

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.

Aggregation

2.88 million acres of forestland in Washington State were owned by small forest landowners in 2019. Any forestry offset protocol implemented under the Climate Commitment Act should provide mechanisms to enable landowners who would otherwise face barriers to participation in carbon offsets to aggregate their offset offerings—particularly Tribal Nations and small forest landowners—in order to maximize benefits to local communities, tribes, and land owners of all sizes.

Thank you for considering my concerns.