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October 26, 2022

**Notice of Final Determination
“Carbon Project”
SEPA File No. 22-092801**

The Department of Natural Resources issued a Determination of Non-significance (DNS), Mitigated Determination of Non-significance (MDNS), Modified DNS/MDNS on **September 28, 2022** for this proposal under the State Environmental Policy Act (SEPA) and WAC 197-11-340(2).

This threshold determination is hereby:

Retained.

Modified. Modifications to this threshold determination include the following:

Withdrawn. This threshold determination has been withdrawn due to the following:

Delayed. A final threshold determination has been delayed due to the following:

Summary of Comments and Responses (if applicable):

Attached.

Responsible Official: Kristen Ohlson-Kiehn

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Date: 10/26/2022 Signature: Kristen Ohlson-Kiehn

There is no DNR administrative SEPA appeal.



Washington State Department of Natural Resources Carbon Project

Summary of Comments and Responses on SEPA Checklist

Prepared by



WASHINGTON STATE DEPARTMENT OF
NATURAL RESOURCES

October, 2022

Acronyms

BNR	Board of Natural Resources
CH ₄	Methane
CO ₂	Carbon dioxide
CO ₂ e	Carbon dioxide equivalent
DNR	Washington State Department of Natural Resources
DNS	Determination of nonsignificance
EIS	Environmental impact statement
HCV	High Conservation Value
N ₂ O	Nitrous oxide
RCW	Revised Code of Washington
SEPA	State environmental policy act
SHC	Sustainable harvest calculation
WAC	Washington Administrative Code

Table of Contents

Background.....	1
Comment Summaries and Responses	2
Topic: Alternative Carbon Projects.....	2
Topic: Best Available Science	2
Topic: Carbon Credit Process	2
Topic: Climate Reserves	4
Topic: Emissions.....	4
Topic: Financial and Socioeconomic Impacts	5
Topic: Harvest Age	6
Topic: High Conservation Value Forests.....	6
Topic: Impacts to Wildlife	7
Topic: Inadequate Analysis - Carbon Analysis.....	7
Topic: Inadequate Analysis - EIS Needed	8
Topic: Incorporation by Reference	8
Topic: Individual SEPA Checklists	9
Topic: Land Conversion	9
Topic: Leakage.....	9
Topic: Length of Public Comment Period	10
Topic: Local Logging	10
Topic: Location of Proposal.....	10
Topic: No Net Reduction in Carbon	11
Topic: Opposed to Proposal.....	11
Topic: Outcome Oriented Approach.....	12
Topic: Pending Applications.....	12
Topic: Policy Changes	12
Topic: Sequestration	13
Topic: Size of Proposal.....	13
Topic: Sources of Emissions.....	13
Topic: Support for the Proposal	14
Topic: Sustainable Forestry	14
Topic: Sustainable Harvest Level	14

Topic: Trust Obligations	15
Topic: Washington Climate Commitment Act	15
Topic: Wildfire.....	15
Literature Cited	16

Background

The Washington Department of Natural Resources (DNR) is proposing a forest carbon project on operable forested state trust lands in western Washington. The project would involve setting aside approximately 10,000 operable acres of forested state trust lands, and generating revenue through the sale of carbon credits rather than through timber harvests. DNR is proposing to choose forest areas that have high conservation value; for example, areas that have important characteristics relevant to biodiversity and species' habitat, ecosystem health, watershed resilience, cultural significance, and community subsistence. Specifically, DNR will seek to identify forest parcels that have these values and where these values might not be maintained or enhanced in the context of timber harvest. It is DNR's goal to simultaneously protect these important forest areas and conservation values, mitigate climate change through increased carbon storage and continued sequestration, and generate revenue for DNR's trust beneficiaries through the sale of carbon credits. The parcels will be selected from DNR-managed forested state trust lands in western Washington.

On September 28, 2022 DNR issued a Determination of Nonsignificance and a State Environmental Policy Act (SEPA) Checklist for the proposed carbon project, which initiated a 14-day comment period. Comments were submitted primarily through Survey Monkey, with emails also submitted. Comments received were reviewed and categorized by topic, with similar comments combined, and responses were developed for each of these topics. The topics, comment summaries, and responses are provided below.

