



# BOARD OF COUNTY COMMISSIONERS

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January 20, 2026

Members of the Board of Natural Resources  
Dave Upthegrove, Commissioner of Public Lands  
111 Washington St. SE  
Olympia, WA 98501

Dear Commissioner Upthegrove and Members of the Board of Natural Resources:

Over the past three years, the Thurston County Board of County Commissioners (BoCC) has sent numerous letters requesting that the Department of Natural Resources (DNR) conserve the increasingly rare structurally-complex native forests that are rapidly disappearing from Capitol State Forest (CSF). With this letter, we hope to settle the issue of conservation of structurally-complex forests (SCF) in Thurston County once and for all, by outlining what we believe to be a reasonable compromise: one that prioritizes protection of the best remaining SCF in the County while minimizing impacts to fiscal years 2026 and 2027 timber sales in which DNR has sunk costs.

With Commissioner Upthegrove's August 26 "Forest Forward" Commissioner's Order, DNR identified a total of 6,046 acres of structurally-complex forests existing *outside* of areas managed for ecological value (AMEV) in Thurston County. (The vast majority of AMEV areas are narrow, HCP-required stream buffers.) As part of the Forest Forward announcement, DNR identified 3,804 acres of those acres for conservation; however, over half of those acres were either under five acres in size, clearly misclassified stream buffers, areas already sold to timber companies, small leave-tree areas, or the result of data errors. DNR has acknowledged flaws in this initial map and has committed to correcting these errors. In the meantime, however, the agency has resumed auctions of SCF in Thurston County, including the recent Ghost timber sale.

We hope the following proposal will be useful as DNR and Board of Natural Resources (BNR) seeks to recalibrate and implement the Commissioner's August 26 Order. Rather than protecting small fragments while logging the last remaining large patches of SCF in CSF, the County would strongly prefer that the largest and oldest remaining SCF be conserved, with logging directed toward non-structurally complex stands and smaller, more fragmented structurally-complex areas.



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To that end, Thurston County requests that DNR prioritize conservation of all remaining patches of SCF that are both greater than 200 meters wide and at least 80 acres in size (see attached map). This is the same approach DNR used during the marbled murrelet long-term conservation planning process, in which large, high-value patches were protected instead of more fragmented areas that would be unlikely to develop into fully functional forests over the long term. In total, we are requesting that the DNR protect 2,420 acres of these priority stands, and allow them to return to an old-growth state without active management. 933 of the acres in these areas are already identified for conservation in DNR's initial map, but 1,487 priority acres (61%) of these larger blocks remain unprotected and at risk. (Not included in this map is the 160-acre NCS parcel in Monroe Creek, as it is already being protected using another mechanism.)

We think it is important that this approach ***would only affect three currently-planned fiscal year 2026 and 2027 timber sales***: Chai Unit 3, Class Dismissed Unit 3, and both units of the Bears sale. At the same time, it would allow FY26 and FY27 timber sales in more fragmented SCFs — including all units of Tree Fiddle, Caramel, Galactica, and Battlestar — to move forward, along with the remaining units of Starwagon, Sparrow Hawk, Chai, and Class Dismissed.

Chai Unit 3, Class Dismissed Unit 3, and the Bears sale are of particular concern to Thurston County for the following reasons:

- Chai Unit 3 would involve logging in one of the only remaining >80-acre patches of SCF that originated in the 1800s. It is also the only significant SCF remaining in the Mox-Chehalis watershed and is also a valuable recreational resource, located in close proximity to the North Slope parking lot. Thurston County is a trust beneficiary of this unit of the Chai timber sale, alongside the common school trust.
- Class Dismissed Unit 3 would involve logging in a portion of one of the largest remaining blocks of SCF in Capitol State Forest. This unit has been a particular concern to the Delphi neighborhood directly below the sale and has significant value for landscape connectivity. Thurston County is a trust beneficiary of this unit of the Class Dismissed timber sale.



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- The Bears sale is located on steep slopes containing significant old growth remnant trees directly above salmon spawning grounds in McLane Creek and directly above the beloved McLane Nature Trails. It is one of the most visible legacy forests in Thurston County, and the proposal to log this area has generated considerable concern within our community. Thurston County is the main trust beneficiary of this timber sale, alongside the common school trust.

Thurston County has heard BNR's concern about not wanting to make policy on a sale-by-sale basis, and we readily agree. **With this letter, we hope to close the issue of legacy forest conservation in Thurston County.** Given that so many of our remaining SCFs are planned for harvest in the coming years, we believe that the agency must walk away from some planned timber sales if it intends to thoughtfully protect the best remaining SCF in our county. When the County first raised objections to the harvest of these forest types in 2023, DNR stated that it had a mandate to log these areas and lacked the discretion to choose not to do so. Using this rationale, the agency proceeded to sink costs into many projects that were of great concern to our community, and eventually auctioned off over 700 acres of legacy forests in our county.

