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**WHATCOM COUNTY COUNCIL**

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January 25, 2022

Dear Commissioner Franz and Members of the Washington State Board of Natural Resources:

We are writing you today as the Forest Practices Application 2818338, also known as the Bessie Sorts Timber Sale, submitted by the Department of Natural Resources has elicited a significant response from community members in Whatcom County. ~~This proposed Bessie Sorts Timber Sale, would impact approximately logging 166 acres of publicly managed forestland in the Lake Whatcom watershed, which includes approximately 46 acres dominated by legacy trees and mature forest habitat including some legacy trees. DNR staff biologist stated that the largest trees are Douglas fir, which have diameters at breast height (DBH) up to approximately 45 inches and the current height of the tallest trees is approximately 230 feet tall, with two of the largest dominant Douglas fir aged and determined to be 110 to 115 years old. The age of the dominant cohort and individual tree characteristics of the largest dominant Douglas fir determined that this stand does not meet the definition of old growth or require retention as outlined in the Policy for Sustainable Forests and, specifically, Policy PO14-008 (Old Growth Stands in Western Washington).~~

Despite this determination, community members have voiced concerns that logging this mature site forest will detrimentally affect our community's drinking water quality, habitat support, reduce resilience to climate resilience impacts, and will potentially create other negative impacts. Clear-cutting and other forest practices inherently can increase rates of soil erosion which could transport excessive phosphorous loads into Lake Whatcom and can also loads pollutants into nearby water sources, and increases risk of floods, landslides, erosion, soil degradation, and herbicide runoff. Lake Whatcom is the drinking water source for over 100,000 Whatcom County residents including most of the residents of the City of Bellingham. We believe protecting our drinking water is of the utmost importance and that older forests help contribute to clean, cool, and plentiful water.

The Lake Whatcom Management Program 2020 – 2024 Work Plan addresses the Land Use Program Area with the stated objective: Prevent water quality and quantity impacts from new development, redevelopment, and forest practices. Program area 3.2 addresses Forestry and recommends assessment of forestry activities to verify that adverse water quality impacts are minimized. The recommended action related to this specific forest practices application states:  
3.2.1 Review reports written by the Interjurisdictional Committee on Department of Natural Resources (DNR) forestry activities.

The Interjurisdictional Committee, including a Whatcom County staff biologist, visited the proposed sale site on June 22, 2021 and all committee members concluded that the design of the Bessie Sorts proposal meets or exceeds the intent of the Lake Whatcom Landscape Plan.

Together with our local partners, Whatcom County has made significant investments to protect water quality and watershed health within the Lake Whatcom Watershed. Whatcom County also recognizes the significant contributions made by the forestry industry and intends to maintain a thriving forestry economy. Whatcom County recognizes that forest practices can be done in ways that minimize impacts to ecosystem and watershed health, and at times forest practices can enhance ecosystem and watershed health. Whatcom County appreciates the review and recommendation provided by the Interjurisdictional Committee and also recognizes the concerns being shared by members of the community. help protect thousands of acres in the Lake Whatcom watershed. Harvesting this area could undo much of the progress we have made in the last few years, and we cannot afford to take that risk, financially or environmentally.

In November 2021, which occurred after the Interjurisdictional Committee site visit, Whatcom County adopted an updated Climate Action Plan that outlines goals, strategies, and actions in both the built and natural environment to reduce greenhouse gas emissions, address mitigation and adaptation to climate change, and build climate resiliency. The plan identified key impacts to the forested landscape including increasing temperatures, prolonged drought, and extreme weather events have the potential to lead to larger and more destructive wildfires, flooding, landslides, and pest outbreaks (page 132, CAP). Key Some of these strategies to mitigate these impacts include: Protect and enhance carbon storage and sequestration in forest ecosystems; Increase forest health, survival and climate resilience through forest management practices that reduce wildfire risk, increase soil moisture, and stream flows, and preserve wildlife habitat; and most relevant to this proposed sale: Promote climate resilient planning and programs to maintain our forest economy for wood products, watershed health, and recreation through leadership, education, and successful programs. include sustainable forest practices to maximize forest health and resilience, maintaining tree canopies, protecting our water resources, and enhancing ecosystem services. We share a commitment to climate mitigation and adaptation, and acknowledge the value of older forests, but worry that proceeding with the Bessie Timber Sale will detract from our local efforts.

We commend Commissioner Franz for issuing a directive that DNR pause all timber sales with forest that originated prior to 1900 and for developing the DNR's Plan for Climate Resilience in February of 2020. Given our parallel commitments to building climate resilience in our forested landscapes, We strongly urge you request that you pause to include any additional action on the Bessie Sorts Unit 2 sale in your directive and withdraw it from the auction process to allow County staff to engage DNR staff and representatives from our local forestry community to review the proposed harvest and recommend possible actions to more fully implement our respective climate resilience plans while still meeting commitments to the public trust. We also encourage the BNR to protect legacy forests by implementing a full moratorium on logging in legacy forestlands. We hope this will result in protecting all mature trees (75 years or older) within the Bessie Sorts.

The two central principles of the DNR's Plan for Climate Resilience clearly define how this work must be done:

Principle #1 Climate resilience requires us to be proactive rather than reactive.

Principle #2 Climate resilience requires us to expand partnerships and collaborations.

Whatcom County commits to being proactive and to partnering with the DNR and the local forestry community to ensure that our ecosystems and our forestry industry is resilient to climate impacts and we request that DNR do the same. Thank you for your time and consideration of our concerns.

Sincerely,