



California Office

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Comments on CCAR Forest Project Protocol Version 3.0

Submitted by Defenders of Wildlife

January 19, 2009

Defenders of Wildlife appreciates the opportunity to submit comments on the CCAR Forest Protocol Version 3.0. Defenders of Wildlife is dedicated to protecting all wild animals and plants in their natural communities. To this end, Defenders employs science, public education and participation, media, legislative advocacy, litigation, and proactive on-the-ground solutions in order to impede the accelerating rate of extinction of species, associated loss of biological diversity, and habitat alteration and destruction.

In addition to the below comments on the Forest Protocol Version 3.0, we also support the comments submitted by Pacific Forest Trust on this version of the protocol and incorporate those comments by reference.

3.5.1 Promotion and Maintenance of Native Species, p. 5-6

- **Defenders supports the requirement for all projects to support functional habitat for endemic plant and wildlife species because it is an essential component to help ensure the ecological integrity of CCAR's program.** Defenders was very pleased to see this listed as a key requirement. It is critical that these safeguards are put in place as there is a significant danger in forest carbon projects resulting in unintended consequences that severely degrade environmental values.

3.4 Project Location, p. 5

- **Defenders support the inclusion of state and municipal lands to assess and increase their climate benefits. However, we do not support the inclusion of federal lands.** Management decisions for federal forests follow completely different legal processes than forests under state control. Allowing projects on federal forests creates real confusion, as it implies eligibility for these projects to sell offsets or obligate emissions reductions to meet compliance goals. The inclusion of federal forests is beyond the scope of CCAR and needs to be decided through the established federal policy development and public review process, consistent with federal laws and regulations.

Appendix A.5: Estimate Carbon in Wood Products, p. 47

- **Defenders supports the inclusion of wood products as a "transfer" pool for forest carbon at the time of timber harvest. However, the issues around counting wood product carbon for forest management projects are still far from resolved.** CCAR needs to consider the perverse effects of an accounting system that, in effect, encourages wood to be harvested and ultimately buried in landfills, potentially at the expense of forest ecosystems. Crediting waste wood in landfills conflicts with the suite of public policies that are seeking to divert wood and other waste to other uses, including recycling programs, composting and biomass energy. To 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. Any assumed landfill value should be eliminated entirely.

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- **An uncertainty discount needs to be applied to the calculation of wood product carbon storage.** There is still a considerable lack of knowledge in all of scientific literature as to actual wood uses and lifetimes. While it is possible to track the log into a certain kind of wood product through documentation of mill production, from that point the chain of custody and fate of the wood becomes uncertain and unverifiable. Until the fate of wood products in use can be independently verified, a discount for uncertainty should be applied to wood product carbon.

Thank you for the opportunity to submit these comments. If there are any questions or comments, you can reach me at (916) 313-5800 ex. 109.

Sincerely,

Kim Delfino

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