

# Chuckanut Mountains Park District Advisory Committee

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*Where The Cascades Meet The sea*

December 15, 2006

Blanchard Mountain Strategies Group  
c/o Bill Wallace, Region Manager, Northwest Region  
Washington Department of Natural Resources  
919 N. Township Street  
Sedro Woolley, WA 98284-9395

Re: Chuckanut Mountains Park District -- Blanchard Mountain Proposal

Members of the Blanchard Mountain Strategies Group (BSG):

As the advisory committee dedicated to the creation of the Chuckanut Mountains Park District (CMPD), to be established in 2007 as a "metropolitan park district" under RCW 35.61, we wish to offer our unanimous support for full protection of the scenic, ecological, and recreation values at Blanchard Mountain. It is our belief that this extraordinary coastal forest landscape must be preserved in order to secure these values for the long-term benefit of current and future generations.

We recognize that the DNR has certain fiscal obligations to its beneficiaries, and that a move to end logging at Blanchard Mountain should not be taken lightly. We also realize that DNR management for timber production in many areas of western Washington is increasingly at odds with the public's interest in protecting open space, wildlife habitat, and recreation lands adjacent to expanding communities. We commend the DNR for its efforts to find creative solutions that provide a degree of protection while maintaining a level of active timber management. In many areas, particularly in the foothills and along the lower slopes of most river valleys, where growth and development are encroaching into the region's timber base, some compromise seems appropriate to ensure the protection of non-timber values, while also striving to maintain a productive forest and viable industry.

Blanchard Mountain, however, represents a very unique situation that we believe warrants full protection of this 4,800-acre forest. Because the BSG process has, perhaps inadvertently, discouraged active public involvement, we feel that a number of issues have not been adequately considered.

First and foremost, the Chuckanut Range, including Blanchard Mountain, is an extraordinary place:

- It is the only place in the entire Cascade Range, from Canada to California, where the foothills of the Cascades extend all the way to saltwater. It is a geologic and geographic anomaly within a much larger region dominated by broad deltas, low hills, and the unconsolidated sediments deposited by rivers and glaciers. All along the east shore of Greater Puget Sound, the 1,000-foot elevation contour line is almost always ten to twenty miles from the shoreline. In the Chuckanuts, that distance is barely 0.3 mile. The Chuckanuts, including Blanchard, is the largest undeveloped coastal forest along the entire eastern shore of the Sound. An analysis by Oregon's Conservation Biology Institute, published in 2004 and funded by the Paul Allen Forest Foundation, found that the forest of the Chuckanuts, including Blanchard (naturally regenerated following logging around the 1920s), is less fragmented than other forests, which benefits ecological integrity and makes new protected areas more desirable. It is also the largest late-successional coastal forest between Vancouver B.C. and Olympia, meaning that within fifty years this forest will be considered old-growth.
- Blanchard Mountain is also within an area that has been referred to as the Puget Lowland Forest Ecoregion, which the World Wildlife Fund considers to be in "critical" need of new protected areas. While the level of protection could never approach that of montane forests in the North Cascades, there is clearly no other location anywhere near the shore where an opportunity like this exists.

We invite you to look at the maps and satellite images of urbanization, as well as rural and agricultural lands that once were forested, and the blocks of public forest that remain anywhere along the coast from Olympia to British Columbia. We cannot imagine a more perfect place to establish a substantial new protected area. Preserving Blanchard Mountain ensures that future generations will have the unique opportunity to experience what this part of the Great Northwest was like before we virtually destroyed the vast majority of it.

Protecting Blanchard Mountain also protects its fish and wildlife and their diverse habitats. A number of listed species will obviously benefit from protection, such as the threatened Marbled Murrelet. This is the only known coastal murrelet nesting area remaining in Puget Sound; all other breeding sites are much farther inland. Suitable habitat so close to the marine shoreline is vital to the recovery of a species that has declined 96 percent in 25 years.

Immediately off-shore, Samish Bay hosts commercially valuable oyster beds, while the bay itself has historically been a critical wintering area for grebes, loons, and other waterfowl. Grey whales and sea lions are occasional visitors. Raptors migrate seasonally through the area, and a large number of neotropical migrant birds nest in the uplands. Eagles nest along the coast. Rare plants occur in wetlands and many natural balds, while abundant cliffy terrain supports a sensitive species of bats. Rare moths and butterflies are also found here. Salmon and steelhead spawn in surrounding streams. Western toads, rubber boas, and alligator lizards, among other species, further reflect the diversity of habitats that are represented here.

