

# Emily Johnston

Dear Mr. Grice,

If we go on as we are, then decades from now--or maybe even just a decade from now--everyone who is currently an adult will be held morally accountable for many failures, but none are likely to be greater than the profound failure to preserve our legacy forests and thus greatly mitigate our carbon emissions (as well as provide a host of other benefits to our local ecologies). Use of CARB-US Forestry standards for offsets in the Climate Commitment Act is a major mistake: among other failures, it encourages short-rotation industrial forestry and clear cuts that devastate forest soil carbon; it fails to account adequately for leakage; it vastly overstates the carbon stored in wood products; and it utilizes inadequate buffer pools.

The use of CARB-US Forestry is the most carbon-impactful mistake in the current rules, but there are others that are failures of equity. For one, the draft program rules should define how Ecology will engage with and support the EJC in the development, implementation, and evaluation of the full program, and define when and how they will provide the EJC details about the CCA program. For another, The program rule must explicitly incorporate Ecology's existing obligation to proactively engage and consult with federally recognized tribes. In particular, it is critical that offset protocols are guided by feedback from Tribal Nations, designed to facilitate participation of tribal nations, and support tribal sovereignty. For yet another, Ecology's responsibility to provide oversight and review of the allocation of allowances for Emission Intensive Trade-Exposed polluters should be strengthened and clarified to provide guidance and establish reporting requirements for consumer-owned utilities on the use of the value of no-cost allowances. Ecology should engage with the Utilities and Transportation Commission on its regulation of investor-owned utilities' use of the value of no cost allowances.

Finally, for the health of our rural communities, any Washington State forestry offset protocol should provide mechanisms to enable landowners who would otherwise face barriers to participation in carbon offsets to aggregate their offset offerings—particularly Tribal Nations and small forest landowners—in order to maximize benefits to local communities, tribes, and land owners of all sizes. 2.88 million acres of forestland in Washington State were owned by small forest landowners in 2019.

As ever, the devil is in the details. Passage of the Climate Commitment Act was viewed as a breakthrough, but if we aren't careful to maximize both equity and emissions reductions in its protocols, it will have been worse than nothing at all. Please take this opportunity to maximize our mitigation of previous decades' mistakes and our failures of understanding. If these problems are fixed, the Climate Commitment Act could yet be something we're justifiably proud of.

Many thanks for your consideration.

Emily Johnston

\*I have sources for all of these statements and am happy to provide them on request.