DEPARTMENT OF NATURAL RESOURCES

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July 31, 2020

Todd Wildermuth, Policy Director
University of Washington
Regulatory Environmental Law and Policy Clinic
William H. Gates Hall Box 353020
Seattle, WA 98195-3020

Dear Mr. Wildermuth,

Thank you for your petition regarding the important issue of carbon sequestration and climate change. I very much appreciate the efforts of the Washington Environmental Council, Washington Conservation Voters, Washington Forest Law Center, and the UW Regulatory Environmental Law & Policy Clinic to partner with the Department of Natural Resources to address the exigent crisis of climate change.

The Department of Natural Resources (DNR), including the Board of Natural Resources (Board), takes the issues of climate change and carbon sequestration very seriously, as reflected by the breadth of activities the Department has completed or is actively engaged in.

As I have stated publicly to the Board, DNR shares your goal of developing a climate policy for state lands. Climate change impacts everything we do, and we need to adapt accordingly. Such a policy, as you are aware, is a significant undertaking, one which requires a great deal of foundational work and research. That work is underway, and DNR has made historic progress on many fronts.

For example, DNR conducted a multi-year climate risk assessment of the programs and responsibilities under the Department's purview. This assessment culminated in the 2020 release of a climate resiliency plan for the agency (available here). Such a plan is a first-of-its-kind at DNR, and the more than 200 detailed action items across every program now guides climate work the agency does. Commissioner Franz stated that, "This report assesses our risks and challenges, but more importantly it lays out achievable steps we can take in every corner of the state to make sure we can increase our resilience to sustain our lands, our communities, and our beneficiaries."[1] For state trust lands, the plan includes several steps to increase climate resiliency while continuing to provide sustainable revenue to the trust beneficiaries including:

- Developing seed management and reforestation approaches appropriate for the changing climate
- Implementing DNR's 20-year forest health strategy
- Enhancing water rights and water use flexibility

[1] https://www.dnr.wa.gov/climate-change

- Designing and maintaining forest roads to be resilient under current and projected climate conditions, reducing impact on salmon bearing streams.
- Enhancing watershed health and forest drought mitigation.
- Increasing the use of state lands for renewable energy to lessen carbon emissions and increase revenue for trust beneficiaries;

The Climate Resiliency Strategy also outlines strategies to:

- Increase the use of state lands for renewable energy to lessen carbon emissions and increase revenue for trust beneficiaries;
- Restore the health of eastern Washington forests to limit the size and damage of wildfires and provide new work in the timber industry;
- Reforest with tree varieties that can withstand changing climate regimes;
- Restore eelgrass beds to provide localized refuges for shellfish in acidifying marine waters;
- Launch and urban forestry strike team to plant more trees in towns and cities to capture stormwater and lower temperatures;
- Assess implications of climate change on potentially unstable slopes.
- Avoid the loss of currently sequestered carbon through retention of working forest land held by small forest landowners.

DNR is also leading efforts to increase carbon sequestration on state lands and with other landowners. In 2019, DNR convened the Natural and Working Lands Carbon Sequestration Advisory Group, including 25 leading carbon sequestration experts and practitioners in Washington State, to provide advice and guidance regarding DNR's efforts. The resulting report to the Legislature will include the following:

- The results of two statewide carbon inventories—the Forest Carbon Inventory with the US Forest Service and the Harvested Wood Products Carbon Assessment. Results will include recommendations to improve the efficiency and effectiveness of carbon inventories, critical for determining the most effective opportunities for landowners to sequester carbon;
- A compilation of existing opportunities for carbon compensation services and other incentive-based carbon reducing programs for forest landowners, including any barriers, such as costs, to the use of these services or programs;
- A shared understanding in the current science of carbon sequestration and the role that natural and working lands can play in meeting carbon reduction goals
- A menu of options for bolstering opportunities for sequestration; and
- Recommendations for additional work or legislation resulting from the advisory group

In support of this advisory group, DNR funded two studies by the US Forest Service: a forest carbon inventory of forestlands in the state and a study of the carbon in harvested wood products. Preliminary results from the inventory study have already been shared, including at the 2019 WEC Carbon Friendly Forestry Conference, and the full study will be published late this summer. The latter study, to be released this fall, focuses on the role harvested wood products play in storing carbon in Washington State.

Together, these studies will help us understand the role of state lands in changing atmospheric carbon levels, and inform future actions regarding carbon sequestration and climate change.

While these studies are underway, DNR will continue to implement the climate resiliency plan, study the impacts and potential opportunities for DNR in the carbon space, and continue to manage our lands according to existing policy and trust mandate obligations.

DNR's 2018 – 2021 strategic plan also specifically highlights the need to strengthen the health and resilience of Washington's land and waters though increased carbon sequestration. [2] This plan includes the strategy to, "Seize opportunities to generate benefits for trust beneficiaries and communities by incentivizing carbon sequestration on public and private lands." As noted above, DNR continues to explore current carbon market mechanisms, with the goal that carbon sequestration may provide additional revenue to the beneficiaries – a true win-win. This work is part of DNR's broader efforts to diversify revenue sources for trust beneficiaries. As carbon prices rise and new protocols are developed, the potential for DNR to enter into carbon markets continues to improve and we are excited to enter this new market.

As I mentioned at the June 2020 Board meeting, DNR's strategic planning projects for state trust lands will continue to assess the impacts of trust land management on the climate, and the impact of climate on these actions. This will continue to be accomplished through the SEPA process, presentations to the Board of Natural Resources, and other project specific efforts, as appropriate. For the upcoming sustainable harvest planning for eastern Washington, DNR is convening a technical advisory committee.[3] The implications of climate change and sustainable harvest levels will be a topic covered by this group.

Beyond forest carbon, the Department also actively promotes the development of wind and solar energy generation on state trust lands. In 2019, Commissioner Franz announced a goal to, "produce 500 megawatts of solar power on public lands by 2025."[4] She noted, "The clean energy we generate reduces pollution and builds energy independence in our communities." These projects allow the greater US economy to decarbonize while providing more revenue to trust beneficiaries than other uses of the same sites.

The Commissioner also worked with labor and environmental organizations on a provision in the Clean Energy Transformation Act legislation that passed in 2019 to support high labor standards for clean energy development. DNR has already realized success in energy projects with high labor standards. The Rattlesnake Flat wind project in Adams County recently became the first L&I-certified commercial energy installation with a project labor agreement. The Lund Hill solar project, located in part on state land in Klickitat County, has completed the leasing process. Avangrid Renewables plans to begin construction as early as fall 2020. When completed, the 1,800-acre project will be the largest photovoltaic project in Washington with a 150 megawatt capacity. Avangrid estimated this project will be a $100 million investment by the company.

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[2] https://www.dnr.wa.gov/strategicplan

[3] https://www.dnr.wa.gov/publications/em_bc_bnr_harvest_committee.pdf?e7mwcf8

[4] https://www.dnr.wa.gov/news/franz-announces-was-first-solar-farm-lease-state-trust-lands-solar-development-klickitat-county

Commissioner Franz and DNR continue to demonstrate leadership in mitigation and adaptation to climate change in Washington State. The Board has and will continue to carefully consider the role of state lands in addressing this pressing issue as we work towards a comprehensive forest carbon policy.

I appreciate your engagement on this issue and welcome your continued input to the Department on methods to help improve the management of state trust lands for the trust beneficiaries, and this pressing need to address climate change for the people of Washington.

Sincerely,

Angus W. Brodie

Angus W. Brodie
Deputy Supervisor for State Uplands
cc: Board of Natural Resources
Washington Environmental Council
Washington Forest Law Center