

BALDWIN, BLOMSTROM, WILKINSON AND ASSOCIATES, INC.

Implementing Ecosystem Forestry in Northwestern California
P.O. Box 702, Arcata, CA 95518, 707.825.0475 (V), 707-825-9359 (Fax) pharper@bbwassociates.com

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California Climate Action Registry
523 W. 6th St. Suite 428
Los Angeles, CA 90014

Re: Revised protocols

To whom it may concern:

As a small forestry consulting firm that has had some exposure to the calculation and sale of carbon stocks under the old protocols, we would like to comment on the draft Revised Forest Project Protocol. Some of the comments below are reiterations of comments made by others as well as the minority reports from the working group.

Inventory of Carbon Pools – Appendix A

We support the inclusion of wood products as a “transfer” pool for forest carbon at the time of timber harvest. However, as indicated by the provisional nature of the inclusion of wood products in the current draft, the issues around counting wood product carbon for forest management projects are still far from resolved. To conservatively assess the contribution of wood products to emissions reductions, wood products should be accounted for at the 100-year end value of their useful life to the point of discard, with an appropriate discount for uncertainty. The assumed landfill value should be eliminated entirely.

Promotion of On-Site Forest Carbon Stocks - Section 3.5.2 p.9.

Protocol needs to be more clearly written to assure that the live tree carbon pool is sustained and increased over the lifetime of a carbon project, as it is vital for both forest ecosystem health and for creation of real emissions reductions. The exception listed in #2 for “balancing structural classes in the development of a sustainable management plan” particularly appears to be a loophole. The current language, combined with a generous calculation for transfers into wood products, has the potential to be interpreted in a fashion that undermines the intent of increasing forest carbon sequestration.

Estimating On-site Baseline Carbon Stocks (6.2.1.1 Private Forest Lands, pg. 13):

The Baseline methodology is potentially too cumbersome and complex to be effectively applied widely in practice. In particular, the reliance on FIA data to represent an average carbon value for a given forest type is questionable. Not the data itself but the allocation of plots to particular forest types has not, in our experience, resulted in a good representation of that forest type. As its use is fairly limited within the proposed Baseline methodology, we recommend leaving out the FIA mean as an element and instead focus on the fundamental guidance for modeling the baseline stocks, i.e.,

modeling it consistent with all legal, physical, financial constraints, as described in the draft. This is sufficient to produce a conservative and realistic baseline determination, consistent with but improving upon the original Protocol. The modeling necessary for this approach is widely understood and utilized by foresters and forest owners, and is used in appraising the fair market value of forestlands across the country.

This simplification accomplishes the objectives of the revision: well-stocked forests will be credited for avoiding depletion of current stocks, and relatively understocked forests will be credited for growth, providing that growth up to the legal/financial feasibility threshold will not be considered additional.

Estimating On-site Baseline Carbon Stocks (6.2.1.1 Private Forest Lands, pg. 14-15):

Demonstrating that the baseline is financially feasible makes sense but is rife with potential problems. The financial feasibility of many timber management activities is highly dependent on available markets which fluctuate significantly from period to period. For example, in many parts of northern California Douglas-fir is currently uneconomical to log even though it is a primary commercial species historically. In order to avoid future pitfalls in the review of proposed project baselines, the criteria and methods for conducting financial analysis for project baselines should be fleshed out and be described in more detail.

Conclusion

The members of the CCAR protocol committee are to be commended for their efforts in developing realistic new protocols which will encourage greater participation by California's non-industrial forest landowners. Making further modifications based on this public comment process should serve to make them better still.