

Comments on DRAFTS from Lisa Gonzales-Kramer, Project Manager, CRSP Reforestation Project Forest Project Protocol 4.0 and Quantification Guidance for Use with Forest Carbon Projects

COMMENTS ON FOREST PROJECT PROTOCOL VERSION 4.0, REDLINE VERSION, April 5, 2017

Section 3.9.2 Natural Forest Management

- P.21 (redline) – The following link does not work on Assessment Area page (<http://svinetfc4.fs.fed.us/research/section/index.html>) to confirm Supersection/Assessment Area.
- P.22 (redline) – Table 3.2, under “Structural Elements” requirements, there are two options. One is to monitor dead wood throughout the Project Area; the second option is to monitor dead wood on harvested areas. The Cuyamaca Rancho State Park (CRSP) Reforestation Project does not fall into either of these options. Suggest an Option III for projects with no commercial harvest activities and where standing and lying dead wood is not cut or moved except for required safety purposes and/or reasonable fuels management. Natural Forest Management in these cases is assumed for the Project Area. Therefore, there is no need to monitor dead wood (standing or lying). The proposed Option III would address this scenario.
- P.23 (redline) – Table 3.2, under “Structural Elements” there is a paragraph under Option I, that states “If dead material does not exist at the quantities identified in the Assessment Area data file, dead trees shall be recruited as described below for Option II.” There do not appear to be any dead material requirements, per this referral, listed in the Assessment Area Data File. (The link to this file is: <http://www.climateactionreserve.org/how/protocols/forest/assessment-area-data/>)

Section 4 Identifying the Project Area

- P. 26 (redline) – We suggest the following edits (added language underlined) for clarification in the last two lines of the third paragraph of this section. “...The Project Area can be contiguous or separated into tracts or distinct polygons. Additionally, the most recent Assessor’s Parcel Numbers (APN) associated with the project area must be submitted to the Reserve.”

Section 5.1 GHG Assessment Boundary/Reforestation Projects

- P. 31 (redline) – Standing dead carbon (carbon in all portions of dead, standing trees) – Reference to measurement requirements for Natural Forest Management Criteria (“Minimum volume thresholds are stated to meet Natural Forest Management criteria.”) needs to be clarified in Section 3.9.2.
- P. 31 (redline) – Lying dead wood carbon – References to measurement requirements for Natural Forest Management Criteria (“...lying dead wood will be accounted for through the Natural Forest Management criteria,” and “Minimum volume thresholds are stated to meet Natural Forest Management criteria.”) need to be clarified in Section 3.9.2.

Comments on DRAFTS from Lisa Gonzales-Kramer, Project Manager, CRSP Reforestation Project Forest Project Protocol 4.0 and Quantification Guidance for Use with Forest Carbon Projects

6.1 Quantifying Net GHG Reductions and Removals/Reforestation Projects

- P.52 (redline) – 6.1.1 Estimating Baseline Onsite Carbon Stocks - Subparagraph 1 under Deferral for Carbon Stocks Not Affected by Site Preparation describes treatment of standing dead carbon stocks which are now excluded from GHG Assessment Boundary for Reforestation Projects.
- P. 54 (redline) – 6.1.5 Quantifying Secondary Effects – The second paragraph states that “Mobile combustion emissions must be added to Secondary Effect emissions (SEy in Equation 6.1) in the first year of a project.” Shouldn’t this deduction apply to the site preparation period which may be more than one year?

Appendix A Determination of a Forest Project’s Reversal Risk Rating

- P. 132 (redline) - A.2 Management Risk/Management Risk II – Conversion of Project Area to Alternative Land Uses - Need to understand what is required beyond the recorded PIA as a Qualified Deed Restriction for public lands. Suggest language be added to first row of Table A.5 “...or on public lands.”
- P. 132 (redline) - A.2 Management Risk/Management Risk III – Over-Harvesting – Need to understand what is required beyond the recorded PIA as a Qualified Deed Restriction for public lands. Suggest language be added to first row of Table A.6 “...or on public lands.”

COMMENTS ON QUANTIFICATION GUIDANCE FOR USE WITH FOREST CARBON PROJECTS, REDLINE VERSION, April 5, 2017

1 Reporting Requirements for Forest Carbon Pools

- P. 1 (redline) – Table 1.1 – Under the Reforestation column of this table, and the row for Standing Dead Trees, it states first: “Required for adherence to Natural Forest Management criteria and for project reporting”; and then secondly: “Any trees removed as part of site preparation must be quantified.” We need to understand how this reconciles with how we are supposed to measure Standing Dead Wood for Natural Forest Management Criteria on PP.22-23 (redline) of the draft FPP v 4.0; and the exclusion of Standing Dead Carbon on P. 31 (redline) of the draft FPP v.4.0. Also, we need to understand how “removed” is defined – what if standing dead wood is felled but not removed from Project Area?
- P. 1 (redline) – Table 1.1 – Under the Reforestation column of this table, and the row for Lying Dead Wood, it states: “Required for adherence to Natural Forest Management.” We need to understand how this reconciles with how we are supposed to measure Lying Dead Wood for Natural Forest Management Criteria on PP.22-23 (redline) of the draft FPP v 4.0.

Comments on DRAFTS from Lisa Gonzales-Kramer, Project Manager, CRSP Reforestation Project Forest Project Protocol 4.0 and Quantification Guidance for Use with Forest Carbon Projects

2 Guidance for Estimating Carbon in Forest Carbon Pools

- P. 4 (redline) - 2.3 Requirements for Estimating Carbon in Standing Live and Dead Trees – This section starts off by stating : “It is required that both standing live and standing dead trees be sampled.” Again, we need to understand how this reconciles with how we are supposed to measure Standing Dead Wood for Natural Forest Management Criteria on PP.22-23 (redline) of the draft FPP v 4.0; and the exclusion of Standing Dead Carbon on P. 31 (redline) of the draft FPP v.4.0.
- P. 9 (redline) - 2.8 Requirements for Estimating Lying Dead Wood Carbon – This section starts off by stating: “All projects must either maintain an inventory of lying dead wood for the project area or monitor harvested areas according to the guidance in this section to ensure the project meets the conditions identified in Section 3.9.2 (Natural Forest Management) of the Forest Project Protocol.” Further, the section states: “Project Operators are required to include the status of lying dead wood with each monitoring report.” Again, we need to understand how this reconciles with how we are supposed to measure Lying Dead Wood for Natural Forest Management Criteria on PP.22-23 (redline) of the draft FPP v 4.0; and the exclusion of Lying Dead Wood Carbon on P. 31 (redline) of the draft FPP v.4.0.
- PP. 19-22 (redline) - 2.9 Requirements for Estimating Soil Carbon Emissions - Step 7f: Determining Emissions Associated with Management Activities. Suggest a set of options for Table 2.18 under Harvesting Intensity that includes “No Harvest.” It’s not clear how to look up soil carbon loss % for site preparation with no harvest.
- P. 24 (redline) - Table 2.20. Example: Summing All Onsite Carbon Stocks and Calculating the Confidence Deduction – This table states that Standing Dead Trees are “Required” for sampling for “All Project Types.” This is not consistent with the exclusion of Standing Dead Carbon on P. 31 (redline) of the draft FPP v.4.0.