



INCREASING THE PACE, EXPANDING THE SCOPE, AND  
IMPROVING THE EFFECTIVENESS OF CONSERVATION

---

RE: Nitrogen Management Project Protocol

Dear Climate Action Reserve,

The Willamette Partnership is a nonprofit, active in developing protocols governing markets for ecosystem services for water and biodiversity. We work across the Pacific Northwest, and in close coordinating with state and federal agencies across the country. We participated as part of the Credit Stacking Subcommittee for this protocol.

We strongly support the provisions in Section 3.5.3 Ecosystem Services Payment Stacking. CAR's approach is consistent with how Willamette Partnership treats stacking of credits and stacking of payments for its water quality, upland habitat, and aquatic habitat credits. It is also consistent with many water quality trading programs across the country, including new programs emerging in the Chesapeake and Ohio River Basins. Proposed Virginia statute on water quality trading is also consistent with CAR's proposed approach.

Thank you for the opportunity to comment, and please do not hesitate to contact us with any questions

Sincerely,

Bobby Cochran  
Executive Director