

Comments on the CAR Proposed Guidelines for Aggregation

The comments provided below are directed to the Need for Input requested throughout the proposed guidelines.

1. Eligible Project Types

As a practical matter, to minimize costs, the aggregation of projects into an aggregate should be geographically located for the project type. Forest inventory designs and verification requirements differ significantly across the US and project types. We encourage CAR to restrict aggregates to the same project type, however, geographic region, as defined by the ecoregions or assessment areas in Appendix F should not be a requirement.

The assumptions used to limit enrollment to 5,000 acres are based on expected prices for CRTs from IFM projects. The economic feasibility of avoided conversion projects are sensitive to different factors. We encourage CAR to not limit the size of projects based on acreage.

2. Number of Landowners

We see no technical issues that should limit the number of landowners in an aggregate.

3. Accounts on the Reserve, Transfers and Sales of CRTs

As described, we do not see any significant issues.

4. Inventory Standards

The approach taken appears to be statistically valid and will reduce in-field inventory costs while maintaining the aggregate sampling error at CAR's required level.

Thank you for the opportunity to offer comments from CarbonVerde on the proposed guidelines for aggregation of CAR's forest project protocol.



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