Today, with the Commissioner's August 26 announcement, DNR now has the discretion to determine which SCF will be conserved and which will be logged. All we ask is that Thurston County's conservation priorities be reflected in the finalized maps, and that — rather than grandfathering in *all* pre-existing timber sale plans — DNR begins planning around the highest-quality legacy forests remaining in our county starting with Chai Unit 3, a truly irreplaceable forest that represents one of the County's oldest remaining stands. We had been informed that this unit had been delayed until 2028, which is why we did not mention this unit in our last letter regarding units of Sparrow Hawk and Starwagon, as we thought that Chai would have been included in the 77,000 acres of conservation. Shortly after that letter was sent, the sale was moved forward, to be auctioned in March.



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With this letter, we have attached three shapefiles which are also shown on the attached map:

- “>80-Acre & >200m-Wide SCF Patches” identifies the remaining structurally complex forest stands greater than 80 acres in size and greater than 200m wide that we ask DNR to prioritize for conservation.
- “SCF Priority Parcels” identifies the 2420 acres of stands that we ask the agency to prioritize for conservation.
- “Other SCF in the 77K that TC supports” identifies areas that DNR had initially mapped as conservation areas that do not overlap with Thurston County priority parcels due to smaller patch size, that the county is nevertheless supportive of.

The Thurston County BoCC has greatly appreciated the spirit of the Commissioner’s Order, and respects the much more responsive and collaborative approach we have seen from Commissioner Upthegrove and DNR in recent months. The BoCC hopes that DNR and BNR will continue to listen to our community’s priorities, and work collaboratively with us to see these key areas protected and restored to old-growth condition over the coming decades.