Comment Summaries and Responses

Topic: Alternative Carbon Projects

SUMMARY OF COMMENT

The sale of carbon by DNR can potentially bring additional income to the state through a well-designed carbon program. However, it should be looked at as adding to what DNR already does and not taking from existing programs as is written in this current proposal. There are areas in the state where DNR could plant trees in understocked or previously burned areas. The growth of these stands could then credit the state with increasing carbon stocks and then monetize those areas for carbon sales. A full SEPA process could investigate other alternatives for carbon sales that did not impact the sustainable harvest program that the Board of Natural Resources (BNR) has established for the DNR to implement.

Response

Thank you for your comments. DNR is open to exploring additional types of carbon projects, including reforestation and/or afforestation.

Topic: Best Available Science

SUMMARY OF COMMENT

DNR is not following the best available science regarding carbon sequestration or findings of the IPCC assessments about the importance of substitution benefits and storage of carbon in harvested wood products.

Response

DNR will continue to practice sustainable forest management on state trust lands which will continue to provide benefits as outlined in the Intergovernmental Panel on Climate Change (IPCC) assessments. The fourth assessment report of the IPCC states that “In the long term, a sustainable strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fiber, or energy from the forest, will generate the largest sustained mitigation benefit” (Nabuurs and others 2007).

Topic: Carbon Credit Process

SUMMARY OF COMMENT

Who determines the credits that are generated and who are they sold to?

Response

The voluntary carbon market is a tool that lets large organizations, small businesses, and even individual people “offset” some or all of their greenhouse gas pollution by buying carbon credits from another entity or individual that is engaged in an approved project that sequesters greenhouse gas. Essentially, the purchaser of the carbon credit pays the entity who is conducting the carbon project (in this case, DNR) for doing extra work to sequester additional carbon.

A carbon credit is defined as one metric ton of carbon dioxide equivalent (CO₂e). An organization that is responsible for releasing one ton of CO₂e through the combustion of fossil fuels may desire to offset that pollution by purchasing one carbon credit from another organization that is engaged in an approved, listed carbon offset project—a project that complies with an independently developed and peer reviewed standard. These standards are developed and administered by carbon “registries.” Some examples of these registries are the American Carbon Registry, the Verified Carbon Standard, and Gold Standard.

DNR’s carbon project will qualify as an improved forest management project using a protocol under one of these registries. By committing to manage a portion of forested state trust lands to a plan that sequesters carbon at a rate that is higher than those forested stands would under DNR’s typical “business as usual” practices, DNR will generate carbon credits. Carbon credits are only awarded for the carbon sequestered as a result of the activity that goes beyond (or is additional to) DNR’s standard business practices. The difference between the new activity and “business as usual” is called additionality. In this case, committing to not commercially harvest 10,000 acres of forested state trust lands for 40 years is the additional activity that will result in more carbon stored over the life of the project. DNR’s carbon broker will inventory the parcels and calculate the resulting tons of CO₂e that are removed or stored as a result of the project (i.e. that is additional) in order to accurately determine the number of credits to be sold on the voluntary or compliance carbon market.

The carbon offset protocols provide methodologies to calculate the additionality of a carbon project. DNR does not itself quantify the overall carbon benefit from its project. Instead, a third-party broker will work with DNR to develop this project and submit carbon estimates to a registry. The registry will then review and vet the details of the project proposal. Each protocol has rules for accounting for factors such as leakage¹ and the rate at which stands of trees sequester and store carbon based on factors like species, age, and site class. Successfully registering DNR’s carbon project with a carbon registry, and successfully completing the calculations, inventories, and peer review process will provide the validation that the project will result in an overall reduction of atmospheric carbon dioxide (CO₂) compared to a baseline scenario. The listing and certification of DNR’s carbon project will provide critical data on the project’s overall environmental benefits. If, by following the approved and vetted carbon protocol methodologies, we find that DNR’s carbon project does not result in additional carbon sequestration and storage, no carbon credits would be generated by the project, and the project would not move forward. DNR and the public can, therefore, have confidence that any carbon credits generated and sold through the implementation of this project will represent real, additional, and verifiable carbon emissions reductions or removals.

