

# Louise Kulzer

## 1. Audits of forest land carbon sequestration

I support having an independent body determine the carbon sequestration rates for specific forest holdings. However, review of CO<sub>2</sub> removal by forest lands in California by Daniel Cullenward has shown a significant overestimate of those rates. Because the Washington market will be linked with the California market, I believe the WA rule should be more conservative and that the audit of lands should only be done by the same body for two consecutive years rather than the four years stated in the draft rule. In addition, better methodologies need to be developed to ensure more accurate estimates of CO<sub>2</sub> removal and these methodologies should be shared by all linked markets. This is particularly important as tribal forest lands are an important supplier of offsets.

## 2. Air Quality monitoring in overburdened communities

The rule has several serious omissions. Among these omissions two are the lack of procedures related to specifying the function of the Environmental Justice Council (EJC) and the lack of specification related to identifying overburdened communities in which air quality monitoring should be conducted. I will address the latter of these concerns as other have commented on the need for specifications related to the EJC.

It is critical that overburdened communities which may be affected by offsets be identified early on so that an appropriate baseline of Air Quality monitoring can be conducted prior to any additional carbon emissions (with accompanying air contaminants) occur in disadvantaged communities throughout the State. Criteria should be provided in the Rule so that it is clearly laid out what concentrations are acceptable and what actions will be taken if acceptable levels are exceeded. Overburdened communities cannot be protected unless the rules by which impacts are measured are laid out in an objective and transparent way.