



PACIFIC FOREST TRUST

Private Forests. Public Treasures.

Comments for CARB U.S. Forest Projects Compliance Protocol Workshop

Constance Best
Senior Strategic Advisor
November 30, 2023



Conserve Forests. Advance Climate Solutions. Protect Water Sources. Save Wildlife Habitat.

Our Mission

To sustain America's forests for their public benefits of wood, water, wildlife, and people's well-being, in cooperation with landowners and communities.

Since 1993, the Pacific Forest Trust has created economic incentives that reward private forest owners for conserving their lands and practicing sustainable forestry. We have helped shape regional and national forest conservation and climate policies, all in an effort to save wildlife and their habitats, create effective climate change solutions, conserve intact forested landscapes, and protect natural water sources.



PACIFIC
FOREST
TRUST

Summary

1

The USFPCP is solid and sound but requires regular periodic improvements. Now's the time.

2

The relationship of the Baseline, Additionality and Permanence is central to quality of USFPCP.

3

CARB should adopt lessons learned and incorporate new data, technologies. Buffer pool underwriting should be examined due to growing climate risks to forest.





PACIFIC
FOREST
TRUST



Forests are complex and so is the USFPCP

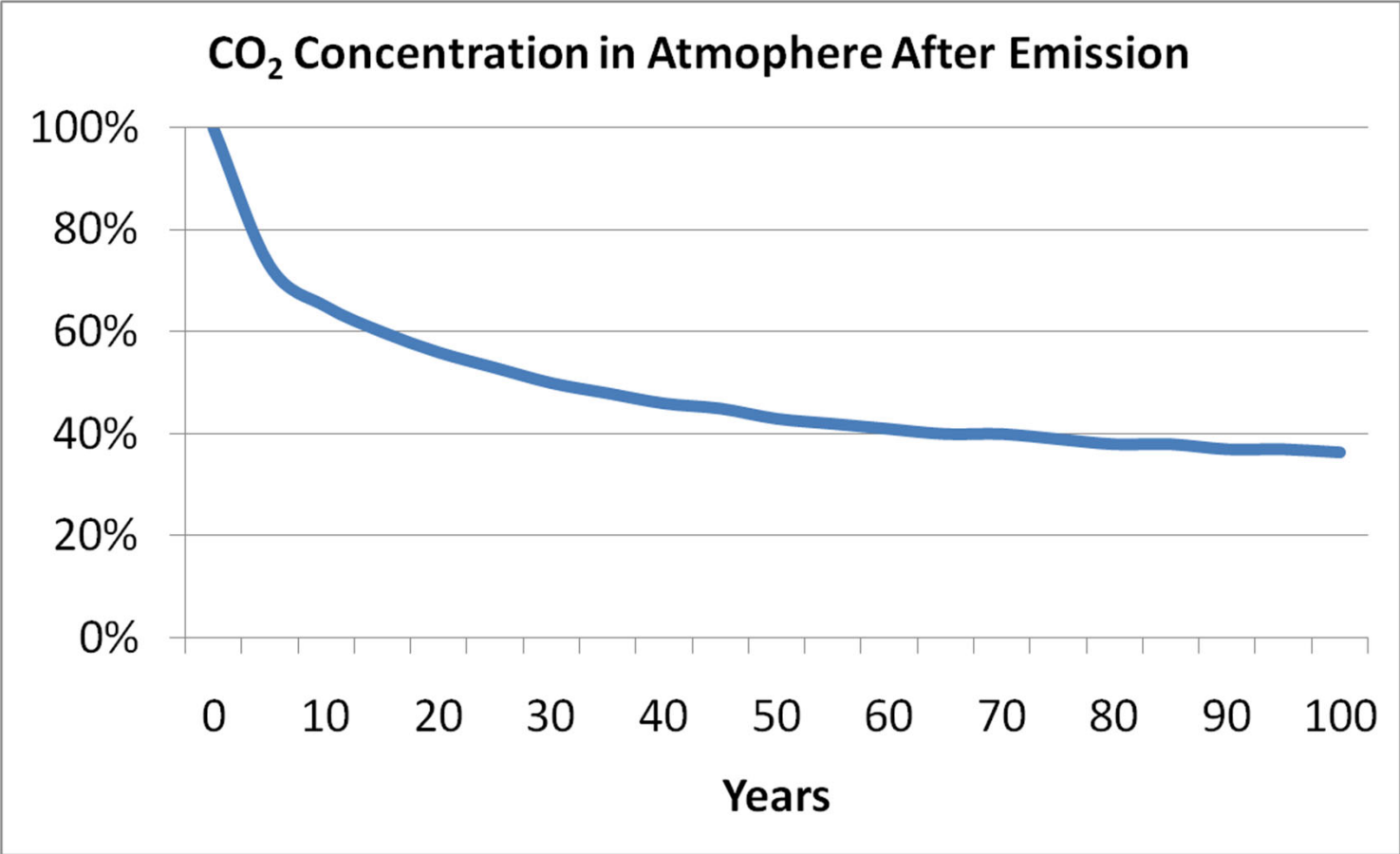
- Forests are dynamic carbon systems that have both natural and management-induced fluctuations in carbon stocks
- Creating an average value for carbon stocks over 100 years takes the noise out of the swings for consistent comparison
- Year to year stock changes are the basis for crediting



PACIFIC
FOREST
TRUST

Common Practice: Carbon stocks in the neighborhood

Cycling time of emission requires long term offsets





PACIFIC
FOREST
TRUST



Commitment to holding C stocks for 100 years is *additional* to business as usual

- Demonstrable change in management



PACIFIC
FOREST
TRUST



Buffer pool working - but needs review

- Post-fire re-inventory exaggerates fire emissions
- Accelerating climate risk requires regular updating of risk factors
- Active management of projects for resilience should be incentivized



PACIFIC
FOREST
TRUST

