

Virginia Davis

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 a concern related to the following area of the draft program rule.

Offsets

Offsets are inherently flawed, allowing polluters to continue polluting. 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.

Thank you for considering my concerns.