

Whidbey Environmental Action Network

PO Box 293, Langley, WA 98260

(360) 222-3345

[www.whidbeyenvironment.org](http://www.whidbeyenvironment.org)

To: Island County Board of Commissioners

CC: Island County Planning Commission

Sunday, September 21, 2025

**Re: Enhancing forest protection through a partial reform of PBRS**

Dear Commissioners Bacon, Johnson, and St. Clair,

Thank you for your thoughtful discussion of forests and the Public Benefit Rating System during your September 17 work session. Each of you raised important questions and observations.

Commissioner Bacon, we heard you express unwavering support for strengthening protections for forestlands—support echoed by your colleagues, with Commissioner St. Clair expressing particular interest in asking the State to be more accountable for their part in enforcing protective rules and Commissioner Johnson bringing an environmental justice perspective with questions about the value of ecosystem services for tax payers of all income bands. Thank you all for your strong interest in this topic, which has implications for aquifer recharge, climate change mitigation, quality of life, and human and ecosystem health for generations to come.

Commissioner St. Clair, we'd be very interested in further discussion of your observations about the State's accountability to enforce replanting requirements to ensure our advocacy to the State aligns with Island County's needs. We also appreciated your pointing out the problem of State language that treat the lands primarily as having extraction value, and we hope that Island County can be ahead of Washington State DNR in adopting climate-forward language about forests in its Comprehensive Plan, PBRS program, and more.

Commissioner Johnson, it was interesting to hear your suggestions about using regulations to limit clearing as an addition to incentivizing forest protection with PBRS. We also recognize the value of your bringing an economic justice perspective to any discussion with revenue implications, and share your hope that an economic study will shed light on the math underpinning our assumption that the return on investment will be greater with a conservation focus than with a timber harvest focus for Island County forests. Your explanation of



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preservation as a climate resource, having economic value comparable to or greater than an extracted resource, gets straight to the heart of the matter.

While Ms. Neff is correct in pointing out that changing language about resources from an extractive to a conservation orientation is needed at the state level, we encourage the Board to make our local plans and codes as responsive to our unique needs and to our climate commitments as possible, within your authority. We thank you for revising the PBRS program to respond to these needs to the benefit of all who breathe our air, drink our water, eat food from our soil, and enjoy the health, safety, climate resilience, and natural beauty of our communities.

Finally, we share your excitement about the potential for Rural County Economic Development funds as a potential source for economic study funding. The desire expressed most strongly by Commissioner Johnson to understand the economic value of conservation is one that we share, and we look forward to supporting Island County in any way possible to gain clarity on this subject.

What follows is some proposed language that would make the PBRS program clearer, more robust, and more responsive to the needs indicated by the Commissioners during Wednesday's discussion. These include your wish to provide more points as an incentive to steward forests for ecosystem services that benefit all Island County residents and to make the program a more appealing alternative to Designated Forest for those who choose to prioritize sincere conservation stewardship over timber production.

Please see, on pages 3 through 7, a marked up version of the forestry section of PBRS and, on pages 8 through 10, a clean version.

With appreciation,

Marnie Jackson and the team at Whidbey Environmental Action Network



*Protecting wild spaces in Island County and beyond since 1989*

### 3.40.030 - Operation of the county public benefit rating system for open space lands.

. . .

A. High priority open space resources. Five (5) points each:

1. Resource and rural agricultural lands.

2. ~~Integrated Forest Management Plan.~~ Stewardship Forestlands.

a. ~~Forest Stewardship Program.~~ Stewardship Forestlands may emphasize forest retention, harvesting, or a combination of both subject to standards intended to provide public benefit related to climate resilience, wildlife habitat, water quality, aquifer recharge, and recreation. See 3.40.280 for forestry practices in the Island County Forest Stewardship Selected Practices and the points awarded for including and implementing those practices.

b. ~~Timber Management Plan.~~ For forestlands primarily devoted to growing and harvesting of timber contact the Island County Assessor about Island County's current use exemption "Designated Forest."

