



Legacy Forest Defense Coalition
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October 2, 2026
William Wells, Olympic Region Manager
Via: SEPA Center
P.O. Box 47015
Olympia, Washington 98504-7015

Dear Mr Wells,

On October 1 I visited Unit 1 of the Birds Eye View timber sale. My goal was to survey the forest association in the area to determine if it represented a G1 critically imperiled forest type based on the International Vegetation Classification System ([CEGL000468](#)). This association Thuja plicata - (Abies grandis) / Polystichum munitum Forest (Western Red-cedar - (Grand Fir) / Western Swordfern Forest) is an association that primarily occurs in the Puget Sound Basin in northwestern Washington in the rain shadow of the Olympic Mountains. Below is the Floristics Summary of this association provided on the Natureserve website.

This forest association is dominated by the evergreen needle-leaved trees Thuja plicata and Abies grandis. These species have average densities of 148 and 90 trees per hectare (>10 cm in diameter), respectively. Pseudotsuga menziesii is often present as scattered large individuals in the upper canopy, and may be codominant in some stands, but is never regenerating. Tsuga heterophylla is occasionally present with low cover. Tree regeneration may be relatively sparse, with the dominant trees each having an average of 64 saplings and seedlings per hectare. The understory is strongly dominated by the perennial fern Polystichum munitum, which averages 43% cover or more, and often the fronds have a 2-m spread. Scattered individuals of several shrub species occur, but none have greater than 2% cover. Mosses are abundant on logs, and average 15% cover. Stands that have been disturbed by logging often have an abundant tree subcanopy and shrubby layer of the seral, broad-leaved deciduous trees Acer macrophyllum and Alnus rubra.

In my survey, I walked the unit conducting variable radius basal area surveys using a BAF 20 angle gauge at 4 dispersed locations in the areas I believed the community to be present. See attached map. **This survey showed a clear co-dominance of Thuja plicata, Pseudotsuga menziesii and Abies grandis in these areas, representing 20.5%, 32.9% and 31.5% of basal area respectively.**

Pseudotsuga menziesii was generally dominant in the canopy of the stand with a substantial component of Abies grandis and a smaller component of Thuja plicata. Regeneration, however, was dominated by Thuja plicata in most areas with the stand clearly on a trajectory towards a greater component of the species in the overstory. Alnus rubra and Tsuga heterophylla were both present in varying amounts and Acer macrophyllum was present in small quantities. Tsuga heterophylla and Abies grandis were both present in regeneration, but to a lesser degree than Thuja plicata.

Table 1 BAF 20 Angle Gauge Species Count							
	Plot 1	Plot 2	Plot 3	Plot 4	Plot 5	Total Count	% Basal Area
Douglas Fir	15	2	0	7	0	24	32.9%
Grand Fir	3	6	5	5	4	23	31.5%
Western Red Cedar	1	4	2	2	6	15	20.5%
Western Hemlock	1	2	1	1	1	6	8.2%
Red Alder	0	0	1	1	2	4	5.5%
Big Leaf Maple	0	1	0	0	0	1	1.4%

Polystichum munitum was dominant with high cover at every plot. I did not conduct point-line intercept transects at each plot point, instead I have attached photos of the understory taken at each plot point. These photos show the clear ubiquity of *Polystichum munitum* in the under story consistent with the description of the CEG000468 community.

In conclusion, the results of my survey were consistent with the *Thuja plicata* - (*Abies grandis*) / *Polystichum munitum* Association as described by Natureserve. *Thuja plicata*, *Pseudotsuga menziesii* and *Abies grandis* were clearly codominant throughout the stand. The stand contained high cover (>43%) of *Pseudotsuga menziesii* and very few shrub species. *Pseudotsuga menziesii* was absent from tree regeneration, which was dominated by *Thuja plicata*.

It is imperative that this critically imperiled forest association is excluded from the Birds Eye View timber sale and that the Washington State Natural Heritage Program visit this site to verify my findings. Moving forward with plans to harvest this area as part of the Birds Eye View timber sale would be entirely inconsistent with DNR's commitments under the Policy for Sustainable Forests (PSF) and the Sustainable Forestry Initiative (SFI).

Given the information included within this letter, I request that the Olympic Region work with the Washington State Natural Heritage Program to determine if the stands in the Birds Eye View timber sale represent an EO of the CEG000468 community. If areas within this timber sale are found to be part of an element occurrence I request that they be removed and buffered from the timber sale.