We would argue that protecting Blanchard and the Chuckanuts could also contribute significantly to the protection and recovery of Puget Sound, one of Governor Gregoire's top

priorities. This week's report by the Partnership for Puget Sound noted five areas in immediate need of attention, including "priority projects to restore damaged forests, rivers, shorelines, and marine waters." We think protecting Blanchard Mountain will do exactly that. It is well known that preserving functional representative ecosystems is key to the restoration of any ecosystem. Blanchard Mountain represents a vital piece in this effort, particularly when you weigh the cost of restoration against the cost of preservation.

The Partnership report also notes that "The pace of growth and corresponding changes to our forest and agricultural land base and our shorelands has far outstripped habitat protection and restoration efforts." Land acquisition along marine shores is emphasized to help protect "marine, freshwater, and upland species of concern." We think it's timely and crucial for the DNR to work toward making the protection of Blanchard Mountain part of the upcoming 2020 Action Agenda of the Puget Sound Partnership. Our Lands Commissioner, Mr. Sutherland, of course, is a member of that team.

Protecting Puget Sound does not mean that all forests have to be preserved, but it does suggest a range of options in which areas most suited to forestry are maintained as working forests to help sustain the industry and to counter urban sprawl, while at the same time we work to preserve and restore those relatively rare places, like Blanchard, that harbor a representative biodiversity and will contribute the most to our region's natural legacy. The Puget Sound Partnership report encourages the same approach.

It is our assertion that the value of Blanchard Mountain, with a maturing forest, spectacular setting, outstanding recreational and ecological values, and proximity to urban populations, will only appreciate over time as a regional community asset in its natural state.

Needless to say, scenic and recreational values are, indeed, substantial. The scenic coast of the Chuckanuts was recognized when State Route 11, or Chuckanut Drive, was formally designated in 1993 as a Scenic Byway. An extensive trail system accommodates many tens of thousands of users each year, with numbers that could easily exceed 100,000 under current growth projections. Numerous lakes and wetlands, maturing forests, and rocky overlooks with unmatched views of the San Juan Islands, Skagit Valley, Samish Bay, and three mountain ranges (the Olympics, North Cascades, and B.C. Coast Range) offer popular destinations and year-round access. A nationally designated trail—the Pacific Northwest Trail—traverses much of Blanchard Mountain.

About ten miles of new trails on Blanchard Mountain were proposed in the 1996 Chuckanut Mountains Trails Master Plan, which DNR, the user groups, Washington State Parks, and both county park agencies helped develop. This would complement nearly twenty miles of existing trails that are heavily used throughout the seasons. The DNR has helped facilitate trailhead improvements, but has not constructed any of these new trails.

It is also worth noting that protection of the Chuckanuts ecosystem could prove invaluable to science, including research that monitors and evaluates the effects of climate change over the coming decades. The absence of a plantation forest history may also have important genetic

implications for understanding coastal ecosystems and species recovery. These opportunities should be seriously considered.

Much has been made of the economic arguments for keeping Blanchard Mountain managed for commercial timber harvest, some of it based on a 2002 study entitled "Evaluation of Blanchard Mountain Social, Ecological, and Financial Values." That study concluded, erroneously in our view, that commercial forestry would result in a greater economic return from logging than from not logging Blanchard Mountain.

While the forestry data may have been credible, the recreation data, including recreation use estimates and perceived dollar values of not logging the area were highly speculative and incomplete. The evidence presented was almost entirely anecdotal, based on observations and interviews with users during a period in which a principal means of access, Chuckanut Drive, was closed for construction for a month. The experts simply added twenty-five percent to the total and called it good enough. To strengthen the results, they offered a weak comparison with the Issaquah Alps in King County, then nearly apologized for bringing it up, since no clear correlation could be drawn.

Phone interviews focused unfairly on one key question: how much would people be willing to pay, as a one-time payment, to end all logging on Blanchard? The question assumed that only today's residents could potentially benefit from preservation, and that they are somehow supposed to bear the brunt of the cost to protect something that will benefit many generations into the future, not to mention all of northwest Washington, if not the state as a whole. (Even if we limited the calculation to four generations--a single 100-year rotation in timber production--one could assume that far more people would be willing to assume some of the cost of *not* logging. If population growth was zero, we would have to multiply the total value calculated in the report by four, yet the population will likely more than double, if not triple, well before the end of the century.) Thus while the financial benefits of logging were assumed to carry over from one generation to the next, the benefits of not logging were placed squarely on the shoulders of today's residents. It would have been far more helpful to ask the question in the form of a willingness to make an annual or periodic contribution. Furthermore, there was no intermediate choice offered in which a portion of the mountain might be preserved and a portion reserved for timber. Nor was there any suggestion that preservation would likely lead to better facilities and enhanced opportunities for the public to more easily enjoy and appreciate what the area has to offer.

