



From: S. Petridis
To: Climate Action Reserve
Subject: Forest Project Aggregation Proposal - Comments

Date: 05 May, 2010
File: Forestry
cc: L. Tranter, Z. Eyster

Please find attached below some comments on the proposed protocol modification as requested.

- a. Page 2: It is unclear what the statement “no forest owner may enroll more than 5,000 acres in aggregates (single or multiple)” means. For example, if 10 projects of 600 acres each in different parts of the country are aggregated, it would add up to more than 5,000. So how would that work?
- b. Eligible Project types:
 - i. All three forest project types enrolled under a single aggregate: Not practical; monitoring nightmare.
 - ii. Only one type of project enrolled under a single aggregate: Yes. One can implement a uniform monitoring plan.
 - iii. Projects from same geographic region: No. That would stop owners who have several tracts in different states from aggregating all under a single project.
- c. Number of landowners:
 - i. Should there be a limit on the number of participants in an aggregate?: No, that would discourage a lot of small land owners. As an alternative one could set an upper and lower limit to what constitutes a project.
- d. Accounts on the Reserve, Transfers and Sales of CRTs:
 - i. Key question is who should have title of the CRTs and hence the ability to sell them. The aggregator should take title contractually and then either re-allocate CRTs or proceeds from CRT sales to project participants
- e. Monitoring and verification: The requirement to have a verification body pass a COI review against all enrolled Forest Owners might create an issue given the limited number of specialist resources. Since the Aggregator is the entity monitoring and managing the project, they should be the only entity subject to a COI review.

I hope the above helps.

Best Regards

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