



6/7/2019

Dear Climate Action Reserve Forestry Staff,

Bluesource appreciates this opportunity to comment on the Reserve's newest revisions to the draft of the Forest Project Protocol (FPP) version 5.0. The Reserve's consistent efforts to enhance the protocol via stakeholder consultation and the incorporation of practical lessons learned over the lifespans of previous iterations of the FPP, is clearly demonstrated in this most recent, and substantially improved, version of the document.

Bluesource believes that several of the changes incorporated into the June 2019 draft of FPP version 5.0 mark meaningful improvements to the program. These include:

- **The updated leakage calculation** – The return to accounting for activity-shifting leakage risk and market response risks separately (with a 20% standard risk rate for activity shifting leakage) is a good decision, as a robust public process lead to the establishment of these leakage factors.
- **The addition of the computational reversal factor** – This is a logical addition to the protocol, as calculation-based reversals (e.g. those triggered by secondary effects) should not require additional site verification activities.
- **The clarified site visit and desk review verification schedules** – The streamlining of verification requirements for projects in the “monitoring” phase is a highly practical improvement to the protocol's MRV procedures.
- **The clarified sequential sampling stopping rules** - The reintroduction of the variable passing plot requirements, as a function of project size, better accounts for the wide variation in forest project footprints under the program.

Thank you for your efforts and careful consideration of stakeholder input.

A handwritten signature in black ink, appearing to read 'Josh Strauss'.

Josh Strauss
Vice President
Bluesource
949-233-1501