



August 18th 2025

Department of Ecology
300 Desmond Drive SE
Lacey, WA 98504

Re: Cap-and-Invest US Forest Offsets Protocol Informal Comment Period

At Port Blakely, we steward forests with a long-term view, shaped by five generations of family ownership and a commitment to cultivating a healthy world. We appreciate the opportunity to comment on the proposed revisions to the forest offset protocols under the Climate Commitment Act (CCA). We believe working forests must be part of Washington's climate solution, and we are eager to help shape a program that reflects both ecological integrity and operational feasibility.

Port Blakely manages over 160,000 acres of forestland in Washington and Oregon, and another 90,000 acres in New Zealand. We have successfully implemented forest carbon projects, including our 10,000-acre Winston Creek Carbon Project, which is certified by the American Carbon Registry and participates in the voluntary market. However, we have not yet enrolled any Washington lands in a compliance carbon program. The passage of the CCA offered a promising path forward, but the current draft methodology does not yet reflect the realities of sustainable forest management in our region.

Key Concerns

1. Species Composition Requirements

The proposed species diversity thresholds do not align with the ecological and economic realities of western Washington forests. Our forests are predominantly Douglas fir, a native species well-suited to our soils, climate, and long-term stewardship goals. Requiring a shift to a more diverse species mix—especially without clear carbon benefits—would impose significant costs and disrupt seed supply chains, markets, and silvicultural planning.

Recommendation: Replace rigid species diversity thresholds with a requirement to plant native species of the landowner's choice. This approach maintains ecological integrity while supporting operational viability.

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2. Even-Aged Management and Clearcut Size

The 40-acre clearcut limit, especially when basal area retention excludes riparian zones, creates inefficiencies and economic barriers for landowners practicing responsible even-aged management. These limits appear to be driven by non-carbon considerations and do not reflect the carbon sequestration potential of well-managed forests.

Recommendation: Align harvest unit size requirements with Washington State Forest Practices Rules. Avoid layering additional restrictions that do not enhance carbon outcomes.

3. Watershed-Scale Age Class Distribution

This provision, inherited from California's compliance methodology, does not reflect Washington's forest conditions or regulatory framework. Many watersheds in our region naturally contain a high proportion of younger stands due to historic harvest patterns. Imposing age class distribution requirements would delay harvests and reduce participation, especially for landowners with small holdings within a watershed.

Recommendation: Eliminate this requirement and require adherence to Washington's Forest Practices Rules.

Final Thoughts

At Port Blakely, we believe in the power of forests to restore balance to our climate. But we also know that meaningful participation in carbon markets requires rules that reflect the realities of forest stewardship. As currently drafted, the methodology creates barriers that would prevent us from enrolling our Washington lands in the CCA IFM program—despite our deep roots in the state and our proven success in carbon forestry elsewhere.

We remain committed to working with the Department of Ecology to develop a compliance protocol that is both scientifically sound and operationally feasible. We welcome continued dialogue and collaboration to ensure Washington's forests can fully contribute to our shared climate goals. Thank you for your consideration.

Yours sincerely



Gareth Waugh
Vice President
US Forestry