

Revised Forest Project Protocol: Draft, December 2008
Public Comment
Tim McAbee

- 1.0 Baseline Setting and Additionality**
- 1.1 Section 6 Quantifying GHG Emission Reductions and Removal Enhancements, pg. 11-19**
- 1.2 The *business-as-usual* baseline approach is only accurate for forestry projects if it is defined in a manner that eliminates or significantly minimizes uncertainty.
- 1.3 To set a baseline by projecting, “What would have happened?” is inherently uncertain when the conditions of a forest are subject to so many forces, both natural and anthropogenic – even if the question is bound by assumptions and limits.
- 1.4 The true purpose of a baseline is to establish a reference condition by which to measure future conditions. How can we actually prove additionality (even ex-post) by measuring against a baseline that “would have happened” if it never happens?
- 1.5 If the purpose of a forestry carbon GHG offset project is to remove, reduce or prevent CO₂ emissions in the atmosphere by conserving and/or increasing forest carbon stocks, then why not measure just that? Sound statistical methods are already established to measure existing forest carbon stocks which at the project start date should be the “baseline.”
- 1.5.1 Sequestration projects such as reforestation and improved forest management should use the *stationary* approach where the baseline is constant. It is my opinion that if these types of projects, private or public, are voluntary (regulatory surplus) then increasing forest carbon stocks permanently above such stationary baseline should be considered additional.
- 1.5.2 Avoided conversion projects should use the *adaptive* approach where “conversion rates” are set by the reserve by region and the baseline decreases at this rate. Permanently maintaining (and possibly increasing) forest carbon stocks above this baseline as long as it is voluntary (regulatory surplus) should be considered additional.
- 2.0 Section 3.3 Project Implementation Agreement, pg. 4**
- 2.1 Will forestland owners really see the difference between a 100 year implementation agreement and a permanent conservation easement? While it is meant to address permanence, I believe it will not effectively increase participation level because forestland owners will still hold the same reservations between the two mechanisms. Further, who can guarantee that they will have the budgets to implement the project requirements for 100 years? Forest carbon projects are typically being funded through carbon credit buyers, carbon finance and contractual and anticipated purchases with much shorter horizons. And what will the carbon markets look like in 50, 75 or 100 years, not to mention regulation, technology, etc? I would think that a shorter implementation agreement like 5-30 years would increase participation. Alternatively, permanence could be addressed with project-pooled buffers.