



SUMMARY OF COMMENTS & RESPONSES REDUCED EMISSIONS FROM MEGAFIRES FORECAST METHODOLOGY VERSION 1.0

One set of comments was received for the Climate Forward draft Reduced Emissions from Megafires¹ Forecast Methodology, Version 1.0, during the public comment period, which took place from June 23 through July 25, 2022. Staff provided responses to the comments below.

The comment letter can be viewed on Climate Forward's website at <https://climateforward.org/program/methodologies/reduced-emissions-from-megafires/>.

COMMENTS RECEIVED BY:

1. Climate Impact Partners

General Comments

1. The Avoided Wildfire Emissions methodology will unlock much needed activities to prevent devastating wildfires in the American West. Climate Impact Partners commends the Climate Action Reserve's efforts for releasing this methodology.

RESPONSE: The Reserve would like to thank Climate Impact Partners for reviewing the methodology and for providing feedback. We, too, believe the methodology provides a much-needed opportunity for private capital to help address not just GHG emissions from wildfires, but a whole host of resource and ecological concerns that are addressed by fuel treatments.

Section 7.4 Conversion of FMUs to CRTs

2. Our team's only comment is to stress the importance of having a sister protocol in the Offsets Program to which projects under Climate Forward could transition to. The Voluntary Carbon Market faces an undersupply of ex-post credits while the need for ex-ante credits is not yet fully established. Having certainty that FMUs could eventually become CRTs would increase project investment potential. We also recognize that the development of a brand new protocol is not an insignificant undertaking.

RESPONSE: Thank you for your comment. We appreciate the desire to convert FMUs from projects registering under this methodology to Climate Reserve Tonnes, or CRTs, under our voluntary offset program and agree that being able to do so would help further incentivize the development of fuel treatments under the methodology. However, at this time, it is unclear if there is a path for quantifying and verifying the climate benefits from fuel treatments on an *ex post* basis. We will continue to evaluate potential means of doing so and welcome suggestions for how it may be done.

¹ The draft provided for public comment was titled "Avoided Wildfire Emissions Forecast Methodology."