

April 28, 2009

Dear Members of the Forest Project Protocol Workgroup:

We are writing to comment on the Draft Forest Project Protocol, April 15, 2009. We would like to commend the Workgroup for revising the natural disturbance risk table and incorporating carbon storage in wood products.

Recent work by Galik and Jackson (2009) indicates that inclusion of wood products in carbon accounting results in increased rotation age as carbon prices rise. Inclusion of wood products also serves as a way to reduce activity shifting leakage. Since the goal of the Climate Action Reserve is to reduce atmospheric CO₂ concentrations, recognizing carbon storage in wood products and the associated co-benefits provides a fuller carbon accounting of forest projects.

Natural Disturbance Risk I – Wildfire: We suggest revising this paragraph to read “techniques including reducing surface fuel loads, removing ladder fuels, adding fuel breaks, and reducing stand density. However, these techniques cannot reduce emission risk to zero because all landowners will not undertake fuel treatments, nor can they prevent wildfire from occurring.”

The natural disturbance risk identification table (Table C.4.1) is a marked improvement over the previous draft. While using the previous 30-years of fire data for a project assessment area is likely to underestimate the fire risk, especially given the potential for climate change to impact fire size (Westerling and Bryant 2008), the conservative accounting of fire risk reduction treatments should provide an adequate buffer pool contribution in the near-term. Additionally, recognizing the risk reduction benefits of high severity fire mitigation treatments reduces the incentive for maximizing stocking levels in fire-prone forest types (Galik and Jackson 2009). However, row 2 in Table C.4.1 should be eliminated. Further dividing the annual fire probability by 2 yields an unsubstantiated reduction in the estimated likelihood of a fire event occurring, this could result in an insufficient buffer pool contribution. We suggest that where assessment area fire data are lacking, applying the approach developed by Hurteau et al. (2009) using LANDFIRE data would provide a quantitative assessment of fire risk.

Thank you for the opportunity to comment on the Climate Action Reserve Draft Forest Project Protocol, April 15, 2009.

Sincerely,



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References:

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