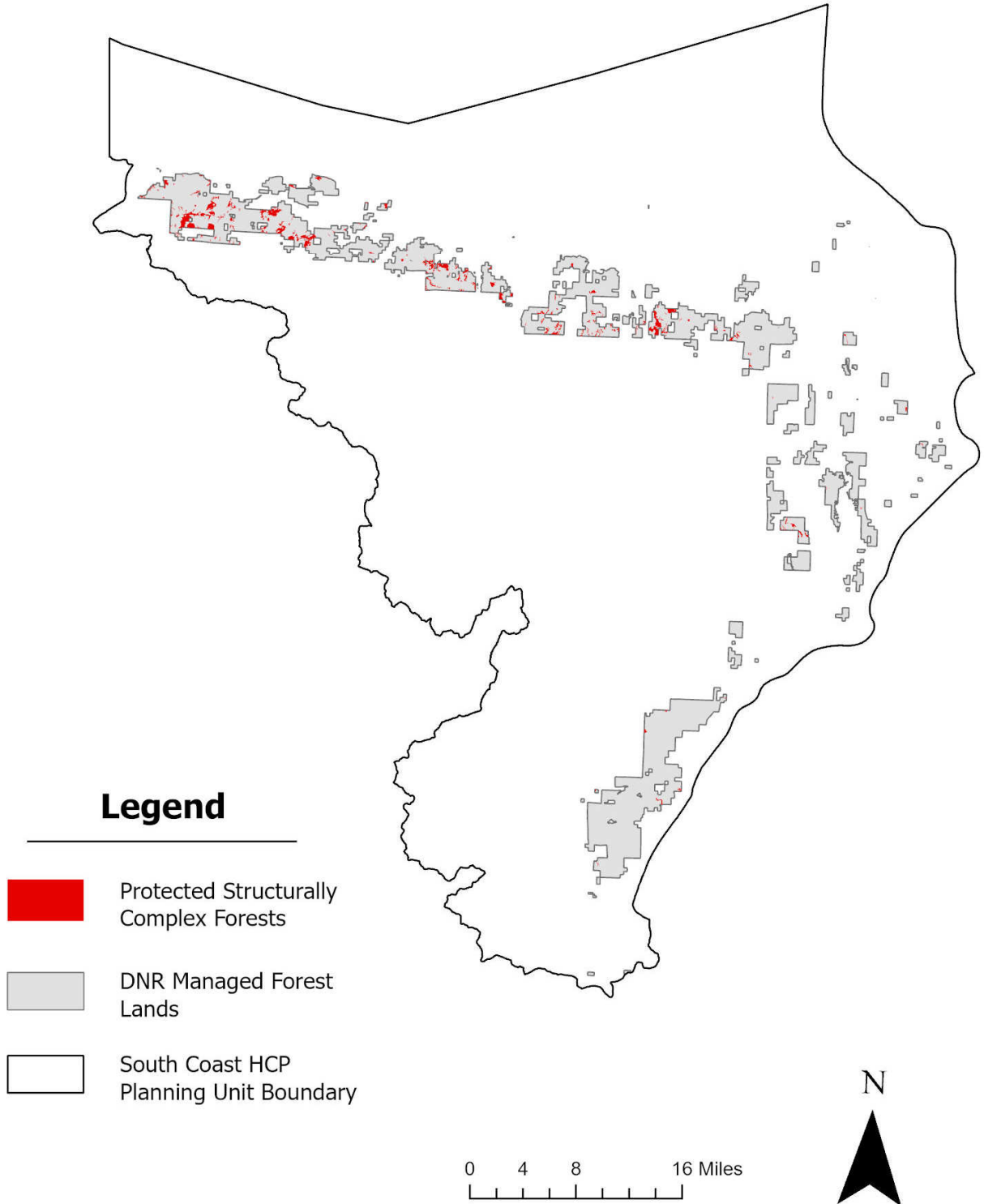


Table 3. Protected Botanically Diverse and Older Forests in the Straits HCP Planning Unit

**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	4	STRAITS	BD	23.08141337	2021
1	4	STRAITS	BD	11.49166638	2021
2	4	STRAITS	BD	5.444267921	2021
3	4	STRAITS	BD	30.01410748	2021
4	4	STRAITS	BD	5.949657726	2021
5	4	STRAITS	BD	6.627753873	2021
6	4	STRAITS	BD	47.89958534	2021
7	4	STRAITS	BD	6.705188699	2021
8	4	STRAITS	BD	7.16833705	2021
9	4	STRAITS	BD	20.73734447	2021
10	4	STRAITS	BD	7.789946449	2021
11	4	STRAITS	BD	24.85520824	2021
12	4	STRAITS	BD	20.09854305	2021
13	4	STRAITS	BD	18.68755031	2021
14	4	STRAITS	BD	16.00946165	2021
15	4	STRAITS	BD	10.3950817	2021
16	4	STRAITS	BD	20.22671764	2021
17	4	STRAITS	BD	15.47820975	2021
18	4	STRAITS	BD	9.882450144	2021
19	4	STRAITS	BD	51.15967248	2021
20	4	STRAITS	BD	23.83892548	2021
21	4	STRAITS	BD	21.92101795	2021
22	4	STRAITS	BD	5.287724155	2021
23	4	STRAITS	BD	12.85522491	2021
24	4	STRAITS	BD	67.87207086	2021
25	4	STRAITS	BD	139.7356086	2021
26	4	STRAITS	BD	21.46958623	2021
27	4	STRAITS	BD	14.87713695	2021
28	4	STRAITS	BD	15.08351851	2021
29	4	STRAITS	BD	14.10621971	2021
30	4	STRAITS	BD	7.515982281	2021
31	4	STRAITS	BD	26.20281502	2021
32	4	STRAITS	BD	6.060901014	2021
33	4	STRAITS	BD	5.595734308	2021
34	4	STRAITS	BD	44.07335511	2021
35	4	STRAITS	BD	392.5001907	2021
36	4	STRAITS	BD	16.84412571	2021
37	4	STRAITS	BD	60.78038623	2021
38	4	STRAITS	BD	111.3032074	2021
39	4	STRAITS	BD	6.358429444	2021
40	4	STRAITS	BD	18.59442135	2021
41	4	STRAITS	BD	9.240667071	2021
42	4	STRAITS	BD	6.407175055	2021
43	4	STRAITS	BD	16.99008431	2021

