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Review of proposed VCS IFM Methodology: Logged to Protected Forest on Fee Simple Forested Properties

Comments by: Frederik Vroom and Robert Seaton

Overview:

There is definitely a need for an IFM methodology for temperate forests and we commend the authors for their effort to address this gap. Our comments on the proposed methodology are limited to what we perceive to be problems which need attention to make this a functional tool. Elements of the proposed methodology that are workable are not addressed.

In general, it was found that the structure of the methodology is very confusing and the rationale behind the many choices appear somewhat arbitrary and therefore need more explanation. A significant number of issues of both clarity and correctness were found. Specifically, references need to be improved for each cited method, text or accounting technique, (for example: page 4, CDM baseline approach). Definitions of terms and variables need to be clarified. References made to other methods, reports or papers for definitions is possible, but confusing. Rather, it would be best to provide a list of definitions as CDM/IPCC/VCS and others use different or slightly adapted definitions. This methodology, although meritous in its intent, needs a significant reworking to make it functional.

Applicability:

It would appear that the proponents have clear reasons for specifying the applicability criteria as given. However, the remainder of the methodology then fails to be consistent with the criteria, or fails to specify exactly how compliance with the applicability criteria can be determined.

1. Applicability criteria 2: The criterium is unclear. *Fee simple* is a definition of land ownership only applicable in some jurisdictions. This criteria should be rewritten to clarify the degree and type of control required. For instance, is a long term lease acceptable?

2. Applicability criteria 3: This criterium is clearly aimed at assisting the applicability of specific economic baseline approaches. If this approach is to be taken, the nature and

timing of a change of ownership needs to be clearly defined – for example, that it must be an arm's length transaction at market value within the last 24 months, that the previous owner could and would have sold to an entity whose purchase case was based on maximizing return, etc.

The other option is to delete this applicability criterium, and make the case for a rate of logging other than that which occurred historically using the procedures in the baseline and additionality tool. The burden of proof would appear to be the same in both cases, and thus it is not apparent that there is any significant gain for the proponent from the inclusion of the applicability criterium. The recommendation would be to delete this criterium and make the method more broadly applicable

3. Applicability criteria 4: What is the definition of "minimal risk" of significant illegal or unplanned development pressure? If this applicability criterium is included, later sections on illegal logging are unnecessary. At times it appears that much of the text of the methodology has been copied from other sources without considering how it fits with the stated criteria.

4. Applicability criteria 5 reduces the applicability significantly, and again appears inconsistent with later sections. This method seems to be written for 1 project. Please clarify how this needs to be proven and how the project is going to prove there is no significant amount of deep organic soils? Where does the methodology require systematic soil depth measurement?

Section 1.3 Baseline approach:

5. Cannot find citation in CDM documents. Please reference document to see citation in perspective.
6. The summary/rational behind the baseline determination approach emphasizes that the baseline should be based on the possibility the land would have been acquired by an entity that will use the land to create maximum value of its investment. This will need to be determined using the methods given in the tool for additionality and baseline – not sure that the guidance given in this section adds anything to the process that must be followed when using that tool. The tool makes the definition of the baseline approach relatively immaterial.

1.4 Selection of pools

7. It is not necessarily true that changes in the soil pool are de minimus. It is generally true that omitting soil pools would be conservative under a LtPF scenario, but not invariably so – in some dry forest types, for instance, logging and resultant increase in grass cover could result in increases in soil carbon.
8. Applicability criterium 5 appears to be aimed at eliminating the necessity to include soil carbon, but includes scenarios where non-CO_2 GHG emissions might be the actual issue, as well as situations where including soil carbon would potentially increase the emissions reductions.
9. The method provides no guidance on the complex issue of accounting soil carbon, we would recommend that soil carbon accounting be eliminated from the method entirely.

The applicability criterium then needs to be rewritten to ensure that not accounting soil carbon will be conservative.

2. Baseline methodology Description

This section appears once again to be trying to pre-empt elements of the additionality and baseline tool. Not sure that it is necessary or adds anything.

10. Section 2.1, paragraph 2, appears to conflict with applicability criterium 2. Again, this issue needs to be sorted out.
11. Section 2.2 paragraph 1 sentence 2 "or expected shift in landowner forest management practices" appears to be in conflict with applicability criterium 3. Clarify.
12. Structure of methodology mixes up baseline, boundary determination and additionality determination as well as ex ante baseline carbon stock determination all in one single chapter. It would be good to rewrite it using the template recently provided by VCS.
13. Section 2.4.2. Consistent with what level of accounting outlined in the GPG for LULUCF?
14. Section 2.4.3 Are all the equations/variables and accounting rules presented extracted from the IPCC guidelines? If so are the same definitions used for each variable and to what certainty does data gathering need to be presented per strata. Please reference.
15. Section 2.4.2 Determination of above and below ground biomass should be by stratum, not by forest type, and should at minimum be based on a good quality forest inventory meeting normal statistical reliability measures. Using figures from "relevant published reports" is extremely unlikely to be sufficiently accurate.
16. General comment: Please give criteria for the determination of the variables of which a few are: $F_{FUELWOODi}$, $f_{ACTUALi}$, $f_{LBBRANCHi}$, $F_{LBCROOTSi}$, $f_{BUCKINGLOSS}$, Many others have been defined but no criteria on how to gather information or extract from other information is given. No references to data collecting manuals are given. If these variables are part of a model that is proposed please reference or elaborate on how these models determine variables.
17. Section 2.4.4.1.15 Forest products: the methodology proposed for quantification of carbon in wood products does not take into account the carbon in wood products in landfills. Directions on the choice of half-life time is needed. Where do examples come from? (reference?).
18. Section 2.4.4.2 IFM unplanned constant scenario emissions: The discussion/description around illegal harvesting is unnecessary as it is already ruled out in the applicability criteria.
19. Section 2.4.5.2 Uncertainty analysis: The text mentions a Project Design Document uncertainty assessment. Is this done on all acquired variables used for models, sampling, economical assumptions? How do you do this assessment? Please reference.

3.2 Sampling design

20. Guidance on the sampling design is not clear. The IPCC has developed three tiers of calculation methods. Please ensure that the methodology describes the processes necessary to achieve the VCS required accuracy in a manner that is not multiple interpretable and thus impossible to validate. The VCS tool for methodological issues regarding estimating GHG benefit of projects and uncertainty specifies that the IPCC

2006 guidelines shall be used as well as for Quality assurance/control and uncertainty analysis[1]

3.7 Leakage monitoring

21. Similar to 3.2

Biographies

Frederik Vroom leads carbon methodology and carbon development work at Brinkman. Frederik has developed an expertise in assessing carbon potential in forestry initiatives. In his Master's degree in Forest Ecology and Management, Frederik specialized in modeling the effect of environmental aspects on the growth responses of trees including stand structure, dynamics, and wood quality. (Frederik_Vroom@brinkman.ca)

Robert Seaton is a forestry and carbon modeling analyst with the Brinkman Group for 22 years. Robert is an expert analyst in temperate softwood and tropical hardwood forestry, focusing on natural system valuation and the economics of sustainability, integrating timber and carbon values. Robert has served as the lead author on a range of carbon sequestration methodologies and project design documents (PDD). (Robert_Seaton@brinkman.ca)

[1] VCS Tool for methodological issues page 9 point 31