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Even though land conversion for urban development is not explicitly a covered activity, neither is it explicitly exempt. It is not an agricultural or a sustainable forest management activity. Emissions from forest land conversion are large and significant in Puget Sound. Using data from i-Tree for Thurston County, emissions from forest land conversion to urban are 150-175 metric tons per acre. In addition, 2.5 tons per acre of lost annual sequestration is also an impact which could total almost 75 tons per acre by the target emissions reduction year of 2050. An entity converting 200 acres per year would be emitting at least 30,000 metric tons in a year. If you don not require land development entities to register and cap their emissions, how can this very impactful activity be controlled and ultimately reduced to net zero emission by 2050, as required by the act?