

## Forest Protocol Draft 2 Comments May 11, 2009

In Section 6.1.2 (Page 17) I appreciate having the table showing the emissions associated with Site Prep.

In Section 6.2.1.1, it is very helpful to have the diagrams. I just wondered, in that section, why the modeled baseline might be above the Control.

In Section 6.4 (Page 34) it appears that the figures in Row (or Line) #29 were obtained by multiplying Row #26 times 0.675. I think Row #26 should be multiplied by 0.47 to get the right values in Row #29.

In Section 7.1, it says: "If the difference between project and baseline carbon stocks decreases from one year to the next that results in a loss of verified reductions, the Reserve will consider this to be a reversal in credited reductions." Well.... umm....your going to have fluctuations in carbon stocks from year to year due to periodic harvests, but as long as the harvests don't remove more than what will grow back by the next harvest in that area, I wouldn't think that would be considered a reversal. Maybe I'm not understanding this correctly.

In Section 7.3 (Page 37), it says: "Each year a project is issued CRTs, a risk rating is calculated and a corresponding percentage of CRTs is placed in the buffer pool." So, let me get this straight. You project what your additionality will average over one hundred years and figure a certain percentage in the buffer pool. Then each CRT that is verified has that percentage put into the buffer pool. Okay, I guess I can see that. Every projected CRT with a buffer ultimately needs to be verified with that same percentage buffer.

In A.4 (Page 59) down at the bottom, it says: "(1 metric tonne = 2240 pounds)". I think it should be: (1 metric tonne = 2204 pounds).

Table A.3.2 (Page 54) gives some examples of formulas that are being used to calculate biomass weight for bark and live crown for Douglas Fir, Ponderosa Pine and Redwood. It would be good to have specific links listed where we can find the formulas for the other species. I have some concerns about all these regression equations for different components of the trees. For example, the formulas for live crown weight in Douglas Fir and White Fir indicate less weight in the live crown than in the bark. The formula for live crown weight in Sugar Pine indicates that the live crown weight in a small tree is 10% of its above ground weight but when you get up to a 50-inch diameter tree, the live crown weight is 42% of its above ground weight. If we could find, or come up with factors for each species that would derive bark and live crown weight from the bole weight, that would seem more straight forward. But maybe these regression equations are the best we have right now.

In Appendix F (Page 76) the "Common Practice Indicator", of Carbon Tons per acre in Live Trees for California Mixed Conifer in the Sierra Nevada-Southern Cascades is 39 tons per acre. Is this metric tons? I calculated an average of 41.6 metric tons per acre in live trees on the Collins Almanor Forest, and this includes root mass. We average over 16 thousand board feet per acre on our forest. I'm surprised that we're so close to the baseline.

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