

May 19, 2006

Comments of the Connecticut Forest & Park Association on the  
Regional Greenhouse Gas Initiative Model Rule

Dear Sir or Madam:

On behalf of the Connecticut Forest & Park Association, I am pleased to comment on the Model Rule for the Regional Greenhouse Gas Initiatives. Before offering our specific comments, I wish to commend the Regional Greenhouse Gas Initiative on the development of this program to stabilize and reduce carbon dioxide emissions. We at the Association applaud your work on this effort and applaud the regional nature of this initiative. You are taking a great step forward in addressing the greatest environmental and economic problem before society. As the oldest conservation organization in Connecticut, we are pleased to offer you our assistance in support of this effort.

I also wish to point out that the Connecticut Forest & Park Association is an affiliate of the National Wildlife Federation, and that we have signed a comment letter on this subject as such an affiliate. I endorse that letter and the points made within. We offer certain further, specific comments on the model rule below, mainly pertaining to carbon offset credit projects.

1. We strongly support the goal of stabilizing and reducing carbon dioxide emissions.
2. Regarding the definition of non-forested areas, we note that openings within a forest greater than one-acre in size are considered non-forested areas. Such openings, however, may indeed be forests. They may be regrowing with tree seedlings, and becoming what we consider to be forests. This would be the case with openings created by clear cuts, shelterwood treatments, or other silvicultural treatments designed to let in sunlight and regenerate a forest stand.
3. Our strongest critical point is that carbon offset projects apply only to “afforestation,” defined to be the planting of forest on land that has not been a forest in the past 10 years or longer. If afforestation may be submitted for credit as a carbon offset project, then reforestation and the sequestration of carbon in the growth of an existing forest should be considered for credit as well. Carbon may be sequestered in forest growth on land, whether the forest is new to the given piece of land or not. We recommend that offset projects could include “afforestation, reforestation, and sequestration of carbon in existing forests.”
4. On page 110, the model rule calls for a description of the “plant species to be planted” to be included in the project narrative. Here we point out that obtaining the natural regeneration of trees, not the planting of trees, is by far the dominant way of creating new forest stands in the northeastern United States. The dominant means of regenerating forests is to create openings that will be regenerated with seeds from the trees surrounding the opening or left within the opening.

Trees certainly may be planted, and the planting of trees may likely be the best way to regenerate a forest on land that has not been a forest for 10 years, but in other cases natural regeneration would be best. We suggest that the project narrative could call for a description of the “plant species to be planted or established via natural regeneration.”

5. Offset credits would only be granted to projects occurring on lands protected by a permanent conservation easement. While we strongly support credit for projects on lands subject to permanent conservation easements, we note that carbon sequestration may occur in a forest regardless of a permanent conservation easement. It may be worthwhile to consider giving some credit to land that is under a term easement or in conservation ownership, yet not under a permanent easement, as well.
6. We question how the removal of forest carbon by harvest for lumber is considered. We note that some carbon so removed will end up sequestered as a building material, where it will remain in a building for an extended period of time. Sawdust will be burned (often for energy) and the chips and bark may, perhaps, be sold to a biomass energy facility, or may perhaps be converted to mulch, and thus sequestered in the soil. Lumber and paper that is discarded will either end up recycled, burned for energy, or buried in a landfill, and thus sequestered.
7. We note that the certification programs offered by the Forest Stewardship Council and the Sustainable Forestry Initiative are recommended as appropriate certification systems for offset projects. We do appreciate that other such certification programs, as determined by the state in which the project is located, may be used as well. While a worthy programs, the FSC and SFI programs are not suited to the small, private holdings that make up most of the forest in Connecticut. The American Tree Farm program of the American Forest Foundation is a certification program that is appropriate for such landowners. Properties subject to a forest stewardship plan prepared under the auspices of the USDA Forest Land Enhancement Program could be considered eligible as well.

Thank you very much for the opportunity to comment on this draft model rule, and thank you for your efforts to address this most important issue. We at the Connecticut Forest & Park Association would be pleased to provide assistance or further comment if desired.

Respectfully submitted,

Adam R. Moore  
Executive Director and Forester