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Director Casey Sixkiller

Washington State Department of Ecology

300 Desmond Drive SE, Lacey, WA 98503

**RE: Climate Action Reserve Comments on the Proposed Amendments to Chapter 173-446 WAC – Cap and Invest Offsets and U.S. Forest Protocol Version 1.0**

The Climate Action Reserve (the Reserve) appreciates the opportunity to provide public comments regarding the Department of Ecology’s (Ecology) proposed updates to the U.S. Forest Protocol Version 1.0 and associated program rules. As an organization dedicated to the development of high-integrity carbon offset standards, we support Ecology’s efforts to strengthen its forestry framework, including by adopting and adapting key provisions from the Reserve’s U.S. Forest Protocol Version 5.1. These changes will enhance the scientific rigor of the program while lowering barriers for small landowners and Tribes.

We offer the following considerations regarding the proposed updates:

**Enhancing Small Landowner Feasibility: Aggregation and Verification**

The Reserve supports Ecology inclusion of the Reserve’s Aggregation Guidelines, which allow multiple small landholdings to group together to meet carbon inventory confidence standards collectively. This approach is important to reduce the inventory and verification costs that serve as a primary barrier for small landowners to participate in forest carbon projects and be economically unviable.

- **Aggregation:** 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 without sacrificing statistical certainty across the aggregate as a whole.
- **Verification Intensity:** We support the proposed changes to the verification cycle. In particular, the 12-year site visit cycle for projects generating fewer than 10,000 credits annually, the modified aggregation verification schedule, and the option for desk reviews

during years when no credits are sought will provide needed flexibility and cost savings for landowners committed to long-term permanence monitoring.

- **Forest Owner Support:** In our experience, smaller landowners and new market participants often need additional support to assess project feasibility and durability. The Reserve has developed a variety of tools and training materials for other jurisdictions to support forest owner engagement and project potential, including a cost-benefit template and project developer guide. The Reserve would welcome the opportunity to collaborate with Ecology to provide resources for local stakeholders seeking to participate under the U.S. Forest Protocol.
- **FPIC:** Furthermore, we encourage Ecology to consider integrating Free, Prior, and Informed Consent (FPIC) requirements for forest owners working with third-party project developers. Such considerations would ensure that landowners understand the full cost-benefit of a project, particularly when the original project developer may no longer be involved during the full project life.

#### **Improved Flexibility: Boundary Adjustments and Computational Reversals**

We support Ecology's inclusion of provisions for boundary flexibility and computational reversals to account for the dynamic nature of forest projects.

- **Boundary Flexibility:** Adopting the Reserve's approach to allow minor boundary reductions, treated as intentional reversals, prevents the unnecessary full termination of projects due to mapping errors or minor changes in ownership.
- **Computational Reversals:** We support the creation of this new reversal category. By distinguishing reversals caused by computational errors and confidence deductions from those caused by on-the-ground activities, Ecology ensures that project operators are not penalized for changes that do not have real impacts in the forest, while still ensuring the environmental integrity of the credits as they are accounted for in future issuance.

#### **Accounting for Forest Productivity: Leakage Carryover**

The Reserve supports the adoption of our Secondary Effects carryover provision. This mechanism allows project operators to accrue positive carryover when actual harvest levels exceed the modeled baseline in a given year. While the net balance of leakage can never be positive (it cannot generate additional credits), allowing this carryover to be applied against future leakage deductions appropriately recognizes landowners who manage their forests for long-term productivity.

## **Improved Forest Management: Baseline Setting and Harvested Wood Products**

We support Ecology’s proposed modifications to baseline setting to ensure conservative crediting for Improved Forest Management (IFM) projects on private lands. We further support the development of a calculator for harvested wood products based on the Reserve’s calculator to facilitate use for forest projects in Washington. We would welcome ongoing collaboration and communication to ensure implementation feedback and considerations for improvements are shared.

### **Permanence**

The Reserve has convened a [technical working group](#) to assess our permanence requirements and mechanisms to ensure the long-term durability of sequestered carbon at risk of reversal. We anticipate completing this work in Spring 2026, with recommendations to strengthen our permanence approach and enable practical implementation for forest owners. We would welcome the opportunity to provide additional input to Ecology at that time as part of continued efforts to support the U.S. Forest Protocol, enhance feasibility for local landowners, and maintain environmental integrity.

Additionally, there are two references to Project Implementation Agreements (PIAs) found in the Abbreviations and Acronyms list and in Table 8.11 (Section 8.3.8), which we understand should be removed.

The Reserve remains a committed partner to Ecology as you finalize these critical updates to the Climate Commitment Act program rules and support the program’s ability to drive high-quality emission reductions across the state’s forestry sector.

Sincerely,

/s/ Amy Kessler

Amy Kessler

Director, Market Development