

**SUMMARY OF COMMENTS RECEIVED
ON THE
DRAFT URBAN FOREST PROJECT REPORTING PROTOCOL
(Draft released July 8, 2008)**

Comments received by:

1. Business and Ecology Consulting (BEC)
2. California ReLeaf (ReLeaf)
3. Canopy (Canopy)
4. Parks & Recreation Department, City of Roseville, CA (Roseville)
5. Econergy International Corporation (Econergy)
6. Goleta Valley Beautiful (GVB)
7. Roseville Electric, City of Roseville, CA (R Electric)
8. Roseville Shade Tree Program, City of Roseville, CA (R Tree)
9. Sacramento Tree Foundation (STF)
10. Weston Solutions, Inc. (WS)

Performance Threshold

- 1) **a.** The performance thresholds required of municipal, campus, and utility entities were 0.72% annual net tree gain, 0.58% annual net tree gain, and 0.004 trees planted annually per residential customer, respectively. We believe these levels are too high and would be a significant barrier to participation. **(ReLeaf, Roseville, R Electric, R Tree, STF)**
- 1) **b.** We were concerned that the performance thresholds required of municipal, campus, and utility entities in the protocol draft were much too high. The California Registry indicated that it was considering setting the performance threshold for municipalities and campuses at a level that would require the existing urban forest to be maintained at least at its current population. All project trees that exceeded this level could be registered for credit. The threshold for utilities would be reduced to zero as it is not common practice for these entities to offer tree planting programs. We support setting the performance thresholds at these reduced levels as we believe they properly represent better-than-average performance. These actions would also provide better incentives for tree planting programs. **(ReLeaf, Canopy, Roseville, GVB, R Electric, R Tree)**

We support the newly suggested performance thresholds at these reduced levels. Municipalities have no mandate to plant trees and less than 1% of utility districts across the nation currently engage in tree planting efforts. In regards to municipalities and campuses, using the no net loss from year to year and setting that as the minimum standard for additionality sets a good base performance threshold standard. **(STF)**

RESPONSE: The California Registry, in consultation with USFS urban forest experts, re-evaluated the stringency level chosen for the performance thresholds. It was determined that the original thresholds for all entities represented a level of performance well above average. As described during the public workshop, the California Registry would consider revising the thresholds to 0% urban tree population growth rates for municipalities and educational campuses. (Originally the thresholds were based on the 50th percentile in a dataset of high performers.

Revised thresholds are closer to the 25th percentile.) In addition, because very few utilities have residential tree planting programs to begin with, the California Registry would consider allowing all such programs to be recognized as exceeding best practice and be eligible to earn GHG reductions. Significant support for these changes was expressed during the public comment period and these changes were included in the final protocol.

Co-Benefits

- 2) Although we recognize that for reasons of accounting and accuracy, the California Registry cannot verify greenhouse gas (GHG) benefits associated with reductions in energy use due to strategic tree planting or with the use of tree residue for bioenergy, we feel these benefits add significant value to tree planting projects in comparison to other GHG reduction measures. We therefore urge the California Registry to emphasize the value of these benefits in the reporting process and to provide a place on the reporting forms for their estimated value to be entered. **(ReLeaf, Canopy, Roseville, GVB, R Electric, R Tree, STF)**

RESPONSE: The California Registry does not include indirect GHG reductions in the calculation of GHG offset credits. The fact that actual emission reductions occur somewhere outside the control of the project has important implications for the ownership of and claims to indirect reductions. These issues make it difficult to track where and whether GHG reductions occurred and to ensure that multiple parties do not take credit for the same GHG reductions (i.e. “double-counting”). Because this information can be potentially useful to project developers and the technical expertise and methodologies were readily available to the committees developing the protocol, technical guidance for quantifying indirect GHG emission reductions were included in an Appendix to the protocol (the CTCC tool also includes optional data fields for calculating indirect GHG emission reductions). Reporting fields for co-benefits will be provided in reporting forms.

- 3) Trees provide many other benefits, some of which can be quantified, such as reduced energy costs, stormwater runoff reduction, and air quality improvement, and others that can be described qualitatively, such as conservation education, improved human health, neighborhood revitalization, job training, and recycling green waste. These additional benefits also add significant value to tree planting projects. The California Registry should emphasize the value of these co-benefits in the reporting process and provide a place on the reporting forms where their estimated value can be entered and a qualitative description can be provided. **(ReLeaf, Canopy, Roseville, GVB, R Electric, R Tree, STF)**

RESPONSE: Reporting fields for co-benefits will be provided in reporting forms.

