



May 8, 2009

Climate Action Reserve
Attn: Mr. John Nickerson, Forester
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014
john@climateregistry.org

Re: Professional Comments pertaining to the 3.0 Final Draft Forest Project Protocol

Dear John;

Forester's Co-Op applauds the dedication and monumental commitment of the entire forest protocol workgroup in drafting a final version of the Climate Action Reserve Forest Project Protocol. Our Company has long operated here in the Central Sierra Nevada Mountain Range offering our cliental exceptional Professional Forestry and Geographic Information Services. With respect the advent of the Reserves Forest Project Protocols we have enrolled in the American National Standards Institute pilot verification accreditation program, attend all recent workgroup public workshop/comment meetings, provided both verbal and written constructive public comment to assist in protocol development. We are glad to see these protocols in their final phase of development and look forward to the day when we will be implementing forestry projects to effectively slow Climate Change.

Public comment pertaining to the final Draft 3.0 Forest Project protocol is as follows;

- 1) **Section 6.2.1.1 Improved Forest Management Private Lands Baseline** –
Live tree baseline determination using “Common Practice” as set by the USFS Forest Inventory Analysis program.

Comment: As witnessed in California, the social and financial land use pressure to convert timberlands to other uses such as homes, vineyards, water storage reservoirs and other developments must be considered “Common Practice”. The high cost of forest regulation in California is also “Common Practice” and is major impediment to adopting forest growth (carbon sequestration) enhancements on private lands. The use of widely dispersed permanent plots that comprise the FIA program cannot accurately measure or account for either of these “common practice” anthropogenic influences that bias baseline calculations using only FIA data. The FIA program was developed to report on standing private forest land inventory and not timberland conversion rates or forest management restrictions.

Recommendation: Abandon the use of the FIA program for baseline determination until more accurate “California common practice” tools and methods are researched and demonstrated to incorporate anthropogenic forest management restrictions. In the mean time



the use of the regulatory method (California Forest Practice Rules) of baseline determination as in the 2.1 protocol should be adopted for use in California in the 3.0 protocol.

5.1 Accounting for Primary Effects:

- “Mobile” emissions are referenced on pages 12 and 13 as secondary emissions which need to be accounted for under Reforestation and which are optional under the other two project types.

How will the double accounting of mobile emissions be dealt with when they emitted by organization/company whom in the future will be reporting their emissions under the General Reporting Protocol?

If the mobile emissions are accounted for in an “optional” situation, will the updates be allowed for instances when a logging is done by a company that has reported their emissions under the General Reporting Protocol? In most case an NTMP would have a new/different logging operating at every scheduled harvest.

Further Clarification of FIA:

3.4 Project Location:

Second Paragraph States:

The framework of the FPP update is designed to allow the protocols to be used beyond California's boundaries with minimal additional analysis. The intent of this effort is to provide a forest project protocol that can be applied to an extensive geographic area for generating high-quality GHG offsets for use in the voluntary market. Inclusion of projects from other states will require expanded tools for measurement and analysis. Approved equations and models will be added as they are developed and/or reviewed for each region. The methods required by this protocol for estimating baseline carbon stocks for forestry projects cannot currently be applied outside the United States, as they rely on U.S.-specific data sets and models.

Due to the lack of FIA provided in this Protocol (which on page 18 states “*Maps of the assessment areas and the FIA means are provided on the Reserve's website*”). As of May 11, 2009 this information is not the website. After calling CAR’s office we were informed that state-by-state FIA would not be available until sometime later in 2009. If a Project is to be submitted under the 3.0 Forest Project Protocol that is located out of the state of California, and it is submitted before the FIA data is available, would that project’s baseline be defaulted back to 2.1 Protocol (which does not include out of California Projects)?



Clarification on the Optional Pools – Section 6 all project types:

Will it be allowable under this protocol for pools that are optional for a given project to be included as the project continues through time and with inventory updates? The initial inventory and project development is quite expensive to moderate sized landowners, although, as credits are sold additional revenue will enable landowners to improve their inventories. If a project is submitted, for example, without any soil carbon data, in the future can this pool be amended into the project?

Project Implementation Agreement Remedies:

Any formula for the determination of remedies due to early project termination must be formulated on the fair and equal valuation of all offset project types registered with the Reserve. If a CRT penalty is to be assessed the terminated project must be allowed to replace future lost CRT from the entire Reserve offset pool. Not doing so would fundamentally corrupt the Reserves rigorous process for registering all offset project types.

In closing, we appreciate the opportunity to provide these protocol comments. Please don't hesitate to contact me if you have any questions.

Sincerely,

Tom Amesbury, RPF# 2253
Principal Forester