



Legacy Forest Defense Coalition  
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Dear Mr. Wells,

I am writing in regards to the “Parched” timber sale SEPA Number #102017. On October 12th I documented multiple occurrences of *Whipplea modesta* (Modesty), a G4/S1 ranked plant considered to be critically imperiled in the State of Washington by the Washington Natural Heritage Program<sup>1</sup> within Unit 3A of the Parched Timber Sale. I observed the plant in three distinct areas on the rocky balds on the east of Unit 3A, none of these occurrences are in leave tree areas, and they are all within approximately 5-10 yards of the planned PA-H-3050 road extension and landing.

*Whipplea modesta* is described<sup>2</sup> as “a sub-shrub with woody stems that trail and freely root on the ground, from which arise erect flowering branches up to 3 in. (8 cm) tall. The bark is gray-brown and peels in narrow strips. The leaves are in pairs, semi-deciduous but often persistent, somewhat sessile, ovate to elliptic, and have short, stiff hairs with a bulbous base. The leaf blades are ½ to 1 ½ in. (1.5-4 cm) long, and 3/8 to more than 1 in. (1-3 cm) wide. The odorless white flowers are in tight clusters at the tips of the shoots. Each inflorescence has 4 to 12 flowers that are about 3/16 in. (4-6 mm) wide and have 4-6 oval petals. There are 4-6 leafy bracts beneath each of the flowers that are 1/16 in. (1.5-2 mm) long and mostly hairless. The fruit is depressed-rounded with 4 or 5 distinct segments that separate and have one plump, honeycomb-pitted seed per chamber.” As you can see in the pictures (included below) the plants I observed match this description exactly. Given that I observed these plants in early fall, none of them had flowers, although several had dead stems associated with flowers.

The WNHP described *Whipplea modesta* habitat in a dnr document<sup>3</sup>, saying “*This species is usually found in open or shady places, on dry and rocky slopes, in “balds”, and in coniferous forest at less than 4600 feet (1400 m). The elevation at which the occurrences were found in Washington was less than 1500 feet (460 m).*” The WNHP also noted that *Whipplea modesta* has been known to occur on south-facing balds on the Olympic Peninsula, the exact type of habitat in which I found this occurrence.

The logging of the area in which this rare plant occurs, along with the associated road building, yarding and creation of a landing directly above this occurrence is likely to have a substantial and potentially irreversible impact on the viability of this population. The Parched timber sale as currently configured does not provide any buffer to the habitat in which the species occurs. *Whipplea modesta* is not represented in the DNR’s Natural Area system and is listed as a priority for inclusion in several

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<sup>1</sup> [https://www.dnr.wa.gov/publications/amp\\_nh\\_vascular\\_ets.pdf](https://www.dnr.wa.gov/publications/amp_nh_vascular_ets.pdf)

<sup>2</sup> [https://www.dnr.wa.gov/publications/amp\\_nh\\_whimod.pdf](https://www.dnr.wa.gov/publications/amp_nh_whimod.pdf)

<sup>3</sup> [https://www.dnr.wa.gov/publications/amp\\_nh\\_whimod.pdf](https://www.dnr.wa.gov/publications/amp_nh_whimod.pdf)

regions in Appendix D of the State of Washington Natural Heritage Plan<sup>4</sup>. The Policy for Sustainable Forest's Policy on Special Ecological Features<sup>5</sup> requires the DNR to:

1. *Identify forested state trust lands with special ecological features of regional or statewide significance that fill critical gaps in ecosystem diversity.*
2. *Protect such areas through means consistent with trust objectives, including transfer out of trust status, retention in long- term deferral status, creative partnerships or other available mechanisms.*

Given that *Whipplea modesta* is considered to be Critically Imperiled in the State of Washington, there is no doubt that this occurrence is of 'regional or statewide significance.' I request that the SEPA checklist for the Parched Timber Sale be withdrawn and that the DNR conduct a comprehensive survey of the sale area to verify this discovery and to document the extent of the species across the sale area. Furthermore, I request the DNR work to include this occurrence in the State Natural Area system or protect this plant and its habitat with a substantial buffer from any future timber harvests.

I am happy to provide any additional information needed to verify this occurrence and to join DNR staff on a site visit to this area.

Please find georeferenced photos of this occurrence below. These photos do not represent a comprehensive survey of the area and I believe that this plant may occur elsewhere in the unit.

Sincerely,

A handwritten signature in black ink that reads "Joshua Wright". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Joshua Wright

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<sup>4</sup> [https://www.dnr.wa.gov/publications/amp\\_nh\\_plan\\_d\\_plants\\_rep\\_priorities.pdf](https://www.dnr.wa.gov/publications/amp_nh_plan_d_plants_rep_priorities.pdf)

<sup>5</sup>Page 38 [https://www.dnr.wa.gov/publications/lm\\_psf\\_policy\\_sustainable\\_forests.pdf](https://www.dnr.wa.gov/publications/lm_psf_policy_sustainable_forests.pdf)



*Whipplea modesta*

Area 1

GPS: 48° 4' 41.06" N 123° 32' 19.53" W



*Whipplea modesta*

Area 1

GPS: 48° 4' 40.98" N 123° 32' 19.908" W



*Whipplea modesta*

Area 2

GPS: 48° 4' 40.8" N 123° 32' 17.622" W



*Whipplea modesta*

Area 2

GPS: 48° 4' 40.83" N 123° 32' 17.88" W



*Whipplea modesta*

Area 2

GPS: 48° 4' 40.88" N 123° 32' 17.952" W



*Whipplea modesta*

Area 3

GPS: 48° 4' 40.91" N 123° 32' 17.64" W





*Whipplea modesta*

Area 3

GPS: 48° 4' 40.78" N 123° 32' 17.538" W



*Whipplea modesta*

Area 3

GPS: 48° 4' 40.8" N 123° 32' 17.622" W