CCAR Forestry Protocols Meeting April 29, 2008

Present: Nick Martin (on phone), Robert Hrubes, Bob Rynearson, Mark Nechodom, Bruce Goines, Jeanne Panek, Tim Robards, Louis Blumberg, Emily Russell-Roy/Connie Best, Ed Murphy, David Bischel, Gary Rynearson, Eric Holst, Michelle Passero, John Nickerson, Caryl Hart

Mark Nechodom agreed to serve as a facilitator as this meeting.

## Minutes were approved to post on CCAR's website.

#### Process Update – John

John presented a schematic of some of the modifications to the existing protocols that have been discussed. The outline included identifying new project types and creating new titles for some of the project types that already exist. The schematic will be modified with evolutions in thought as the update process continues and will serve as a base outline for drafting the updates. A definition box (field) will be added to each project type to assist in communicating the projects in the protocols, both new and old. Each version will be posted on the CCAR website to track progress.

#### Public Lands Subcommittee Discussion – Bruce, Caryl, Doug, Louis, Mark

The subcommittee addressed issues raised at the April 10 meeting and brought the following points to the workgroup:

- The baseline should consist of a qualitative test that looks back at the entities practices. This would include an investigation into the regulatory structure under which land is managed, the mission of the agency, any official plans and policy documents that govern management, and physical management practices that have actually occurred.
- Establish a current inventory of the relevant carbon pools.
- Apply a dynamic baseline that projects the inventory based on historical evidence.

The workgroup discussed the baseline approach in depth and agreed that the approach worked well for reforestation projects. There were many questions raised about the approach for forest management improvements, with much of the discussion focusing on rapid shifts in management policy that could impact carbon trends looking forward.

The group agreed to consider reforestation projects as a separate project type from improved forest management to enable more rapid progress in developing an approach for reforestation. The project type of improved forest management will be considered at a later time. It was identified that simply modifying the existing definition of the reforestation project type to allow for reforestation activities to occur on lands that have undergone significant natural disturbances to participate would facilitate participation by public landowners.

*Request to subcommittee*: Explore the affects of amending key governing terms in the definition of the reforestation project type in the current protocols (must be out of forest cover for at least 10 years with forest cover defined as having less than 10% canopy cover) on the existing protocols. The amendment of the criteria would allow a clause such as; must be out of forest cover for at least 10 years, or have undergone a natural disturbance that resulted in the canopy cover being reduced to less than 10% canopy cover.

This recommendation was accompanied with a realization that this modification might not be unique to public lands – the amendment could apply to private lands as well. Additionally, concern was raised whether the 10% threshold was the right threshold for eligibility status. No solutions to this concern were submitted.

*Modification to request*- Gary and Bob will work with the public lands subcommittee to determine if the same amendment could apply to private lands. This end result would be a modification to an existing project type for all landowners rather than creating a new project type unique for public lands.

The results of this investigation will be reported back to the workgroup at the May 23<sup>rd</sup> meeting.

# Private Lands Subcommittee Report – Michelle, Gary, Bob, Eric, Emily, Tim

Eric presented the update which focused on the continued exploration of FIA data to be used to establish a performance standard. The main focus of the investigation is to determine if the FIA data is a reasonable basis for developing a performance standard. The subcommittee put together a draft workplan that outlined a broad scope of work for analysis by Jeremy Fried at the Pacific Northwest Station for review and analyze.

The workplan aimed at testing the ability and quality of data at various levels of stratification. The levels of stratification suggested to the workgroup included:

- Forest Cover Type
- Private and Public
- Site Class
- Type of Management (even aged versus uneven aged)

The workgroup raised questions related to:

• Site Class – the key points here focused on availability of plots and question whether it is a component of the dataset. There was a suggestion that site class adjustments might be managed through policy adjustments to the mean inventory (from FIA data) in the assessment area.

- Whether it is important to separate California data from Oregon data to develop performance standards. Investigation into this is thought to reveal whether the 30 years of Forest Practice Rules in California has had an impact on common practice as measured by FIA plots.
- Management approaches (Even aged or Uneven aged) It was argued that continuous bifurcation of the FIA data gets away from measuring performance and may affect the statistics associated with the mean estimate.

Dave Bischel shared a study that looked at basal area within the coastal region and basal area within inland areas (CA). The report suggests that there are higher levels of stocks in coastal areas than inland and that standard errors in both areas are reasonable.

There was considerable discussion about the structural approach to developing the performance standard using FIA data. It was argued that the approach diverts from past approaches to CCAR baselines where common practice is identified initially through a qualitative assessment of practices which leads to quantifying the carbon. Furthermore, the difference is that the performance standard is derived from FIA data where policy constraints are not the leading factor. It was argued that the stringency level of the practice could be adjusted if workgroup members were not satisfied with the results of this approach. It was stated that there could be problems in defining distinct project types is assessment of practices does not lead the process. It was stated that any change from this approach should be documented.

Others countered this perspective and argued that the purpose of the qualitative assessment of the practices is focused on justifying the baseline approach. The FIA includes practices in the approach since it measures the actual application of the common practices. It is clear that the FIA – mean inventory approach is focused on carbon results rather than the practices that lead to the mean. The practice approach is implicit; the mean inventory approach is explicit with regards to carbon quantification.

