

THE
CONSERVATION FUND

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December 14, 2018

California Action Reserve
818 West 7th Street, Suite 710
Los Angeles, CA 90017

Re: Comments on the draft Forest Project Protocol Version 5.0

Dear Climate Action Reserve,

The Conservation Fund (“Fund”) appreciates the opportunity to comment on the draft 5.0 of the Forest Project Protocol (“FPP”). Broadly, the Fund is supportive of the pragmatic efforts of the Climate Action Reserve to update the FPP with an eye towards reducing project development costs and making the program more accessible to smaller projects and landowners. We understand maintaining a rigorous verification standard while reducing long term costs is balance and we appreciate your efforts – especially around the site visit and verification schedule revision. We would also like to offer the following comments on specific aspects of the protocol:

Updates to the Assessment Area Data File

The inclusion of the standing dead and standing live carbon stocks in the Common Practice statistic (Section 6.1.2) is useful as an apples-to-apples comparison once a project has been developed. However, because standing dead trees are not generally inventoried to the precision required – height, diameter, species, and decay class – in timber inventories typically available at the project evaluation stage, we are concerned that the requirement will hamper project evaluation and development. When the initial stocks are below the common practice statistics, a High Stocking Reference value, 80% of the highest value for aboveground standing live and standing dead carbon stocks per acre within a decade of the start date must be calculated. It is difficult to imagine that many forest inventories will have forest inventory data that include standing dead trees, let alone inventories that have collected appropriate decay classifications per tree. We suggest that the Assessment Area Data file provide separate standing live and standing dead values in the Assessment Area Data file for reference, similar to the Basal Area Reference values

FPP 3.3.3 – Enhancement payment

We appreciate the discussion of enhancement payments and are very supportive of the language that clearly outlines that financial assistance to landowners for discrete practices that address natural resource concerns and deliver environmental benefits are compatible with forest projects.

Sincerely,

Lauren Fety
Forest Analyst