

National Indian Carbon Coalition (Bryan Van Stippen)

The National Indian Carbon Coalition (NICC) appreciates the opportunity to provide feedback on the proposed revisions to the Washington Cap-and-Invest Program's U.S. Forestry Protocol. NICC is a tribal-led program formed by the Indian Land Tenure Foundation and the Intertribal Agriculture Council that supports Tribal Nations in evaluating and developing high-integrity carbon projects. Over the past several years, we have partnered with multiple Washington-based Tribal Nations to assess participation in Improved Forest Management (IFM) offset projects under the Climate Commitment Act's Tribal Carbon Offset Assistance Program grants. To date, only one Tribe has listed an IFM project; the remaining Tribal Nations are still weighing the current program rules, the management adjustments necessary for compliance, and the financial incentives associated with participation.

Introducing protocol changes at this juncture would require Tribal governments to restart fiscal analyses, operational planning, and internal approvals, creating additional burdens for staff and leadership. As proposed, the revisions would raise development and compliance costs, reduce financial predictability, and materially complicate participation. In practical terms, they would alter the underlying value proposition for Tribes and substantially decrease the likelihood that many will be able to move forward in the Cap-and-Invest market.

NICC urges a path that preserves momentum while strengthening program integrity: (1) grandfather projects already initiated under the existing protocol; (2) provide a clear, multi-year transition period with definitive guidance so Tribes do not have to re-tool midstream; (3) engage in government-to-government consultation to co-develop any substantive changes, including consideration of a Tribal-specific compliance track that reflects Indigenous stewardship practices and tenure realities; and (4) offer targeted technical assistance and funding to cover the re-evaluation costs created by any revisions. These steps would maintain rule stability, enable Tribal participation at scale, and advance the CCA's climate and equity objectives.

NICC stands ready to share data, project timelines, and case examples from our work with Tribal partners and to collaborate on a durable framework that both protects environmental integrity and is workable for Tribal governments. Thank you for your consideration.