

**CLERK OF THE COUNCIL**

Dana Brown-Davis, C.M.C.

**COUNTY COURTHOUSE**311 Grand Avenue, Suite #105  
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April 11, 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 and Board of Natural Resources,

The Whatcom County Council appreciates DNR's commitment to engaging county governments regarding the management of our state public lands. 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, and ask that DNR pause the timber sale while the legislature considers various pathways that could protect forests like Brokedown Palace without adversely impacting beneficiaries or the timber economy.

We would like to share our perspective for why we are asking for a pause.

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. We also value the ecosystem services that private, county, state, and federal forests 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.

Over the past few years, Whatcom County has heard from thousands of concerned citizens in our community about DNR timber sales that include mature unplanted forests. We recognize that certain forests have greater ecological value than others, and other forests are more suited for continued commercial timber production. Whatcom County hopes to help facilitate dialogue amongst local forestry partners, conservation groups, tribes, government agencies, and other beneficiaries to determine how we collectively envision a future for our region that includes both forest protection and a thriving timber industry.

Scientists predict that climate change will dramatically increase winter high flows in the Nooksack watershed, while also contributing to reduced low flows during summer months. Scientific research has found that natural climate solutions—such as protecting mature forests and advancing climate-smart forestry practices—can attenuate these watershed extremes, thereby enhancing the resilience of our watersheds and our communities to climate impacts.

Protecting mature forests also results in the sequestration and storage of vast quantities of carbon for long periods of time, which can contribute to our carbon reduction goals.

Given the climate projections our region faces, we believe DNR should expand its forest management toolbelt to better balance timber production with the conservation values that mature forests provide when left intact. Whatcom County Council does not believe that forest conservation should come at the cost of our schools, fire districts, or other beneficiaries. The legislature is currently considering various bills and budget items that may provide DNR with greater flexibility to advance conservation objectives while ensuring that trustland beneficiaries continue to receive funding. The legislative session is slated to conclude in late April.

Specifically, we are asking DNR for three things:

**1. Pause the Brokedown Palace Timber Sale until the legislature has provided guidance, authority, and funding to DNR regarding the management of mature, structurally-complex forests on state land.** Brokedown Palace could be a prime candidate for protection under the Climate Commitment Act's Natural Climate Solutions account, which is currently being considered in the legislature. Additionally, the mature portions of Brokedown Palace would be a good fit for DNR's pilot carbon project that is still in development. Logging this forest now would negate opportunities to include the forest in these programs, and therefore we believe a pause is both prudent and justified.

**2. Respect your agency's responsibility to consult with tribes as co-managers of this land.** We hope DNR is currently engaging with 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. The Middle Fork has been nominated by the Nooksack Tribe as a Place of Significance, and both tribes are currently engaged in numerous significant salmon habitat restoration projects just downstream of the proposed timber sale. We urge DNR to take its co-management responsibilities seriously as you consult with both the Nooksack Indian Tribe and Lummi Nation.

**3. Consider alternative logging prescriptions that mitigate environmental risks.** If the legislature fails to weigh in and the regulatory process for Brokedown Palace resumes later this year, we ask that DNR consider alternative management prescriptions that do not involve clearcutting on this steep and unstable slope above the Middle Fork Nooksack River. DNR could significantly reduce some of the ecological and hydrologic risks associated with this timber sale if "variable density thinning" of some kind were to be used to harvest timber while retaining significant forest integrity and structure.

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

Sincerely,

Barry Buchanan, Chair  
Whatcom County Council