



CLIMATE  
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RESERVE

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Washington State Department of Ecology

300 Desmond Drive SE

Lacey, WA 98503

**RE: Comments on the Draft Agreement on the Harmonization of Market-Based Programs for Reducing Greenhouse Gas Emissions Between Québec, California, and Washington**

The Climate Action Reserve (the Reserve) appreciates the opportunity to provide public comments on the draft linkage agreement released on March 3, 2026, which outlines the proposed integration of Washington’s cap-and-invest program with the joint California-Québec market. As an approved Offset Project Registry under both the California and Washington State Cap-and-Invest programs, we strongly support this milestone and the jurisdictions’ shared commitment to scaling regional climate leadership.

**Support for Program Linkage**

We support the overarching objective of the agreement to harmonize greenhouse gas (GHG) reporting and market-based programs. A linked market across Washington, California, and Québec will provide greater liquidity, reduce price volatility, and support each jurisdiction’s ability to meet their climate goals. The regional cooperation will further serve as a model for global markets and governments to achieve emissions reductions in a cost-effective manner.

**Recognition of Compliance Instruments and Offset Quality**

We further support the provisions in Section 1 and Section 6 regarding the mutual recognition, equivalence, and interchangeability of compliance instruments. The ability for market participants to transfer and exchange instruments - including allowances and offset credits - across jurisdictions is fundamental to a functional linked market.

Furthermore, we support Section 5, which requires all offset protocols to ensure emission reductions and removals to be real, additional, quantifiable, permanent, verifiable, and enforceable. These essential quality criteria are vital for ensuring the environmental integrity of the market. In addition, we support the need for shared infrastructure to

facilitate the interoperability of the programs as established in Section 9.

**Commitment to Technical Collaboration**

Finally, the Reserve remains open to further collaboration and to provide technical support for the development and refinement of high-quality offset protocols. We remain committed to supporting Ecology and its partners in maintaining a robust, high-integrity offset market that provides cost-effective emission reductions for Washington, California, and Quebec.

Sincerely,

/s/ Amy Kessler

Amy Kessler

Director, Market Development