

# Heather Bergey

Dear Mr. Grice,

I am writing to comment on the CCA Program Rule WAC-173-446 and look forward to what positive environmental effects can come from certain changes to it following passage.

My concerns regard Tribal Sovereignty, offset programs, and the adoption of California's forestry initiatives.

Knowing that Dept of Ecology has an obligation to collaborate and consult Tribal Nations, I think the program rule should make this extremely clear. I worked in the Cedar River Watershed and learned about the relationship City of Seattle has with the Muckleshoot Indian Tribe; it is good that this good relationship exists but I strongly believe they need to have more authority in decisions regarding the watershed. I expect this increased involvement for the new CCA and to be explicit in the rule.

My issue with offsets is this: they move the pollution elsewhere and allow organizations to continue polluting while appearing to be off the hook for their emissions. Strict oversight is required to ensure this program does not allow polluters off the hook for their emissions and I believe the rule should allow for possibility of new guidance on offsets including measures to counter issues similar to those raised in CA with their tree offset program.

This brings me to my final concern that I'll highlight in this comment: the adoption of the CA forestry protocol. I think there are very serious issues with the program in how it allows loggers to still log the same amount just in different areas, similar to how offset programs tend to just move the issue. Even worse, as is, sneaky 'book keeping' is allowed so that sites that would have \*never\* been logged are marketed as 'saved sites' which again allows logging companies leverage to create a new offset site elsewhere. This is a **SERIOUS** issue with the program. Please investigate the efficacy of this program before fully adopting it; it is not one I wish for the state that I love and reside in. I hope that you take this concern seriously, and implement measures to accurately record the emissions of logging practices.

I work in construction and so I understand the need for logging; I am not asking logging practices to stop but to ensure the sustainability of this state's wonderful forests, including its old growth forests which are dwindling. These forests sequester so much carbon and provide necessary habitat for the states native plants and animals.

Thank you for your time and work,

Heather Bergey