2024-09-03 Forest Offsets public comments.

1. Climate change scientists say the next 10/20/25 years (some say only through 2030 or 2040) are our critical time window to reducing GHG. If you allow longer verification periods and significant reductions (35% is too much) in promised carbon sequestration to take place in these projects, the buyers of these credits are not meeting net zero emissions during that calendar year during this critical window. Instead of focusing on providing financial flexibility for failed projects, I recommend expending time and resources on helping these projects succeed, especially in the context of this critical window for GHG reductions. See #3.

2. Things like drought, wildfire are likely to be regional and could affect multiple projects in the same time period - will the buffer pool be big enough to take this into account?

3. Very much disagree with collecting dispensed credits from project owners after they've had a significant reversal. Using legal means to collect will take forever at much higher public expense than withholding credits until the project is verified to be on track. Instead, I recommend you actively monitor these projects early and often, using clear (single?) acceptable standard and public entities (not project staff/consultants) doing the monitoring and assessing in order to reduce the incidence of reversals/terminations. Credits should be dispensed incrementally as projects are monitored/verified quarterly or some other timing during the year - *and assist at-risk projects to move forward as promised.* This reduces risk, improves predictability and reduces the likelihood of having to resort to legal (expensive) collection. Active monitoring could reduce buffer pool contributions as it reduces risk and collection costs. It could also encourage participation by providing public support for monitoring/assessing/tech assistance esp. to smaller projects.

4. Don't allow use of insurance instead of buffer contributions. That will privilege larger projects/owners.

5. Salvaging should be strongly discouraged due to wildlife habitat/ecosystem services value of what's left + the additional carbon expended to harvest and process salvaged timber.

6. Sierra Pacific said they have 95% valid sampling, but has still had 4 reversals out of 16, if I heard Ed M correctly (?). Seems odd that big forestry companies (with risk managers and tax accountants and probably the best predictive data on fire danger for their holdings) can't predict project outcomes more reliably than that… Is there any performance criteria which stops accepting projects from entities that regularly fail?

7. If you don't, I would recommend Ecology have qualified financial analysts assessing these rules changes to make sure changes don't create opportunities for financial gaming (cash flow/tax benefits, e.g.) that is not related to reducing GHG emissions and may distort the market.