

Forest Protocol Public Comment, Version 3.0  
May 2009

Dear Mr. Gero;

A significant transaction barrier for a forest landowner to enter into a contract using the proposed Forest Project Protocol is the 100-year term. I have heard that the 100-year term is “science based” and reflects the number of years that CO<sub>2</sub> stays in the atmosphere. However, I have also read that an amount of carbon equal to the total amount stored in the atmosphere cycles through the ocean in about eight years  $[(750 \text{ GT}) / (92 \text{ GT per year}) = 8.3 \text{ years}]$ . What is the scientific basis for the 100-year term?

Other similar land transactions in California of which most landowners have familiarity are: a land lease with a maximum term of 33 years; and a Williamson Act Contracts of 10 years.

I would recommend that a more flexible alternative of terms, in 10-year increments, be allowed for forest carbon buyers to offer more flexible terms with Forest Project Protocol contracts. This would allow more landowners to enter into such agreements, while maintaining the Forest Protocol term to be science based.

Thank you for your consideration and hopefully the forest project protocol will encourage forest landowners to sequester forest carbon to reduce CO<sub>2</sub> in the atmosphere.

Best regards,

Bob Whitney, President  
Golden State Land Conservancy