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March 13, 2026

Washington Department of Ecology
300 Desmond Drive SE
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RE: U.S. Forest Protocol, version 1.0 Public Comment Period, March 2026

Dear Department of Ecology,

I am submitting feedback on behalf of Washington Forest Protection Association (WFPA) during the public comment period for the Department of Ecology's ("Ecology") Draft U.S. Forest Protocol, version 1.0 ("Protocol") Rule Proposal Phase.

WFPA is a forestry trade association representing large and small forest landowners. Members manage more than four million acres of productive working forests, including timberland located in the coastal and inland regions of the state. The organization's members support rural and urban communities through the sustainable growth and harvest of timber and other forest products for U.S. and international markets.

We support updates to Ecology's Protocol that reflect the best available science, robust data, and credible carbon accounting frameworks. Additionally, we recognize that carbon offset methodologies are rapidly evolving to advance high-quality nature-based solutions, and we believe Washington should be a leader in this exciting and important field.

We also appreciate Ecology's most recent updates to the Protocol, which overall encourage broader landowner participation and reduce several barriers to entry. In particular, Ecology's decisions to remove the species diversity requirements, increase the maximum clearcut size, and eliminate age class distribution requirements for small projects represent meaningful improvements that will make this program more accessible for a broader range of landowners.

However, we remain concerned that several requirements in the current Protocol will continue to limit landowner participation and, for those who do participate, introduce significant and unnecessary operational challenges throughout a project's lifetime.

We also have concerns that the management and enrollment requirements in the drafted Protocol will have adverse socioeconomic impacts, especially in Washington's rural areas. Washington's forest industry generates approximately 102,000 jobs, $5.6 billion in total wages, and over $300

million taxes and fees in the state.[1] Given these significant benefits, we encourage Ecology to develop a forest carbon offset protocol that incentivizes high-quality nature-based solutions while also supporting the state's robust forestry sector.

To improve program accessibility, operational flexibility, and the quality of carbon accounting, we offer several recommendations below. These recommendations reflect our primary objectives to ensure the Protocol:

1. Is accessible to a wide variety of landowners,
2. Supports meaningful carbon and environmental benefits,
3. Is grounded in the best available forestry and forest carbon science and data, and,
4. Supports the socioeconomic health of our state's robust forestry and forest product industries.

Recommendation 1: Revise the harvest retention requirements for even-aged harvesting

Overview

After receiving feedback in the previous public comment that the proposed clearcut size limits were too restrictive for landowners operating in Washington, Ecology increased the allowable harvest block size in the latest draft of the Protocol. The updated Protocol limits clearcut size to 60 acres when harvest does not retain basal area, and the allowable harvest block size increases as the landowner increases harvest retention. The updates are highlighted in yellow in the table below:

Harvest Retention (sq. ft. BA/Acre of All Species)	July '25 Draft: Max Size of Harvest Block (Acres)	Jan. '26 Draft: Max Size of Harvest Block (Acres)
0	40	60
>= 15 < 20	60	80
>= 20 < 25	80	120
>= 25 < 30	120	400
>= 30 < 40	400	600
>= 40 < 50	600	Unlimited
>= 50	Unlimited	Unlimited

Comments and Recommendations

While we appreciate Ecology's latest updates to this requirement, we recommend further revisions to support broader landowner participation. The current clearcut size restrictions will likely continue to impose significant operability constraints across landowner types. We acknowledge that adopting Washington Forest Practice Rules is not feasible, as some projects using this Protocol will operate outside of the state. **WFPA therefore recommends removing the Protocol's harvest-**

[1] https://www.wfpa.org/climate-change-solutions/forest-statistics/#/

related requirements and requiring projects to comply with their state's limits on clearcut and retention requirements.

If Ecology chooses to maintain the harvest size restrictions in the Protocol, we propose that landowners be allowed to assess the harvest block size as a rolling average over time. This approach would provide landowners with greater operational flexibility and better reflect the long-term management strategies they commonly employ.

Recommendation 2: Remove the HUC 14 forest area enrollment requirement

Overview

Ecology's Protocol requires that the carbon project must include all forested areas owned by the Forest Owner within an area no smaller than an area defined by HUC 14-digit hydrological units where available (or 12-digit HUC area if 14-digit is not available) or the entire area owned by the Forest Owner, whichever is smaller. Note that HUC-12 units are about 10,000 to 40,000 acres in Washington. HUC-14 units are about 3,000 to 10,000 acres and do not cover the entire state.

This requirement is consistent with the Climate Action Reserve's IFM methodology, version 5.1.

