

# 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.

## Industrial forestry

Logging is the number one source of emissions in OR, and estimated to be third in WA. 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.

Yet CARB - US Forestry favors industrial logging practices. Such practices produce significant carbon emissions, from soil compaction as well as machinery operations. It takes decades for clear cut forests to return to a natural state that adequately supports diverse habitats. So called plantation "working forests" do not provide anything close to natural habitat or biodiversity.

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.

Washington should also avoid decoupling carbon storage from overall forest health. In New Zealand, high carbon prices have incentivized dense plantations of non-native, short-lived trees such as radiata pine that offer poor habitat and can displace native forests.

Thank you for considering my concerns.