Nor did this study attempt to quantify economic benefits rising from long-term protection. There was no acknowledgment that protected areas, once so designated, tend to become a magnet for increased visitation, which has obvious spin-off effects for recreation-related spending and tourism development generally. There was no mention of how new or improved facilities that might result from park or natural area designation can potentially increase use, or that both residents and visitors might attribute significantly greater importance and value to the mountain if such improvements were made.

In addition, research by the National Park Service and others has clearly shown that newly established parks, trails, preserves, and the like, particularly in urban and suburban areas,

consistently augment property values for nearby residents and businesses, which increases the tax base. Increased property values in the range of five percent or more have been attributed to such improvements.

The Chuckanut Mountains Park District we are proposing has a total assessed value in the range of \$3 billion today. If we assumed only a one-percent increase in average property values for the entire district as a result of turning Blanchard Mountain into a state park, for example, that would amount to a \$30 million increase in real property value, and potential tax revenues to local government possibly in the hundreds of thousands of dollars each year.

To be clear, we are very appreciative of the work that has been done by DNR staff and the Blanchard Mountain Strategies Group to explore options for future management of these critical public lands. On August 8, 2006, Mr. Bill Wallace of the DNR met with the CMPD Advisory Committee. He presented a very lucid, informative description of the DNR's mission and provided information concerning the Chuckanut Mountains, property ownership and fiscal responsibilities. The following is an excerpt from the approved minutes of that meeting:

“Department of Natural Resources: Bill Wallace described DNR's role that includes primarily managing forestlands for various beneficiaries. Their job “isn't to cut trees, it's to generate revenue for the beneficiaries.” They also manage for multiple use. The Blanchard Mountain Forest benefits Skagit County. They have paused on timber harvesting presently as they are working with a Blanchard Strategies Group to explore possibilities for the future. The group's recommendations will be made public and DNR will decide how to proceed. Bill pointed out that roughly 20% of the area is protected already for other reasons. As they are “looking for a stable funding source to manage for recreational use,” Bob [Gibb] suggested a parks district would be invaluable to Blanchard Mountain to address their concerns for the future.”

In his presentation, Mr. Wallace noted the recent removal of large areas of federal forests from logging, noting that many of those lands would benefit ecologically from selective logging. The CMPD Advisory Committee is not adequately informed to take a firm position on the logging of federal lands, although we certainly encourage dialogue and creative solutions that can lead to sustainable practices and increased conservation within all forests.

On November 21, 2006, Mitch Friedman, Executive Director of Conservation Northwest and a member of the BSG, presented to the CMPD the group's proposal concerning logging on Blanchard Mountain. Four members of the Friends of Blanchard Mountain attended. Following a brief historical review of DNR-managed land in the area, especially Blanchard Mountain, he noted consensus on stopping development sprawl into the area. He presented a compromise proposal preserving a core of forest at the top of the mountain but permitting logging on many other areas of the mountain. He considered the compromise to be an opportunity to preserve much of the mountain, expressing concern about potential development in some of the privately owned portions. There were many questions and discussion from the group, but the general consensus was not to agree to the compromise proposal.

In consideration of the unique ecological and geological aspects of the Chuckanut Mountains as detailed in the Cascades-to-Chuckanuts Conservation Plan developed by the Whatcom and Skagit Land Trusts in 2004, and with the recent data from the Outdoor Industry Foundation as reported by Joanne Kelly of the Scripps Howard News Service and in consideration of the recently reported fiscal impact of tourism on the economy of the State of Washington and Whatcom and Skagit Counties by the state office of Community Trade and Economic Development as reported in the Bellingham Herald (December 3, 2006), the members of the CMPD Advisory Committee strongly support maintaining public land on Blanchard Mountain in its natural state. We consider it ill-advised to recommend any logging in the Chuckanut Mountains, including Blanchard Mountain.

If the goal or mission of the DNR is to manage forestlands and generate revenue for the State of Washington and the beneficiaries, this coastal forested mountain range should be managed to prudently preserve its unique qualities and to generate optimum non-timber revenue to the local and state economies. Revenue from tourism, recreation, and an increased tax base could ultimately far exceed that from logging. We can and must find ways that these sources can be tapped to replace the revenue from logging.

Fiscal considerations need to recognize the proximity of Blanchard Mountain to year-round utilization for recreation and tourism, its proximity to I-5, the North Cascade Highway, Puget Sound, and to other urban areas of western Washington and southwestern British Columbia, and not just those in Whatcom and Skagit Counties.