Comments and Recommendations

We previously recommended removing this requirement because it imposes unnecessary management burdens on landowners who manage their forests for multiple uses. Although the updated draft retains this requirement, we strongly urge Ecology to reconsider.

The majority of forest landowners in Washington state manage their forests for a variety economic, environmental, and social objectives. Some areas owned by a single landowner may be well-suited for a carbon project, while others provide different benefits. The Protocol should support this diversity of land uses, including carbon storage and sequestration.

We are also concerned **about the socioeconomic impacts of this requirement, and we encourage Ecology to consider these potential impacts in the Protocol**. Restricting large portions of regional woodflow could jeopardize mills and processing facilities that rely on stable supply to remain viable. If large areas must be withheld from harvest solely to meet an enrollment rule, and not because they are best suited for carbon projects, **wood supply could contract enough to threaten facility closures, associated jobs, and the broader forest products economy**. **Allowing landowners to enroll only the acres best suited for carbon projects while continuing other management elsewhere would sustain climate benefits, forest sector jobs, and the many other benefits our state's forests provide**.

If Ecology included this enrollment requirement to address the risk of activity-shifting leakage[2], we recommend replacing it with an alternative that achieves the same goal. The ACR Improved Forest Management methodology (v2.1) requires landowners to demonstrate that no activity shifting leakage will occur by requiring entity-wide sustainable management commitments. This can be demonstrated through third-party forest certification (such as SFI, FSC, or ATFS certification), enrollment in a state sanctioned forestry program, or, for small landowners, adhering to a long-term forest management plan. These approaches mitigate leakage while supporting active management and healthy forest products markets.

We **encourage Ecology to consider the potential socioeconomic impacts of this requirement and revise it to allow partial enrollment within a watershed, paired with entity-wide sustainable management commitments.** This approach would **enable both high-quality nature-based solutions and sustainable forest management activities**.

Recommendation 3: Remove the watershed-scale age-class distribution requirements for projects of all sizes

Overview

The Protocol states that on a watershed scale up to 10,000 acres, all projects must maintain, or make progress toward maintaining, no more than 40 percent of their forested acres in ages less than 20 years. Areas impacted by a Significant Disturbance are exempt from this test until 20 years after reforestation of such areas.

The latest Protocol version removes this requirement for projects less than 1,000 acres in size.

Comments and Recommendations

We support Ecology's decision to remove the watershed-scale age-class distribution requirements for smaller projects. This change meaningfully improves project operability, and **we encourage Ecology to extend the removal to all projects.**

[2] Activity shifting leakage occurs when a landowner increases harvest on other lands that they manage or operate outside of the carbon project area to compensate for a reduction in harvest on the project area.

Age class distribution requirements do not increase or incentivize carbon sequestration. Instead, **they impose management constraints that conflict with regional forest practices** and reflect legacy elements of the California Air Resources Board's (CARB) compliance methodology, which was developed with California-specific forest dynamics in mind.

Forest Inventory Analysis (FIA) data demonstrate these differences in forest structure across geographies. **In California, approximately 11% of private forestland acres are aged 20 or younger, while in Washington that share is more than double, at 25%** (**Error! Reference source not found.**). While FIA data represent statewide averages, they highlight substantial regional differences in management patterns and age class structure.

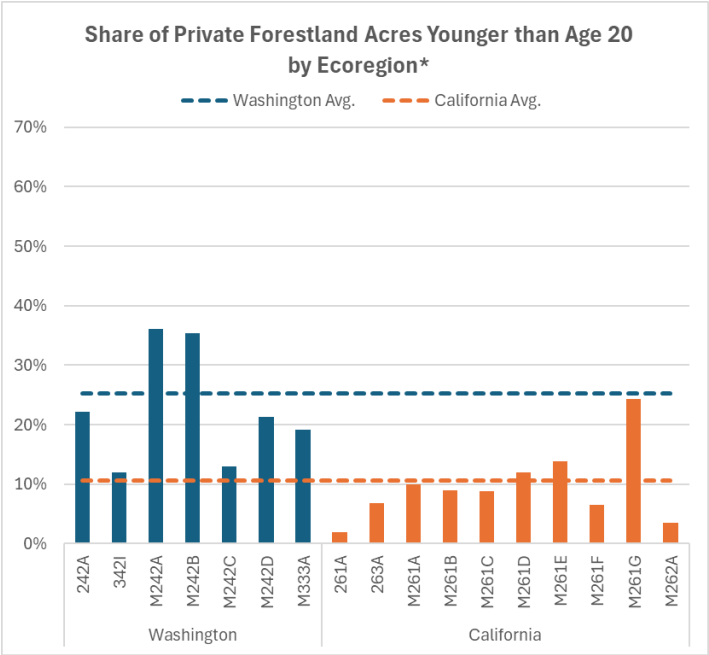


*Figure 1. *Note ecoregions with <2% of the state's private forested acres were removed from the graph to reduce variability. These ecoregions are included in the state-wide average. Acres without age class designations were excluded from analysis.*

Maintaining these requirements across geographies will create unnecessary burdens and operability constraints for landowners, **and WFPA recommends that restrictions on age class management be removed from the Protocol**.