Respectfully,

*Thurston County Board of County Commissioners*



Tye Menser  
Chair



Carolina Mejia  
Commissioner



Wayne Fournier  
Vice-chair

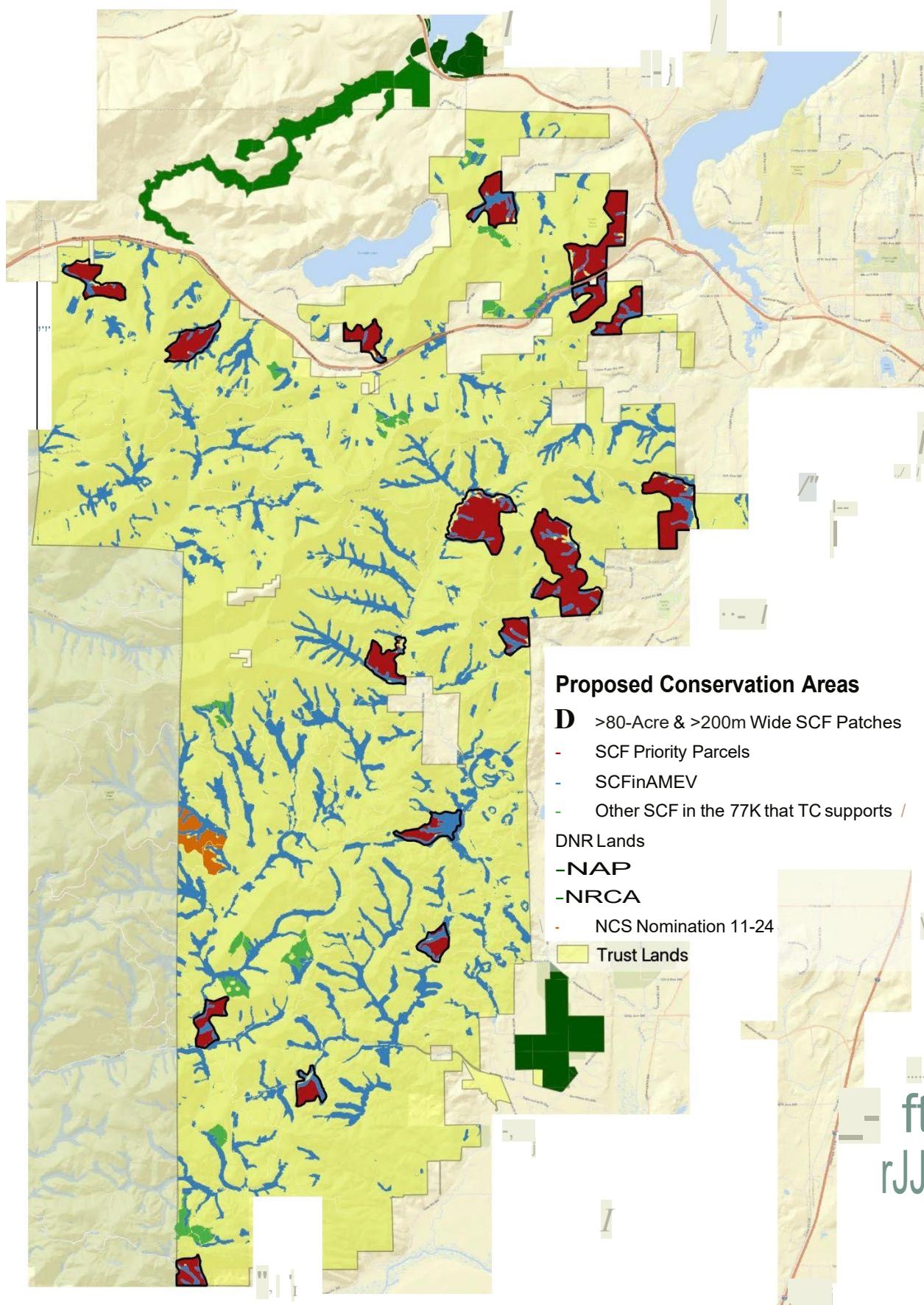


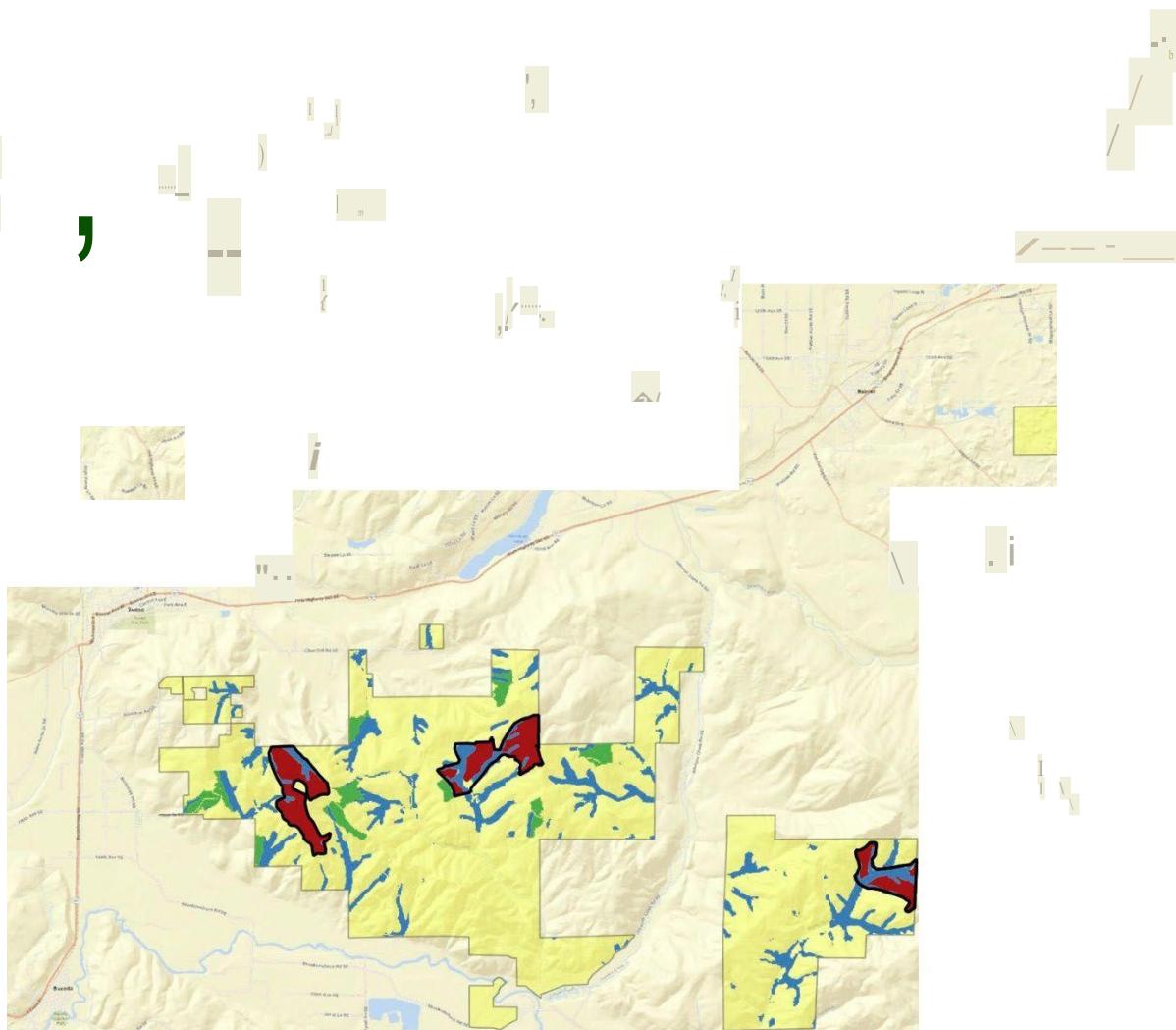
Rachel Grant  
Commissioner



Emily Clouse  
Commissioner

  
Attest:  
County Manager





### Proposed Conservation Areas

**D** >80-Acre & >200m Wide SCF Patches

- SCF Priority Parcels

- SCFinAMEV

- Other SCF in the 77K that TC supports

DNR Lands

-NAP

-NRCA

- NCS Nomination 11-24

**L** Trust Lands