- 4) While some of these benefits are not climate indicators, is there some way the carbon registry can value these benefits to increase the promotion and desirability of the Protocol projects? **(STF)**

RESPONSE: While the California Registry supports reporting of co-benefits, the valuation of such benefits is beyond the scope of services provided (which include GHG accounting tools and GHG offset registration services).

Project Entities

- 5) The protocol only allows for projects undertaken by municipalities, utility companies, and educational campuses to be registered. Often, however, other entities, in particular nonprofit tree advocacy groups, take the lead in spearheading tree planting projects.

Two potential concerns for including other entities arise: the questionable longevity of other entities, especially nonprofit organizations, and the lack of available data for setting a performance threshold. We note first that the entire premise of the California Registry relies on assuming the longevity of the nonprofit California Registry itself. Therefore, we consider this concern to be shared equally between those doing the reporting and those accepting and verifying the reports. There are many groups statewide like Goleta Valley Beautiful that are involved in the long term sustainability of our urban forests that should be included in your participating entities list. The California Registry should determine whether sufficient historic data exist and whether a suitable matrix can be developed to create a performance threshold before deciding to exclude other entities. We therefore encourage the California Registry to consider adding other entities, in particular nonprofit tree advocacy groups, to the list of participating entities. **(ReLeaf, Canopy, Roseville, GVB, R Electric, R Tree, STF)**

RESPONSE: The protocol allows for participation by any type of organization in partnership with these three entities: municipalities, educational campuses, and utilities. Over the long term, ownership and responsibility for tree care and maintenance resides with the entity, so it is important to have them involved as project developers to safeguard the survivability of the project and help ensure the permanence of GHG reductions. In addition, sufficient data were available to establish a standard of best practice (necessary for determining additionality) for these entities during the protocol development process. In future revisions to the protocol, the California Registry will review relevant available data for other types of entities (including non-profit tree planting groups) with a view towards expanding the list of eligible entities.

- 6) There are two other types of entities that we feel should be included and weren't specifically listed – counties and school districts. Rather than dismiss entities from the protocol, we encourage the California Registry to determine standards for allowing private or non-profit agencies to participate, such as including data needed to set a threshold and historical record and project successes showing reasonable assurance to the longevity of the organization.

Concerns over the non-public agency's ability to track their trees may also be addressed by creating the standard for reporting. Reasonable standards will allow a window for those organizations that have the capacity and organizational longevity to participate. Questions of site ownership are addressed in the same manner for which they are addressed by utilities. Ultimately, it will be the market for carbon offsets which will be the greatest barrier to entry for private organizations. However, as the price of carbon rises it is foreseeable that the California Registry will be excluding some well-qualified organizations that possess the capacity and motivation to capture certified carbon credits.

We therefore encourage the California Registry to consider creating a list of reasonable standards for participating organizations rather than limiting participation from one type of an organization or another. **(STF)**

RESPONSE: See above. In addition, in consultation with USFS, it was determined that the performance threshold for municipalities is applicable to counties and other local agencies. This was clarified in the final protocol. In future revisions to the protocol, the California Registry will review relevant available data for establishing a performance threshold for school districts.

Permanence

- 7) It is our belief that a secured guarantee of continuous annual reporting for a 100 year project lifetime is highly implausible. Our company has extensive experience working with the public sector, and sources of funding for even one time projects is often a major impediment to pursuing the initiative. Although it is under the guidance of the IPCC, the 100 year standard is likely to be daunting to any local body considering urban forestry projects.

It is our suggestion that this project lifetime be adjusted and made as condensed as possible without loss to the integrity of sequestration benefits. For instance, a 10-year “good-faith estimate” of project reporting, with the “intention” to continue the project beyond that, might be acceptable to a state agency. A blanket binding commitment would likely not be acceptable. Of course, any future benefits would be lost if the project were terminated. **(WS)**

RESPONSE: The 100-yr reporting is a good faith estimate of project reporting and is intended to ensure long-term commitments that will foster permanent GHG reductions.

Tree Maintenance Plan and Leakage

- 8) It may not be appropriate for California Registry to determine leakage based on annual expenditure fluctuations (Section 4.3). If there proves to be a decrease of 10% with regards to expenditures, this protocol should have a built in process through which project owners may be able to defend these circumstances. For example, project owners may simply have found a more cost effective method of maintaining their sites while at the same time preserving the same high standard of management. It is our suggestion that this option be made available for project owners. **(WS)**

RESPONSE: The protocol asks the project developer to explain shifts in funding as a preliminary step in the leakage assessment. If changes can be explained, then no leakage is assumed. This was further emphasized in the final protocol.

