

Virginia Davis

Thank you for the opportunity to comment on WAC-173-446, Climate Commitment Act (CCA) Program Rule.

I appreciate the hard work the Department of Ecology has been doing to implement the CCA. However, I have a concern related to the following area of the draft program rule.

Ecology's proposed adoption of California's forestry protocol is premature. CARB - US Forestry should not be adopted as-is. ❖

The CARB - US Forestry protocol doesn't adequately account for leakage (logging occurring elsewhere because of avoided logging prompted by a protocol offset).

A 2019 study found that 82% of the credits issued under CARB - US Forestry likely do not represent true emissions reductions due to the protocol's use of lenient leakage accounting methods. ❖

The CARB - US Forestry protocol also lacks genuine additionality, that is, credits are being issued for forests that were not actually going to be harvested, or that the carbon sequestration benefits of specific offsets were overestimated. A 2021 study showed that ecological and statistical flaws in California's offsets program create incentives to generate credits that do not reflect real climate benefits.

Washington State should not adopt the CARB - US Forestry protocol until these shortcomings are addressed.

Thank you for considering my concerns.