44	4	STRAITS	BD	47.26812636	2021
45	4	STRAITS	BD	27.05907415	2021
46	22	STRAITS	BD	11.87228219	2021
47	22	STRAITS	BD	20.91506486	2021
48	22	STRAITS	BD	6.427394433	2021
49	22	STRAITS	BD	11.58322366	2021
50	22	STRAITS	BD	13.47192643	2021
51	24	STRAITS	BD	7.417098752	2021
52	24	STRAITS	BD	19.29911725	2021
53	24	STRAITS	BD	5.940939735	2021
54	24	STRAITS	BD	7.08905988	2021
55	24	STRAITS	BD	10.73513455	2021
56	24	STRAITS	BD	8.598618405	2021
57	24	STRAITS	BD	7.085079693	2021
58	24	STRAITS	BD	16.01542334	2021
59	24	STRAITS	BD	8.834089412	2021
60	24	STRAITS	BD	10.56934986	2021
61	24	STRAITS	BD	76.77445339	2021
62	24	STRAITS	BD	5.209294874	2021
63	24	STRAITS	BD	11.18623715	2021
64	24	STRAITS	BD	334.209093	2021
65	24	STRAITS	BD	5.458201909	2021
66	24	STRAITS	BD	14.22778414	2021
67	24	STRAITS	BD	5.764869928	2021
68	24	STRAITS	BD	7.300595193	2021
69	24	STRAITS	BD	16.9346771	2021
70	24	STRAITS	BD	6.490760533	2021
71	24	STRAITS	BD	5.178804543	2021
72	24	STRAITS	BD	6.53402551	2021
73	24	STRAITS	BD	17.86711423	2021
74	24	STRAITS	BD	8.906774635	2021
75	24	STRAITS	BD	57.38264935	2021
76	24	STRAITS	BD	12.517822	2021
77	24	STRAITS	BD	16.70282706	2021
78	24	STRAITS	BD	14.12263764	2021
79	24	STRAITS	BD	7.106606403	2021
80	24	STRAITS	BD	12.60763483	2021
81	24	STRAITS	BD	124.4179609	2021
82	24	STRAITS	BD	12.90424409	2021
83	24	STRAITS	BD	6.792162706	2021
84	24	STRAITS	BD	7.601913256	2021
85	24	STRAITS	BD	117.9995939	2021
86	24	STRAITS	BD	178.0859371	2021
87	24	STRAITS	BD	31.93761007	2021
88	24	STRAITS	BD	22.86801172	2021
89	24	STRAITS	BD	5.926312996	2021
90	24	STRAITS	BD	9.847994069	2021
91	24	STRAITS	BD	44.47960484	2021
92	24	STRAITS	BD	22.95035839	2021
93	24	STRAITS	BD	392.5213633	2021
94	24	STRAITS	BD	15.39602273	2021
95	24	STRAITS	BD	6.663632764	2021

96	24	STRAITS	BD	160.5582906	2021
97	24	STRAITS	BD	6.211491796	2021
98	24	STRAITS	BD	8.997641747	2021
99	24	STRAITS	BD	7.915633843	2021
100	24	STRAITS	BD	324.548942	2021
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102	24	STRAITS	BD	11.72830242	2021
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106	24	STRAITS	BD	6.187497468	2021
107	24	STRAITS	BD	6.810593247	2021
108	24	STRAITS	BD	90.78088216	2021
109	24	STRAITS	BD	181.647401	2021
110	24	STRAITS	BD	5.268811076	2021
111	24	STRAITS	BD	6.179385277	2021
112	24	STRAITS	BD	40.67046346	2021
113	24	STRAITS	BD	5.13691316	2021
114	24	STRAITS	BD	11.60073255	2021
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126	24	STRAITS	BD	9.675445671	2021
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133	26	STRAITS	BD	5.662669391	2021
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135	26	STRAITS	BD	22.23918719	2021
136	26	STRAITS	BD	28.65307544	2021
137	26	STRAITS	BD	8.971288185	2021
138	26	STRAITS	BD	5.724183375	2021
139	33	STRAITS	BD	9.6834448	2021
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144	33	STRAITS	BD	10.53856998	2021
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146	37	STRAITS	BD	22.90780531	2021
147	37	STRAITS	BD	23.90252217	2021

148	37	STRAITS	BD	67.72239993	2021
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**TOTAL ACRES      5836.128861**