

# Camille Baldwin-Bonney

Dear Mr. Grice,

Thank you for the opportunity to comment on WAC-173-446, Climate Commitment Act (CCA) Program Rule. I am a Washington resident and mother of two and very proud to be in a state where we take the climate crisis seriously. 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.

I am concerned that the timeline for implementing the CCA does not allow the Governor's newly formed Equity and Justice Council (EJC) time to fully evaluate disparate impacts of climate on communities of color.

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.

I am wary of offsets. They are often heavily influenced by industry. There is a lot to be learned from the mistakes California made in regard to offsets. We should adopt new offset protocols to harness other natural climate solutions.

Ecology's proposed adoption of California's forestry protocol is premature. CARB - US Forestry should not be adopted as-is. 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. It is imperative that credits are issued for natural forests (not industry forests) because it is imperative that credits are issued for forests where carbon sequestration is happening.

Thank you,

Camille