



12/20/2019

Dear Climate Forward Staff,

Bluesource appreciates this opportunity to comment on Climate Forward's draft of the Reforestation Project Forecast Methodology v1.0. We believe this methodology has great potential to galvanize afforestation/reforestation activities that were previously unfeasible under traditional offset protocols, and we look forward to utilizing the Methodology on the ground when the final version is approved.

While overall, Bluesource believes this methodology looks well designed, there are a few items we'd like to bring to your attention for potential modification. These include:

**Comment 1:**

Additional information would be helpful in determining the appropriate forest type in step 2 of section 5.2.2. "Using the Reforestation Communities Data File, determine the forest type that corresponds to the project's geography and species composition of the trees planted or regenerating on the Project Area."

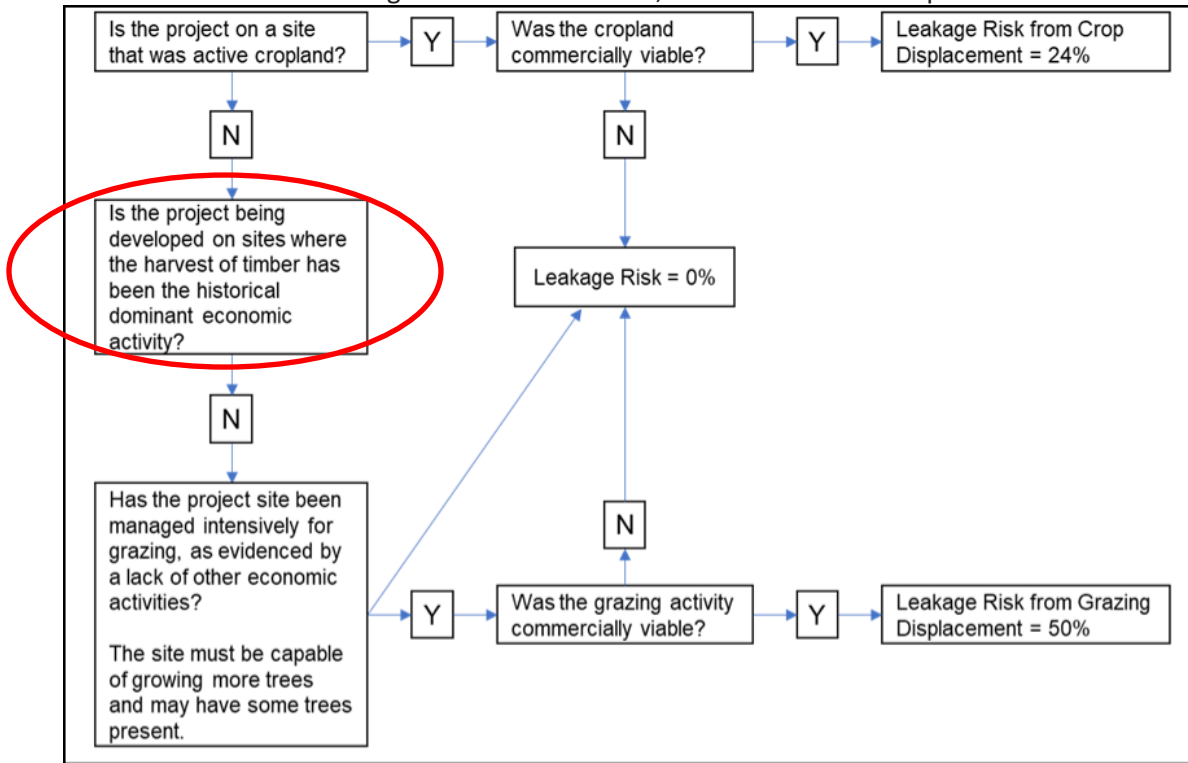
Ideally, there would be a qualitative description of each forest type and region so that there is no ambiguity in assigning forest types.

**Comment 2:**

It should be noted that, in the absence of a conservation easement, the default Rate of Return and CMAI factors will severely limit credit generation for large private landowners and will discourage them from participating in the program. The crediting for large private landowners is about half that of non-profit or government landowners, which seems far too conservative. In the absence of these crediting handicaps, it is likely that large private landowners would be strong candidates for participation in this program.

**Comment 3:**

The box circled in the leakage decision tree below, dose not have a “Y” option.



Thank you for your efforts and careful consideration of stakeholder input.



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