Washington State Department of Agriculture

What questions do you have about this rulemaking?

The Washington State Department of Agriculture (WSDA) has several questions regarding future reporting requirements, which fall under the following categories:

GHG reporting:

How will difficult-to-measure carbon sinks and sources be included in required emissions reporting (e.g., soil, vegetative, or blue carbon)?

How will requirements treat the reporting of GHG estimates vs. measurements? Will model results be eligible for use in reporting?

Does Ecology plan to develop models for processes/practices that do not currently exist for Washington, and that cannot otherwise be measured?

How does Ecology intend to evaluate projects that do not result in GHG emissions reductions, but provide other ecosystem services critical to climate change adaptation (e.g., sustainable water supply or habitat restoration)

Will Ecology provide technical assistance to grant recipients to comply with this future rule? How will Ecology ensure an equitable process for all grant recipients, especially for those with limited administrative or technical capacity?

What are the consequences for a grantee whose project fails to provide GHG emissions reductions or meet other criteria?

Offsets/LCFS:

If Washington CCA revenue is used to fund projects that also generate renewable fuel or offsets, can project owners participate in external markets (California/Quebec/Oregon), or will they be required to participate in Washington's cap-and-invest or LCFS markets?

If a grantee generates a project that falls within one of the four approved offset protocols, is adherence to those protocols sufficient for quantifying and reporting GHG reductions, or will there be additional requirements?

Use of funds:

Can CCA funds be used to meet the reporting requirements if additional expertise is required?

Will the rulemaking define the allowable proportion of CCA revenue that can be used to support administrative costs at Ecology?

Will Ecology administrative costs be used to streamline and assist with reporting requirements to reduce the burden on grantees?

Will the rule define reportable spending, and outline the criteria agencies should use to identify and determine what qualifies as reportable spending?

Responsible entities:

If funding is administered through a pass-through agency (e.g., Ecology provides funds to WSCC, who provides funds to WSDA), will the pass-through agency (WSCC) be required to report spending and benefits to Ecology, or will the end recipient (WSDA)?

In the above scenario, who is held responsible if a project fails to result in GHG emissions reductions or meet other criteria?

What concerns do you have about this rulemaking?

We have many concerns on behalf of the Washington agricultural industry, individual producers, and WSDA. These concerns are embedded in the above questions (#1) and below hopes (#3).

What hopes do you have for this rulemaking?

WSDA hopes that:

Reporting requirements are flexible enough to incorporate the many methods of estimating or measuring GHG emissions and other benefits, which can vary by individual project. There are many unknowns associated with the climate mitigation/adaptation potential of agricultural practices. We hope to see reporting requirements flexible enough to allow the agricultural industry to fully participate and reap the benefits of this important state law.

Safeguards for equity and justice are built into reporting requirements, so that small or socially disadvantaged producers are not unduly burdened.

Ecosystem services beyond GHG emissions reductions will be considered of equal value, so that the state supports producers in adapting to climate change as they simultaneously mitigate it.

Furthermore, WSDA, the agricultural industry, and individual producers are critical stakeholders in mitigating and adapting to climate change. We hope the rulemaking process is transparent, participatory, and inclusive of agricultural stakeholders throughout every stage.

What else would you like to share?

WSDA and its stakeholders are happy to participate in rulemaking via committee, consultation, or other means. Please reach out for agricultural representation during this process.

STATE OF WASHINGTON
DEPARTMENT OF AGRICULTURE
P.O. Box 42560 • Olympia, Washington 98504-2560 • (360) 902-1800

CCA Funds Reporting Rulemaking Initial Input Survey
Responses from the Washington State Department of Agriculture

Survey Questions

#1 What questions do you have about this rulemaking?

The Washington State Department of Agriculture (WSDA) has several questions regarding future reporting requirements, which fall under the following categories:

GHG reporting:

- How will difficult-to-measure carbon sinks and sources be included in required emissions reporting (e.g., soil, vegetative, or blue carbon)?
- How will requirements treat the reporting of GHG estimates vs. measurements? Will model results be eligible for use in reporting?
- Does Ecology plan to develop models for processes/practices that do not currently exist for Washington, and that cannot otherwise be measured?
- How does Ecology intend to evaluate projects that do not result in GHG emissions reductions, but provide other ecosystem services critical to climate change *adaptation* (e.g., sustainable water supply or habitat restoration)
- Will Ecology provide technical assistance to grant recipients to comply with this future rule? How will Ecology ensure an equitable process for all grant recipients, especially for those with limited administrative or technical capacity?
- What are the consequences for a grantee whose project fails to provide GHG emissions reductions or meet other criteria?

Offsets/LCFS:

- If Washington CCA revenue is used to fund projects that also generate renewable fuel or offsets, can project owners participate in external markets (California/Quebec/Oregon), or will they be required to participate in Washington's cap-and-invest or LCFS markets?
- If a grantee generates a project that falls within one of the four approved offset protocols, is adherence to those protocols sufficient for quantifying and reporting GHG reductions, or will there be additional requirements?

Use of funds:

- Can CCA funds be used to meet the reporting requirements if additional expertise is required?
- Will the rulemaking define the allowable proportion of CCA revenue that can be used to support administrative costs at Ecology?

- Will Ecology administrative costs be used to streamline and assist with reporting requirements to reduce the burden on grantees?
- Will the rule define reportable spending, and outline the criteria agencies should use to identify and determine what qualifies as reportable spending?

Responsible entities:

- If funding is administered through a pass-through agency (e.g., Ecology provides funds to WSCC, who provides funds to WSDA), will the pass-through agency (WSCC) be required to report spending and benefits to Ecology, or will the end recipient (WSDA)?
- In the above scenario, who is held responsible if a project fails to result in GHG emissions reductions or meet other criteria?

#2 What concerns do you have about this rulemaking?

We have many concerns on behalf of the Washington agricultural industry, individual producers, and WSDA. These concerns are embedded in the above questions (#1) and below hopes (#3).

#3 What hopes do you have for this rulemaking?

WSDA hopes that:

- Reporting requirements are flexible enough to incorporate the many methods of estimating or measuring GHG emissions and other benefits, which can vary by individual project. There are many unknowns associated with the climate mitigation/adaptation potential of agricultural practices. We hope to see reporting requirements flexible enough to allow the agricultural industry to fully participate and reap the benefits of this important state law.
- Safeguards for equity and justice are built into reporting requirements, so that small or socially disadvantaged producers are not unduly burdened.
- Ecosystem services beyond GHG emissions reductions will be considered of equal value, so that the state supports producers in adapting to climate change as they simultaneously mitigate it.

Furthermore, WSDA, the agricultural industry, and individual producers are critical stakeholders in mitigating and adapting to climate change. We hope the rulemaking process is transparent, participatory, and inclusive of agricultural stakeholders throughout every stage.

#5 What else would you like to share?

WSDA and its stakeholders are happy to participate in rulemaking via committee, consultation, or other means. Please reach out for agricultural representation during this process.

Contact:
Dani Gelardi
Senior Soil Scientist and Agency Climate Coordinator
dgelardi@agr.wa.gov
360.791.3903