

Grayson Badgley

Hello. Um, my name's Grayson Badgley. That's G-r-a-y s-o-n and Badgley is B-a-d-g-l-e-y. Lower my hand. All right. And I'll start my comment. Uh, I want to first start by thanking ecology for the opportunity to comment today. And I also want to take a moment to thank Jordan in particular. Um, Jordan, I know you've worked on this, um, very hard for a number of years, and. Yeah, uh, I just it's worth recognizing all the hard work that I know has gone into this. Um, I've been engaged with ecology for about two years in developing the revisions to this forest protocol that are proposed in this rulemaking, uh, that started with my participation on, uh, ecology's US Forest Offset Protocol technical working group. Uh, and it's continued. Uh, the last two rounds of informal comment of the draft versions of this proposed protocol. I've submitted comments. I've spoken with Jordan on various occasions throughout that process. I've relied on my training, my academic training as a forest ecologist. I have a PhD in forest ecology and plant physiology and on my expertise in the carbon markets, which I've been studying and researching for the past several years. It's with that background that I can confidently say that Ecology's proposed protocol fails to satisfy its statutory requirement that its offsets are real and permanent. I think ecology has done some good things. I think they really have made some steps to lower the likelihood of issuing nonadditional credits, and I think it's great that there's going to be spatially explicit risks. But when it comes to how the proposed protocol specifies buffer pool contributions for wildfire and insect risk, uh, there's, uh, some real scientific problems, in particular critical assumptions about the maximum risk of wildfire loss at twelve percent and insect risk being capped at eight percent over the next one hundred years. It has no basis in science. It has no basis in the scientific literature. These assumptions were not discussed in the various technical work, group meetings, and on multiple occasions I've

asked ecology where these numbers came from, and I really haven't had one yet. Uh, there's equally arbitrary decisions that have been made around, um, reductions in these risks from vegetation management plans. It's a fifty percent reduction for vegetation management plans. That is written in the protocol don't have. They're very ill defined. It doesn't even say the vegetation management plan has to address specific insect risks. Uh, it's started as an eighty percent reduction and now it's just a fifty percent reduction. But where did those numbers come from? I don't know, but what I can tell you is they do not come from the scientific literature. Combined together, these two arbitrary decisions of capping risk and arbitrarily allowing for reduction of those arbitrary risks means that we have no assurances that offsets issued under this rule will be real or permanent, which is required by statute. Thank you.