

# Liz Campbell

Dear Mr. Grice,

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 concerns related to the following areas of the draft program rule. Especially with Logging. It is ridiculous to consider wood products, the cut forests, as carbon storing. We need our old growth and mature Pacific Northwest Forests intact. 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." 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.

## 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.

Thank you for considering my concerns.