

Date: 19 January 2009

To: California Climate Action Registry

From: World Wildlife Fund US  
Washington, DC

Subject: Revised Forest Project Protocol, Draft December 2008

The WWF would like to congratulate the Forest Project Protocol Working Group on its work revising this protocol. Since the WWF had not been engaged previously in the revision process, our comments are limited and organized below as general comments, and protocol strengths and perceived weaknesses. Our comments are limited to the contents of the draft protocol without making judgments to the inclusion or exclusion of any content (for example, eligible project types).

### General Comments

CCAR is providing important leadership in the development of these protocols. The WWF believes that these rules provide a high level of environmental integrity, are scientifically sound, and provide a good place to start in evaluating the balance needed to ensure their use by forest managers to mitigate climate change. WWF believes that the tools provided, (for example to quantify leakage, permanence, and baselines), will ensure a consistently verifiable approach from which to continually improve. For example, the leakage risk assessment for improved forest management is based on many assumptions that need to be refined periodically to ensure that they remain valid. Additionally, Appendix C provides table values for the impact of unit risk on carbon reductions that are useful but need continual monitoring to maintain their usefulness.

### Strengths

3.3 Project Implementation Agreement, page 5

A long term commitment of 100 years that is binding on future landowners.

6.2.2 Secondary Effects, page 17

This leakage assessment tool provides for the use of good metrics, for example - increasing average harvest age of commercial species.

8.3 Rationale, page 30

The requirement for annual verification.

A4 Accounting for Confidence of Estimates, table A.4 page 47

Allowing the deduction to be based on the actual error of the estimate provides an economic incentive to have a more precise inventory.

Appendix B, B1 About Models and their use in the Reserve, page 51

Requirements for the approval and use of models are reasonable.

### Perceived Weaknesses

#### 3.1 Additionality, page 4

Allowing the use of management practices present on lands that are not controlled by the project owner but within the assessment area allows for the inclusion of data that may be subjective and based on assumptions that cannot be verified. Professional judgment must be used to develop baselines so that additional carbon stocks can be assessed based on objective evidence of what is above business as usual for the project owner.

#### 6.1.1 Primary Effect, page 11

A requirement to demonstrate that, under baseline circumstances, the project area would remain out of forest cover for at least 10 years will necessarily be based on many assumptions. Unlike forest modeling, future claims like this one may not be verifiable.

#### 7.2.2 Use of the Buffer to Compensate for Reversals, page 28

It is unclear what is meant by, “the Reserve will draw down proportionately from other pooled buffers to fully compensate the loss”. Each project must be accounted for separately from the pool for each landowner and ensures strict liability for any landowner carbon stock reversals. Define an enforceable process that will be triggered if/when the landowner converts the project to another land use. A reversal of this magnitude will not be covered by the buffer pool.

#### 8.2 Annual Monitoring Requirements, Inventory Confidence, page 29

Confidence limits and errors are available only at the time the inventory is taken. From this time, as growth models are used to forecast carbon stocks, the CI and error over time move in directions that cannot be estimated. Will an inventory “true up” be required periodically?