anew climate

State of Washington
Department of Ecology

March 13, 2026

Re: Anew Climate Comments on Chapter 173-446 WAC: Cap-and-Invest US Forest Offsets Protocol - Rule Proposal

Dear Department of Ecology staff,

Anew Climate is one of the largest climate solutions companies in North America and was formed through the February 2022 merger of long-time industry leaders Element Markets and Bluesource, which had been in operation since 2005. Anew has a successful track record within the markets for compliance and voluntary carbon credits, across a broad range of project types, including improved forest management, nature-based and technology-based carbon removals, and more. We have been active participants in Washington's Cap-and-Invest Program, California's Cap-and-Trade Program, and Alberta's Cap-and-Trade Program, as well as voluntary carbon markets, since their inception.

Anew appreciates the efforts of ECY to continuously improve its high-quality forest protocol for the state of Washington, as evidenced in this most recent update to the protocol. We find these changes to be consistent with best practice with regards to forest carbon accounting and believe these will ensure the protocol maintains the high level of integrity and conservativeness required of a compliance grade offset protocol. As before, we would encourage a thorough review of the protocol as a whole to address ambiguous language or requirements, but we do have several specific requests for clarity, all of which are follow-ups from our initial comments (submitted to ECY August 18th, 2025, available here).

1. Computational Reversals

In the proposed Draft Protocol, a "computation reversal" is defined in section 1 as

> *any reversal that is due to required protocol calculations (including the confidence deduction and secondary effects). Re-establishment of the project baseline at the end of the crediting period does not constitute a computations reversal.*

The second sentence appears to be a new addition to the updated protocol. In the Draft Rule Language for Chapter 173-446 WAC, Section 4, it is elaborated that

> *these types of reversals – which are not directly related to on-the-ground activities, but which nonetheless result in a situation in which the project has been over credited – must be compensated.*

Anew appreciates the added clarity on the definition and application of this term. However, we believe additional clarification is needed in order to ensure that the 'gray area' between the different types of reversals is minimized as much as possible. This is especially important because the consequences of the varying types of reversals are materially different. In this draft, a couple situations are proposed for the application of the computational reversal – for example, in the same Draft Rule Language section mentioned above, it is stated:

> *Confidence deductions and accounting for secondary effects may cause a computational reversal under certain circumstances, such as slower than anticipated forest growth."*

In other protocols which Anew is familiar with, this type of situation would constitute an 'unintentional reversal', due to the implied source of the reversal potentially being caused by environmental or climatic conditions. This begs the question: how can the computational reversal clearly be delineated from a situation caused by natural conditions (which would fit the unintentional reversal definition more clearly)?

Anew believes that the lines between these reversal types, especially as it relates to computational reversals, still need to be more clearly defined in order to prevent the types of situations outlined above.

2. Baseline Quantification Approach Revision

In the 'Considered revisions to U.S. Forest Protocol' document, Revision 2 outlines several draft Common Practice values for an example region (Puget Trough), as well as the broad methods used within the EVALIDator Tool to produce these values. Anew appreciates the updates to this section and feels that they serve to elicit a better understanding of the entire process. However, Anew also believes that there are potential improvements to be found here.

First, we advise that the number of plots in each forest type group, ecoregion, and ownership type combination should be either factored into the calculation or used to adjust the values alongside other regions. In our experience, EVALIDator data can be very limited for individual groups within these combinations and therefore can easily be skewed by outlier data points. Anew believes that a mechanism such as a minimum plot number for each forest type/ecoregion/ownership combo can limit the potential impact of this problem within individual strata. Other potential ideas would be welcomed as well, so long as the result provides both transparency and rigor to the output.

Anew would also like to get additional clarity on how individual strata will be grouped into these FIA forest type groups, given the potential subjectivity of mixed forest types. How would Ecology view the delineation of these mixed forest types into strata which could vary considerably in common practice value, particularly in regions where dominant forest type groups may include associate species found in other forest types? Anew believes the current development stage of the protocol provides a key opportunity to address this issue by providing as much clarity as possible, in order to both strengthen the additionality of the protocol, as well as to ensure smooth project development processes for both landowners and project proponents.

We appreciate the opportunity to submit these comments and would welcome your feedback and questions. My team and I are available to discuss these comments and our experience with compliance offsets at your convenience. Please feel free to reach me at jstrauss@anewclimate.com or our Senior Director, Policy, Teresa Lang, at tlang@anewclimate.com.

Sincerely,

Josh Strauss
President, Environmental Products
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