



April 24, 2014

John Nickerson
Director of Forestry
Climate Action Reserve
601 W. 5th Street, Suite 650
Los Angeles, CA 90071

PRESIDENT
Steve Johns

SECRETARY
Sydney Coatsworth

TREASURER
Michael Benoff

BOARD OF DIRECTORS

Dr. Janine Bera
Christi Black
John R. Briggs
Eric Douglas
Susan Essaf
Della Gilleran
Ryan Hooper
William Ishmael
John Lane
John McKinney
Charles Metzinger
Lynn Pomeroy
Eva Robertson
Rev. Jean Shaw
Robert Sherry
Sandra Shewry
Jeff Townsend
Robert Waste
John Webre

BOARD EMERITUS
Jane Hagedorn
Ann Kohl

EXECUTIVE DIRECTOR
Raymond L.
Tretheway III

Re: Public Comment on the Urban Forest Project Protocol Version 2.0

Dear Mr. Nickerson,

Thank you for the opportunity to comment on the Urban Forest Protocol revision. The Sacramento Tree Foundation appreciates the time and effort invested to lead the protocol revision project with its goal to develop a protocol that is rigorous enough to meet regulatory-quality standards in a manner that is both practical and economically feasible to implement.

Given the current low price of carbon, it is our hope that Version 2 will streamline the process enough for cost savings that would allow a substantial number of projects to be implemented in the near term.

As a member of the Revision Committee, the Sacramento Tree Foundation applauds:

1. Your leadership of the Committee's efforts to recognize the carbon sequestration benefits of the entire urban forest at a canopy-wide level with the introduction of the Urban Forest Management Project concept. The Urban Forest Management Project Protocol concept has the potential to recognize the greenhouse gas reduction capacity of all urban forest trees rather than just the 10 – 20% comprised of publicly owned trees.
2. The inclusion of a Planting Baseline developed per Performance Standards for each type of entity, so that innovative early adoptors are encouraged to expand their work and serve as role models for others in their sector.

As a nonprofit that could potentially act as a Project Operator representing an Urban Forest Owner, the Sacramento Tree Foundation has several recommended revisions for the current draft:

1. As discussed at the October 3, 2013 committee meeting and noted in our followup email to the committee, securing the agreement of every Urban Forest Owner – which means every individual homeowner – is as much of a barrier to implementation of an Urban Forest Management Project as tracking each tree for a Tree Planting Project, which was a concern shared by many stakeholders with the first version. Given that homeowners move or can change their minds, it is likely to be even more of a barrier. The Tree Foundation still believes that an automatic inclusion of homeowners based on the public good benefits of a community wide, tree canopy project with an opt-out

option for individual owners is more effective as well as consistent with other public good actions of municipalities, especially if homeowners are reassured that they will receive benefit from the arrangement. We believe further legal and policy research is necessary to ascertain the best method of implementing a opt-out option.

2. Given the rapid advance of remote technology's ability to map, photograph, and measure details of the earth's surface since the first Urban Forest Protocol, it is imperative to include remote sensing and measurement as a tracking, monitoring and verification option for Tree Planting Projects.

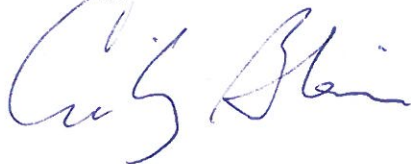
The next 25 years will experience an extraordinary acceleration of the use of remote sensing. The current draft requires 100% onsite sampling every 10 years, which is extremely inefficient and cost prohibitive – especially given the 125 year timeframe and the current price of carbon offset credits. Remote sensing and measurement methods are integral to a practical and economically feasible protocol. The Tree Foundation wholeheartedly recommends that remote sensing and measurement be included.

3. The Tree Foundation highly recommends further face-to-face meetings to resolve these challenging issues. The full-day, in-person meetings of the committee were very powerful and resulted in discussion and insights that were not possible via email and telephone conference calls. We believe the protocol merits the additional time to guarantee a workable protocol.

Funded by a grant from the California Department of Forestry and Fire Protection, this draft is a promising start on a revised protocol. The Tree Foundation strongly urges the Climate Action Reserve to continue to refine the draft and ensure a protocol which can be implemented in the near future.

Thank you again for your ongoing commitment to this complex project. Please feel free to contact me at any time for further discussion or clarification.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cindy Blain".

Cindy Blain
Community Partnerships & Innovation Director
Sacramento Tree Foundation