

Jill Silver

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.

I wanted to share my suggestions for improving the following areas of the draft program rule.

Environmental Justice Council

The timeline for implementing the CCA does not allow the Governor's newly formed Equity and Justice Council (EJC) adequate time to understand the CCA program, or its social and environmental context. The draft program rules should define how Ecology will engage with and support the EJC in the development, implementation, and evaluation of the full program.

Ecology needs to define when and how they will provide the EJC details about the CCA program, including:

Air-quality monitoring program data, especially data related to emissions-intensive, trade-exposed (EITE)-adjacent, overburdened communities;

How pollution allowances will be administered to ensure overall declining greenhouse gas (GHG) emissions under the cap, the appropriate amount of revenue generation from auction activity, and the overall health and integrity of the cap and invest program;

Criteria for the selection of offset protocols, including risks and benefits, and how the definition of adverse impacts relates to the rule definition of "environmental harm";

What decisions will be needed to facilitate linkage with other pollution reduction programs, as well as the predicted or possible downstream consequences of those decisions.

Honoring Tribal Sovereignty

The program rule must explicitly incorporate Ecology's existing obligation to proactively engage and consult with federally recognized tribes. In particular, it is critical that offset protocols are guided by feedback from Tribal Nations, designed to facilitate participation of tribal nations, and support tribal sovereignty.

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

Offsets allowing polluters to continue polluting are inherently flawed. 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., biochar (from forest slash, young stand thinning, and Scotch broom), agriculture, and blue carbon.

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 clearcut forests to return to a natural state that adequately supports diverse habitats, especially in the face of exploding non-native flammable Scotch broom. And so-called short rotation "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, require prevention and control of Scotch broom using the most effective protocols to avoid seed production, integrate biochar production on site with Conservation Corps crews, 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."

Aggregation

2.88 million acres of forestland in Washington State were owned by small forest landowners in 2019. Any forestry offset protocol implemented under the Climate Commitment Act should provide mechanisms to enable landowners who would otherwise face barriers to participation in carbon offsets to aggregate their offset offerings particularly Tribal Nations and small forest landowners in order to maximize benefits to local communities, tribes, and land owners of all sizes.

California's buffer pools

Forest offset protocols call for "buffer pools" to attempt to account for the fact that some of the carbon presumed stored in the forest will end up being released by wildfire. Recent analysis has indicated that the quantity of trees that California has set aside may be inadequate compared to the risks the state faces from increased mega fires. California's "buffer pool" must be evaluated before Washington State links with California's cap and trade program.

Finally, as a small forest landowner under 20 acres, the Designated Forest Land program managed by counties has no option for NOT cutting my forest, for preserving the mature to old forest in a carbon sequestering condition. That needs to change!

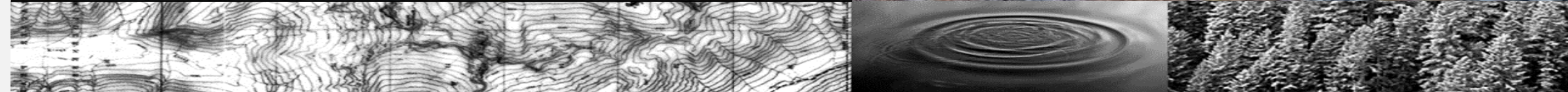
Thank you for considering my suggestions and concerns, and for working to provide a viable platform for a climate program.

Coastal Conservation Corps

Proposal for Jobs in Restoration and Resiliency



Jill Silver, 10,000 Years Institute



An aerial photograph of a river system flowing through a dense forest. The river has multiple channels and sandy banks with scattered driftwood. The surrounding landscape is a mix of green deciduous trees and darker evergreen forests, with rolling hills and mountains visible in the distance under a cloudy sky.