Recommendation 4: Revisit and revise structural elements requirements

Overview

Ecology's drafted Protocol requires landowners to retain and monitor standing and lying deadwood at average per acre volumes identified in the Assessment Area data file.[3] If deadwood does not exist in the required quantities, dead trees must be recruited during harvest according to the following guidance:

- When the project undergoes **normal harvest** (not salvage harvest): Standing and lying deadwood must be retained at average per acre values identified in the Assessment Area data file within each harvest unit. If dead material does not exist at the required levels, live trees shall be retained… at three times the amount identified in the Assessment Area data file minus whatever quantity does exist.

[3] In most cases, these values represent a significant increase in deadwood retention compared to CARB's methodology.

- When the project undergoes **salvage harvest**: Standing dead and lying dead wood shall be retained at a combined four tonnes per acre on average within each harvest unit.

Using the values published in the Assessment Area Data File, a Douglas fir forest in the Puget Trough ecoregion must maintain 6 $mtCO_2e$/acre of deadwood. If the Project Area does not meet these requirements and harvests timber, the landowner could be required to retain up to 18 $mtCO_2e$/acre in live trees in the harvest area.

Comments and Suggestions

We have **two primary concerns** related to these requirements:

1. **The deadwood retention requirement appears high and may be artificially inflated by regional averages:** In many cases, the deadwood volume in the Assessment Area data file is higher than what we typically find on actively managed forests. Since the Assessment Area data requirements are derived from averages using Forest Inventory Analysis (FIA) data, it is possible that areas with above average deadwood stocking (such as areas that experienced a wildfire or insect infestation) are inflating this regional average and causing burdensome requirements for landowners that manage healthy, productive forests.
2. **The live tree retention requirements do not provide adequate progress toward meeting the deadwood stocking requirements and instead create management burdens for landowners:** The requirement to retain live trees at three times the rate of deadwood storage identified in the Assessment Area data file is unnecessarily punitive for active forest managers and is unlikely to create meaningful change in deadwood storage.

Given this, **we recommend that Ecology review the drafted Protocol's deadwood retention requirements and improve their alignment with levels seen in productive forests**. **We also recommend that Ecology revisit and revise the live tree retention requirements in this section, so they do not cause unintended management burdens.**

We would also support Ecology reverting to CARB's structural elements requirements, which provide clearer and more practical deadwood retention standards for most land managers.

Further, we would like to note **additional recommendations** related to the structural elements requirements in Ecology's Protocol:

- **Reconsider Lying Deadwood:** The decision to include lying dead wood is likely to impose regulatory and monitoring burdens that yield minimal climate or environmental impact. Ecology's drafted Protocol acknowledges that "lying dead wood is highly variable and it is therefore difficult to achieve accurate estimates. It also constitutes a minor portion of forest carbon." Given this, **we recommend removing the lying dead wood requirement and focusing retention standards on standing deadwood**, where measurement is more reliable. Ecology may also consider aligning with CARB's treatment of lying deadwood.
- **Clarify Assessment Area Data File:** Ecology's Assessment Area data file's deadwood component is labeled as "AboveBelowGroundDead_Common_Practice_mTCO2e". It is

unclear if this field includes lying deadwood. We **recommend Ecology revisit this field, confirm whether the data include lying deadwood, and revise the label as appropriate**.

- **Specify retention units:** Option II of the Protocol's structural elements requirements specifies that projects conducting salvage harvest must retain a combined minimum of four tonnes per acre of standing and lying deadwood. However, the units of tonnes are not adequately specified. We assume the Protocol means to specify tonnes of CO_2e, and **we suggest Ecology update these units to provide further clarification.**

Recommendation 5: Remove soil carbon accounting for improved forest management projects

Overview

Ecology's drafted Protocol requires IFM projects to calculate and deduct soil carbon losses from IFM activities. The deductions use regional average carbon storage values and consider harvest intensity, soil disturbance, and site preparation activities to calculate a percentage of average soil carbon that is lost during harvest.

