

SUPERIOR COURT OF WASHINGTON FOR JEFFERSON COUNTY

IRON MOUNTAIN QUARRY, LLC, a
Washington Limited Liability Company, and
POPE RESOURCES, a Delaware Limited
Partnership;

Petitioners/Plaintiffs,

vs.

JEFFERSON COUNTY, a Washington
Municipal Corporation, acting through its
Department of Community Development; and
STACIE L. HOSKINS, Planning Manager,
Jefferson County Department of Community
Development;

Respondents/Defendants.

NO. 10-2-00181-5

DECLARATION OF KARL F.
FORSGAARD

Karl F. Forsgaard declares as follows:

1. I am competent to testify. I am a Staff Attorney at the Washington Forest Law Center (WFLC). WFLC is a non-profit, public interest law firm dedicated to providing legal services to organizations that monitor and protect the Pacific Northwest's private and state-owned forest lands. Commercial forest lands, also known as "working forests," contribute to the regional economy and family incomes, provide wildlife habitat and recreation, and store

1 carbon. These benefits are impaired or lost when working forests are converted to non-forest
2 uses.

3
4 2. Attached hereto as Exhibit 1 is a true and correct copy of a report by the University
5 of Washington, College of Forest Resources, entitled Retention of High-Valued Forest Lands at
6 Risk of Conversion to Non-Forest Uses in Washington State, published March 25, 2009 as part
7 of a series on "The Future of Washington's Forests and Forest Industries." The report can be
8 viewed on the Internet at: <http://www.ruraltech.org/projects/wrl/sfr/pdf/RetentionReport.pdf>

9
10 3. Attached hereto as Exhibit 2 are true and correct copies of maps of the Port Ludlow
11 area including (a) a Pope Resources map of the proposed mine site showing the extent of the
12 commercial forest reserve owned by Pope Resources; (b) an excerpt from the map contained in
13 the U.W. conversion risks report (Exhibit 1) confirming that the proposed mine site is part of
14 the commercial forest reserve, i.e., the proposed mine site has been designated by the County as
15 forestland of long-term commercial significance under the Growth Management Act. The
16 U.W. conversion report map can be viewed on the Internet at:

17
18 http://www.ruraltech.org/projects/wrl/sfr/maps/images/Strategic_Forest_Retention_Appendix
19
20 [Area_3_300dpi.png](#)

21
22 4. As a courtesy, on September 13 and 14, 2010, I telephoned the parties' counsel to
23 inform them of WFLC's motion and ask if they would consent to the filing of WFLC's brief
24 *amicus curiae*. Counsel for petitioners IMQ and Pope Resources (Keith Moxon of Gordon
25 Derr) said petitioners take no position. Counsel for Jefferson County (Quinn Plant of Menke
26 Jackson Beyer Ehlis & Harper) said he did not see any reason why they would object, but
27 needed to check with his clients.
28
29
30
31