Some members questioned whether the goals linked to the discussion are consistent with CCAR and ARB goals.

It was recommended that there should be a discussion to evaluate the tradeoffs to the two general approaches to developing baselines.

The discussion continued with various members voicing support for the current Option C regulatory approach, for an approach that aimed at standardizing Option C rules to facilitate input into a lookup table, the FIA performance standard, and an approach that uses current stocks and stock change accounting.

Voices in favor of the Option C method argued that the approach:

- Will provide the greatest incentive.
- Represents what could happen in absence of the project
- Is the way timber appraisals are conducted.
- Allows modeling of what is occurring

Voices questioning the Option C method argued:

- How might we consider smoothing to the large dips that create reductions in the baseline approach?
- Allows modeling of liquidation forestry
- Option C alone is not adequate to derive timber appraisals

Voices in favor of the Option C (management practices) standardization argued that the approach:

• Raises the level of stringency as compared to the current Option C method.

Voices questioning the Option C (management practices) standardization argued:

• How do we build the Option C lookup tables, through even age or uneven age management?

Voices in favor of the FIA method argued that the approach:

- Is unbiased and reduces gaming
- Works outside of California
- Ease of use
- FIA data has utility in measuring broad resolution trends and value in synchronization of approach

Voices questioning the FIA method argued:

- Unknowns related to ability to provide estimates.
- Simply measuring existing stocks may not be a reasonable measurement of effectiveness of the forest in terms of carbon sequestration. A forest with high stocks could be stagnant and not sequestering.
- Comparing low sites to high sites is problematic when considering stocking levels due to biological capacity of the site (the project area's estimate compared to the mean inventory estimate is affected by more than management alone biological carrying capacity matters).
- Eligibility issues with landowners with stocks below performance standard.

Voices in favor of the Current Stock method argued that the approach:

• is simple and clean

Voices questioning the Current Stock method argued:

• does not fit politically

John stated that CCAR would prefer a performance standard approach where possible and that the stock change accounting method would need to consider growth that would have occurred in the projects absence before it could be considered. Additionally, CCAR is seeking methods that enable their use outside of California. One workgroup member questioned if the workgroup was going to allow project specific analysis or limit ourselves to lookup tables.

Four unique approaches were been identified along with certain key work prior to consideration:

- 1. Current approach using Option C (Existing CCAR protocols)
- 2. Standardizing FPR language with no direct reference to Option C additional work needed to clarify this approach include addressing definition issue of even age basis or uneven age basis.
- 3. FIA approach More work needed to determine if approach even works (scoping with PNW station to determine how viable approach is).
- 4. Current Inventory and stock change accounting with consideration provided for background growth.

Each baseline alternative has supporters that will argue the merits of the approach using standardized evaluation criteria.

## Request to subcommittee:

- 1. Develop criteria to evaluate each baseline approach. Some criteria articulated at the meeting included identifying how wood products might be integrated (FIA approach) and how qualitative assessment guidance might be integrated.
- 2. Continue to pursue analysis of viability of FIA data as basis for performance standard in concert with Forest Service PNW.
- 3. Address concerns raised on how to approach standardizing practice approach (#2)

The evaluation criteria will be presented to the workgroup for discussion at the May 23<sup>rd</sup> meeting. An update report on the status of the FIA analysis is also expected.

## **Discussion on Cobenefits**

An unplanned discussion of cobenefits stemmed out of the baseline discussions. The focus of the discussion was on how even age management will be considered in the protocol updates. The discussion centered on the current definition of 'natural forest management' in the protocols and the lack of clarity related to understanding if even age managers in California are allowed to participate in carbon projects.

Clarifying this is considered an urgent matter to some workgroup members whose participation in the workgroup was stated to depend on the outcome of the clarification. Some members discussed what *might* be allowed under the current protocols and the natural forest management definition (no even age management projects have attempted to register yet). Others recommended taking the debate away from describing what fit the natural forest management definition and work on determining what limitations on species and silviculture would be included in the protocols.

### Request to informal group

John agreed to develop a matrix on how other protocols address cobenefits. Additionally, Michelle, Doug, Robert and Ed were signed up to work with John and develop a discussion on natural forest management.

The group agreed that cobenefits should be discussed in detail at the May 23<sup>rd</sup> meeting.

## Avoided Conversion Subcommittee Report – Michelle and John

The report was tabled until a later meeting.

#### **Oak Woodlands subcommittee – John and Doug**

The report was tabled until a later meeting.

#### **Permanence – Workgroup**

John stated that CCAR would like to focus the review of permanence and updates on looking at the risk of reversal of project reductions. In preparation for future discussions related to permanence, John requested that members:

- Become familiar with how current protocol addresses permanence
- Become familiar with how the Voluntary Carbon Standard addresses permanence.
- Consider and compile a list of risk elements send list to John.
- Consider and compile a list of elements that mitigate risk- send list to John for compilation.

John will compile list and distribute at the next meeting to provide the basis of the discussion on permanence. Michelle and Doug agreed to summarize the current approach to permanence in the protocols and distribute to the workgroup.