

**Comments on Climate Action Reserve  
Forest Project Protocol 3.3  
July 18, 2012**

We appreciate the opportunity to comment on the Climate Action Reserve’s draft Forest Project Protocol. This effort is extremely important given the wide-reaching influence of the Reserve in policy development, and the need for extensive terrestrial sequestration projects to “bridge the gap” while long-term low-carbon energy and industrial solutions are developed.

We look forward to ongoing engagement with, and support of, the Reserve on forestry and other project types.

**Table 6.4. Soil Carbon Emissions by Soil Order (Avoided Conversion Project Baseline)**

We understand the new default rate for loss of carbon from Histosol soils to be given at 0.8% / year over a 100 year time horizon (80% emitted, with 10% of total each 10 year period). This is a much slower loss rate in the early years following conversion to agriculture than is supported by soil science literature and IPCC guidance which states “for changes in land use or management that cause a decrease in soil C content, the rate of change is highest during the first few years, and progressively declines with time.”<sup>1</sup>

This is a highly critical issue, as such an artificially slow loss rate in the early years of project implementation means that landowners’ reward for the benefits of avoided conversion will be delayed for many years. This will make many projects, particularly those undertaken by smaller landowners (who represent the majority of avoided agricultural conversion opportunities), uneconomic given the high upfront costs associated with project development, inventory and verification. As a result many lands that could otherwise be protected by via incentives provided by carbon credits will be instead be converted, leading to unnecessary harm to the climate and reduced supply of carbon credits.

(Please note that SSR AC-6 in Table 5.3. GHG Assessment Boundary – Avoided Conversion Projects is confusingly worded as it states that baseline carbon stocks “are assumed to be static.” This contradicts other guidance provide in the protocol for accounting for baseline soil emissions in the case of avoided conversion projects.)

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<sup>1</sup> 2006 IPCC Guidelines for National Greenhouse Gas Inventories, Chapter 2.

**Table 5.1 & 5.2. GHG Assessment Boundary – Soil Carbon in IFM and RF Projects**

Given the cost of soil carbon sampling and analysis, landowners should be credited for avoided soil emissions in the baseline scenario of IFM and Reforestation projects (rather than only being debited for soil emissions in the project scenario). This will enable a higher number of smaller carbon projects to be economically implementable, and leverage of the significant and important efforts CAR has put into determining the effects of various management practices on soil carbon.

**Section 5. GHG Assessment Boundary – Lying Deadwood in all Project Types**

Given the cost of lying deadwood sampling and analysis, landowners choosing to include this pool in the inventory (i.e. Option I under Natural Forest Management Criteria) should be credited or debited for changes to this carbon stock. This will enable a higher number of smaller carbon projects to be economically implementable, leading to increased climate benefits and carbon credit supply.