



June 4, 2015

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 forest protocol. 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 following proposed changes:

- The process for classification of high and low site class for determining common practice lacks clarity. Item (d) in Appendix F uses the terms “site class productivity class” and “basal area growth” to define high and low site classes, yet does not cite or define these terms. Item (e) contradicts itself, providing four options for determining site class (soils data from state or federal agency, direct site class data from state or federal agency, attestation of state forester, or field analysis), and in the subsequent sentence requiring the Offset Project Operator (OPO) to demonstrate field analysis to determine high and low site class. Please clarify how site class is to be determined by the OPO.
- The Common Practice Values in the updated assessment area data file vary greatly from those in the previous version, some demonstrating higher growth than expected over a short time period. ecoPartners previously asked the Board to include standard error calculations for all Common Practice Values in the assessment area data file. As no variance statistics have been included in the latest assessment area data file, we are unable to assess the accuracy of the new dataset. For the purpose of transparency and a better understanding of the new data, please consider including standard error of the common practice value in the assessment area dataset.
- While the requirements for projects that practice even-aged management are an improvement from those suggested in the previously proposed changes to the protocol, they remain inconsistent with forest practices in many regions outside of California. Additionally, this will significantly increase costs of monitoring and verification, limiting participation. Please conduct further review, engaging stakeholders on a national level to develop definitions of even-aged management applicable to forests nationwide.
- The modification to the minimum baseline level (MBL) calculation of the for improved forest management (IFM) projects where initial carbon stocks are above common practice is detrimental to the interests of the OPO and the ARB. Using the modified equation for MBL now requires that the weighted carbon stocks (WCS) be calculated for all forest projects, for those that are below common practice and now likewise for those that are above common practice. The calculation of WCS is complicated and expensive; it requires an inventory of all OPO or affiliate owned forests or a high intensity stratified vegetation-type analysis. These further analyses, in addition to the associated increase in verification intensity, escalate the costs of

Ecological Carbon Offset Partners, LLC
2930 Shattuck Avenue, Suite 305, Berkeley, CA 94705
+1 415 634 4650



project development and discourage forest owners from participating in the program. Please consider removing this amendment as the protocol already requires “sustainable and long-term harvest practices” be maintained on all forestland holdings controlled by the Forest Owner.

- In section 3.1.b.1.C, please include a new set of qualifications for ownerships less than 200 acres, as the current qualifications preclude these small ownerships from practicing forest management. For example, a 200 acre forest ownership harvesting 40 acres would likely fall below 20% less than the carbon stocks at project initiation while a 1,000 acre forest ownership harvesting 40 acres would likely be unaffected. As written, the current qualifications in this section unfairly penalize small landowners with fewer than 200 acres.

All of the previous comments above were raised prior to the December 2014 board hearing. While the Board has made some changes to the definition of even-aged management since then, none of the remaining items were addressed, nor has the Board responded to our comments. While we understand that the Board receives numerous comments, these are items that numerous other stakeholders are concerned about, as well.

Rather than adopting the problematic changes highlighted above, we urge the Board to direct staff to organize a technical work group process to allow for a more robust discussion of proposed amendments to the Forest Protocol and produce language that more accurately and efficiently addresses the perceived matters of concern.

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

Respectfully,

A handwritten signature in black ink, appearing to read "K. Holland", is written over a white background.

Kyle Holland, Managing Director