



July 20, 2023

Commissioner Hilary Franz  
Office of the Commissioner of Public Lands  
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[cpl@dnr.wa.gov](mailto:cpl@dnr.wa.gov)

Washington State Board of Natural Resources  
MS 47000  
Olympia, WA 98504  
[bnr@dnr.wa.gov](mailto:bnr@dnr.wa.gov)

Dear Commissioner Franz and Members of the Washington State Board of Natural Resources:

We are writing in our individual capacities as members of the King County Council to request that you defer auction of the Wishbone Timber Sale – now scheduled for July 25<sup>th</sup> – and work with us to protect the mature legacy forests within this sale area and throughout King County for their climate and biodiversity benefits.

As noted by our Strategic Climate Action Plan (2020 SCAP p. 61), “Mature temperate conifer forests in the Pacific Northwest sequester more carbon than any other forest ecosystem in North America. They are also among the most carbon dense forests in the world.” As the signals of climate change grow ever more catastrophic, we believe it is critical for the Department of Natural Resources (DNR) to bring an end to the logging of these forests to keep their rich carbon stocks out of the atmosphere while keeping the land cool, protecting water supplies, conserving habitat for native fish, wildlife and plants, and reducing the risk of wildfires and floods.

We are concerned about DNR’s lack of disclosure about the climate impacts of timber sales like Wishbone and failure to consider reasonable alternatives such as protecting existing mature legacy forests as carbon and biodiversity reserves, using variable density thinning to keep the forest canopy intact and help restore big old trees to the landscape, and avoiding new road construction. We urge you to settle the ongoing litigation over Wishbone with the Appellants and make these changes to the sale design. Going forward, we also urge you to use the SEPA process to answer a number of key questions about climate impacts before authorizing any future timber sales in King County. In particular:

- (1) What are the carbon costs of logging in terms of carbon now stored in trees, vegetation and soils lost to the atmosphere as well as all the fossil energy burned during logging, road building, transportation, downstream processing, and waste disposal. This life cycle estimate of gross emissions is required to properly complete the Air section of your existing environmental checklists.
- (2) What are other climate impacts associated with removal of mature forest cover, such as an increase in surface temperatures or changes in flood and landslide risk?
- (3) How long do forestlands subject to intensive logging (variable density harvest) activities remain a source rather than a sink for carbon emissions? From what Appellants filed it appears this effect could last for 10 – 15 years after harvest, which makes maximizing carbon sequestration across King County forestlands a challenge.

- (4) How much carbon could be captured and taken out of the atmosphere if forests in the timber sale area were allowed to grow to their maximum ecological potential as old growth stands? In other words, how much carbon could be captured by a 'no action' alternative under SEPA?
- (5) In terms of volume, value, and environmental impacts, what would be the result of limiting the timber sale to variable density thinning of young, dense plantations to promote structural complexity and relying on existing road networks?
- (6) What policy mechanisms, like reconveyance and critical areas can be used to protect the legacy forest component of all upcoming timber sales in King County?

By answering these questions with respect to all new timber sales you will be helping us to satisfy another key component of our Strategic Climate Action Plan, which is to “account for climate impacts in policies, plans, practices and procedures and implement climate-resilient decisions” (2020 SCAP p. 263). We hope we can work with you on an alternative, climate-resilient design for Wishbone.

We realize that deferring the Wishbone sale until it can be reconfigured and halting any further loss of mature legacy forests in King County comes with an economic price tag, affecting beneficiary revenues, jobs, and supply of logs to local mills. But we also recognize that timber sales like these generate costs that you presently do not account for – like the social cost of carbon, which EPA now estimates as ranging from \$120 to \$430 per metric ton carbon dioxide.

If applied to the emissions calculated for the Wishbone Timber Sale by Appellants, this sale could generate between \$5.8 and \$16.6 million in climate damages. Locally, those costs include increases in heat, landslides, flooding, and wildfire risk so these are by no means speculative. In managing DNR lands for all the people we believe such costs need to be taken into consideration.

We look forward to hearing from you on the Wishbone matter shortly and beginning a longer conversation about the future of state forestlands in King County.

Sincerely,



*Dave Upthegrove, District Five, Council Chair*



*Jeanne Kohl-Welles, District Four, Council Vice-Chair*



*Rod Dembowski, District One*



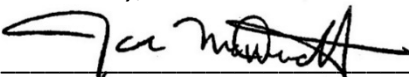
*Girmay Zahilay, District Two*



*Sarah Perry, District Three*



*Claudia Balducci, District Six*



*Joe McDermott, District Eight*