

# Virginia Davis

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. However, I have a concern related to the following area of the draft program rule.

## 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.

Thank you for considering my concerns.