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ENVIRONMENTAL DEFENSE
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September 24, 2007

Dr. Jeanne Panek
California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

Re: CARB Forest Project Protocol

Dear Dr. Panek,

Thank you for allowing us to further comment on CARB's adoption of the Forest Project Protocol. We have formerly submitted a statement of support for CARB's adoption of the current California Climate Action Registry forest protocol and we reiterate that support here. In addition, as CARB seeks to look for other methods to recognize forestry projects, we would like to focus your attention on a new manual titled "Harnessing Farms and Forests in the Low Carbon Economy."

"Harnessing Farms and Forests in the Low Carbon Economy" is a guidance document for private landowners in the farm and forest sector seeking to benefit the climate through emission reductions and carbon sequestration. It was developed by an eminent team of scientists organized under the auspices of the School of the Environment and Earth Sciences at Duke University and edited by staff at Environmental Defense. The so-called "Duke Standard" includes a wealth of information and recommendations that are particularly relevant to the application of forestry projects as offsets in a cap and trade program.

As you will see from reading the attached document, the "Duke Standard" for forest offset projects differs form the current CCAR protocol in areas such as requirements for conservation easement (pag46), leakage (page 91) and baseline / additionality analysis (page 48). Again, we support your adoption of the current CCAR protocol and we look forward to working with you and your staff as these issues are discussed in further detail throughout the upcoming public workshops and multi-agency working group meetings.

Please feel free to contact me or Eric Holst, Manager at the Environmental Defense Center for Conservation Incentives, at eholst@environmentaldefense.org, or (916) 492-7080, if you have any questions or concerns.

Sincerely,

Timothy O'Connor
Climate Change Policy Analyst
Environmental Defense