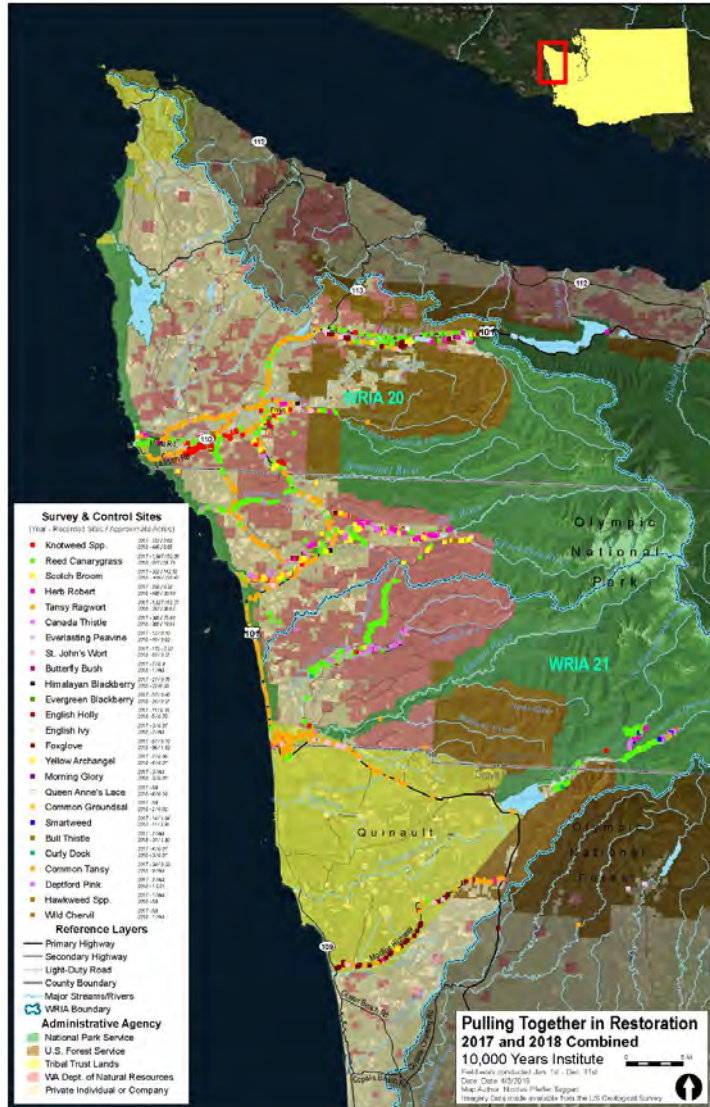
About Us

At 10KYI, we evaluate the effects of human activities on natural environments – the forests, rivers, wetlands and estuaries that sustain our communities and ecosystems.

Through development of innovative, science-based approaches to restore ecological integrity, we promote sustainable practices in landscapes across the region.

WCRRI: 10KYI's *Pulling Together* in Restoration Project

Preventing the spread of invasive species in coastal watersheds, providing training and local jobs for local work



10,000 Years Institute

Challenges



Rural Communities Need Jobs, Training, & Housing



The COVID pandemic, lack of training opportunities, and the loss of forestry and fisheries jobs in rural coastal communities has led to increased unemployment, under-employment, and migration from rural areas to cities.

Challenges



Declining Forest Health



Forests need thinning and invasive plant management to increase understory plant growth, grow trees faster, and improve habitat quality.

Challenges

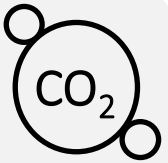


**Wildfire
Risk**



Invasive Scotch broom and overly dense stands increase wildfire intensity and severity.

Challenges

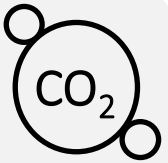


Waste & Energy Management



Rural communities on the coast face high costs for transportation of goods and services, and many challenges for waste management.

