

# ELLISON, SCHNEIDER & HARRIS L.L.P.

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April 11, 2008

Kelaine Vargas  
Urban Ecologist  
Center for Urban Forest Research  
U.S. Forest Service  
1731 Research Park Dr.  
Davis, CA 95616

Dear Ms. Vargas:

Pursuant to your request for comments on the Urban Forestry Greenhouse Gas Reporting Protocols, we are pleased to submit the following comments on behalf of the California Alliance for Golf (the "Alliance"). The Alliance is a newly formed organization that acts as the umbrella organization for golf related industries, organizations and businesses in the State. The Alliance's mission includes, among other things, promotion of the positive environmental benefits of the golf industry, which it practices on a daily basis.

The golf industry is a major force in California's economy, and golf courses have much to offer in the way of environmental stewardship. For example, in addition to preserving open green space in urban settings, golf courses provide opportunities for groundwater recharge and water quality protection and enhancements. Similarly, golf courses include trees, turf, and other biomass that can improve and enhance air quality.

The Urban Forest Protocols may provide a unique opportunity for the Alliance to further its environmental stewardship mission by actively participating in air quality improvement programs, in general, and greenhouse gas ("GHG") emission reduction programs, in particular. The Alliance has been following this process and intends to participate where possible and practicable. The Alliance has reviewed the draft Urban Forestry GHG Reporting Protocols ("Draft Protocols") and offers the following specific comments.

First, the Alliance believes that the definitions in the Protocols should allow groups of individuals and organizations to "aggregate" their individual properties into a single "GHG project." "Aggregation" would allow cities, counties, golf course owners, and the like to aggregate their individual properties into a single "GHG project." Aggregation of projects that may be geographically distinct will also help increase CO<sub>2</sub> sequestration by maximizing growth and by avoiding the potential issues associated with "closely-spaced seedling," as identified in

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the Draft Protocols. We would be pleased to discuss the concept of Aggregation with you and craft appropriate language, including a definition of "Aggregator" for inclusion in Annex I.

Second, the Alliance believes that in addition to trees, turf grasses and other plants provide similar GHG reduction potential. For example, researchers sponsored by the USDA and at Colorado State have found that 2.47 Acres of golf course turf can sequester up to one ton of carbon per year (*Agronomy Journal*: 94:930-935 {2002}). Similarly with respect to composting, a study conducted by University of Nebraska researchers, found that compost when applied to soil can sequester significant amounts of carbon. (*Agronomy Abstracts*: #134752 {2002}). Again, we would be interested in working with you to account for the GHG reduction benefits of turf grass and other CO<sub>2</sub>-reduction biomass.

The Alliance looks forward to working with you on these important CO<sub>2</sub> sequestration strategies. If you have any questions, I can be reached at (916) 447-2166.

Sincerely,



Ellison, Schneider & Harris L.L.P

Jeffery D. Harris  
Attorneys for the California Alliance for Golf

cc: Robert Bouchier, Executive Director, California Alliance for Golf  
Mike McCollough, NCGA