Using the procedures outlined by Ecology, our estimates indicate that **soil carbon deductions could easily reduce a project's available credits by 10 to 50% in a year when a landowner harvests approximately 4% of their land base.**

Comments and Suggestions

Requiring active forest managers to deduct soil carbon losses based on regional averages will likely have significant, unintended consequences for landowners of all sizes, and **the deductions as calculated in the Protocol are not supported in scientific literature today.** Several large studies find that forest soil carbon accounting is complex, highly variable, and site-specific:

- One meta-analysis[4] found that forest harvesting, on average, had little or no effect on soil carbon. In some cases, harvest increased soil carbon storage.
- James and Harrison[5] found that harvesting reduced soil carbon by an average of 11%. However, there was high variability between responses and soil depths, with the greatest losses occurring in the O horizon and much smaller losses (3.3%) occurring in the top soil carbon pools (note that Ecology's suggested deductions are typically much higher than this 3.3% deduction).
- A separate meta-analysis[6] found that soil carbon concentration and pool sizes responded differently to harvest. The analysis found that mineral soils showed no significant overall

[4] Johnson and Curtis (2001). Effects of forest management on soil C and N storage: meta analysis. Forest Ecology and Management.
[5] James and Harrison (2016). The effect of harvest on forest soil carbon: a meta-analysis. Forests.
[6] Nave et al (2010). Harvest impacts on soil carbon storage in temperate forests. Forest ecology and management.

change in carbon storage due to harvest, and variation among mineral soils was best explained by taxonomy.

We therefore urge Ecology to revisit this requirement and exclude soil carbon accounting from IFM projects. Note that this revision would also align with the most widely utilized U.S.-based IFM methodologies available today, including ACR's IFM v2.1, VCS's VM0003, and CARB's IFM protocol.

Recommendation 6: Revise and align baseline calculations in Equation 6.1 and Section 6.2.1.8 of the drafted Protocol

Overview

As presented, Equation 6.1 in the drafted Protocol specifies that the baseline onsite carbon stock must be calculated annually. However, Section 6.2.1.8 specifies one calculation for the entire reporting period but does not provide an equation to calculate the value of the baseline stock changes.

Comments and Recommendations

We appreciate Ecology's updated baseline carbon accounting, and we are supportive of the change to calculate the avoided emissions over a 10-year crediting period with a straight-line depletion from the initial standing carbon stocks to the determined baseline value. However, it appears that there are discrepancies between the equations presented in the Protocol.

We suggest that Ecology include an equation to calculate the baseline carbon stock changes in Section 6.2.1.8. Then, this equation should be aligned with the variables presented in Equation 6.1. While this should not change the drafted Protocol's intended accounting framework, this will help increase clarity and improve accounting in the methodology.

Recommendation 7: Provide clearer, more actionable criteria for what qualifies as a comprehensive vegetation management plan

Overview

Ecology allows landowners to significantly reduce their buffer pool contribution by implementing a "comprehensive vegetation management plan." The Protocol states:

> *"Vegetation treatments must be available in a report and aligned with a comprehensive vegetation management plan that identifies specific temporal and spatial actions to enhance forest resilience across the Project Area. The vegetation management plan must be approved by a state agency or federal or, if approval by a state or federal agency is not possible, developed under the oversight of a Professional Forester and reviewed by Ecology and the approved offset project registry."*

Comments and Suggestions

We support the inclusion of a vegetation management plan to reduce the buffer pool contribution, as active forest management can meaningfully lower the risk of forest losses from insects, wildfire, and other disturbances. However, we believe that Ecology has not adequately defined what constitutes an acceptable vegetation management plan, creating a significant risk that landowners will invest in developing management strategies and plans that Ecology may ultimately deem inadequate.

To support landowners in developing valid vegetation management plans, we recommend that Ecology provide greater clarity regarding what must be included in these plans. To ensure compliance with this section of the Protocol and a subsequent reduction in buffer pool allocation, Ecology might consider:

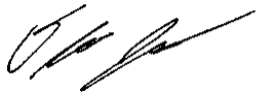
- Providing a list of elements that must be included in the plan for approval,
- Providing example management plans in the resources of the Protocol, or,
- Developing templates that landowners can follow to ensure compliance.

Summary

In summary, WFPA supports Ecology's commitment to fostering high-integrity forest carbon offsets, and we appreciate the revisions made to the latest draft of the Protocol. At the same time, we remain concerned that several requirements in the current Protocol will limit landowner participation and cause operational challenges for forest owners of all types. Washington's forests deliver critical benefits. They support biodiversity, sustain local economies, produce renewable materials, and provide other vital ecosystem services. The Protocol is an important opportunity to expand these public benefits, and we urge Ecology to revise the Protocol so that it reflects the best available forestry and forest carbon science and data, reduces landowners' barriers to entry, and encourages broader participation in this market.

Sincerely,

On behalf of WFPA,



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