¹ **Leakage** occurs when an increase in greenhouse gas emissions occurs outside the project boundary as a result of emissions reduction activities within the project boundary.

Once the parcels have been identified for inclusion in the carbon project, DNR will work with a carbon broker to begin the formal process of completing the steps necessary to list the carbon project with a registry. DNR will also move forward to establish lease terms and negotiate with potential lessees who will enter into lease agreements for the parcels. The lessee and the carbon broker (which may be the same entity) will manage the sale of carbon credits via the voluntary carbon market to entities who are interested in offsetting some portion of their greenhouse gas pollution. The money that those entities pay for offsets will come back to the lessee who will then distribute a portion of that money to DNR, according to pre-determined lease terms. Those revenues will be split between DNR and its beneficiaries according to the trust makeup of the land under lease.

At this point, DNR has not yet entered into agreement with a carbon broker, lessee, or any end-purchasers of carbon credits.

Topic: Climate Reserves

SUMMARY OF COMMENT

Washington State is experiencing climate change and DNR should be advocating for setting aside significant areas of forest as climate reserves as the best means of mitigating climate change. The reserves should incorporate legacy forests, those over 80 years old, which best store and sequester carbon compared to younger forests. The stands included should be inventoried and ground-truthed for the amount of carbon they store and sequester. Until DNR establishes forest reserves there should be a moratorium on harvest of legacy forest, and the 10,000 acres should be considered a pilot program, with additional acres added later.

Response

The criteria DNR proposes to use to identify areas of forested state trust lands to include in the carbon project, described under the topic High Conservation Value Forests in this document, likely capture many of the characteristics described by the commenter (refer to “high conservation value forests” response below) . While DNR does not plan a moratorium on all lands that may qualify for the carbon project, those that are selected will be deferred from even-aged management while final selections are made and the selected lands will be deferred from even-aged management for the life of the lease term. Refer to the “carbon credit process” response above for a description of how the carbon benefit and credits are estimated and verified.

Topic: Emissions

SUMMARY OF COMMENT

On-site and off-site emissions impacts were incorrectly analyzed as wildfire will increase from lack of forest management. The overall amount of carbon would be reduced since carbon is stored in harvested wood products and trees planted to replace those harvested.

Response

The proposal does not include any changes to existing statute or BNR policy; therefore, the carbon leases will not restrict the agency's ability to address forest health problems (e.g., insect infestations or disease outbreaks) and/or engage in wildfire suppression activities. Please reference "effects on fire threat index" on page L-29 of Appendix L in *Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington Final Environmental Impact Statement* (DNR 2019).

Topic: Financial and Socioeconomic Impacts

SUMMARY OF COMMENT

DNR needs to analyze and disclose direct and indirect impacts to trust revenue, jobs, mill infrastructure, public services, and other socioeconomic factors.

Response

Financial impacts and financial analyses, including profits and revenue to support public services, are not part of a SEPA analysis. Please refer to the following sections of Washington's Administrative Code (WAC): [WAC 197-11-740](#), [WAC 197-11-746](#), and [WAC 197-11-448](#)(1) and (3). While required under NEPA for major actions by federal agencies, socioeconomic impact assessments are not required under SEPA rules ([WAC 197-11-448](#) (1), (2), and (3)). DNR will be conducting a financial analysis to assess the non-environmental impacts of the carbon project once all of the 10,000 acres have been identified. A separate financial analysis after the carbon project parcels have been identified is necessary for it to be meaningful, because different types of forest parcels will generate different amounts of carbon credits according to factors such as current standing carbon vs. potential for sequestration through growth. DNR will be able to incorporate timber volume data from the specific parcels, rather than using estimates or averages to conduct a financial analysis at this time.

While public services and utilities are an element of the environment under SEPA ([WAC 197-11-444](#)), the SEPA Checklist specifically asks whether the proposal will result in an increased need for public services, which the carbon project will not. Potential impacts to public services would be financial impacts and therefore would be properly addressed in a financial analysis.

