

NORTHCOAST REGIONAL LAND TRUST

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

cc: policy@climateactionreserve.org

Dear Gary:

As director of the Northcoast Regional Land Trust, I interact with non-industrial forestland owners on a regular basis. These landowners are becoming more interested in carbon values and private land forest carbon projects. The monetary costs associated with carbon projects is daunting and any policies you can promote which will in turn promote the participation of non-industrial forest land owners would be greatly appreciated. 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 level the playing field 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.

For that reason, our organization supports the adoption of the Proposed Guidelines for Aggregation by the Climate Action Reserve as soon as possible.

Sincerely,

Lindsay Magnuson, Executive Director