

12 January 2009

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

Re: Revised protocols

Ladies and Gentlemen:

As a small non-industrial landowner and consulting forester who manages 30,000 acres of non-industrial California family forests, I would like to comment on the following aspects of the revised forestry protocols:

Removal of Conservation Easement requirement:

For almost all non-industrial landowners, the conservation easement requirement was a fatal flaw in the old protocol. It was a deal-breaker. These landowners would simply not participate if an easement was required. By providing more flexibility and not requiring an easement, the committee has removed the single major barrier to increased landowner participation in the program.

Baseline:

While the use of USFS FIA plot data will not be without technical problems, the fundamental concept is legitimate. Presumably, once the data is interpreted, the results will be quantifiable and straight-forward. It will be a “clean” baseline from which to begin. If there is a question that there are not enough plots to generate statistically valid data, then more can be added through time.

However, most importantly this approach is realistic. Previous protocols (while providing more economic benefit to landowners) permitted modeling down to an unrealistic baseline. It is questionable whether any landowner in the state has ever actually harvested timber down to the baseline used in modeling via the old protocol.

I believe the reality of the situation is this: While it may be theoretically possible to comply with Forest Practice Rule silviculture in harvesting to such a low baseline, this approach neglects to consider, among other elements, the cumulative impacts of such a harvest. Considering the need to address non-timber values in the Timber Harvest Plan

process, I seriously doubt that such an aggressive baseline harvest would ever actually pass muster with California's regulatory agencies.

The CCAR Forest Project Submittal Form itself requests information on environmental co-benefits. These co-benefits themselves would all be severely impacted by baseline modeling permitted under the old protocol. By permitting such modeling, it would be easy to question the overall legitimacy of the protocols. This would ultimately compromise the credibility of the entire CCAR Forestry program itself.

Inventory:

The acceptance of non-permanent inventory plot data up to 12 years old is a very positive change. This permits landowners to take advantage of data they already possess and negates the need and expense to perform new inventories. The 12 year statute is reasonable, as most conscientious landowners tend to update inventories every 10-15 years anyway.

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.

Regards,

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