

Whatcom County Forestry Advisory Committee  
5280 Northwest Drive  
Bellingham, WA 98226

April 11<sup>th</sup>, 2023

Whatcom County Council  
311 Grand Avenue, Suite 105  
Bellingham, WA 98225

Whatcom County Executive's Office  
311 Grand Avenue, Suite 108  
Bellingham, WA 98225

Dear Whatcom County Councilmembers and County Executive Sidhu,

The Whatcom County Forestry Advisory Committee (FAC) would like to provide some feedback on a draft letter, released on April 7<sup>th</sup>, 2023, from the Whatcom County Council to the Department of Natural Resources (DNR) asking for a pause on the Brokedown Palace timber sale.

Regarding the Council's concerns with the timing of this sale, we would like to note that the sale has not yet been approved and is still in the review process. A permit application must be received and numerous public comment periods must take place before a DNR auction. As such, a request for a pause would seem unnecessary at this time. The county will have opportunities to understand and consider the implications of this session's legislative proposals on local timberlands in the meantime.

On March 7<sup>th</sup> of this year, State Lands forest manager, Chris Hankey, presented to the Council's Climate Action and Natural Resources Committee about Brokedown Palace. In that presentation, he addressed many of the questions raised in the draft letter, including information on tribal engagement and how the DNR plans to mitigate risks. As part of the standard timber sale review process, tribes are consulted on every project proposal and participate on Interdisciplinary Teams that evaluate the units for adherence to state Forest Practice rules. Annually, the DNR holds meetings with the local tribes to discuss future action plans.

This particular sale is located in the Nuxwt'iqw'em Cultural District, and this designation requires any sale proposals in the district, whether public or privately-owned, to be classified as a Class IV Special which is the most rigorous application process requiring an environmental checklist in compliance with the State Environmental Policy Act (SEPA). This process requires additional outreach and opportunities for input from local tribes. In addition, two Licensed Engineering Geologists are consulted – one during the proposal phase and another during the regulatory review. As Brokedown Palace is still in this review phase, we suggest that the Council withhold taking a position until this process is complete.

We certainly appreciate the Council's interest in taking a more holistic look at forestland management in the state as context is critically important in forestland management decisions. As you know, 75 percent of Whatcom County's forestland base is already restricted from harvest in the form of North Cascades National Park protections, state land set-asides, and county, private, and tribal riparian buffers. The 25 percent that remains productive forestland provides climate-friendly building materials for the region as

well as good jobs and funding for public services. As such, we urge Council members to carefully consider policy positions that could lead to additional loss of productive forestland in the county.

Should the Council decide to move forward with a letter, however, we have some suggested content modifications. The term “mature unplanted forest,” is used in the draft letter and it is implied that such forests have “greater ecological value than others.” The terms, “mature unplanted forests” or “legacy forests” have been used of late in certain circles and are not scientific terms nor have “mature unplanted forests” shown to provide more environmental benefits compared to planted forests of the same age. We urge the Council to avoid making such assertions.

We would like to thank the Council for its consideration on this issue. County governments throughout our region assemble and rely on forest advisory groups to provide information and feedback on a wide variety of issues, including DNR’s timber program. Whatcom FAC members have significant local expertise when it comes to forestry issues and can play an important role in ensuring county-level policy statements or recommendations reflect the best available science and the realities on the ground. We appreciate your consideration and are available to answer any questions you might have.

Sincerely,

John D. Gold, Chair  
Whatcom County Forestry Advisory Committee