

Urban Forest Project Protocol Version 2.0 Public Comment

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I agree with Greg McPherson 100% regarding the need for reducing project verification costs by more flexible guidance for carbon inventories and use of remote sensing with field data collection for planting projects.

My comment, under Subsequent Verifications, concerns the protocol's use of "allometric equations" and satellite images for quantifying carbon stocks. If that is the case, why not clarify and state upfront to allow allometric equations for subsequent verifications. That would dramatically lower the cost of verification for a utility-funded tree planting program, which plants trees all over a map, over a huge service territory. In other words, the 1st year verification requires the initial or on-site visits, and then the subsequent verifications can be done using allometric equations and satellite data.

The cost of frequent verifications is a substantial barrier to participation in your urban tree carbon protocol. For instance, SMUD would have to hire an independent consultant to perform the verifications, and all of them would have substantial fixed cost, whether we have a few or many trees in the sample. The 5-year verification time frame means that we would have to require too many on-site visits over the 100 year time frame, and thus impose a substantial cost. I can tell you that 2 years ago SMUD's Shade Tree program went out to solicit bids from consultants for the initial CARB and CAR carbon certification verification and application, and we received three bids ranging from \$30,000 to \$50,000 to perform only the 1st year verification. Needless to say, we have determined that SMUD is not willing to incur that kind of cost for the 1st year verification. Now imagine, for the next 100 years we need to hire contractors for 20 more on-site verifications because of the proposed 5 year verification cycle requirement.

I appreciate the desire to maintain the rigor, integrity, and accuracy of these estimates of carbon sequestration and storage benefits, but if you make the urban tree carbon verification requirements too costly (i.e. on-site verification every 5 yrs.), all of your invested efforts to revise the protocols would be a moot point—nobody would participate. A ten-year verification cycle that uses remote sensing would provide the rigor, integrity, and accuracy of these carbon estimates and would be a far less costly solution-- this would be the only way to keep the future cost of verification reasonable.

If verification process is too cumbersome and expensive, nobody will participate in an Urban Tree Planting Carbon Project. All of this effort to revise the existing urban tree protocol would not generate any positive future results. (As if you went to all this effort to throw a nice party, and nobody showed up.)

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