

To: Climate Action Reserve

All permits in the Forest Practice Rules have to meet MSP, but what matters is which type of permit is REQUIRED for any particular landowner to conduct forestry operations. There is no such thing as an "MSP document" even though your guidance draft refers to this repeatedly. It seems particularly confusing for CAR to have created this new terminology and made it the centerpiece of the document. For the sake of clarity, you need to list which permits/plans fall into your category of "MSP document" - i.e. Sustained Yield Plan, Option A plan, NTMP etc...

It seems that NTMP's fall into a different category from the other long-term management documents because they are voluntary. Landowners with over 50,000 acres are required to file an SYP or Option A/B plan for their ownership and are not allowed to simply file stand alone THP's. However, landowners with under 2500 acres, even though they could utilize an NTMP, are allowed to file stand alone THP's that meet MSP using option C. Therefore, an NTMP should not be considered the legal baseline.

On another note, Habitat Conservation Plans should be considered as legally binding requirements. Companies that have entered into these agreements (HCP) have done so because they have to in order to continue managing their land. They are generally tied to the management described in an Option A and have been developed to gain approval from the various wildlife agencies and avoid liability under the Endangered Species Act. Trying to operate without an HCP under these circumstances would be next to impossible.

I appreciate your consideration of my input.

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