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Ruby Canyon Environmental

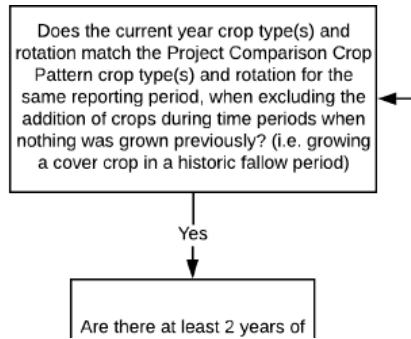
743 Horizon Court, Suite 385

1. Section 3.4.1 The Performance Standard Test

- a. The words “In any case” are used in the last sentence of the second paragraph and twice in the third paragraph. Consider revising the grammar.
- b. There appears to be a typo in the second sentence of the third paragraphs: “modeling approach selected for the reporting period, and. In any case, the”.

2. Figure 3.1 3. Define the baseline for each cultivation year

- a. For the box with the text in the picture below, there is no option for a “no” arrow. If this is a yes or no question, shouldn't there be an option for no?



3. Section 6 8. B. is blank.

4. General comment on verification rotation; the Reserve should consider the following requirements for this project types (and other AFOLU project types). The Reserve and ARB are the only registries that require separate courses on their Protocols. In theory, this is a sound practice. In practice, this increases verification costs for the Project Developer because some of the Protocols have very few projects that are participating.

Projects can verify 5 reporting periods at a time for this Project type. For COI purposes, this means that if two five-year reporting periods are verified, the Project Developer will need to hire two separate VBs. Each VB will be required to train two individuals.

For Project types including OWC, OWD, Grasslands and N2O, the Reserve has two and sometimes only one VB certified. There are hardly any projects under these protocols. Thus, the VBs are force to pass on the Reserve's extremely expensive training (including man-hours for homework, class and test-taking) directly to the Project Developer because the VB cannot spread the cost of training out over many verifications (like Landfill projects).

Unless we are unaware of knowledge that the Reserve is privy to, it is unlikely that there will be more than a handful of Projects under this Project type.

The Reserve should either consider foregoing the direct training costs or adjust the timing of COI so that a verification body can assess COI based on number of verifications and not number of reporting periods. Otherwise, the training costs will inflate the verification costs.

5. I agree with section 8.4.1. One comment is that as a VB, we are okay performing site visits to at least one concentrated area of fields per verification. This issue with the nitrogen management protocol site visit requirements are that site visit travel costs and time become unreasonable if there are more than 1000 fields across multiple states.

One comment; as a VB, we would likely perform a site visit to an area of concentrated fields. If the random selection includes fields that are hundreds of miles from a cluster, we will likely always choose the option for a remote site visit to those fields based on cost and the fact that ICT is readily available now.

6. Regarding Table 8.1 and 8.2; the following items are listed as NOT being able to apply professional judgment: 2.2, 3.4.1, first 5 in table 8.2. These items will likely involve SOME professional judgement. We believe it is unreasonable to have NO professional judgement with these.