

Grizzly Mountain Ranch

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Subject: Updated Forest Project Protocol, Comments;

I have had the opportunity to review the last two Forest Project Protocol Draft documents. My comments will address the current Draft, irrespective of the changes made between draft documents, because I do not have the time or resources necessary to do a comparative analysis before commenting. Sorry for the inconvenience.

1. Page 9, **Table 3.1**, (Distribution of age Classes/Sustainable Management) Criteria. The preamble states (The forest, including entity lands outside project area, is currently under one of the following)
 - a. Having the criteria apply to lands that are outside the project area poses a problem for me, and I am sure, the USFS, BLM and State. Let me explain. The Grizzly Mountain ranch has an NTMP signed in 2001 and a Conservation Easement, dated 12/30/2008, and is therefore qualified to enter into a **Project Implementation Agreement**. However the additional ranch that I acquired last year, does not meet the Criteria YET, and thus disqualifies the entire combined ranch.
 - b. Another potentially disqualifying event occurred during the construction of a single parcel for the Conservation Easement. The original eight parcels were resized via lot line adjustments resulting in one large 1,131 acre CE parcel, 6 Residential parcels and a Hydro Parcel. A strict interpretation of the Criteria for (**Entity Lands outside the project area**) would seem to disqualify the C E property, so long as all parcels remain in common ownership.
2. Page 28, **6.3 Avoided Conversion Projects**
 - a. Having just experienced the process of obtaining a qualified appraisal of lands that exceed the slopes criteria I suggest that making the determination of **Suitability of Project Area for Conversion** be left to the Appraiser. How much of San Francisco would be unsuitable for conversion under the existing **Criteria**?
3. Page 38, **8.2 Annual Monitoring Requirements**
 - a. I suggest that Conservation Easement monitoring be include as a sufficient substitute.

Thank you,

Norman Ross Burgess, Owner