

Public Comment for Draft Grassland Project Protocol

SCS Global Services

Thank you for allowing us to submit comments to the Grassland Project Protocol. We (Letty Brown and Francis Eaton) have the following two comments:

With regard to stratification methods for the location-based emission reductions threshold, was the Universal Soil Loss Equation (USLE) considered as one of the variables used for stratification? As a tool commonly used to estimate average annual soil loss by accounting for soil erodibility, rainfall, runoff, slope, cover, and management factors, it is highly relevant to soil organic carbon dynamics as well as land productivity. Factoring the USLE into the stratification process would improve the quantification of the baseline and project emissions estimates and the resulting model accuracy.

In relation to the optional quantification of non-tree woody biomass (shrubs), were ground-based methods considered for monitoring changes in shrub cover? In our experience using Landsat imagery to monitor changes in shrub cover introduces a great deal of uncertainty into the monitoring process.

Please let me know with any questions about these comments.

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