

## Ed Chadd

Please use the best available science and modeling when developing forest offset protocols for the CCA. I note the following concerns:

1. California's forest offset system has underperformed and incurred costs to the public:

a. "Systematic over-crediting in California's forest carbon offsets program":

<https://onlinelibrary.wiley.com/doi/10.1111/gcb.15943>.

b. "The Climate Solution Actually Adding Millions of Tons of CO2 Into the Atmosphere":

<https://www.propublica.org/article/the-climate-solution-actually-adding-millions-of-tons-of-co2-into-the-atmosphere>

2. Any directive to consider the dictates of HB 2528 (as codified in RCW 70A.45.090) in the rulemaking must consider at the same time the best available science on the subject of forestry-related carbon sequestration, which contradicts much of the conclusions dictated by HB 2528:

a. Scientists' letter to the U.S. Congress re climate impacts of logging:

<https://sites.tufts.edu/gdae/files/2020/05/Forest-Letter-to-Congress.pdf>

b. Proforestation Mitigates Climate Change and Serves the Greatest Good:

<https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>

c. Proforestation is the optimal way to store forest carbon: <https://www.mdpi.com/2073-445X/11/5/721>

d. All forest sector emissions must be accounted for: <https://iopscience.iop.org/article/10.1088/1748-9326/ab28bb>