

# Kim Drury

## Pollution Allowances

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.

## Offsets

It is important that the program rule establishes a process to evaluate the impact of offsets and the effectiveness of the offsets program over time.

The rule should include language allowing for adaptation and adoption of new protocols moving forward, post-rulemaking, including:

- Updating existing offset protocols based on lessons learned in California, such as evolving California's urban forestry offset protocol (which has never been feasible to use).
- Adopting new offset protocols to harness other natural climate solutions in Washington state, e.g., blue carbon and agriculture.

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 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.

## Industrial forestry

- Logging is the number one source of emissions in OR, and estimated to be third in WA. Emissions have been underestimated by up to 55% in Oregon and 25% in Washington, and as of 2019, these emissions were not reported in state GHG reporting guidelines. Yet CARB - US Forestry favors industrial logging practices. Such practices produce significant carbon emissions, from soil compaction as well as machinery operations. It takes decades for clear cut forests to return to a natural state that adequately supports diverse habitats. And so called plantation "working forests"

do not provide anything close to natural habitat or biodiversity.

To be most effective, any forestry offset protocol used by Washington State should reward the avoidance of industrial forest practices, incentivize longer harvest rotations, and prioritize the protection of old growth and mature forests.

Washington should also avoid decoupling carbon storage from overall forest health. In New Zealand, high carbon prices have incentivized dense plantations of non-native, short-lived trees such as radiata pine that offer poor habitat and can displace native forests.

#### Wood products

CARB - US Forestry credits the storage of carbon in wood products, even though they store far less carbon than forests. However some estimates have only 15% of a log's carbon ending up in a wood product; the rest becomes carbon emissions. Crediting carbon storage in wood products encourages increased harvests and shorter rotations, both of which are counterproductive to Washington's climate goals.

As 200 forest and climate scientists told Congress in June 2020: "We find no scientific evidence to support increased logging to store more carbon in wood products, such as dimensional lumber or cross-laminated timber (CLT) for tall buildings, as a natural climate solution." If Washington claims to "follow the science" - then Ecology's rules need to follow the science.

Thank you for considering my views.