

Wolf Lichtenstein

Yes, this is Wolf Lichtenstein, L-I-C-H-T-E-N-S-T-E-I-N. I'm the proprietor of Evergreen Carbon, a Washington State registered company. Um, my-my comment is on the DEBs, the direct environmental benefit. Um, eh, the-the-the rule itself is not clear when we do have another GHG program, say California because California allows a percentage of their offsets, um, or require a portion to be DEBs but not all of them is my understanding. And what your rule says that all of them should be DEBs unless we, uh, team or trade with another GHG program, which would be California, sure would be the first one. Um, and then 50% could come from that jurisdiction. But then in that jurisdiction, well, 50% can come from outside and not have direct environmental benefits. So it's just-- it's not quite clear. And so I would simplify the rule for here in Washington, at least for the first compliance period, is to say that because we're just gearing up the offset market here, um, I would say, uh, have the rule say 50% be DEBs, direct environmental benefit, to Washington State. And then- and then the other 50%, you know, as long as they're compliant with that particular, uh, protocol, the US forestry or ODS or something like that. So that would, uh, open up the market a little bit for the offset market, at least during the first compliance period. Um, because there are-- and I-I don't believe there are, uh, sufficient pro-- uh, projects here in Washington State under the, uh, limited number of protocols chosen to meet the market demand. And that's the end of my comment.