

**CLERK OF THE COUNCIL**

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**COUNTY COURTHOUSE**

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**WHATCOM COUNTY COUNCIL**

May 9, 2023

Hilary Franz, Commissioner of Public Lands  
Washington State Board of Natural Resources  
Jay Guthrie, NW Region Manager, DNR  
Laurie Bergvall, Assistant Region Manager, DNR  
Chris Hankey, Baker District Manager, DNR

Dear Commissioner Franz, Board of Natural Resources, and DNR staff,

The Whatcom County Council appreciates DNR's commitment to engaging county governments regarding the management of our state public lands. Over the past few years, Whatcom County has received significant community response regarding DNR's management of state-owned forests, especially in the context of project climate impacts for our region. The County Council values our forestry economy and we believe improved forest management strategies are needed to proactively restore forest health and bolster our community's resilience to future climate impacts.

First, we support a strong timber industry in Whatcom County that produces high quality wood products while providing employment opportunities in the forests and mills of Northwest Washington. Whatcom County supports actively managing forestlands for multiple co-benefits including enhancing watershed resilience, supporting jobs in the woods, expanding recreational opportunities, restoring fish and wildlife habitat, and producing wood products in perpetuity. We value the ecosystem services and climate benefits that our public lands provide, especially mature forests with significant biodiversity and structural complexity. We do not believe these economic and ecological values are mutually exclusive, and we welcome innovative approaches that better balance the many uses and benefits that our forests provide.

Going forward, we ask three things of DNR:

**1. Explore co-management opportunities with Whatcom County**

Whatcom County is committed to ensuring that the protection of critical forests and the expansion of climate resilient forest management practices does not burden the local timber economy but rather enhance it. We believe in order to accomplish these goals, DNR must expand its consultation with stakeholders, local governments, tribes, and community members. Whatcom County is eager to continue working with DNR to facilitate community dialogue about the stewardship of our forests.

Whatcom County is the trust beneficiary for roughly a third of DNR land in the county. Most of these "State Forest Trustlands" once belonged to Whatcom County, and were deeded to DNR to be managed on our behalf. Unfortunately, DNR's current protocol for approving timber sales doesn't require any consultation with Whatcom County (unless the sale is within the Lake Whatcom watershed). We believe more proactive engagement with County Council and county staff would help ensure DNR's forest management planning efforts are more consistent with our

natural resources objectives. Importantly, such consultation will help improve public buy-in for DNR forest management, which will thereby lead to greater certainty for the agency.

## **2. Take advantage of the various programs the Legislature has provided**

We believe DNR should expand its forest management toolbelt to better balance intensive timber production with ecological and watershed resilience to future climate impacts. Whatcom County Council does not believe that maintaining climate-resilient forests should come at the cost of our schools or other beneficiaries. The Washington State Legislature ~~agrees. The state legislature~~ just allocated \$70 million from Climate Commitment Act (CCA) revenue to allow DNR to protect mature, structurally-complex forests, which includes an estimated \$20 million to protect up to 2,000 acres of forestland, while ensuring the beneficiaries are not adversely impacted. Whatcom County Council understands pausing harvest may delay funding for our local beneficiaries. We are committed to exploring all possible pathways to offset any potential negative impacts to our local beneficiaries, including the Mount Baker School District. The legislature also allocated \$10 million for DNR to conduct more thinning treatments that improve forest health, which is needed across state lands in the Mount Baker Foothills. **We are supportive of this program being utilized in Whatcom County and are eager to work with DNR to identify which parcels should be included.**

Additionally, there are other opportunities to conserve naturally-regenerated forests without adversely impacting the trust beneficiaries, such as the Trustland Transfer Program that was just updated and revitalized in the 2023 legislative session. DNR's carbon project also offers an attractive model to provide consistent revenue to trust beneficiaries while protecting the many co-benefits associated with mature, structurally-complex forests. We encourage DNR to further explore opportunities to use these programs to balance the various benefits that our forests provide.

## **3. Pause the Brokedown Palace Timber Sale until December 31, 2023 when DNR identifies the acres that will be transferred out of trust status as a part of this program. This will provide the time necessary to evaluate possible ~~it can be evaluated for inclusion of this parcel~~ in the Climate Commitment Act program.**

In recent months, we have received significant community response regarding DNR's proposed Brokedown Palace Timber Sale, located along the Middle Fork Nooksack River. The Whatcom County Council shares some of the concerns that have been raised regarding potential impacts to water quality and salmon recovery. We recognize that certain forests have greater ecological value than others, whereas other forests are more suited for continued commercial timber production. We believe the mature, unplanted stands included within the sale boundaries are worth more standing (notably, these stands appear to overlap with the State Forest Trustland that is supposed to be managed on our behalf).

Brokedown Palace could be a prime candidate for protection under the CCA program that was just established by the legislature. Logging this forest now would negate opportunities to include the forest in the CCA program, Trustland Transfer Program, or carbon project; therefore, we ask DNR to pause the timber sale until the sale can be further evaluated.

~~Lastly, we hope DNR continues to engage both the Nooksack Indian Tribe and Lummi Nation to understand how this proposed timber sale might adversely impact cultural and natural resources that are important to each tribe. We urge DNR to take its co-management responsibilities seriously by being responsive to concerns raised by either tribe.~~

Thank you for working with us as we engage the public on this very important topic. We look forward to future collaboration.

Sincerely,

Barry Buchanan, Chair  
Whatcom County Council

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