

Comments on Climate Action Reserve White Paper, **Accounting for Carbon in Soils**,
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Thank you for this opportunity to comment on the Forest Protocol White Papers.

Accounting for Carbon in Soils makes a solid contribution towards identifying and addressing weaknesses in the current assumptions about soil carbon impacts of forest management in the current Forest Protocol. The use of scientifically sound and realistic assumptions related to soil carbon pool dynamics (as well as other carbon pools) is essential for achieving environmental integrity of any forest related climate mitigation activities. In other words, accurate assessment of carbon pool dynamics is the basis for ensuring that any accounting of forest activities closely corresponds to what the atmosphere actually sees.

The purpose of these comments is to draw attention to one possible oversight in the paper on assessing soil carbon dynamics, and it is one that has received significant attention in the global climate negotiations. That is the issue of carbon emissions from peat lands, particularly those that have been put under land use management, whether for forestry or agriculture. Wetlands International has taken a leading role in this regard. A variety of briefing documents concerning wetlands, LULUCF in developed countries and carbon accounting for activities including afforestation, reforestation and forest management can be found on the Wetlands International website.

<http://www.wetlands.org/NewsandEvents/CalendarofEvents/ClimateSummitinCanc%C3%BAnMexico/Canc%C3%BAnAddressingPeatlandEmissions/tabid/2415/Default.aspx>

The US, including Alaska, has the fourth largest area of peatlands in the world, and also has the fourth highest rate of peatland emissions.

<http://www.wetlands.org/LinkClick.aspx?fileticket=o%2bd%2bTaPldLI%3d&tabid=56>

Recognizing and accounting for peat lands in forestry projects will be important for accurate soil carbon accounting. Because of their high carbon content and prevalence in many forest or formerly forested landscapes in North America where the Forest Protocols will be applied, I would strongly encourage some explicit consideration of peat land soil carbon issues as the Forest Protocols are further developed.

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