

Dearest Wildlife Advisory Committee,

Thank you for the time allotted to me on June 11, 2021 to speak. For those of you who I haven't met, I am a Critical Areas Planner here at the Whatcom County Planning Department and am tasked with enforcing the CAO under development permit and enforcement application scenarios. In this meeting, I requested assistance with finding a statically or scientifically sound methodology to implement for survey and sample of the WDFW PHS listed habitats of "old growth" and "mature forest" under the current Whatcom County Critical Areas Ordinance.

THE WDFW definition as adopted in the Whatcom County CAO under WCC 16.16.710 is currently regulated without any adopted, or scientifically driven method to determine the PHS presence or absence. **Therein lies the difficulty with regulating the habitat for protection. Identification of the habitat by an untrained individual is very difficult indeed. Currently, surveys for PHS that don't have survey methodology behind them are vulnerable to bias or subjective documentation.**

I was directed during the meeting to provide any information I have regarding potential methodologies and our current regulated definition of Old Growth and Mature Forest under the CAO, so here is what I have thus far.

Here is the current, regulated definition which I can't find any methodology to support:  
<https://wdfw.wa.gov/sites/default/files/publications/00165/wdfw00165.pdf>

**Priority Area Description:**

**Old-growth west of Cascade crest:** Stands > 3 ha (7.5 acres) having at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 2 trees/ha (8 trees/acre) that are > 81 cm (32 in) dbh or > 200 years of age; and > 10 snags/ha (4 snags/acre) over 51 cm (20 in) diameter and 4.6 m (15 ft) tall; with numerous downed logs, including 10 logs/ha (4 logs/acre) that are > 61 cm (24 in) diameter and > 15 m (50 ft) long. High elevation stands (> 762m [2500ft]) may have lesser dbh [> 76 cm (30 in)], fewer snags [> 0.6/ha (1.5/acre)], and fewer large downed logs [0.8 logs/ha (2 logs/acre) that are > 61 cm (24 in) diameter and > 15 m (50 ft) long].

Stands smaller than 3 ha (7.5 acres) in rural and urban areas can still retain significant wildlife value and therefore should be evaluated as a potential biodiversity area (see Biodiversity Areas and Corridors).

**Mature forests:** Stands with average diameters exceeding 53 cm (21 in) dbh; crown cover may be less than 100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than that found in old-growth; 80 - 200 years old west and 80 - 160 years old east of the Cascade crest.

It appears that Old growth stands are defined as an “ecological condition” by the Washington Department of Natural Resources. [https://www.dnr.wa.gov/publications/lm\\_ess\\_westside\\_oldgrowth\\_rpt.pdf](https://www.dnr.wa.gov/publications/lm_ess_westside_oldgrowth_rpt.pdf)).

I was informed by a DNR Forester that they utilize the Van Pelt method below to assess the ecological condition to meet the Old Growth stand requirements on State Lands.

Here are some methodologies I have found in a very small amount of research.

**Washington Department of Natural Resources**

Some background information from the DNR:

<https://washingtondnr.wordpress.com/2010/07/21/how-does-dnr-identify-old-growth-forests/>

WADNR’s “Identifying Mature and Old Forests” (Van Pelt, 2007)

[https://www.dnr.wa.gov/publications/lm\\_hcp\\_west\\_oldgrowth\\_guide\\_full\\_lowres.pdf](https://www.dnr.wa.gov/publications/lm_hcp_west_oldgrowth_guide_full_lowres.pdf)

**BC Ministry of Forests and Range (thanks Amy!)**

Field Manual for Describing Terrestrial Ecosystems 2<sup>nd</sup> Edition:

[https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-data-centre/field\\_manual\\_describing\\_terrestrial\\_ecosystems\\_2nd.pdf](https://www2.gov.bc.ca/assets/gov/environment/plants-animals-and-ecosystems/conservation-data-centre/field_manual_describing_terrestrial_ecosystems_2nd.pdf)

I really appreciate your voluntary efforts and actions. If you have any further questions regarding how the CAO works on the ground during the development permit review stage, please feel free to contact me.

Best,  
Erin

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