While the specific financial implications are uncertain at this time, DNR is certain that these parcels will continue to generate revenue for beneficiaries, albeit in a different manner than through timber harvests (refer to the response to "carbon credit process" for more detail). With timber harvests, a parcel is harvested once, and the revenue is distributed to beneficiaries. That same parcel will not be harvested again for an indeterminate period of time, ranging from 40 years to 80 years or potentially beyond. By leasing these parcels for a carbon project, the beneficiaries instead will have a predictable stream of revenue that is generated and distributed on an annual basis throughout the lease term. In the carbon project, tree growth will result in carbon credits generated and sold. In addition, through the lease terms, beneficiaries will see regular payments, similar to other commercial leases.

Topic: Harvest Age

SUMMARY OF COMMENT

Removal of 10,000 acres from the area available to meet the sustainable harvest level is likely to result in arrearage which would drive harvest of many more acres of younger forest. DNR has not disclosed the environmental impacts of this change.

Response

DNR will conduct an end of decade arrearage analysis per DNR Policy PO14-024 End of Decade Analysis: Arrearage to determine if an arrearage exists at the end of the current planning decade.

Topic: High Conservation Value Forests

SUMMARY OF COMMENT

High Conservation Value forest is not defined.

Response

DNR is using the High Conservation Value (HCV) criteria to guide selection of candidate parcels for potential inclusion in the carbon project. The HCV criteria were developed for, and are used by, forest certification systems to help identify areas where specific values are present in the forested landscape that merit special attention in the context of natural resource management. The HCV criteria are not intended to represent an exhaustive list of all values present in a forest; but rather to highlight unusual or important ecological and social features.

The HCV criteria include:

1. Significant concentrations of biodiversity;
2. Significant landscape-scale ecosystems and ecosystem mosaics;
3. Rare, threatened or endangered ecosystems and habitats;
4. Basic ecosystem services in critical situations (e.g., watershed protection, erosion control);
5. Areas or resources fundamental to meeting basic needs of Indigenous populations and local communities (e.g., subsistence); and
6. Areas or resources critical to Indigenous populations and local communities' traditional cultural identity.

DNR already carefully accounts for many of these values in operations, and protects habitat, critical species, watershed health, cultural resources, and more through our existing policies and practices. Some operable forest areas nevertheless have some of these special features and/or have high potential to sequester and store carbon. It is on these potential areas that DNR will focus its selection of the candidate parcels for inclusion in the carbon project. Some of these special attributes include areas of older, mature

forests, Special Ecological Features, as described in the *Policy for Sustainable Forests* (DNR 2006), including rare plant communities that are not already protected, areas adjacent to other conservation areas, areas brought to our attention by concerned citizens, and more. To identify HCV areas, DNR staff will prioritize operable forest areas across western Washington with these types of attributes and select areas that have one or more of them. Staff will also consider the distribution of these areas to ensure that no one region is overly impacted by the potential selection of parcels. Staff will continue to consider this and other factors, including continued consultation and public engagement, in determining the final selection of parcels.

Topic: Impacts to Wildlife

SUMMARY OF COMMENT

DNR does not disclose or analyze the effect of the carbon project on the marbled murrelet and other wildlife species, including those that rely on early seral habitat.

Response

No probable significant adverse impacts to wildlife or wildlife habitat were identified in developing the carbon project SEPA Checklist.

Topic: Inadequate Analysis - Carbon Analysis

SUMMARY OF COMMENT

DNR's analysis does not include a carbon analysis to show how the proposal would offset carbon emissions. A carbon analysis should include the amount of carbon sequestered at different growth stages of a stand and the amount of carbon that is stored in harvested wood used in wood products. Substitution impacts and carbon storage should also be included.