Challenges



**Carbon,
Methane,
& PM
Emissions**



Slash pile burning emits carbon dioxide, methane, and particulates - contributing to climate change, ocean acidification, and sea level rise – and impacts to human health.

Opportunities and Solutions



Coastal Conservation Corps

Provide permanent year 'round place-based jobs



Biomass Optimization Center

Convert waste to products, biochar and energy



Coastal Conservation Corps

A permanent place-based Conservation Corps is the next logical step...

Matching local skilled experience with local youth-in-training in work that supports coastal economies.



Coastal Conservation Corps

A Coastal Conservation Corps will focus on critical and under-funded resource management tasks



Photo by: CSIRO



Photo by: Wild Salmon Center/Trout Unlimited



Forestry

- Forest thinning
- Young stand thinning
- Biomass for biochar
- Wildfire fuels reduction
- Invasive species:
 - Scotch broom
 - Reed canarygrass
 - Herb Robert

Marine

- Marine debris collection
- Invasive species:
 - European green crab
 - Spartina
 - Scotch broom
 - Gorse

Restoration

- Road maintenance
- Restoration project support
- Native plant revegetation
- Invasive species:
 - Scotch broom
 - Reed canarygrass
 - Herb Robert

Recreation

- Trails
- Facilities maintenance
- Bunkhouse construction for crews
- Invasive species:
 - Herb Robert

Coastal Conservation Corps

Invasive plant management supports clean gravel, forests, roads, and property values

Gravel mines



Coastal Conservation Corps

Invasive plant management on roads - roads act as pathways for 'propagules'...

Gravel mines



Roadsides



Coastal Conservation Corps

Invasive plant management in forest harvest units – as sources that travel to rivers



Gravel mines



Roadsides



**Forests and
Rivers**

Coastal Conservation Corps

Invasive plant management in river corridors and floodplains to protect salmon and water



Gravel mines



Roadsides



**Forests and
Rivers**



Impacting forest succession

Coastal Conservation Corps

Forestry Support – Our forests need thinning!

Non-merchantable and young stand thinning, and riparian treatments to enhance forest growth, improve habitat for multiple species, increase carbon storage, and make biochar



Coastal Conservation Corps

Forest, Riparian, and Stream Channel Restoration

De-Incision – Deploy the CCC workforce and thinned non-merchantable biomass to rehabilitate incised streams, reconnecting floodplains to store groundwater, reducing downstream flooding, and increasing humidity to reduce wildfire risk

Coastal Conservation Corps

Forest, Riparian, and Stream Channel Restoration

Recover the diversity, the age classes, and the homes and food for forest species with thinning and biochar, and store tons of carbon in soil, live and dead biomass to protect our coastal ecosystems – and produce trees and materials for mills and homes!



Carbon Conservation Corps

For mobile biochar production



We already employ large hand crews in the dangerous work of fire fighting. We could use this labor to reduce fire danger by thinning overcrowded plantations, and improve forest soils by adding biochar, while sequestering carbon from the atmosphere.



Kelpie Wilson
Wilson Biochar Associates



www.slideshare.net/kelpiew/a-carbon-conservation-corps-for-mobile-biochar-production

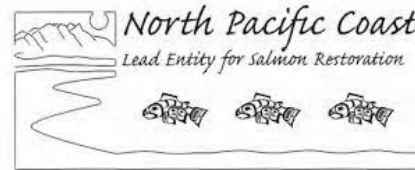
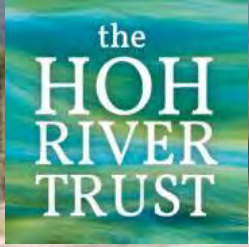
Let's Build a Coastal Conservation Corps!


- Budget: \$20-30 million per biennium
- 130 fulltime, year 'round satisfying jobs
- Partnerships with federal, state, local, tribal, private and non-profits
- Save \$30 billion in impacts and provide community stability

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Partners, Collaborators, and Funders






Team up? Thank YOU!

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