



Mendocino County Farm Bureau

Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

June 5, 2009

Subject: Do not let the Forest Project Protocol leave small family forests behind

Dear Mr. Gero,

Thank you for your dedicated work in bringing a new forest project protocol close to completion. Mendocino County Farm Bureau (MCFB) is writing out of concern, however, that the forest project protocol as currently drafted would leave small forest landholdings without an opportunity to take advantage of the emerging carbon market. Landowners with less than 5,000 acres of forest, the majority of landowners in Mendocino County, will be unable to participate in the protocol as currently designed.

MCFB would like to suggest the development of rules that enable small landowners to aggregate together into a single, larger carbon project. This suggestion is supported in section 2.2 of the draft protocol when it is stated that, "Multiple entities can aggregate projects to reach an economy of scale and one representative may do the aggregation and report, so long as all the entities' names and information are also listed. The Reserve will develop guidance for aggregation after completing this version of the FPP."

MCFB is concerned that the necessary guidance will not become a part of the new forest project protocol and that the forest verification protocol will also fail to consider aggregated projects. There are various group certification processes that have already been developed by others such as those adopted by the Forest Stewardship Council. Therefore, the forest verification protocol could use the models implemented by such entities as the Forest Stewardship Council to develop certification guidelines for group aggregated projects.

The pressure of meeting a deadline or the simple convenience of approving the current forest project protocol should not be an excuse for locking smaller family forests out of the carbon market. MCFB urges you to include placeholder text in the forest project protocol on aggregation rules, with a timeline of three months for adoption. MCFB also urges you to ensure that the verification protocol includes explicit language enabling group certification.

Sincerely,

Mike Anderson
President, Mendocino County Farm Bureau

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