

THE
CONSERVATION FUND

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Dear Climate Action Reserve,

The Conservation Fund ("Fund") appreciates the opportunity to comment on the draft 4.0 of the Forest Project Protocol ("FPP"). Generally, the Fund appreciates the pragmatic efforts of the Climate Action Reserve to update the protocol in areas that will reduce the cost of project development, implementation, and verification while maintaining a rigorous verification standard. The Fund provides the following comments:

FPP 4.0 – Identifying the Project Area

The inclusion of the Landfire database as an option to define Assessment Areas is unbiased and useful. The application of this database will allow project developers to spend less time defining Assessment Areas when considering a potential project. The use of this database will also remove ambiguity from the verification, reducing verification time and cost.

However, we do suggest additional clarity surrounding language in section 4.0. In the first paragraph, the sentence "After the second site visit verification, the project boundary may no longer be amended" is confused by the later guidance in section 4.3 "Modifying the Project Area" which discusses removal of a portion of the Project Area.

FPP 9.3.5.1 - Updated stopping rules for sequential sampling

The suggested stopping rules for diameter and height measurements will allow verifiers efficiently sample diameter breast height measurements, tree height measurements, and determine conformance by using statistical analysis. We suggest additional clarity surrounding the structure and tolerance of the DBH and height sequential sampling tests.

Update of the Assessment Area Data File

Including standing dead stocks in the common practice statistic is useful; however, it would be beneficial to project developers to have the standing live and standing dead values available separately in the Assessment Area Data file. The separation of pools would allow for more accurate initial analysis of a potential project.

Sincerely,

Lauren Fety
Forest Analyst