#### *Discussion:*

*All other open space categories refer to lands, corridors, area, etc., not management plans for those areas. The open space resource is the actual land, not a management plan.*

*"Open Space land" is defined in RCW 84.34.020(1). These lands are rated by a point system adopted by the County Commissioners, the Open Space Public Benefit Rating System (PBRS). The amount of tax reduction is based on the points awarded. RCW 84.34 also has a separate "Timberlands" category, defined in section 020(3). These are lands devoted to timber production and by statute get the same tax reduction as "Designated Forest" in RCW 84.33. See RCW 84.23.060. "Timberlands" are not part of the PBRS. They are not subject to the PBRS point scoring system. The amount of tax reduction is not dependent on the PBRS point system. "Timberlands" also fall outside the purpose of the PBRS because they are devoted to timber production rather than open space purposes.*

*Because "Timberlands" are administered by the County Assessor and are not part of the PBRS, which is administered by the County Commissioners, people looking for information about that program are directed to the County Assessor here rather than further in the PBRS ordinance.*

*The reference to the "Designated Forest" program administered by the County Assessor deliberately omits reference to lands "five (5) acres or larger." By statute, both the Designated Forest and Timberland tax categories are limited to contiguous parcel(s) totaling at least 5 acres. There is no provision in Washington law to grant tax reduction for contiguous parcel(s) less than 5 acres devoted to timber production.*

### 3.40.250 - High priority open space resources.

...

#### B. ~~Integrated Forest Management Plan:~~ Stewardship Forestlands.

##### 1. Definitions.

a. ~~Forest Stewardship Program.~~ Stewardship Forestlands. Lands primarily devoted to climate smart and ecological forestry. ~~improving forest health.~~ A Forest Stewardship Plan and Island County Forest Stewardship Selected Practices checklist shall be filed with the county legislative authority at the time the application is made for initial classification and every time the ten year enrollment period is renewed. ~~as Integrated Forest Management Plan pursuant to this chapter.~~

~~b. Timber Management Plan.~~ Lands primarily devoted to growing and harvesting timber. ~~Timber management includes land used for incidental uses that are compatible with the growing and harvesting of timber, but no more than ten (10) percent of the land may be used for such incidental uses. A timber management plan shall be filed with the county legislative authority at the time application is made for classification as Integrated Forest Management Plan pursuant to this chapter.~~

##### 2. Source.

~~a. Island County Commercial Forest Land Study, Crescent Springs Management, January 1998.~~

~~b. Washington State Integrated Forest Management Plan Guidelines and Template, March 2017.~~

b. Island County Forest Stewardship Selected Practices checklist.

##### 3. Eligibility.

a. Eligible lands are those that are currently not enrolled in existing current use assessment programs and comprise one or more contiguous parcels with at least 4 acres of contiguous parcels. ~~and meet the definition for one (1) of the Integrated Forest Management Plans, above.~~

b. Plans shall be prepared by, or in close collaboration with, a professional forester or another natural resource professional acceptable to the approving agency or organization.

~~c. Forest Stewardship Program. Shall meet all the requirements of the Washington State Integrated Forest Management Plan and be approved by Washington State's Department of Natural Resources.~~

~~d. Timber Management Plan. Shall meet all the requirements of the Washington State Integrated Forest Management Plan.~~

~~(i) No more than five (5) acres of land shall be eligible for high priority open resource "Timber Management Plan". This includes applicants that have enrolled in PBRS and are receiving bonus points for "contiguous parcels under separate ownership" (section 3.40.280.D).~~

~~(ii) For forestlands primarily devoted to growing and harvesting of timber that are five (5) acres or larger see Island County's current use exemption "Designated Forest".~~

#### *Discussion.*

*"Forest health" is an ambiguous term; a forester and an ecologist have very different ideas of what constitutes a healthy forest. Also, the County should provide for forest that is already "healthy."*

*The general concept here is to encourage and reward forestry not based on large clearcuts every 40-50 years. The goal is to avoid large clearcuts and move the land into older more economically and ecologically valuable forest. In contrast, current industrial forestry is logging forests at younger and younger age, with 40 years now considered standard and the industry talking of 25 year "rotations." As the age of the trees declines, all of the public benefits decline. There is less Carbon sequestration, greater stormwater runoff and poorer aquifer recharge, degraded wildlife habitat, etc. For these reasons the Forest Stewardship Selected Practices checklist has a "ceiling" of removing no more than about 25% of the timber volume in any ten year tax period, with increasing points (tax reduction) as less is taken. The Forest Stewardship Selected Practices checklist is submitted anew for each 10 year tax program and states the proportion of the standing timber volume that will be retained. For example, in the first 10 year tax period 25% might be taken, 15% in the second tax period, 20% in the third, etc. Over time, the age of the trees and the resulting public benefit will increase. See 3.40.280 below for the checklist.*

