



**THE
CLIMATE
TRUST**

July 2, 2019

The Climate Action Reserve
818 W 7th St., Ste 710
Los Angeles, CA 90017

Re: Public Comments Forest Project Protocol 5.0, Round 2

Dear Climate Action Reserve,

Thank you for the opportunity to submit public comments regarding the latest Forest Project Protocol revision to version 5.0, dated June 5, 2019. Please see The Climate Trust's comments below.

Section 3.8 Regulatory Compliance.

Adjusting instances of material non-compliance to no longer include violations of laws not directly pertaining to the protection of carbon and associated environmental values is a significant improvement to the protocol. The previous version created unnecessary and unfair risks to projects from activities outside of the direct control of the project owner.

Section 4.2 Project Area Acreage

Projects may be located in counties or towns that do not have GIS parcel data available. It is therefore not always possible to calculate the percentage of each parcel in a project area. For instance, projects that are located on multiple parcels but do not encompass the entirety of any parcel can only determine total GIS parcel acreage, total assessor parcel acreage, total GIS project acreage, and total assessor project acreage (calculated using GIS ratios), but cannot calculate exactly how many project acres are in each parcel without parcel shapefiles. The Climate Trust recommends that calculating the portion of each parcel in a project as a percentage be removed or estimated.

Section 6.1.6 Quantifying Secondary Effects

The Climate Trust believes the approach to calculating secondary effects and recuperating credits previously lost to secondary effects as the forest reaches an optimal age for forest productivity is well-reasoned and encourages sound forest management.

Definitively capturing precise leakage values resulting from the implementation of carbon projects over a 100-year project timescale is inherently difficult if not impossible. Market and economic forces exert strong influences on timber harvest rates that can make estimating carbon project leakage very complex. As the protocol notes, many carbon projects will increase timber supply over the life of the project because the protocol encourages forests to be managed closer to optimal rotations for

Invest with purpose.



**THE
CLIMATE
TRUST**

productivity. Continuing to use a standard 20% leakage factor, which was originally determined through a scientific and public review process is appropriate unless new peer-reviewed studies indicate otherwise. Leakage rates should continue to be viewed in light of the already conservative nature of the protocol and the pressing need to sequester atmospheric carbon in our forests.

Regards,

Julius Pasay
Forest and Grasslands Manager
The Climate Trust

Invest with purpose.