



Skagit County Board of Commissioners

Ron Wesen, First District

Kenneth A. Dahlstedt, Second District

Lisa Janicki, Third District

November 27, 2019

The Honorable Hilary Franz
Commissioner of Public Lands
Board of Natural Resources
MS 47000
Olympia, WA 98504-7000

Submitted via email to: bnr@dnr.wa.gov

Re: Comments on the Sustainable Harvest Calculation FEIS and the Marbled Murrelet Long-Term Conservation Strategy

Dear Commissioner Franz and Members of the Board of Natural Resources,

Thank you for the opportunity to comment on the Final EIS (FEIS) for the Sustainable Harvest Calculation (SHC) and the Marbled Murrelet Long-Term Conservation Strategy (MM LTCS) FEIS.

The Board of Skagit County Commissioners would like to thank you and your staff for your hard work in developing these environmental impact statements and for your responsiveness to our questions to date.

These two decisions are likely to affect the trust beneficiaries significantly. As we have attempted to understand the financial impacts of proposed alternatives on Skagit County and its junior taxing districts, we remain concerned about sustainable harvest model assumptions, policy choices, and a lack of on-the-ground analysis. With many outstanding questions, we ask that you delay your decision on these matters for a reasonable period of time.

Skagit County is one of the largest recipients of state timber sales receipts in Washington. Between 2009 and 2018, Skagit County and its junior districts received over \$76 million in timber sale revenue from state-managed land, providing mission-critical funding for our community's schools, emergency management, fire districts, hospitals, libraries, conservation of agricultural lands, veterans' relief, economic development, county roads and culverts (including habitat-related work), and general fund public services. The Department of Natural Resources (DNR's) preferred alternative for the SHC reduces Skagit County's sustainable harvest level from 326 MMBF (2005-2014) to 259 MMBF (2015-2024), representing a 21% drop. Under this alternative, our community would see a 56% decline in average annual harvest sold over the remaining five years of the current planning decade. Revenue and public services would decline commensurately.

DNR did not release the Revised Sustainable Harvest Financial Analysis until mid-October 2019. This timeline affords inadequate opportunity for Skagit County to analyze and discuss the diminished forest land revenue the SHC appears to reflect both internally and with our junior taxing districts. Among other things, we are unable to fully comprehend DNR's policy choices and modelling assumptions.

We are initiating a contract with an independent expert to review DNR's SHC modelling assumptions and policy choices, as well as to review Skagit County's timber inventory. We are also working with the Washington State Association of Counties (WSAC) to better understand the direct and indirect financial impacts of DNR's preferred alternative. We anticipate that this process will take several months.

In light of the foregoing we strongly urge the Board of Natural Resources to delay a decision on the SHC until our independent analysis is complete. It is incumbent on Skagit County government to ensure that sound alternatives are chosen applying both best available science and DNR's fiduciary responsibility to our community.

Unless the Board of Natural Resources decision is delayed and we are afforded that opportunity, Skagit County and its junior taxing districts may have no choice but to appeal, a course of action that we would sincerely like to avoid.

We have submitted previous comments on the MM LTCS. DNR has communicated that only 731 acres of special habitat areas will be set-aside for the marbled murrelet in Skagit County. DNR has also presented a taxing district analysis that shows no Skagit County junior taxing district will see its operable acres reduced more than 2.0% under the proposed HCP amendment. Based on this information, provided by DNR, and the limited impacts of the MM LTCS specifically on our community, Skagit County will not submit further comment on the proposed alternatives under the MM LTCS. We remain concerned about the potential impacts of the MM LTCS on other trust beneficiaries throughout Washington State.

We look forward to continuing to work with you and your staff to reach an alternative for the SHC that maintains the fiduciary duty to the trust beneficiaries while protecting the sustainability of our forest lands. Thank you for your consideration of our comments and your ongoing commitment to maintaining an open dialogue on these important decisions.

Sincerely,

**BOARD OF COUNTY COMMISSIONERS
SKAGIT COUNTY, WASHINGTON**


Lisa Janicki, Chair


Ron Wesen, Commissioner


Kenneth A. Dahlstedt, Commissioner