- 9) As for leakage caused by shifting funds from non-project trees to project trees, it is unclear how exactly this will be documented for California Registry’s review. Under the Tree Monitoring Plan (Section 9.1) it is required to report the total number of entity trees prior to the start of the project (Project Eligibility Section of the Project Submittal Form). However, it seems it is not required to submit a maintenance plan, including annual

expenditures, of these entity trees. How then will California Registry be able to compare the two and safeguard against leakage? More to the point, how does “number of trees” have much meaning—shouldn’t it be carbon stocks determined using allometric equations? **(WS)**

RESPONSE: The Tree Monitoring Plan supports multiple mechanisms in the protocol, including but not limited to leakage. The Tree Monitoring Plan asks for entity and project-level expenditures, which are the basis for the leakage assessment. This was further clarified in the final draft. Data on number of trees is used to evaluate additionality by comparing entity performance to a performance threshold. Due to revisions in the performance threshold, the number of entity trees is no longer necessary to report, only the number planted and removed each year at the entity and project level.

Performance Monitoring

10) We have concerns about the measurement of maintenance efforts for monitoring the success of projects. We believe budget numbers and vehicle miles traveled are not clear indicators of the relative maintenance efforts. Since inventories are required to be considered for a project, we believe monitoring of the management plan, inventory and population condition over time will show a clearer picture of how the project trees and previous existing trees are cared for. **(STF)**

RESPONSE: Budget numbers are used to assess the potential for leakage. However, the budget alone will not be the only criteria considered. Significant changes in expenditures trigger further review by a verifier. The reporting of vehicle miles traveled is used to verify estimates of GHG emissions from project tree care and maintenance; these are the activity data used with standard emission factors to estimate GHG emissions. Project trees must be monitored and inventoried over the course of the project lifetime. In addition, as a result of revisions to the performance threshold, in the final protocol entity-level net tree gain (NTG), i.e., number of trees planted minus number removed, must be reported annually. If the entity NTG is less than zero, then no GHG reductions can be reported that year. The California Registry believes these criteria are necessary and sufficient for monitoring project performance across multiple areas.

Other Clarifications

11) What if planted trees are unsuitable to the site due to climate changes/shifts, pests, or diseases? **(BEC)**

RESPONSE: Project tree sites can be relocated during the project lifetime and this may be necessary if tree sites become unsuitable. In addition, the protocol encourages project developers to minimize the risk of losses and asks for a description of activities taken to promote establishment, vigorous growth, and longevity of project trees (e.g. purchasing trees grown to quality standards, providing effective training in tree care practices, enforcing ordinances to protect project trees, and implementing tree care agreements).

12) What happens if urban trees (in a project) are burned in a wildfire? **(BEC)**

RESPONSE: Fires causing urban tree loss are considered unlikely in most urban and developed areas and GHG emissions from combustion are not explicitly included in the accounting boundary. However, any trees lost due to fire would need to be replaced under the permanence requirements. This one-to-one replacement will account for the carbon stocks lost in fires and non-CO₂ emissions from combustion would be relatively small and considered de minimis.

13) Please address the "balance" between shade/energy/wildfire.

When trees are planted 10 to 30 feet from a house/structure, some will grow and their branches hang over the roof, and then homeowners are obligated to prune/remove trees, if they live in a high wildfire hazard zone. The CalFire wildfire regulations (Office of State Fire Marshal) now require the following, from <<http://www.leginfo.ca.gov/cgi-bin/waisgate?WAISSdocID=8732659322+0+0+0&WAISSaction=retrieve>>:

- (c) Remove that portion of any tree that extends within 10 feet of the outlet of a chimney or stovepipe.
- (d) Maintain any tree adjacent to or overhanging a building free of dead or dying wood.
- (e) Maintain the roof of a structure free of leaves, needles, or other dead vegetative growth. **(BEC)**

RESPONSE: Energy benefits from urban trees are reported optionally as co-benefits. The protocol does not in anyway impact existing requirements under wildfire regulations.

14) It should be clarified whether a "tree site" contains one tree at a given time, or multiple trees. **(Econergy)**

RESPONSE: One tree can occupy a tree site at a time. The tree may need to be replaced over time to adhere to the permanence requirements. In addition, tree sites can be relocated if necessary.