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Gary Gero
President, Climate Action Reserve
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014

Dear Gary:

I am writing to express my support for the Proposed Guidelines for Aggregation released by the Climate Action Reserve on April 23, 2010. Thank you for proposing and considering changes to the Forest Project Protocol that would improve access to the carbon offset market for smaller forest landowners.

Individuals and families manage the vast majority of private forest land in our country, most with ownerships of less than 5,000 acres. The inventory, monitoring and verification costs associated with CAR forest carbon projects can be prohibitive for these family forest owners who lack economies of scale. I think this Aggregation Proposal would be a concrete, important step towards ensuring that the carbon markets work for the average landowner and not solely for industrial forest owners.

One potential area of concern is the annual account maintenance fee. If each of the projects within an aggregate are required to pay the \$500 account maintenance fee, even in the many years where there is no account activity, this would become prohibitive over the 100 year life of the project. A more workable arrangement would be for only the aggregate account holder to pay the fee, since it is through this aggregate account that all project maintenance activities will be taking place.

Additionally, the requirement for an aggregator to maintain a constant number of landowners by finding a new one when one wants to leave is problematic. Since the concern is statistical validity, the rule should be based on the overall sampling error which could easily remain within acceptable limits even after losing one project.

Our firm supports the adoption of the Proposed Guidelines for Aggregation by the Climate Action Reserve as soon as possible.

Sincerely,

Greg Blomstrom &
Paul D. Harper