*Because lands devoted to timber production do not fall within open space lands, there is no reason to include them here. The referral to the Designated Forest tax program administered by the County Assessor has been placed in the initial language regarding forestlands in 3.40.030.*

*The Crescent Springs study was for the purposes of determining if Island County has any forest lands of long term commercial significance, per GMA's resource lands requirement. The conclusion was that there were none and as a result the County Commissioners did not designate any forest lands as GMA resource lands. That study is not relevant to PBRS. It is also not easily available; I doubt that there is an easily accessible copy in the Planning Dept. or that it is ever used. What is relevant is whether the particular lands are forested or being re- or afforested. Aerial photos will be adequate to determine this.*

### **3.40.280 - Bonus system.**

Additional point values may be applied for the following eligible lands:

J. Properties with an approved Forest Stewardship Plan and Island County Forest Stewardship Selected Practices checklist.

1. Island County Forest Stewardship Selected Practices checklist.

<u>Check all practices that will be followed during the next ten years</u>	<u>Practice</u>	<u>Notes</u>	<u>Points</u>
	<u>Adherence to Island County Critical Area standards</u>	<u>Required for enrollment. “Standard” logging under the Washington Forest Practices Act do not respect local wetland and stream critical area protection standards.</u>	<u>0</u>
	<u>2.5 acre size limit on openings created by timber harvest</u>	<u>Required for enrollment. Ecological forestry does not include large clearcuts.</u>	<u>0</u>
	<u>Providing public access for recreation or education, such as trails open to the public and scientific research.</u>		<u>5</u>
	<u>Retention of at least 9 standing green trees, 6 snags, and 6 down logs per acre of opening created by timber harvest for every opening larger than 1/8 acre. Green trees and snags must be in or immediately adjacent to the opening(s); down logs must be within the openings.</u>	<u>Retention of standing green trees, standing dead trees (snags) and logs is important to future forest ecological function. These numbers are 3 times the current subminimal requirements by the WA Forest Practices Act and more closely match those recommended by forest ecologists.</u>	<u>5</u>
	<u>Retention of 75-79% of the original volume of the timber stand at the end of the 10 year enrollment period.</u>	<u>This level of timber harvest is equivalent to a 40-50 year clearcut rotation.</u> <u>The purpose of these retention standards is to encourage longer rotation ages and increase of the volume / size of trees over time (increasing Carbon sequestration and wildlife value).</u>	<u>5</u>

	<u>Retention of 80-84% of the original volume of the timber stand at the end of the 10 year enrollment period.</u>	<u>This level of timber harvest is equivalent to a 50-65 year clearcut rotation.</u> <u>The purpose of these retention standards is to encourage longer rotation ages and increase of the volume / size of trees over time (increasing Carbon sequestration and wildlife value).</u>	<u>20</u>
	<u>Retention of 85-89% of the original volume of the timber stand at the end of the 10 year enrollment period.</u>	<u>This level of timber harvest is equivalent to a 65-90 year clearcut rotation.</u> <u>The purpose of these retention standards is to encourage longer rotation ages and increase of the volume / size of trees over time (increasing Carbon sequestration and wildlife value).</u>	<u>25</u>
	<u>Retention of 90% or more of the original volume of the timber stand at the end of the 10 year enrollment period.</u>	<u>This level of timber harvest is equivalent to a 90 year or longer clearcut rotation.</u> <u>The purpose of these retention standards is to encourage longer rotation ages and increase of the volume / size of trees over time (increasing Carbon sequestration and wildlife value).</u>	<u>30</u>
	<u>Permanent conservation easement, commercial logging only to accelerate development of mature forest structure or control invasive species</u>	<u>A forest landowner who places a perpetual conservation easement on their land has given up all future income and should be rewarded accordingly.</u>	<u>30</u>

### **3.40.030 - Operation of the county public benefit rating system for open space lands.**

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b. For forestlands primarily devoted to growing and harvesting of timber contact the Island County Assessor about Island County's current use exemption "Designated Forest."

### **3.40.250 - High priority open space resources.**

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B. Stewardship Forestlands.

1. Definitions.

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2. Source.

a. Washington State Integrated Forest Management Plan Guidelines and Template, March 2017.

b. Island County Forest Stewardship Selected Practices checklist.

3. Eligibility.

a. Eligible lands are those that are currently not enrolled in existing current use assessment programs and comprise one or more contiguous parcels with at least 4 acres of contiguous parcels.



b. Plans shall be prepared by, or in close collaboration with, a professional forester or another natural resource professional acceptable to the approving agency or organization.

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