



736 F Street  
Arcata, CA 95521

May 5, 2009

<i>City Manager</i> (707) 822-5953	<i>Environmental Services</i> 822-8184	<i>Police</i> 822-2428	<i>Recreation</i> 822-7091
<i>Community Development</i> 822-5955	<i>Finance</i> 822-5951	<i>Public Works</i> 822-5957	<i>Transportation</i> 822-3775

Climate Action Reserve  
523 W. 6<sup>th</sup> St Suite #428  
Los Angeles, Ca. 90014

Re: Revised Forest Protocols Public Draft 4-15-09

To Whom It May Concern:

Thank you for the opportunity to comment on the Updated Forest Project Protocols dated April 15, 2009.

General Comments:

#### FIA Baseline

I generally support the use of FIA standard to calculate baseline in order for the protocol to eventually be applicable for wider use within the U.S. There are areas such as the redwood type where FIA plot data is likely insufficient. The USFS will need to densify plots in the redwood type and other areas to provide a robust enough dataset to use FIA as intended.

#### Reserve Project Registration Costs

It appears that a forest project will require an annual \$500 fee to be registered by the Reserve. Over a 100-year period this amount would be \$50,000 and could discourage small projects from participation. I recommend that a tiered system be in place so that small projects pay a different annual registration fee. The criteria for small project could either be by project acreage or tons of VER's registered.

#### Specific Protocol Comments

The City of Arcata has a long-standing timber management system and operates under a Forest Plan and Non-Industrial Timber Management Plan (NTMP). We are regulated under the California Forest Practice Rules and other pertinent regulations like any private timberland owner in California.

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Use of the Public Lands baseline assumption for public agencies as described on Page 25, Section 6.2.1.2, would likely exclude the City of Arcata from considering a forest project and registering VER's.

The City is on the cusp of registering a forest project and has inventoried a portion of the land base with the intention of doing so. I recommend that **municipally owned community forests not be included** in the Public Land category. There are many localities considering acquiring and managing forests under the community based forestry model. The carbon market could be a useful tool for financing such transactions thus it is important that we do not introduce a disincentive for such projects. Additionally, newly acquired lands for the purposes of managing as community forests would not have a ten year history to project forward so therefore applying this concept to new public forests of this type would be problematic.

I also recommend that the Public Lands Baseline Guidance projection for Improved Forest Management Projects be guided by applicable statues, regulations, policies, plans and activity-based funding over the past 30 years rather than the last 10 years.

Page 25. "Public Lands" should be defined in the *glossary of terms*. It is not clear if this section was developed for federally owned timberlands.

The revised protocol also has a number of improvements over previous versions. The methodology is generally clearer than in version 2.1. The statistical confidence deductions also make much more sense under this new protocol as well.

I appreciate all the hard work involved in producing the 3.0 revised protocols and commend all who worked on this revision.

Regards,



Mark S. Andre, RPF #2391  
Director Environmental Services Department  
City of Arcata