

Below are just a few of my comments and questions on the revised Forest Protocols:

Page 12: Obtaining detailed information from contractors to calculate Mobile Emissions from Forest Management activities may be difficult. The amount of Carbon emissions from commercial logging represents only 1 to 2 percent of the amount of Carbon removed from a forest stand. It would seem like some general rules of thumb could be developed for emissions from various forest treatments on a per acre basis.

Page 15: It is unclear to me how to apply financial, legal, physical and biological constraints to baseline activities when calculating the baseline.

Page 28: In the event that a reversal reduces the Carbon stocks by more than is contained in the buffer, do I understand correctly that the Project Owner can go forward from there maintaining what is left and establish a new buffer for the reduced Carbon stocks of the same percent that was used for the original Carbon stocks?

Page 39: In the second paragraph, I don't know if I understand the sentence, "Pools may only be excluded if doing so will have no deleterious effect on total quantified GHG reductions." Does that mean that if I anticipate the change in Soil Carbon, Litter Carbon or Shrub Carbon will be de minimis in future operations, I don't have to monitor those? How would I establish that?

Page 43: The example of the calculation of below ground biomass from above ground biomass density shows 346.874 metric tons per hectare for ABD and 36.211 metric tons per hectare for BBD. I came up with 80.9185 metric tons per hectare for BBD and wondered if I applied the formula from the previous page correctly. Here's how I calculated it:

$$\begin{aligned} \text{BBD tons/ha} &= \exp(-.7747+.8836(\text{LN ABD tons/ha})) \\ &= 2.71828182845904^{(-.7747+.8836(\text{LN ABD tons/ha}))} \\ &= 2.71828182845904^{(-.7747+.8836(5.848961602))} \\ &= 2.71828182845904^{4.393442471} \\ &= 80.91849961 \text{ tons/ha of below ground biomass} \end{aligned}$$

Pages 56-59: Are risk ratings based on development potential, timber value and financial risk superseded by a restrictive contract or deed restriction?

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