

**Minority Opinion re: the California Climate Action Registry December 5th, 2008
Forest Project Protocol Draft
Submitted by The Nature Conservancy
December 12, 2008**

The Nature Conservancy (TNC) appreciates the opportunity to submit a minority report to explain its dissenting opinion on particular issues related to the December 5, 2008 forest protocol draft presented at the workshop. While the following issues reflect particular issues where TNC believes further consideration and due diligence are needed, there are many aspects of the current draft protocol that TNC supports.

Accounting for wood products deserves further consideration:

While TNC is generally supportive of the inclusion of wood products as a carbon pool in improved forest management projects, TNC believes the accounting for this pool deserves further consideration. Specifically, TNC is concerned that the inclusion of any remaining carbon value of wood products in landfills presents a double counting issue as the wood product carbon at that point would be under the management and control of another entity. In addition, accounting for the wood product carbon that is buried in the landfill could have the perverse consequence of creating the incentive to bury additional wood products in a landfill versus encourage recycling, the diversion of wood products from landfills and other preferable outcomes from an environmental and GHG reduction perspective. There is also significant uncertainty regarding the fate of a wood product as it travels through the supply chain with uncertainty potentially being the greatest at the end of the product life. Additionally, proper safeguards should be included to ensure that the inclusion of wood products does not inadvertently lead to a sustained decrease of live tree carbon stocks.

TNC acknowledges and appreciates that there are continued efforts to consider further the complexities of the wood products pool and how it should be incorporated into improved forest management projects, and we are optimistic that these issues can be reconciled. At a minimum, TNC recommends further discussion and consideration to terminate the wood products accounting at the point the carbon pool could enter a landfill. Furthermore, TNC recommends consideration of additional discounting of the wood products pool to account for the uncertainty related to the fate of a wood product once it enters the stream of commerce.

The forest management baseline for public lands deserves further consideration with respect to the application of funding as an element of baseline determination

The protocol draft approach to determine baselines for forest management on public lands, includes, among other things, funding allocation as an element to determine a project baseline. Funding for public lands management is variable and complex. Given this complexity and the subjective interpretation of baselines and additionality that may

result from criteria based on allocated funds, TNC recommends the removal of this criterion from the baseline approach.