Response

Please refer to *Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington Final Environmental Impact Statement* (DNR 2019) and the *Long-term Conservation Strategy for the Marbled Murrelet Final Environmental Impact Statement* (DNR and USFWS 2019) climate sections (pages 4-6 to 4-17 and 4-6 to 4-14 in each document, respectively) where DNR assessed if alternatives would cause more greenhouse gases to be emitted than sequestered. Carbon protocols that would be applied to the leased areas to calculate carbon credits do account for carbon stored in harvested wood products, as well as potential leakage impacts. If, by following the approved and vetted carbon protocol methodologies, DNR finds that the carbon project does not result in additional carbon sequestration and storage, no carbon credits would be generated by the project, and the project would not move forward.

Topic: Inadequate Analysis - EIS Needed

SUMMARY OF COMMENT

DNR's SEPA analysis is inadequate for a variety of reasons and an environmental impact statement should be prepared for the carbon project which analyzes various alternatives and would necessitate a robust public process.

Response

An environmental impact statement (EIS) is prepared when the lead SEPA agency determines a proposal is likely to have probable significant adverse environmental impacts (Revised Code of Washington (RCW) [43.21C.031](#)). An environmental checklist is used to evaluate a proposal's likely environmental impacts. If no probable significant adverse environmental impacts are identified during the SEPA threshold determination process (refer to [WAC 197-11-330](#)), an EIS is not required. Please refer to [WAC 197-11-782](#) for the definition of 'probable' and [WAC 197-11-794](#) for the definition of 'significant'.

The SEPA Checklist for the carbon project did incorporate by reference the final environmental impact statements for *Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington Final Environmental Impact Statement* (DNR 2019) and the *Long-term Conservation Strategy for the Marbled Murrelet Final Environmental Impact Statement* (DNR and USFWS 2019), both of which analyzed a range of alternatives that included removal of a greater number of acres from the operable land base than proposed by the carbon project.

Topic: Incorporation by Reference

SUMMARY OF COMMENT

Although the SEPA Checklist incorporates by reference the 2019 EIS for the sustainable harvest calculation, it does not specifically describe the environmental impacts analyzed in the sustainable harvest calculation (SHC) alternatives from increased or decreased acres of timber harvest and therefore does not adequately analyze the effects of harvesting less under the carbon project and is insufficient for a determination of nonsignificance (DNS).

Response

The carbon project SEPA Checklist incorporated the analyses in the *Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington Final Environmental Impact Statement* (DNR 2019) and the *Long-term Conservation Strategy for the Marbled Murrelet Final Environmental Impact Statement* (DNR and USFWS 2019) by reference. These environmental impact statements (EISs) analyzed and described the impacts to different elements of the environment from a range of marbled murrelet conservation measure alternatives which included removing acres from the operable land base. Removal of acres from management for habitat conservation would present the same effective impact as leasing it for carbon credits under a passive management carbon project. The 10,000

acres proposed under the carbon project are within the range of acres analyzed under the alternatives in the incorporated EISs.

Topic: Individual SEPA Checklists

SUMMARY OF COMMENT

DNR must conduct SEPA analysis for each lease.

Response

This is a non-project proposal at this early stage of DNR's consideration. DNR will evaluate the further need for site specific SEPA analysis when leasing sites are selected.

Topic: Land Conversion

SUMMARY OF COMMENT

DNR incorrectly answered question 8.a. on page 13 of the checklist, and did not disclose that commercial forestland of commercial significance would be converted to non-working forestland.

Response

No land use designations will change from the proposal.

Topic: Leakage

SUMMARY OF COMMENT

The proposal will have no impact on global climate change and the carbon project ignores the risk of leakage and the environmental impacts associated with leakage which were not assessed.

Response

Previous EIS work conducted by DNR, such as the *Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington Final Environmental Impact Statement* (DNR 2019) and the *Long-term Conservation Strategy for the Marbled Murrelet Final Environmental Impact Statement* (DNR and USFWS 2019), has shown that under a range of active forest management scenarios forested state trust lands in western Washington sequester more carbon than they emit over time. The carbon project would not change this conclusion. In order to generate carbon credits from a carbon project DNR cannot permit the foregone harvest volume from the project to be made up elsewhere on forested state trust lands. The extent of market leakage that will occur from the carbon

project, that is the foregone harvest volume from DNR’s carbon project being procured from other landowners, is unknown and speculative. Market leakage will be factored into the carbon offset credits generated through DNR’s project. DNR does not itself quantify the overall carbon benefit from its project. Instead, a third-party broker will work with DNR to develop this project and submit carbon estimates to a registry. The registry will then review and vet the details of the project proposal.

