Comments to Washington State's Department of Ecology (ECY) on US Forest Offset Protocol Revisions

Submitted via ECY's **Public Comment Form**
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The **International Emissions Trading Association** (IETA) welcomes this opportunity to provide guidance as requested by Washington's Department of Ecology (ECY) on its draft rule language to update **Chapter 173-446 WAC, Climate Commitment Act Program Rule**, related to the US Forest offset protocol. IETA has long been a proponent of robust and high-integrity compliance offsets within Washington's Cap-and-Invest program to ensure cost-containment, enable linkage and provide environmental and co-benefits beyond the regulated sectors. We support ECY's decision to revise the US Forest Protocol but have several recommendations for ECY's consideration.

In the 'Proposed revisions to U.S. Forest Protocol' document, **Revision 2** states that through a revised approach to the baseline quantification approach, "'common practice" values will be derived by Ecology from the US Forest Service EVALIDator Tool." The common practice values will consist of on-site live and dead trees, as opposed to the current protocol which only considers above-ground live trees. Given the potential outsized impact of this change, IETA **suggests that additional clarification should be provided on the exact steps to recalculate the common practice values**. Additionally, the quantification of dead trees could have challenging statistical implications for certain assessment areas or supersections.

Also in **Revision 2**, ECY proposes to provide Improved Forest Management (IFM) projects with credits for avoided harvest over a 10-year period rather than as a lump sum in the first issuance of the project. **IETA is supportive of this change**, as current protocol method of providing a lump sum at the first issuance has been the subject of criticism by some stakeholders for overissuing credits.

IETA supports Revision 7 to adopt some of the Climate Action Reserve (CAR)'s aggregation guidelines. This would allow multiple small landholdings to group together to meet carbon inventory confidence standards collectively, which can reduce inventory and verification costs for small landowners. In addition, by allowing the 5% target sampling error to be met at the aggregate level while permitting up to a 10% error at the individual site level, the protocol reduces the number of sample plots required per landowner.
We also support the proposed changes to the verification cycle, particularly, the 12-year site visit cycle for projects generating fewer than 10,000 credits annually. The changes

will make the compliance offset market more accessible and affordable for small landowner committed to long-term permanence monitoring.

In **Revision 12**, ECY proposes adding "computational reversals" as a new type of reversal that occurs because of required protocol calculations and not site changes. We support the addition of this reversal category, as it ensures that project operators are not penalized for changes that do not have real impacts in the forest. However, IETA requests that **ECY include additional clarification on what constitutes a computational reversal**. There could be gray area where the difference between an unintentional, intentional, and computational reversal might be uncertain and/or open to significant interpretation by project proponents, verifiers, or registries. Additional **details on the situations which trigger** each type of reversal would be helpful for project planning.

On behalf of our 300+ member organizations, IETA appreciates this opportunity to provide feedback to ECY on the proposed changes to the US Forest Offset Protocol in the Cap-and-Invest Program.