

WA Department of Natural Resources

As an amendment to comments previously provided by DNR, the agency would like to highlight that without "climate resiliency projects" on the list of exemptions from the GHG emissions reductions reporting, the staff capacity and expertise required by this proposed rule would be much greater than previously anticipated. Nearly all of DNR's CCA funded work would be required to do the GHG emissions reductions reporting, and our work is particularly challenging to calculate these reductions following the complex protocols. We are not unsupportive of the proposal, however, the agency would need funding for the additional staff capacity and expertise that would be needed to carry out this work.