



December 14, 2016

Bob Winslow  
Department of Natural Resources  
Morning Star Inter-Trust Exchange  
PO Box 47014  
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Submitted electronically to: [Exchanges@dnr.wa.gov](mailto:Exchanges@dnr.wa.gov)

**Re: Morning Star Inter-Trust Exchange No. 86-093996**

Dear Mr. Winslow:

We are writing to express our support for the proposed expansion of the Morning Star Natural Resource Conservation Area (NRCA) within Snohomish County by nearly 3,000 acres.

The proposal would exchange approximately 280 acres of State Forest Land Trust holdings near Sultan, WA in Snohomish County for an equal-valued parcel of Common School Trust forestland. Legislatively appropriated funds in the Trust Land Transfer (TLT) program will compensate the Common School Trust for the value of the property transferred into the Morning Star NRCA. This expansion is part of a larger nearly 5,000-acre expansion approved by the agency in 2015.

The DNR Natural Resource Conservation Area (NRCA) program provides significant opportunities for public benefits by providing numerous ecosystem services and recreational opportunities for Washington residents and the general public. Additionally, NRCAs can provide important economic benefits to local communities through direct and indirect spending associated with recreation, overnight stays, dining and purchasing of other amenities. These values are consistent with the goals of our organizations and many of our organizations have supported the establishment of NRCAs in the past such as the Middle Fork Snoqualmie NRCA (2001), Mount Si NRCA (1987) and the West Tiger Mountain NRCA (1989).

The proposed expansion of the Morning Star NRCA is particularly compelling because it is the only such designation in Snohomish County and it is adjacent to the recently designated 106,000-acre Wild Sky Wilderness (2008) on the Mt. Baker Snoqualmie National Forest. Expanding the Morning Star NRCA effectively enlarges the area protected through the Wild Sky Wilderness Act. This proposed expansion would make an important contribution to completing the wildlife corridors that exist in this area as well as watershed protection.

While we support the expansion, we are concerned that the appraisal values of Parcels B & C over represent the harvestable timber values in those parcels. These parcels should be appraised according to their true harvestable value according to current rules and regulations (including Habitat Conservation Plans). If they are not this could unfairly impact both the trust land transfer and the compensation value for expanding the NRCA by the State Legislature. In the future, we would like to work with the agency to support further expansion of the Morning Star NRCA and assist in designing a system that addresses our concerns with the appraisal process.

Thanks you for the opportunity to provide comments.

Sincerely,

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