

February 21, 2022

Re: Reforestation Forecast Methodology Public Comment Draft of Version 2.0

Dear Mr. Remucal,

DroneSeed appreciates the opportunity to review and comment on the draft of version 2.0 of the Reforestation Forecast Methodology. In general, we are pleased with the revisions to the methodology, but below we have provided a few comments and questions to the suggested changes.

Thank you for considering these comments. We look forward to the official release of version 2.

Sincerely,

Cassie Meigs
Director of Account Management
DroneSeed Co

-----Comments -----

Section 3 Eligibility Rules

3.8.1 Tonne-Tonne Accounting

- The changes to the required terms of the easement are a positive change from the prior version and recognize the financial uncertainty imposed on the easement holder. However, we question the need for the buffer pool contribution if reforestation is mandatory, as it seems like the project owner is getting penalized twice. Please consider the use of the Buffer Risk Pool instead to deal with this risk. We also note that State laws govern whether or not reforestation is required after a wildfire event, and if salvage logging occurs post-wildfire (as is allowed by the required terms of the easement), then reforestation is required (in Oregon). Therefore, the easement requirements should only apply when reforestation is not legally required.

3.8.3 Conservative Crediting and Permanence Risk Pool

- The Permanence Risk Pool is intended to provide insurance in case of natural disturbance, so we suggest striking the requirement for reforestation in easement terms.

As a compromise, we suggest a requirement that the Forest Owner hold seed (at an approved seed storage facility) for the appropriate seed zone and elevation for the duration of the easement as insurance in the event reforestation is necessary. This creates proactive steps to ensure seed supply in diverse seed zones, incentivize new seed collection efforts, and the creation of infrastructure and record-keeping for long-term cold storage of critical seed banks.

Another alternative, previously discussed, is to permit buffer credits to be sold (rather than retired) to fund additional reforestation.

Section 5 Quantification Guidance

5.1.3 Shrub Carbon

(pg 31) "Projects with no shrub cover within the project area immediately preceding the project start date are not required to perform the shrub carbon analysis, though the project proponent must demonstrate the lack of shrub cover."

- Clarify how the project proponent needs to demonstrate the lack of shrub cover within the project area. Would this again be with random photo plots? Can the same photo plots be used as were taken to assess naturally regenerating seedlings?