

October 6, 2023

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

Chair Buchanan and Council Members:

Thank you for the opportunity to comment on the proposed creation of a task force to develop a Whatcom County Forest Resiliency Plan (AB 2023-640). We appreciate the Council's interest in forests and the many benefits they provide, including carbon sequestration and storage, wildlife habitat, and clean water. Our forests face many threats, including wildfires, climate change, and conversion to non-forest uses (i.e., development). We are concerned, however, that the scope and composition of the proposed task force is too broad to be effective and that it gets ahead of recently formed advisory groups at the state and regional levels. Instead, we believe Whatcom County should first focus on developing a management plan for the growing acreage of county-owned forest land.

The American Forest Resource Council (AFRC) is proud to represent forest products companies, including many family-owned operations, that produce the renewable, carbon friendly wood products our society needs right here in Washington state under strict environmental protections. The alternative choice is using more carbon intensive building materials like concrete and steel or importing more lumber and wood products from foreign countries that may not share our environmental standards or democratic values.

We believe it is important to consider who owns the forests in Whatcom County: 38% - U.S. Forest Service (USFS); 30% - National Park Service (NPS); 10% - Department of Natural Resources (DNR); 11% - private, non-industrial; 9% - private, industrial; and 2% - county/tribal. For the 68% of the forests in Whatcom County owned by the federal government, Whatcom County has no direct say over the laws and regulations that drive resource management decisions. Meanwhile, the management of DNR state trust lands is guided by a trust mandate and state and federal law. Half of DNR state trust lands in western Washington have been set aside through a landscape-scale 1997 State Lands Habitat Conservation Plan (HCP) and other protective policies that are some of the most restrictive in the world. It is also important to remember that counties have no role in regulating private forestlands managed consistent with the Washington Forest Practices Act.

As part of the [\\$83 million "Natural Climate Solutions" proviso](#) in the 2023-2025 Capital Budget (ESSB 5200, Section 3130), DNR was directed to form a Carbon and Forest Management Work Group that will "examine the relationship between forest management and atmospheric carbon sequestration (absorption) and storage in DNR-managed forests." According to a [draft work group charter](#), the group will collaborate on approaches to forest management and conservation, increasing carbon sequestration and storage, generating predictable beneficiary revenue, maintaining timber supplies that support the local timber industry, and addressing rural economic needs. At least two county elected officials will serve on the work group along with representatives from tribes, industry, and environmental groups.

The work group process will also include a regional wood supply analysis to better understand current and future demand for wood supply, including modeled impacts on wood supply based on potential changes to forest management practices on DNR state trust lands. The proviso also directed DNR to contract with universities or other researchers to "verify and assess the potential increases or decreases in carbon sequestration and storage, in both forests and harvested wood products based on potential changes to management practices on forested state trust lands that also account for increases or decreases in the availability of wood products harvested from forests managed by the department."

These analyses are critical to understanding the carbon sequestration and storage benefits of DNR state trust lands and wood products, as well as the wood supply needs of the forest products industry infrastructure – the mills, contractors, truckers, and others – that is so critical to our ability to wisely manage and conserve Washington’s forests. DNR expects to submit a full report of the findings to the Legislature in late 2024 or early 2025.

The Secretary of Agriculture also recently named a 21-member [Northwest Forest Plan Federal Advisory Committee](#) to “solicit advice and recommendations on landscape management approaches to consider for National Forest System lands in the Northwest Forest Plan area to promote sustainability, climate change adaptation, and wildfire resilience.” The Committee’s recommendations could inform future management plans for over 24 million acres of diverse federal forestlands in the Pacific Northwest, including the 1.7-million-acre Mount Baker-Snoqualmie National Forest.

The Forest Service developed a Membership Balance Plan that considered geographic and demographic factors in naming Committee members, which include scientists like Dr. Jerry Franklin, industry representatives, environmental groups, tribal representatives, and local elected officials. The Committee’s recommendations could result in programmatic changes to the 1994 Northwest Forest Plan or more targeted land management plan changes on each affected national forest. The Committee, which first met in September 2023, is unlikely to provide recommendations to the Forest Service until late 2024. It could take many additional months for the Forest Service to adopt formal changes to the Northwest Forest Plan or individual forest management plans.

These recently formed advisory group processes involve lands managed by the DNR and the USFS, which collectively own nearly half of the forestland in Whatcom County. In light of this, the proposed Whatcom County Forest Resiliency Task Force seems premature, and its scope and purpose remain largely ill-defined. As an alternative, we suggest that Whatcom County focus on developing a management plan for the approximately 14,000 acres of county-owned forestland – a number that has grown in recent years with the Lake Whatcom reconveyance. Whatcom County also has a role in providing direction for the future management of the Stewart Mountain Community Forest.

Whatcom County should consult with relevant county departments and existing advisory committees, including the Forest Advisory Committee, to hire a professional forester to help develop this management plan and oversee the management of county-owned forestland. Once this necessary work is complete and after the DNR and USFS advisory groups have provided recommendations it may be appropriate to reconsider whether a task force might be appropriate.

Thank you for the opportunity to comment.

Sincerely,

Heath Heikkila

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**Heath Heikkila**  
Director, Government Affairs  
[American Forest Resource Council](#)