



September 15, 2014

Members of the California Air Resources Board,

Ecological Carbon Offset Partners (ecoPartners) appreciates the opportunity to comment on the proposed changes to the cap-and-trade regulation, in particular those changes outlined in Appendix E: Description of Quantification Methodology Changes – U.S. Forest Projects. While ecoPartners welcomes the majority of the proposed changes to the Compliance Offset Protocol for U.S. Forest Projects, we would like to comment on the proposed changes to Appendix F.

The proposed changes to the determination of the Common Practice value, both in changes to the assessment area data and the methods of site class stratification, have a significant impact on current projects and projects in development. For an Improved Forest Management (IFM) project, the calculation of the Common Practice value is extremely important as this is tied to the baseline carbon stocks, and thus the total emissions reductions of a project. Changes to the Assessment Area Data File values have not been made public and has therefore not been subject to stakeholder review. This lack of transparency makes it impossible to fully assess the impacts of the proposed changes.

Additionally, proposed changes to the determination of site class lack clarity, introducing the undefined acronym "NIMS" and raising more uncertainty to this task. Furthermore, changes to the methods of site class stratification are potentially conflicting, recommending the use of site trees to classify site productivity codes and recommending the use of soil data for this stratification in the following paragraph.

Our greatest concern is the effect that the proposed changes will have on existing projects and those under development. They will certainly have a substantial effect on the offset credits generated by a project, and consequently a project's feasibility. Without public access to the Assessment Area Data Files, we are unable to quantify this effect. We recommend postponing the aforementioned changes until a full stakeholder review can be completed so impacts can be fully evaluated.

ecoPartners thanks you for the opportunity to comment on these proposed changes and we look forward to continuing to work with the Air Resources Board.

Respectfully,

A handwritten signature in black ink, appearing to read "K. Holland", written in a cursive style.

Kyle Holland, Managing Director