1) p. 5 “This protocol recognizes the fee owner as the default owner of urban forest carbon where no explicit legal encumbrance exists.”

Should read: This protocol recognizes the fee owner as the default owner of urban forest carbon where no explicit legal encumbrance exists or no municipality, educational institution or utility has legislated otherwise.

This change makes it possible for eligible entities to pursue legislative options that might streamline the carbon ownership issue.

2) p. 14 – secondary effects (p.14) not defined. Primary vs secondary not clear.

3) p. 28-31 UFMP – appears that no accuracy assessment is required for current tree canopy classified wall-to-wall – given multiple sources of error, one can’t assume results are accurate, and need to specify allowable bounds/confidence statistics/ tolerance standards.

4) p. 29 – table #8 confidence stats for canopy cover, not clear if this refers to sampling 1/10 ac plots for transfer functions or for citywide canopy cover estimates

5) There is need to clarify tree canopy measurement methods and confidence stats for:

   field plots – 24 tube sitings per plot vs. remote sensing of tree cover

   city – UTC classified wall-to-wall vs. sampled using field plots? Are the plots used for remote sensing the same as used for field plots? If so, what if there is a discrepancy between tree cover measured using tube sitings and remote sensing? Which is more accurate?

6) p.29 UFPP - field verify every 5-yrs is too often, too expensive

7) p 34 UFPP – include remote sensing, which can be used to detect tree presence, size and condition, with field measurements. Remote sensing every 5 years and field verification every 10 years. Otherwise, it is too expensive.

8) p. 43 UFMP – need more flexible stratification- 12 classes x 40 plots = 480 plots x $200/plot = $96,000. This will make it too expensive for most cities to conduct the initial carbon inventory. What is the justification for requiring 12 classes and minimum of 40 plots?

9) p.52 “Any substantial change in legal requirements, including ordinances, regulations or other legal obligations that would modify the trend described above over the next 20 years must be modeled for the next 20 years or as long as stated in the requirements (whichever is longer).”

Should read: Any substantial change in legal requirements, including ordinances, regulations or other legal obligations, other than requirements for complying with this protocol, that would modify the
trend described above over the next 20 years must be modeled for the next 20 years or as long as stated in the requirements (whichever is longer).

This change makes it possible for eligible entities to pursue policies and planning authorities that might promote carbon projects as additional to a pre-existing baseline.

10) Please index the glossary with terms that appear in the text