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May 11, 2009

John Nickerson
California Climate Action Registry
523 W. Sixth St., Suite 428
Los Angeles, CA 90014

Dear Mr. Nickerson:

On behalf of its thirty member counties, the Regional Council of Rural Counties (RCRC) welcomes the opportunity to offer comments on the Climate Action Reserve's Final Draft Forest Project Protocol Version 3.0 (Protocol), released in April 2009. RCRC appreciates the Reserve's efforts to amend the Protocol, and offers the following comments on the Final Draft.

RCRC appreciates the Reserve's willingness to work with interested stakeholders to revisit how permanence is achieved for projects on industrial forest lands. We feel that the concept of the Project Implementation Agreement (PIA) is a good compromise, allowing private industrial forests to participate without requiring that those lands be placed into a conservation easement, while giving them the option of buying out their credits in the event of a land-use change in the future. We also feel that the "insurance pool" included in the Protocol will provide the appropriate protection for landowners whose projects are affected by fire or other natural disasters.

RCRC's main concern with the proposed Protocol is that it considers woody material harvested for use in the energy sector as an emission, rather than taking the entire life-cycle into account. According to the U.S. Energy Information Administration (EIA) (<http://www.eia.doe.gov/oiaf/1605/coefficients.html#note2>), which bases its recommendations on greenhouse gas accounting methods developed by the Intergovernmental Panel on Climate Change (IPCC), wood, wood waste, and other biomass fuels in which the carbon is entirely biogenic should be assigned an emission factor of zero. If a project exports wood for use as biomass, the Protocol should consider that entire life cycle and at a minimum designate that export as a carbon-neutral activity now instead of waiting until it is addressed in the energy sector protocol. Landowners with registered projects should not be penalized for contributing to the development of the biomass industry, particularly considering its potential to replace petroleum and coal-based energy sources in the future.

RCRC thanks you for your consideration of our comments. We look forward to providing input on the development of other protocols in the future. Please feel free to contact me if you have any questions or would like to further discuss our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton". The signature is fluid and cursive, with a large loop at the end.

Staci Heaton
Regulatory Affairs Advocate

CC: Climate Action Reserve Board of Directors
RCRC Board of Directors