

Climate Action Reserve
Proposed Amendments Relative to Baseline Determination
Forest Project Protocol Version 3.1 Public Comment
July 30, 2010

John and Derik,

CFA sent a formal letter of comment into the CAR process, which I fully support.

While the weighting makes small changes the resulting outcomes are still not rational. I am attaching two similar work sheets [see *Example1_3%* and *Example2_50%* under Public Comments]. In example 1 I have a project of 20,000 acres and an entity of 800,000 acres (3%). I also ran an example of a 10,000 acre project with a 20,000 acre entity (50%) again the values change but what I consider the odd behavior is still there. I believe that fundamentally this approach fails because there is not necessarily a simple way to relate Entity averages to projects, simply because there are a myriad of real world reasons that a project area can differ from an entity wide average. These being recent purchase, purchase from different past owners, individual location history that is different. All these and many more can result in a location being different than an entity, but none of them change the real outcome of permanence and atmospheric removal of CO₂ once a project is developed. Nor do any of them represent cherry picking.

Thanks for looking at these.

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