

Thanks always, Climate Action Reserve, for leading the continuous improvement process for the Forest Project Protocol, the highest standard for quantifying verifiable emissions reductions from forest projects. I hope you will accept this brief comment by email.

A key element that I believe is missing from the update is addressing the matter of updating the Common Practice Indicator for each assessment area, based on current FIA data. Currently all versions of the Protocol are silent on this issue, which already lead to an unforeseen, surprising update by ARB for use in the Compliance Protocol. This is critical baseline data point. Landowners and project developers need a regular, transparent and predictable updating procedure. I hope that CAR can incorporate this in the pending update or an addendum issued shortly thereafter. This will have many benefits for users of the CAR FPP, but could also provide guidance for ARB consideration.

While it may be as simple as setting a five year update schedule; I think it would be best to review the FIA data management system and consider if there may be a more nuanced approach to institute to avoid the data jumping around from period to period due to market forces as we saw in the recent update instituted by ARB.

Thank you for taking this suggestion into consideration.

Sincerely,  
Connie

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Constance Best  
Co-CEO

The Pacific Forest Trust