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please see attached document.

DEPARTMENT of ECOLOGY
PROPOSED US FOREST PROTOCOLS: PUBLIC COMMENTS

You have managed to take a project that was cumbersome and confusing to most people, even professionals, and make it more so.
Examples include statistical accuracy of aggregated smaller projects. Smaller project developers are going to be reliant upon other small project developers to invest in their project at a rate adequate to satisfy the accuracy and precision requirement in the protocols.

A managed forest has been sequestering carbon assets for decades. It is only recently that we have monetized the intrinsic value of forests. Which is why the first carbon offset payment is the largest. This large initial payment is the source of interest and commitment on the part of landowners to invest in a long-term contract necessary for a carbon project to function and meet its desired social purpose. For the State to meter this first payment to landowners over 10 years defeats the purpose of making this long-term commitment on the part of the landowners to a carbon capture and storage mechanism.

There is no mention in your protocols of the potential of applied silviculture and active forest management. Silviculturists manage short- and long-term risks to forests with prescriptive treatments. There is too little incentive built into your protocols to reward private landowners for implementing these treatments. And then there is the issue of costs and where the funds come from to pay for these important treatments.

Reforestation is a great example of the disconnect between your protocols and sustainable forest management. Reforestation is an important part of any sustainable forest management effort. It should not be considered a separate and apart from 'Improved Forest Management' prescription. All viable Registries direct landowners to regenerate about 20% of their land base in every harvest entry. So if we have a 100-year rotation and a cutting cycle of 20 years, we should have 5 somewhat unique age classes in a mosaic pattern across the landscape. It is this age class distribution that is so critical to sustainable forest management. Or perhaps we have a 75-year rotation with a harvest entry every 15 years, we would still manage and maintain 5 unique age classes. Stand structure (diversity within a forest type), forest structure (diversity across forest types), and age class distribution are critical elements of a sustainable forest and carbon asset management effort.

A Conservation Plan with a Forest Management Plan component must be the governing document for sustainable forest and carbon asset management effort. This Plan must address current and desired forest conditions, as well as site class, soils data, inventory design, and

proprietary information. Owners may or may not be willing to share proprietary information. A Non-disclosure Agreement may be necessary and this option should be addressed in the protocols. Proprietary information may include carbon assets, timber volume and value summaries, Net Present Value, soils value, harvest schedules, goals and objectives.

The notion of leakage is an over-blown construct. If local and state government agencies are actively promoting sustainable forest management, the issue of 'leakage' becomes mute. My experience tells me that State agencies, especially, are not promoting sustainable forest management practices and in fact, are telling private landowners to 'cut all their big trees' because that maximizes tax revenue for the State.

In reality, this effort on the part of the Dept. of Ecology to develop protocols for carbon projects in the State of Washington is geared more towards creating a revenue stream for the State rather than building a sustainable economy especially needed in the rural parts of this State. It may not be stated in so many words, but this effort underneath the language appears to be geared towards 'controlling the resource' rather than cleaning the air.