

From: **Nick Kent**  
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Dear CCAR,

Public Comment on Draft Protocols.

I am in favor of using USFS FIA data as a baseline as I believe it is a fair and accurate average to use vs. the Forest Practice Rules, Option C which would simulate an overly depleted forest and which if used is not applicable to other regions outside CA, and would denigrate the protocols by using a method that is not defensible as business as usual. The current conservation easement requirement does not ensure carbon storage and is prohibitively expensive due to the real cost of stewardship endowments, and the disincentive to many landowners of dealing with a third party Grantee on their property as well as the new owner of the carbon they have sold.

I am concerned with the cost of updating inventories subject to third party verification for small landowners. The high cost of periodic verification for carbon sold up to 100 years prior is enough disincentive to scare most landowners under 2,500 acres away. Is there a way to lower this cost, or require less frequent inspections? Possibly with lower cost lidar review in the future? Aggregation is a good concept but basically creates business partnerships among landowners that may not want to be tied to each other. Aggregation needs to be described better, and such that each party in an aggregation is responsible for their carbon only and not others in the aggregation group.

The native forest management and Co-benefits requirements disallows plantation management based on a notion that plantations displace native peoples, livestock or farming and create mono-cultures. Plantations should be allowed if they are 3<sup>rd</sup> party, FSC equivalent, Certified as the social implications of forest management must be taken into account. Plantations are the future wood basket which take pressure of natural forests and disallowing them is very short-sighted and myopic to California where there are few if any plantations on non-forest lands. Plantations can create much greater additionality than lighter touch forest management, thus sequestering much greater amounts of CO<sub>2</sub>. The issue is global warming and carbon sequestration, and the co-benefits is a co-opting of the intent of reducing GHG's.

A private insurance option vs. a buffer pool would put more carbon on the market, creating more incentives for additionality.

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