



October 7, 2020

Angus Brodie
Deputy Supervisor for State Uplands
Washington Department of Natural Resources
MS 47000, 1111 Washington St. SE, Olympia, WA 98504

Dear Angus,

Thank you for the response to our June 2019 petition to the Board of Natural Resources, requesting a carbon and climate policy for state forestland management.

We are encouraged to read that the agency shares our goal of developing a climate policy for state lands.

We support the commendable efforts the agency is making on climate and carbon, including the Carbon Sequestration Advisory Group, carbon inventories, and the Plan for Climate Resilience. Much of the work the agency has completed so far in the state forestland space has focused on adaptation and resilience—both vital strategies. Yet what is still missing, notably from the Plan for Climate Resilience, is harnessing Washington’s public forests to increase carbon sequestration. When combined with significant emissions reductions, our state forestlands can actively combat the unparalleled threat of the climate crisis.

In our current reality, increasing carbon sequestration must be a key principle of public forest management. There is no safe climate future without proactive investment in natural systems. Every decision on DNR-managed forestlands impacts the atmospheric global greenhouse gas balance. The agency has taken on climate work in some key areas, but the Board has yet to do so.

The Board has a statutory duty to establish policies to ensure that DNR’s land management is based on sound principles. The Board cannot ensure sound management in a changed climate regime without directly addressing carbon and climate—this is now an essential part of the effective management of these forests. The Board and agency have ample decision-making space, and a responsibility as trust manager, to ensure that our state forests capture more carbon, prevent harmful climate fires, and are increasingly healthy and resilient. To do this, the Board needs to establish clear underlying management values that promote long-term carbon sequestration and climate resilience.

We understand that DNR is working to incorporate climate considerations into aspects of its forest management, including the upcoming Sustainable Harvest Calculation. The agency, however, still lacks a formal policy for how to consider carbon and climate impacts in decision-making. The assessments and inventories the agency is undertaking are important and necessary, but how will they directly inform DNR's management practices? An official policy is necessary to govern and bind management decisions, timber harvest planning, and set the long-term direction of state forestlands and the carbon they store and emit.

The agency is understandably interested in carbon sequestration opportunities that generate revenue; however, taking substantial action on carbon should not be dependent on DNR's access to carbon markets. The next 10 years of climate response are crucial. The overwhelming severity of the climate crisis and the prognosis for our planet can be dispiriting and daunting, but the agency and Board manage a public asset on behalf of the state that can help combat the very thing that threatens our communities and natural resources. As the agency knows, Washington's west coast forests are particularly adept at sequestering carbon, and are high priority sites for this work. It is in the Board's power, right now, to do something significant for climate action. It would be a shame to waste this opportunity by delaying or aiming small.

Adopting a climate policy for state forests would be wholly consistent with the long-term interests of the trusts, however the trust mandate is defined. If the Board and agency do not address how state forests can contribute to the reduction of climate change, they do so at the expense of future generations. Future trust beneficiaries will look back on DNR's forest management and ask if intergenerational equity, and fully addressing the greatest threat to our forest resources and communities, was at the forefront of DNR's management considerations, or if it was neglected in favor of maximizing revenue for the current beneficiaries. As a perpetual trust, DNR is obligated to manage these lands with a focus on impacts to future generations for decades, if not centuries, to come. To meet this responsibility, the Board and agency must establish a strong carbon and climate policy that has a long-term, actionable vision, consistent with Washington's carbon emission projections and reduction goals.

Climate-smart forest practices can protect the long-term health and value of forest assets. Improving forest carbon sequestration can have many co-benefits that increase ecosystem and community health and resilience, including potentially greater timber volume in the long-term. Because carbon storage opportunities and susceptibility to climate conditions are different on the east and west sides of the Cascade crest, these differences should be a regular part of the discussion and any carbon and climate policy must harness and reflect the unique opportunities and challenges of each region.

Meaningful action is urgently needed to utilize the sequestration potential of Washington's forests and develop a climate and carbon policy for state land management. You write that the Board will continue to consider the role of state forestlands in climate change as you work toward a comprehensive forest carbon policy. We appreciate this, and know that developing this policy is a substantial undertaking that requires extensive research, groundwork, and staff time, and that some of that work has already begun. We fully support this endeavor, and would like to see a comprehensive outline of the path ahead that also addresses in detail how the work DNR is

already doing will directly inform a policy. Our hope is to see a final policy adopted that demonstrates leadership and is as bold, ambitious and direct as the future in front of us requires. Thank you again for your response and the agency's efforts on climate and carbon thus far. We look forward to working with DNR and the Board throughout this process.

Sincerely,

Lisa Remlinger
Chief Policy Officer
Washington Environmental Council & Washington Conservation Voters

Peter Goldman
Director
Washington Forest Law Center

cc: Board of Natural Resources