



July 11, 2022

Department of Ecology  
State of Washington

RE: Comment on Draft Rule WAC 173-446-505 re Urban Forest Compliance Offsets

Dear Department of Ecology,

I understand that the State of Washington intends to utilize California's ARB Urban Forest Protocols from 2011. As the Executive Director of the California Urban Forests Council (CaUFC), I strongly recommend that you consider or create other, better, processes to manage the offset credits for urban forestry.

I was part of the 2013 working group intending to revise the original urban forestry protocols in a manner that would actually address these issues with real, achievable community-based solutions.

The original protocols were never unusable, and the revised ones brought forward by The Climate Action Reserve, though somewhat improved, are not realistic, and in a way punish cities that are trying to do the right thing - ones that have existing urban forestry goals on the books, in my opinion.

California does not have an effective urban forestry compliance system now. I hope that this will change at some point in the future.

We at CaUFC applaud you for taking this vital step and encourage you to reconsider finding alternatives to ARB Urban Forest Protocols for best results for your program.

Here's to a successful outcome,

Sincerely,

A handwritten signature in cursive script that reads 'Nancy J. Hughes'.

Nancy J. Hughes  
Executive Director