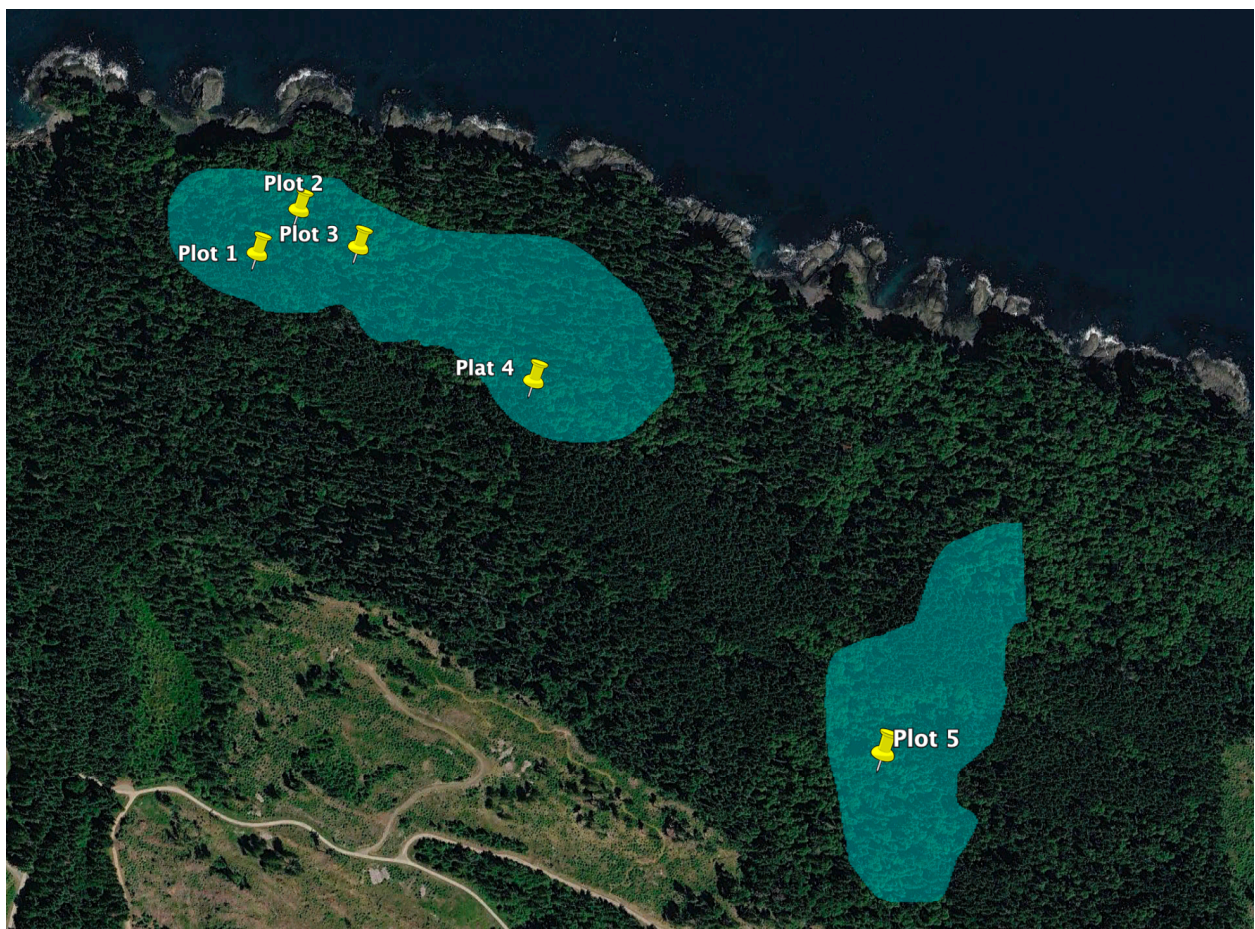
Below I have attached a map showing the plot locations for my angle gauge survey, as well as a table with GPS coordinates for each plot point, and what I estimate to be the extent of this element occurrence (highlighted in blue). I have also attached photos of the ground cover at each plot point.

Sincerely,

Joshua Wright

Joshua Wright
Programs Director
Legacy Forest Defence Coalition

Plot 1	48° 9'41.00"N 123°40'42.02"W
Plot 2	48° 9'42.73"N 123°40'39.54"W
Plot 3	48° 9'41.26"N 123°40'36.01"W
Plot 4	48° 9'35.96"N 123°40'25.61"W
Plot 5	48° 9'21.17"N 123°40'4.91"W



Plot 1



Plot 2



Plot 3



Plot 4



Plot 5

