

Conservation Collaboratives, LLC, a new Vermont based organization, is grateful for the opportunity to submit comments on the draft version of the Revised Forest Project Protocol. Through a combination of Improved Forest Management and Avoided Conversion Carbon Offsets Projects, we are seeking to fund – in part – the conservation of more than 1,000 acres of forest in northeastern Vermont. These comments are from the perspective of a first time project developer and potential aggregator, who is trying to navigate the Protocol and its requirements as they pertain to forest land outside of California.

5 Defining a Forest Project’s GHG Assessment Boundary (p.10)

The Revised Protocol allows several sources, sinks, and reservoirs (SSRs) to be excluded if, over the project lifetime, they are projected to be less than five percent. Although this requirement is logical, it is difficult to address. Prior to the release of the draft Revised Forest Project Protocol, we conducted a forestry inventory, which included additional measurements for a carbon assessment. We consulted with Professor William Keeton, a forest carbon expert, based at the University of Vermont to design the inventory. We did not take field measurements on shrubs and herbaceous understory, litter, or soil as we did not anticipate the overall change would be significant in an IFM Project.¹ Now, we do not know how to show, without taking measurements, that these SSR categories represent less than 5% of total GHG reductions and therefore need further guidance to move forward.

6.2.1.1 Private Forest Lands (p.13)

As a project developer, we need clearer guidance on the specific FIA data to be used (e.g. state, by forest type, by soil type, etc.) and where to find it. The data available through FIDO is aggregated by county and not normalized in a way that would be useful for this analysis (e.g. volume/acre or biomass/acre). The Forest Service or another agency should normalize and house the appropriate data so that it can be accessed for carbon offset project analysis. Finally, we would like to have the chance to review the decisions to ensure that the available data is relevant to regional circumstances, forests, and conditions in the northeastern US.

6.2.1.1 Private Forest Lands: Estimating the Baseline (p.14 and Appendix A)

We support the baseline approach described in “Recommendations to RGGI for Including New Forest Offset Categories: A Summary presented by the Maine Forest Service, Environment Northeast, Manomet Center for Conservation Sciences, and the Maine Department of Environmental Protection. (http://www.maine.gov/doc/mfs/mfs/topics/carbon/docs/pdf/recommendations_to_rggi_061108.pdf) From a project developer’s standpoint, this approach is more straight forward (assuming consensus on appropriate FIA data) and incentivizes owners of degraded

¹ Note – out CWD class overlaps with the Protocol’s litter class as our CWD sampling tallied all pieces of woody debris greater than 3 inches and longer than 3 feet long, using three 20m transects from each plot center.

forests to participate in the carbon market. The approach has mechanisms to guard against gaming and in the long run, will meet the goal of increasing carbon storage capacity of forests.

6.3.1.1 Disparity in Value (p.19)

The State of Vermont, through the Vermont Department of Taxes, offers forest landowners the opportunity to enroll their forest land in the Use Value Appraisal (UVA) Program. This Program “enables landowners who practice long-term forest management to have their enrolled land appraised for property taxes based on its value for forestry, rather than its fair market value.² In this situation, would it be permissible to use the UVA price in comparison with the recent purchase price (fair market price) to show a disparity in value?

7 Ensuring Permanence of Credited Emissions Reductions (p. 27)

As an organization with the long-term goal of forest conservation, we are in favor of the perpetual easements to ensure permanence. Easements are widely accepted, legally binding, and attached to the property deed. With everything that there is to learn about carbon markets, understanding an unfamiliar legal instrument might just push a small landowner (500-2,000 acres) over the edge. Our concern is that in 40, 60, or 80 years a non-standard legal instrument might not be understood and abided by. That said, we are interested in learning about other vehicles that would ensure permanence over a project’s 100 year lifetime.

8.2 Annual Monitoring Requirements (p. 29)

To understand the ongoing project costs and financial feasibility, we would like to get a sense of what will be required in the “field review” require every six years.

Contact Information

Laury Saligman
Conservation Collaboratives
3 Dunpatrick Circle
Montpelier, VT 05602
laurysaligman@yahoo.com
802-505-0582

² For more information, please visit http://www.vtfor.org/resource/for_forres_useapp.cfm