Finally, we think it is important to point out an almost complete lack of Natural Resource Conservation Area (NRCA) designations on the mainland of Whatcom and Skagit Counties. While we don't want to diminish the value of the 3,900-acre NRCA on Cypress Island, which is part of Skagit County, it is an island and therefore isolated from the mainland, difficult to access, and not serviced by any ferry system. Nor does it function as a reserve for terrestrial wildlife living on the mainland. Yet next to nothing has been so designated between the mountains and the sea in our region, despite the presence of a substantial land base managed by DNR. We understand that the Trust Land Transfer Program might not be easily applied to Blanchard Mountain since much of the land is in Forest Board status. However, a land exchange could be considered which could make an NRCA a viable option.

By comparison, a total of six NRCAs covering over 42,000 acres have been established in the mountains and foothills of King and Snohomish Counties. In mainland Whatcom and Skagit Counties, only two NRCAs exist, covering a mere 740 acres, or less than two percent of the area so protected in the adjacent counties. If we dismiss the NRCAs located in the higher mountains of King and Snohomish Counties (Mount Si, Greider Ridge, Morning Star, and Mount Pilchuck), we are still left with nearly 16,000 acres of low-elevation NRCAs in those two counties. In the Whatcom-Skagit area, there is only one low-elevation site. Known as Lake Louise, it is a 137-acre forested NRCA near Lake Whatcom. Its size is less than one-percent of the total lowland forest area protected by the DNR in King and Snohomish Counties.

Clearly, Blanchard Mountain offers a superb opportunity to help rectify this remarkable discrepancy in the protected status of our DNR-managed state lands.

Again, while we realize the DNR has certain obligations to its beneficiaries in the management of Blanchard Mountain, we believe that continued commercial logging is not an appropriate long-term use of this unique coastal mountain landscape. The majority, if not all, of the mountain should be protected as a state or county park, NRCA, or similar designation that ensures that the scenic, ecological, and recreation values we enjoy today remain paramount, and are not impaired or degraded by road building, timber harvest, and related management activities.

### **Our Proposal:**

To help address all of these issues, we offer the following proposal for Blanchard Mountain:

We propose that Blanchard's current financial contributions to surrounding communities from logging be replaced by other sources, including an annual contribution of funds levied by the CMPD, once it's created, for a period of years to be determined, and by other sources, including matching funds, grants, private donations, trust transfer, and most importantly, legislative appropriations. This approach could offer the Skagit County beneficiaries compensation for the loss of timber revenue, as well as a stable, long-term cash flow, while also permanently protecting the area's natural, recreational, and other economic values.

It is the intent of the advisory committee that the CMPD offer meaningful assistance to the DNR in assessing ecological conditions and opportunities for restoration, and that the district could play an important supporting role in planning and funding for recreational use and conservation, while also assisting the DNR with various ongoing land management challenges. The CMPD, for example, could help coordinate volunteer efforts in habitat restoration and trail maintenance.

CMPD could further assist by initiating an educational/public relations outreach program for Whatcom and Skagit County communities within the CMPD. We could invite public participation in developing a strategic plan to accomplish these more immediate goals, as well as for long-term protection and management of the area.

Within the next year or so, we expect the CMPD will have been created, including approval of a permanent levy, by the voters of the region. Early on, elected commissioners would likely begin to shape a comprehensive plan, in cooperation with all land managers, for the protection and recreational use of Blanchard, just as it will for other areas that the park district encompasses.

As the advisory committee to the CMPD, we will strongly advise the new district commissioners to implement the strategy presented here as quickly and efficiently as possible. Certain studies will need to be conducted and agreements negotiated to implement a specific plan of action. It is reasonable that such work might last for several months to a year.

In the meantime, we strongly advise that a two-year moratorium be put in place on all logging in the area until the park district is formally established, a funding plan is developed, and final agreements are reached.

We believe this is a rational and viable solution to the Blanchard Mountain crisis that will ensure that the area satisfies fiduciary obligations and serves the interest of the beneficiaries and the public at large. This approach can provide a win-win-win solution for the community, DNR, and the environment, while also bringing to an end a public opinion battle that has been simmering for at least fifteen years.

We suggest that DNR and the BSG include the CMPD as a viable option for a future management strategy for Blanchard Mountain. We are prepared to continue our efforts to educate the public about the unique values that exist here, to engage potential funding agencies in further conservation and advocacy efforts, and to help build the political support that is needed to secure the long-term protection of this outstanding natural community asset.

We appreciate the DNR's sensitivity to the importance of protecting Blanchard Mountain and we look forward to further discussion regarding this proposal.

Sincerely,

CMPD Co-chairs:

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Ann Eissinger  
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Robert Gibb, M.D.  
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cc:

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Governor Christine Gregoire  
Doug Sutherland, Public Lands Commissioner  
Senators Harriet Spanel, and Dale Brandland  
Representatives Doug Erickson, Kelli Linville, Jeff Morris, and Dave Quale  
Friends of Blanchard Mountain  
Whatcom Land Trust  
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