

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. We must make every effort possible to lessen our current trajectory toward an unlivable planet.

Here are some of my concerns about the draft rule.

- 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 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.
- 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.
- Logging is the number one source of emissions in Oregon and estimated to be third in Washington. 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.
- To be most effective, any forestry offset protocol used by Washington State should reward the avoidance of industrial forest practices, incentivize longer harvest rotations, and prioritize the protection of old growth and mature forests.

Thank you for this opportunity to comment. I know you can do a better job in this area.