Topic: Length of Public Comment Period

SUMMARY OF COMMENT

The 14-day public comment period should be extended.

Response

DNR received specific requests for an extended comment period and determined that a comment period extension was not necessary for the carbon project. Some of the extension requests focused on financial impacts associated with the potential 40-year deferral. SEPA is not intended as a financial analysis tool. Instead, SEPA focuses on potential *environmental* impacts. Refer to the “financial & socioeconomic impacts” response above.

Topic: Local Logging

SUMMARY OF COMMENT

There is a need for local logging and loss of local logging will result in longer commute distances that will reduce environmental benefits of the carbon project.

Response

Refer to the “financial & socioeconomic impacts” response above. Any financial impacts associated with conserving these 10,000 acres will be dispersed both geographically (across western Washington) and temporally (i.e., these parcels would likely have been harvested over a period of multiple years).

Topic: Location of Proposal

SUMMARY OF COMMENT

The project does not describe where the 10,000 acres will be located. This makes it impossible to know the financial impacts to trusts.

Response

Financial impacts are not environmental impacts subject to SEPA analysis. See “financial & socioeconomic impacts” response above. The proposal is located on forested state trust lands in western Washington. Specific locations will be determined following an extensive consultation and engagement process.

Topic: No Net Reduction in Carbon

SUMMARY OF COMMENT

There is opposition to the underlying structure of carbon offset programs because it allows polluters to pollute.

Response

Successfully registering DNR’s carbon project with a carbon registry, and successfully completing the calculations, inventories, and peer review process, will provide the validation that the project will result in an overall reduction of atmospheric CO₂ compared to a baseline scenario. The listing and certification of DNR’s carbon project will provide critical data on the project’s overall environmental benefits. If, by following the approved and vetted carbon protocol methodologies, we find that DNR’s carbon project does not result in additional carbon sequestration and storage, no carbon credits would be generated by the project, and the project would not move forward. DNR and the public can therefore have confidence that any carbon credits generated and sold through the implementation of this project will represent real, additional, and verifiable carbon emissions reductions or removals.

Topic: Opposed to Proposal

SUMMARY OF COMMENT

Several commenters wrote that they were generally opposed to the proposal but did not give specific reasons why or ask for clarification or additional analysis. Many thought it was a bad idea, or that DNR should not set aside lands in addition to what has already been set aside for other reasons.

Response

Thank you for your comments.

Topic: Outcome Oriented Approach

SUMMARY OF COMMENT

The lack of scientific support and scant analysis in the SEPA Checklist constitutes an outcome-oriented approach to environmental review which has been rejected by the courts.

Response

Thank you for your comments. The SEPA Checklist and incorporated analyses from *Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington Final Environmental Impact Statement* (DNR 2019) and the *Long-term Conservation Strategy for the Marbled Murrelet Final Environmental Impact Statement* (DNR and USFWS 2019) reflect that the types of lands being considered for the carbon project will not have any probable significant adverse impacts to any elements of the environment under a carbon lease. DNR is performing its SEPA analysis at a time when the proposal's impacts could be meaningfully evaluated. The commenters did not identify any probable significant adverse environmental impacts associated with the carbon leasing proposal.

Topic: Pending Applications

SUMMARY OF COMMENT

One commenter noted an approved forest practices application overlaps with the Phase 1 parcels.

Response

This is a non-project action. The parcels for inclusion, including those presented during Phase 1, are still going through the consultation and engagement process, screenings by region staff, and have not been finalized.

Topic: Policy Changes

SUMMARY OF COMMENT

The carbon project is a policy change that requires BNR approval.

Response

The comment does not address potential environmental impacts, but rather, raises a process-oriented issue in DNR decision making.

Topic: Sequestration

SUMMARY OF COMMENT

Since it is unlikely these leased areas will ever be logged there will be a decrease in the amount of carbon sequestered in the long term compared to if these stands were managed on a regular rotation, due to the fact that as trees age, the rate at which they sequester carbon diminishes.

