



To: Climate Action Reserve
523 W Sixth St., Suite 428
Los Angeles, CA 90014
May 21, 2010

RE: Comments Regarding CAR's Forest Project Protocol Proposed Guidelines for Aggregation

To Whom It May Concern,

Ecotrust is grateful to have the opportunity to provide comments on the new proposed guidelines for project aggregation. As an organization that has been working for years to promote sound ecological forest management on private lands, this tool will help open the door to the carbon market for owners of small forest tracts.

On May 11th, 2010, Ecotrust hosted a work session with a small group of forest landowners and managers who are interested in learning how carbon offset credits might work for them. CAR staff presented its proposal on how separate forest landowners could work with an aggregator to pool their credits into one offset project. The comments below reflect our comments with input from our collaborating landowners and managers on CAR's Proposed Guidelines for Aggregation.

1. The proposal to require that projects enrolled in one aggregate all be from the same geographic region is generally a good idea in order to limit complexity, but we see that the ecoregions and assessment areas defined in Appendix F of the FPP would be too limiting. We suggest selecting a larger region or leaving the boundary up to the aggregated group.
2. We do not see a need to limit the number of participants in an aggregate. The economic feasibility of the project should determine the limit.
3. The proposed Inventory Standards for Participating Projects is reasonable, and we do not believe these standards should present obstacles for smaller landowners.
4. If a landowner leaves an aggregate and another joins, we suggest CAR allow the aggregator to be an interim verifier and not require an immediate, on-site verification by a third-party but require an annual monitoring report that may or may not get verified. We see that requiring an immediate, third-party verification could significantly increase the costs and penalize the entire group. The annual monitoring reports and the verification process are likely to be what makes or breaks the economic viability of aggregation projects.
5. CAR should consider some additional criteria or requirements for becoming or maintaining the status of an aggregator. Landowners will need a reliable source of information on the history of aggregators' performance.

In general, we believe the Proposed Guidelines for Aggregation are workable for groups of smaller forest landowners.

Finally, though not included in the scope of these guidelines, we do remain concerned about the practicality of the Project Implementation Agreement and the length of project commitment.

Sincerely,

Brent Davies
Director of Forests and Watersheds
Ecotrust