



Policy Team
Climate Action Reserve
523 W. Sixth Street, Suite 428
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March 25, 2011

To CAR Policy Team:

Thank you for your leadership in commissioning the Forest Protocol White Papers and for the opportunity to comment on them. Blue Source has been actively developing forest carbon projects over the past 3 years with currently 8 listed forestry projects on the Climate Action Reserve. Given our in depth forest carbon knowledge and on-the-ground experience utilizing CAR's Forest Project Protocol we would like to offer the following thoughts and observations specifically regarding the 'Accounting for Carbon in Soils' White Paper:

- 1) The White Paper does not explicitly consider the soil carbon loss associated with Avoided Conversion projects. This is an oversight as soil carbon is a very significant pool for many Avoided Conversion projects, particularly in areas that contain peat/muck coastal soils. These are important projects and ones where the inclusion of soil carbon value is a driving factor in some landowner decisions to conserve or cut their forests.
- 2) The paper stresses that creating new or adapting current models may be the best approach to account for soil carbon changes. We agree that utilization of models can be an efficient tool, though we are concerned about the time it will take for soil carbon models to become operative for use under CAR's Forest Project Protocol. Another good option that could be applied immediately for creating soil carbon inventories and subsequent verification is to compare on-site measurements along with proxy site sampling. While adequate proxy sites are not available in all cases, they should be

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utilized to allow landowners with meaningful soil carbon volumes a means to move ahead with project implementation and accounting for this pool today.

- 3) In addition to ensuring that previously unidentified negative impacts of alternative management regimes on soil carbon are accounted for, it is critical that any changes to the Forest Project Protocol also grant project owners full credit for positive soil carbon benefits generated by their actions. We see many potential project opportunities that deliver significant carbon and environmental co-benefits that face challenging economics under Reserve requirements. Soil carbon can offer an important enhancement that allows some of these projects to proceed if credited fairly.

Thank you again for the opportunity to comment,

A handwritten signature in cursive script that reads "Roger Williams".

Roger Williams
Vice President