

## Sherri Dysart

Director Watson, Earlier today, I sent comments about the CCA rules process through a template provided by the Washington Environmental Council. I wanted to add a bit more detail to my answers. Build adaptive management into each section of the rule so the state can adjust the details as we learn more over time. This law breaks new ground in many ways: from the capping of greenhouse gas emissions, and the generous allocation of free allowances of EITEs, to the incorporation of the Environmental Justice Council in evaluating the impact of the program. Ecology needs stronger tools to check progress and results across the rules to build a stable and effective market - without harming already overburdened communities. "Adaptive Management" sounds good on paper. The Department of Natural Resources is supposed to be revising rules and practices via their Adaptive Management program. The timber industry has outsized representation on the Forest Practices Board, and because there is a requirement to make changes only through "consensus", the timber industry in reality routinely thwarts updates over time. I can see the same scenario playing out within the implementation of rules and procedures within Ecology unless there is careful planning and oversight of those who are "at the table". Explore opportunities to strengthen forest offset protocols based on learnings from California's cap & trade program. Forest offset protocols must be based on the best available independent science, i.e. research not influenced or funded by the timber industry. The timber industry has influenced public policy through lobbying efforts as well as by spreading misinformation. Seek input from independent sources. Thank you for considering these comments.