



Rocky Mountain Elk Foundation

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Via Email

May 10, 2010

Climate Action Reserve
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014
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RE: Forest Protocol Proposed Guidelines for Aggregation – Public Comments

To Whom It May Concern:

The Climate Action Reserve (CAR) recently released a draft copy of the forest protocol proposed guidelines for aggregation. The Rocky Mountain Elk Foundation (RMEF) wishes to submit comments on these proposed guidelines. RMEF supports CAR's efforts to allow aggregation of smaller projects but urges much more flexibility in acreage and types of projects.

The ability to aggregate projects can be beneficial to small acreage landowners and land trusts like RMEF; however, RMEF has some concern over how this protocol would accommodate the unique relationship between landowners and land trusts. RMEF urges CAR to develop and clarify protocols in order to facilitate land trusts and landowners participating in aggregation projects and to clarify how this type of aggregation would be feasible under the existing protocol.

RMEF partners with landowners across the country to conserve land for elk and other wildlife habitat. These conservation efforts are often accomplished by protecting lands with conservation easements or through habitat stewardship activities. Conservation easements are structured to fit the needs of the wildlife/habitat, landowners, and RMEF. Some of these conservation easements cover more than 5,000 acres and involve properties with different types of forest, range, and various habitat types; however, the costs of registration and verification have proven a significant disincentive for RMEF and landowners to pursue carbon credit registration efforts. RMEF believes that the 5,000 acre limitation is much too low. So long as efficiencies can be demonstrated, why have any acreage limitations on aggregated projects? Also, RMEF urges CAR to not establish a threshold limit on the number of participants in the aggregate.

RMEF continues to urge CAR to not be too limiting in its definitions of Forest Owners and Aggregators. A management regime that results in sequestration of carbon may involve



permanent land protection (such as through a conservation easement) that could also spell out management requirements. At the same time, the fee title owner and the land trust can mutually decide which entity is entitled to the portion of the property rights that constitutes the carbon sequestration right. Aggregation should make it easier for landowners and land trusts to cooperate to provide for good land stewardship with an increased opportunity to attempt to market sequestered carbon.

So long as there is some commonality involving forest project types and geographic regions, RMEF urges CAR to be very flexible in allowing aggregation. RMEF believes that all three forest types should be included in aggregate projects, and geographic limitations in many circumstances are not necessary. If geographic limitations are too restrictive, it could potentially limit the ability for a land trust like RMEF to participate in projects.

Ideally, land trusts like RMEF would be ideally situated to participate in aggregation of projects. RMEF urges CAR to provide for flexibility in the aggregation and other protocols so that many of the land trusts and landowners across the country can begin to participate in registering carbon credits.

Sincerely,

Rocky Mountain Elk Foundation, Inc.

By:

Jack Blackwell

Vice President Lands and Conservation

By:

Blake Henning

Director of Lands