



THE PACIFIC FOREST TRUST

Working Forests Work Wonders For Us All.

February 20, 2009

California Climate Action Registry
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014

Re: Comments on Draft CCAR Forest Project Protocol, Additional Wood Products and Carbon Pool Guidance

Thank you for the opportunity to comment on the proposed wood products guidance, as well as revisions to the measurement of carbon pools. As a workgroup member, we would like to salute the members' continued diligent efforts to produce a credible, comprehensive, and practical forest project protocol. We are supportive of the changes made in these two sections.

We would like to note that the accounting for harvested wood products is especially challenging as compared to on-site carbon stores as once the logs are delivered to the mill, the carbon is outside the control of the project developer. Absent an economy-wide cap on greenhouse gas emissions and a chain of custody tracking system, the fate of the carbon stored in wood products will continue to be difficult to quantify with the same accuracy and verifiability as on-site stores. Under these circumstances, project protocols are compelled to make assumptions about the amount and duration of carbon stored in the harvested wood pool.

The workgroup has made its best effort to find a middle ground that does not overstate nor understate the 100-year stores in the harvested wood product pool. As with many aspects of this protocol, PFT believes that this is an area that will benefit in particular from improvements to knowledge and systems over time. Going forward, this initial framework should be able to readily incorporate more specific initial measurements of carbon in round logs by species, more specific primary and secondary manufacturing losses, more specific estimates of the duration of wood in use by product types, better accounting for direct and indirect emissions along the chain of custody, and a better understanding of the final disposal of the wood.

Given these circumstances, we believe the approach reflected in this new guidance is a reasonable one. We look forward to continuing our participation in the workgroup and with the stakeholders to craft a final revised forest project protocol for consideration by CCAR.

Sincerely,

Connie Best
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