

**Whidbey Environmental Action Network**  
**Restoration Education Preservation**

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*Dedicated to the preservation and restoration of the native biological diversity  
of Whidbey Island and the Pacific Northwest*

**June 4, 2007**

**TO: Board of County Commissioners**  
**FROM: Steve Erickson**  
**RE: Rhododendron Park and management of County owned ecologically  
significant lands**

We urge you to sign no contracts and make no commitments towards logging in Rhododendron Park before looking at the site with a vegetation ecologist familiar with the Park. We have contacted Chris Chappell, former vegetation ecologist for the Washington Natural Heritage Program. Chris did the original ecological evaluation of the Park. He is willing to walk the site with you and provide his opinion of the proposed logging.

It was our understanding that the Commissioners intended to conduct such a walkthrough, and that we could attend. Yet on May 16 at 12:00 we received a phone call from Lee McFarland, acting Parks Director, informing us that at 3:00 you would look at the site without an ecologist. We then called Natural Heritage in Olympia and learned that McFarland had just contacted them that morning. Of course, rearranging schedules on such short notice was impossible. This short notice was so unreasonable that it calls McFarland's intentions into question. In fact, he told Marianne Edain regarding having an ecologist attend, "Who needs them?"

It is important to understand why the Dept. Natural Resources did not log this publicly owned land. In the early 1990's DNR's land holdings were surveyed and evaluated by the Washington Natural Heritage Program (WNHP). While part of DNR, WNHP is not part of the timber division:

The WNHP collects data about existing native ecosystems and species to provide an objective, scientific basis from which to determine protection needs. The program also develops and recommends strategies for protection of the native ecosystems and species most threatened in Washington. This information is used by landowners, state and federal government agencies, consulting firms, planning departments, and conservation groups to support the state's environmental and economic health.

<http://www.dnr.wa.gov/nhp/about.html>

The survey of Rhododendron Park, conducted by vegetation ecologist Chris Chappell, concluded that Rhododendron Park is an outstanding and rare example of a "High Quality/Rare Ecological Community," namely an unlogged Douglas-fir - Western Hemlock / Pacific Rhododendron - Evergreen Huckleberry forest. He found that the trees are predominantly of two age classes, 100-150 and 350 years old. Despite their age, the trees are relatively small because of the poor soil and low precipitation. Because of its outstanding ecological significance and poor growing conditions, DNR did not log this forest, despite its high value as timber.

On May 27 Marianne Edain and I visited the Park. We found numerous large healthy trees marked for cutting. See the photos on pages 4 and 5. These were clearly selected to be profitable for logging and cutting them has nothing to do with "forest health" or "public health and safety." We also saw trees that are arguably "hazard trees" that are not marked for cutting. These trees had lower timber value than the large healthy trees that are marked.

Many trees are marked for cutting that are healthy, but have poor "form" for timber. See the photo on page 6. Some of these trees are large.

Many small trees less than 15-20 feet tall and 3- 4 inches diameter are also marked for cutting. These trees pose no hazard. Many of these trees are in clumps with other, larger trees on the periphery of campsites. Removal of these trees will have the opposite of the intended effect and result in degradation of forest health. Clumped as they are, people now tend to walk around these trees, protecting the roots of the adjacent larger trees and the understory vegetation. Removal will result in the creation of new *de facto* trails with trampling of understory vegetation and soil compaction around the roots of the larger trees. This is predictable and we have seen it occur in other parks and campgrounds. Removal of these small trees may make the forest look less "messy," but will in the longterm result in degradation of the forest and unplanned expansion of campsites. Proper planning will take into account all of the predictable effects of the proposed logging, including people's natural tendency to take shortcuts and thereby create additional trails. If expanding any particular campsite is desired, it should be done consciously with proper planning and not in this manner.

The proposed logging will damage many additional trees and the forest understory - the Rhododendrons. When the large trees are felled they will damage other trees and crush the shrubs in the forest understory - primarily the Big-leaf Rhododendron the park is named for. Even worse, when these trees are "yarded" - dragged out - they will compact, disturb, and tear up the ground, leaving it vulnerable to weed invasion. Trees that must be felled for safety reasons should be left where they fall. These down logs are critically important to maintaining the forest's ecological functions. They provide important structural habitat for numerous organisms, including small mammals, amphibians, and understory plants, as well as being critical to creating and maintaining forest soil fertility as they decay. This is a key difference between managing Rhododendron Park for its ecological value and health and treating it as a timber plantation. The only time any portion of a down tree should be moved is if it is actually in a campsite or across a trail or road.

The logging as currently proposed is management of the Park as a timber plantation and for commercial logging, not the ecological values which are the reason the Park was not logged

by DNR. The logging has little connection to public health and safety. Many of the trees were obviously marked for cutting because of their timber value, not because they are "hazard" trees. Most of the others that are marked were obviously chosen because they reduce the future timber value of the forest. The County has relied on a *timber management* company to decide what trees should be cut. It's obvious that they chose trees for cutting based on their current and future value as *timber*. But Rhododendron Park is not a *timber plantation* - it is a rare undisturbed natural forest and public park. It should be managed as such - not for future timber production.

Because of its high ecological value and rarity, as determined by the Washington Natural Heritage Program, Rhododendron Park is designated as a critical area. There are two requirements that are relevant here. The first is that critical areas may not be altered. The second is that "Requests for permit approval by Island County will be acted on only after consultation with the Washington Natural Heritage Program." While there may not be a permit required, the lack of consultation with WNHP amounts to evasion of the intent, if not the letter, of the County's own ordinances. We urge the County to show good faith by having a walkthrough of Rhododendron Park with vegetation ecologist Chris Chappell.

Finally, this situation is symptomatic of a larger problem: the County's lack of planning for conservation and management of its ecologically significant lands. Island County now owns ecologically significant forests, wetlands, and prairies, but management is either lacking, haphazard, crisis driven, or without recognition of the ecological significance or value of these lands. We request that the County begin a systematic program of creating management plans for these lands that prioritize the conservation and restoration of their significant ecological values.



**PHOTO-1. Grace, a Canadian girl no more than 4 feet tall, next to a healthy Douglas Fir about 1-1/2 foot diameter marked with a blue stripe for cutting. Trees of this size in Rhododendron Park are 100-150 years old. This tree is not in the campground at all and is at least 50 feet from the nearest road.**



**PHOTO-2. Another large healthy tree not in or near a campsite or road but marked with a blue stripe for cutting.**



**Photo-3. Healthy tree with a “crook” marked with a red stripe, presumably for cutting. The tree has some timber value now, but not over the long term because of its form.**