



September 27, 2022

SEPA Center

P.O. Box 47015

Olympia, Washington 98504-7015

Comments submitted electronically to: sepacenter@dnr.wa.gov concerning (SEPA File No. 22-091302)

Greetings,

Thank you for the opportunity to provide comments on SEPA File # 22-091302 or the Box of Rain timber sale. I am writing to request that this sale be canceled. This sale contains trees that are naturally regenerated after being logged 92 years ago. Trees of this age sequester more carbon than younger trees, and if we are to mitigate climate change, we need to save our older, more mature forests. These types of forests will help Washington state meet our 2050 climate goals, and IPCC's goal of stopping deforestation by 2030.

Wild Orca is a non-profit whose mission is to translate science into action to save the Southern Resident killer whales (SRKW) from extinction. Dr. Deborah Giles, Science and Research Director, is one of the world's leading experts on these orcas and has studied this endangered population almost exclusively since 2005. Despite being one of the most studied and well-known species on the planet, the decline of the SRKWs continues. Wild Orca works to redress this by filling knowledge gaps through high-impact, non-invasive field-based conservation research. In doing so, we arm policymakers with the latest available science—underpinned by the urgency for recovery—while engaging the public with accessible and digestible information, as well as initiating opportunities for direct engagement with key decision-makers to create accountability.

Wild Orca is especially concerned with this sale due to the location of the proposed clearcuts being so close to the Middle Fork Nooksack River, which just underwent dam removal and successful restoration of prime salmon habitat. The Box of Rain Forest provides critical habitat for wildlife—especially for salmon, which depend on the clean, cold water from the Middle Fork’s tributaries. Box of Rain is located within 100 yards of the left bank of the Middle Fork Nooksack River, which is home to all five Pacific salmon species (Chinook, chum, pink, sockeye, and coho). The Middle Fork is currently listed under section 303d of the Clean Water Act for excessive temperatures, which are likely a result of climate warming and cumulative impacts of aggressive industrial logging practices in the upper watershed.

The Southern Resident killer whales evolved over 1000s of years as the original fishers of Chinook salmon in the Pacific Northwest (PNW). Before the arrival of European colonizers, the PNW was almost completely forested (virgin stands of old growth) and provided pristine habitat for Chinook salmon. Streams ran cold from the mountains to the sea allowing these anadromous fish to complete lifecycles which started in the mountains, leading next to spending the majority of their lifespan in the oceans, and then returning to natal waters to spawn and die, thus completing a cycle, that is also beneficial to the continuation of PNW forests by providing needed nutrients to the soil.

Salmon, as a keystone species in the PNW, suffer from continued loss of forests by current timber practice management that has had, and continues to have, a profound impact. These timber practices include clearcutting entire forests, which results in hotter temperatures in streams and lack of oxygen in streams due to mud and debris slides. Logging roads and culverts also degrade salmon habitat. Forests that have been clearcut continue to emit carbon into the atmosphere for years, and it is estimated that replanted areas do not start to sequester carbon for roughly 15 years. Continuing these practices will result in losing these fish, which will imperil the ecosystem for the SRKWs, and the over 137 species that depend upon PNW salmon.

Deforestation impacts salmon and SRKWs by directly contributing to ocean acidification and ocean warming. Carbon used to be stored in forests – with logging, the excess carbon is now being taken up in the oceans. A warming ocean has less oxygen, which impacts survival of aquatic species. A prime example of this happened in 2014, when a large mass of warm water in the North Pacific Ocean, known as “The Blob” decimated northern copepods. Copepods are tiny, energy-rich organisms full of lipids. Their presence, or lack of, are vitally important to the food chain. Salmon feasting on forage fish, that have feasted on copepods, are larger and more nutritious to Southern Resident killer whales.

We simply do not have 80+ years to wait for replanted areas to mature in order to equal the carbon sequestration already taking place in our old-growth and mature forests. Once these forests are gone – due to the impacts already felt from climate change (unprecedented drought in the western United States, interruption of the water cycles, etc.) – there is no guarantee that the trees will regrow. (In the PNW, we are losing our Western Red Cedars due to drought.) We also strongly urge that DNR rethink their current logging practices and stop clearcutting of forests, which also destroys the mycorrhizal sublayer, another important carbon sink; and that newer logging practices of allowing for longer rotations be adopted. Longer rotations have been proven to store more carbon.

Unless we save the forests, reducing fossil fuel usage will simply not be enough – to save endangered salmon, endangered Southern Resident killer whales, and ultimately, ourselves. We are at T-7.5 years. Please cancel the Box of Rain timber sale.

Sincerely,

Teri Wright

Teri Wright
Legislation & Policy Organizer
Wild Orca