



Forest Landowners OF CALIFORNIA

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California Climate Action Registry
Air Resources Board
Cal/EPA Building
1001 I St
Sacramento, CA

Subject: Comments on Revised Forest Project Protocol

Gentlemen:

The Forest Landowners of California (FLC) supports the concept of Carbon Sequestration and aspects of the Revised Forest Project Protocol noted as follows:

- Participation in the Carbon Sequestration Program is voluntary. (Staff statements at Jan 5, 2009 CCAR Workgroup meeting in response to workshop member statement of lack of interest in project participation due to risk.)
- A Conservation Easement is not a program participation requirement. (3.3 Project Implementation Agreement p.5)
- An average per acre volume of carbon can be determined for all private ownerships in each forest type based upon Forest Service FIA plots throughout the state. (6.2.1.1 Private Forestlands p.13 – 15)
- The use of old inventory data up to 12 years old will be permitted for a limited time. (A.3 Create Forest Inventories p. 39-40)
- The cost of measuring, reporting, evaluating and trading of carbon credits should be a small percentage of the value of those credits. (general comment on contents of : 6 Quantifying GHG Emission Reductions and Removal Enhancements p11-26; 7 Ensuring Permanence of Credited Emissions Reduction p27-28; 8 Project Monitoring p 28-30; and 9 Reporting Requirements p. 30 – 31.)

FLC still has concerns for the small non-industrial forest landowner that relate to the economics of participating in carbon sequestration program and the long term liabilities associated with it.

Thank you for the opportunity to provide you with these comments.

Yours truly,
Forest Landowners of California

Ralph E. Gaarde
President

cc FLC Board of Directors