Response

The project proposal analyzed in the SEPA Checklist was a 40 year carbon lease to generate carbon credits and revenue. The carbon project does not foreclose future forest management of leased parcels.

Topic: Size of Proposal

SUMMARY OF COMMENT

It is unclear if only 10,000 acres are included in the proposal.

Response

The proposal is to lease approximately 10,000 operable acres that are currently available for even-aged harvest techniques, such as variable retention harvest. Other acres that are not currently available for even-aged harvest techniques due to existing federal or state laws or DNR policy could be encompassed in the proposal areas, however because they are already deferred from even-aged harvest they would not be targeted for generating carbon credits.

Topic: Sources of Emissions

SUMMARY OF COMMENT

Rotting and living trees both emit greenhouse gases including CO₂, nitrous oxide (N₂O), and methane (CH₄) (references provided) and removing productive timberlands will ensure more global warming.

Response

Although it is true that forests emit greenhouse gases, the analyses in both the *Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington Final Environmental Impact Statement* (DNR 2019) and the *Long-term Conservation Strategy for the Marbled Murrelet Final Environmental Impact Statement* (DNR and USFWS 2019) found that under all of the alternatives analyzed, sequestration of carbon is greater than the amount emitted on forested state trust lands (refer to pages 4-6 to 4-17 and 4-6 to 4-14 in each document, respectively). The alternatives in the two EIS's referenced here, and incorporated by reference in the SEPA Checklist for the carbon

project, analyzed a range of alternatives that deferred from harvest varying amounts of forested state trust lands, and the 10,000 acres proposed for the carbon project is within the range that was analyzed in each.

Topic: Support for the Proposal

SUMMARY OF COMMENT

Several commenters wrote in support of the proposal, either because they thought that it provided effective mitigation for climate change or because they are in support of setting aside forested areas in general as opposed to active management including timber harvest.

Response

Thank you for your comments.

Topic: Sustainable Forestry

SUMMARY OF COMMENT

DNR practices sustainable forest management and should continue to practice and promote sustainable forest management and the associated wood products.

Response

Thank you for your comments. DNR will continue to practice sustainable forest management on its operable land base.

Topic: Sustainable Harvest Level

SUMMARY OF COMMENT

The proposal will impact the sustainable harvest level.

Response

DNR will factor the 40-year lease carbon project into the next sustainable harvest calculation.

Topic: Trust Obligations

SUMMARY OF COMMENT

DNR's SEPA Checklist fails to disclose how the carbon project is consistent with the constitutional and statutory requirements for state trust lands. It lacks an analysis of how the project is consistent with DNR's trust obligations and with RCW 79.10.320 and 79.10.310.

Response

This comment does not address the potential environmental impacts from the proposal, but rather, raises other, non-SEPA legal issues.

Topic: Washington Climate Commitment Act

SUMMARY OF COMMENT

The proposal is inconsistent with the Washington Climate Commitment Act.

Response

[RCW 70A.45.090\(c\)](#) of the Washington Climate Commitment Act supports the participation of working forests in current and future carbon markets.

Topic: Wildfire

SUMMARY OF COMMENT

There is concern about DNR's ability to respond to fires within the leased parcels and about increased susceptibility of the parcels to wildfire and other forest health concerns leading to an increase risk of wildfire on these parcels. In addition, DNR needs to analyze the impacts of increased wildfire on elements of the environment.

Response

Please refer to the "emissions" response above.

Literature Cited

Washington Department of Natural Resources. 2006. *Policy for Sustainable Forests*. Washington State Department of Natural Resources, Olympia, Washington.

Washington Department of Natural Resources. 2019. *Alternatives for the Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington Final Environmental Impact Statement*. Washington State Department of Natural Resources, Olympia, Washington.

Washington Department of Natural Resources and U.S. Fish and Wildlife Service. 2019. *Long-term Conservation Strategy for the Marbled Murrelet Final Environmental Impact Statement*. Washington State Department of Natural Resources, Olympia, Washington.