

Rick Schmeling

As a small private forest landowner, I do not think your proposed changes go far enough away from the copied California rules to make a viable offset protocol in Washington state. My two small tree farms contain 80-90% healthy Douglas Fir trees, but as I read the proposal, anything over ~65% DF makes it ineligible for consideration. This presents a barrier for me to enroll my property. Similarly, the limitations on 40% basins under 20 years old makes it impossible for me to manage my small tree farms because any economic harvest on the property would make 100% of the HUC-watershed under 20 years old. Again, this a barrier to my entry into your program. Please do not force California prescriptive regulations from CARB onto outcome-based Washington Forest Practices regulations. I don't understand why the protocol cannot simply state "comply with FP rules of your area" instead of detailing every forest management aspect for watershed-scale timing and greenup and clearcut size and species management.