



February 17th, 2022

Climate Action Reserve
818 W. 7th Street, Suite 710
Los Angeles, CA 90017

RE: Comment to Reforestation Forecast Methodology v2.0

Dear Climate Forward Staff,

Thank you for the opportunity to comment on the draft version 2.0 of the Reforestation Forecast Methodology (the “Methodology”).

As a project developer, offset purchaser, and strong proponent of natural climate solutions, The Climate Trust (TCT) welcomes the opportunity to comment on existing and updated language in the proposed Methodology update. We believe that several updates to the Methodology provide helpful clarification on a range of practical questions that arise during the project development process. The introduction of programmatic monitoring by the Climate Action Reserve is another welcome addition that will increase consumer confidence in FMUs. There are two items that we would like to bring to your attention for potential modification to facilitate even greater utilization of the Methodology. These include:

1. Remove the requirement for pre-planting site photos

The updated Methodology includes a requirement to assess baseline shrub cover by collecting pre-project photos before any site preparation or planting has occurred. This requirement will jeopardize the eligibility of many potential projects. The Climate Trust often partners with organizations that have already begun some level of project activity before becoming aware of the still new opportunities through Climate Forward. For example, partners that work with TCT often initiate site preparation activities such as salvage logging and slash burning soon after a wildfire event occurs and prior to exploring a Climate Forward reforestation project. Therefore, the requirement for pre-planting photos would unfortunately exclude many of the very projects that Climate Forward is seeking to incentivize. Perhaps where reforestation is being done after a wildfire event, the shrub baseline can be assumed to be *de minimis* as site preparation is taking place after most of the shrub layer has been removed by fire. In such instances, baseline shrub carbon stocks are almost certainly lower than project stocks and it would



be conservative to exclude them, as discussed in Section 5.2.2 of the methodology. This could be determined using post-fire aerial imagery or deduced through fire intensity. Recent aerial imagery is acceptable to the Reserve when determining shrub cover for the calculation of combustion emissions associated with machinery use in site preparation (Section 5.5.1). It would be preferable to either estimate shrub carbon using a similar approach with aerial imagery or to assume that shrub stock changes are *de minimis* and covered by the conservative nature of project estimates.

2. Allow conversion of FMUs to CRTs based on remotely sensed data

Remotely sensed data provides a reliable and efficient means of assessing forest cover and evaluating trends in forest growth. Furthermore, the relatively homogenous stands that develop following reforestation as prescribed in this methodology are especially well suited to analyses based on remotely sensed data. Instead of requiring a ground-based inventory to convert FMUs to CRTs, it would be more efficient to combine the multiple lines of information available for forests regenerated under Climate Forward to generate ex-post estimates of carbon on the landscape. A reliable estimate of forest carbon can be achieved by combining aerial imagery with planting data (date and acreage planted to each species) and the forest growth projections from Smith et al. (2006) that have been thoroughly vetted and are already being used to calculate FMUs in CAR's Reforestation Communities Data File. Once a project has provided appropriate aerial imagery as documentation of acceptable forest cover, a calculator based on the Reforestation Communities Datafile could do the FMU-CRT conversion automatically based on the number of years since planting and the number of acres that remain forested. Given the relatively homogenous nature of newly planted stands, CRTs could be issued assuming conservative stocking values. This approach could be limited to acres that have not been thinned or subjected to natural disturbance to further ensure they do not exceed Smith et al.'s conservative values.

Thank you for your efforts towards increasing the pace and scale of reforestation, and for your consideration of stakeholder input.

Sincerely,

The Climate Trust



**THE
CLIMATE
TRUST**

About The Climate Trust

The Climate Trust (TCT) is an Oregon based non-profit organization founded in 1997 whose mission is to manage, develop, and fund high quality carbon offset projects in the United States. TCT wrote the first standard for a US offset project in 2001. Over its 25-year history, The Climate Trust has contracted millions of tons of carbon emissions reductions, developed forestry, grassland, and other carbon offset projects through compliance and voluntary registry protocols, and developed innovative financial mechanisms to increase the pace and scale of carbon offset development.