Public Comments for TEP Methodology
Summarized October 31, 2011

Soil Carbon Methodology (Overview)
Comments given by section of the document.
Procedure for Demonstrating Additionality

- Project Description developers should also be allowed to use VCS's "Tool for Demonstration and Assessment of Additionality."

Quantification of GHG Emission Reductions and Removals

- Task 2.6 under this section deals with projecting future biomass under the baseline scenario, but the goal statement only refers to woody biomass. This seems inconsistent with a more general approach to project total future biomass including non-woody vegetation. The language around biomass is somewhat inconsistent throughout the documents/modules about whether they include non-woody biomass or not. The language in the modules themselves seems more general.
- Tasks 2.12 through 2.14 deal with estimating current animal populations, future animal populations and projecting emissions under the baseline scenario, but there is no task for projecting animal emissions under the project scenario. This seems like a necessary task to include given that animals are likely to still be present in some project scenarios.
- As written, Project Developers are not required to account for the loss of fertilizer applications from a baseline scenario. This seems like a major omission.
- The methodology accounts for biomass consumption by fire under the project scenario ex-ante but not in ex-post calculations.

Leakage

- Task 3.16 refers to displacement of agricultural production but only lists domestic animals as the relevant variable in the Methods section of this task. It seems agricultural production has been forgotten from the text of the goal and methods sections.
- Suggest allowing people to choose to use VCS's "Tool for Market Leakage" (under development).
- The same issues arise under the both the ex-ante and ex-post estimation since the same methods and tools are used for both.

General Comments

- Even though the applicability criteria in the overview document clearly outline only ALM projects, the applicability criteria for many of the modules is listed as all AFOLU projects. More consistency is needed.
- Numerous editing errors were present throughout all the documents that need to be corrected, but they became way too numerous to detail here. The writing and language needs to be improved.