



Legacy Forest Defense Coalition
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January 23, 2025

William Wells, Olympic Region Manager
Via: SEPA Center
P.O. Box 47015
Olympia, Washington 98504-7015
sepacenter@dnr.wa.gov

Re: Tiger Stripes Sorts timber sale – SEPA comments (File No. 25-011401)

Dear Mr Wells,

On January 21st, I visited Unit 2 of the "Tiger Stripes Sorts" timber sale scheduled for auction in March 2024. During my site visit, I observed a *Pseudotsuga menziesii* / *Gaultheria shallon* - *Holodiscus discolor* Forest community present throughout unit 2 of the timber sale. This Douglas-fir / Salal - Oceanspray community is considered to be an S2 imperiled forest type by the Washington State Natural Heritage¹ program based on the International Vegetation Classification System ([CEGL005531](#)).

According to Natureserve “This association occurs from sea level to about 610 m (2000 feet) elevation in the Puget Lowland, Washington, and in the Georgia Basin of British Columbia. This association occurs on dry, nutrient-poor sites, with soils that are shallow to bedrock or very coarse and deep glacial outwash. It tends to occur on upper slopes or south to west aspects.” Tiger Stripes Sorts unit 2 matches this site description exactly with shallow soils, areas of exposed bedrock and a southwest aspect. Below is the summary of this association provided on the Natureserve website.

This is an evergreen needle-leaved forest dominated by *Pseudotsuga menziesii*; other tree species are absent or present in small amounts, *Pinus contorta* being the most frequent. The understory is dominated by a relatively continuous layer of the evergreen broad-leaved shrub *Gaultheria shallon*, typically 0.5-1 m tall. The deciduous broad-leaved *Holodiscus discolor* is usually present and forms an open layer 2-5 m tall, sometimes codominated by *Corylus cornuta*. Herbaceous species typically occupy little cover. Other frequent species include *Rosa gymnocarpa*, *Mahonia nervosa*, *Goodyera oblongifolia*, *Polystichum munitum*, *Festuca occidentalis*, *Pteridium aquilinum*, *Rubus ursinus*, and *Trientalis borealis ssp. latifolia* (= *Trientalis latifolia*).

I had not planned to conduct a full survey of the plant community in Tiger Stripes Sorts during my visit so did not bring necessary equipment to conduct a transect or basal area survey, however the association was evident at this site. As you can see from the attached photos this site was dominated by *Pseudotsuga menziesii* which was the only species in the over across much of the stand. I observed regeneration consisting primarily of *Abies grandis* with *Tsuga heterophylla* and *Thuja plicata* also present in some areas. *Holodiscus discolor* and *Gaultheria shallon* were ubiquitous in the understory throughout

¹ https://www.dnr.wa.gov/publications/amp_nh_assoc_list.pdf

the stand. *Rosa gymnocarpa*, *Mahonia nervosa* and *Polystichum munitum* were also present in most areas. I did not conduct a full survey, so my description does not capture the full species diversity of the understory, however my observations of the forest, and the pictures provided below, match the exact description of this plant community provided by Natureserve.

Given the information included within this letter, I request that the Olympic region work with the Washington State Natural Heritage Program to determine if Unit 2 of the Tiger Stripes Sorts timber sale represents an element occurrence of the CEG005531 community. If this area is determined to be Element Occurrences of the CEG005531 community I request that they be removed from consideration for any future timber harvests.

I am freely available to join members of the Washington State Natural Heritage Program in a site visit to this forest if desired.

Below I have attached a map showing the observed extent of the EO and photos that show the understory and species composition throughout the stand.

Sincerely,

A handwritten signature in dark ink that reads "Joshua Wright". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Joshua Wright
Program Director
Legacy Forest Defence Coalition













