

Comments by Plumas Corporation on Forest Project Implementation Agreement

June 11, 2009

Plumas Corporation is a non-profit carrying out various natural resource and economic programs in Plumas County since 1983. We are a member of the Climate Registry. We carry out forest fuels reduction projects for the Plumas County Fire Safe Council. Our defined primary interest in this arena is to make the protocols and the PIA usable by industrial and non-industrial forest lands. We do not believe you have yet carried out your intent to " allow greater landowner participation, particularly... working forests."

Comments :

/PIA--/

*Recital F *(p.1). This section should be amended to allow alternate methods (e.g. replacement) to assure continued integrity of the carbon dedication.

Agreement 4-Monitoring (p.2). This section should include more specific provisions for Reserve's assumption of safety and liability (e.g. insurances and training).

*Agreement 5 (e)- Transfer *(p.4). The subordination clause does not allow for the appropriate and regular financing of forest lands. Other financial institutions need the flexibility to be in first position in some circumstances. The reserve needs to accommodate this possibility through better defined methods to possibly subordinate the Reserve's interests.

Agreement 6-Remedies (p.4)- The 30 day period to cure a breach should be expanded to sixty days in order to allow for the Forest owner to conduct needed field activities which may be weather dependent or otherwise difficult from an environmental or wildlife standpoint to cure immediately (within 30 days). The assumption in this section that the Forest Owner is in breach if the Reserve notifies them of such an alleged breach. This process is too draconian and should be much more iterative for broad landowner use to be accomplished

John Sheehan