



## RESPONSE TO PUBLIC COMMENTS

A draft Methodology for *REDD – Avoiding Planned Deforestation* was developed by Winrock International for potential approval by the American Carbon Registry (ACR).

All new methodologies, whether developed internally or brought to ACR by external parties, undergo a process of public consultation and scientific peer review prior to approval.

This methodology was posted for public comment from August 10 through September 7, 2010. Two comments were received (see below). The methodology was then submitted to three anonymous scientific peer reviewers, experts in the field of forest carbon and REDD. Two rounds of review comments, responses, and methodology revisions took place. The reviewers' comments and the methodology author's responses to each are documented in a separate *Response to Peer Review Comments*, posted at [www.americancarbonregistry.org](http://www.americancarbonregistry.org).

	Comment	Commenter	Response
1	It appears that the REDD – Avoided Planned Deforestation Methodology could apply to domestic (i.e. United States) projects. Enabling domestic application of this methodology to projects avoiding conversion to non-forest uses in alignment with the Forest Carbon Project Standard 2.0 would be a boon for small to medium sized landowners interested in using carbon values to drive conservation.	PACE Global	This is correct. Nothing in the methodology would limit its use to outside the United States.
2	Is there an option under REDD-APD for landowner / proponent to suspend monitoring/verification after year 10, with no penalty beyond loss of ERTs contributed to the buffer pool, so long as they don't want continued ERT issuance? This would be ideal from the perspective of several landowners we are working with.  If there is no way to avoid monitoring and	Blue Source	The REDD-APD public comment draft read:  <b><i>C. Documenting Project Continuance beyond the APD Crediting Period</i></b>  For forest carbon project activities in general, ACR requires a Minimum Project Term longer than the Crediting Period. This Minimum Project Term is the time period over which the Project Proponent commits to project continuance, monitoring and verification.  In the case of REDD-APD, because all planned deforestation in the

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	<p>verification in Y10-40 (other than to “buy out” by refunding total ERTs issued to the project since inception), the critical question is: is there any way the landowner / proponent can to continue receiving ERTs from ongoing growth (that wouldn’t occur if the conversion had happened), so that the out-years are not simply an ongoing net expense? If there isn’t any way to receive credits over this period, the long-term monitoring and verification costs would make some projects uneconomic.</p>		<p>baseline scenario must be projected to occur within 10 years of the Start Date, and because planned deforestation can be avoided only once, there will be no crediting beyond one 10-year Crediting Period. Therefore Project Proponents are not required to monitor and verify, only to document project continuance, after the end of the Crediting Period in order to continue receiving periodic refunds of earlier buffer contributions in the event of no reversals.</p> <p>Project Proponents who provide, at least every five years, geo-referenced photo or satellite documentation that the forests where planned deforestation was prevented remain intact, with no losses or incursions exceeding a <i>de minimis</i> threshold of 3% of the project area, will continue to receive periodic refunds. If losses or incursions exceed this threshold, or Proponents fail to provide such documentation, ACR retains and retires any remaining buffer contribution per the <i>Forest Carbon Project Standard</i> Chapter 5 Section F.</p> <p>Which would allow what the commenter is suggesting: no further monitoring and verification after one 10-year Crediting Period, along with the option to provide photo documentation to continue buffer refunds.</p> <p>Through the subsequent peer review process, this portion of the methodology was slightly revised to allow (but not require) multiple Crediting Periods for situations where baseline deforestation would take more than 10 years to occur. However the methodology still only requires monitoring and verification through the end of the final 10-year Crediting Period – as long as the Project Proponent is only claiming credits for avoided emissions from deforestation. If the Project Proponent desires to claim credit for ongoing growth in forests deforested in the baseline, the Project Proponent must continue renewing the Crediting Periods and monitoring and verifying (as is always required for ERT issuance). In either case, the Proponent has the option of providing photo documentation after the final</p>

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			<p>Crediting Period in order to document that the forest remains and continue receiving buffer refunds.</p> <p>The corresponding text in the final (post peer review) methodology reads:</p> <p><b><i>C. Documenting Project Continuance beyond the APD Crediting Period</i></b></p> <p>For forest carbon project activities in general, ACR requires a Minimum Project Term longer than the Crediting Period. This Minimum Project Term is the time period over which the Project Proponent commits to project continuance, monitoring and verification.</p> <p>In the case of REDD-APD, because all planned deforestation in the baseline scenario must be projected to occur within a defined period of time, and because planned deforestation can be avoided only once, there will be a limited number of 10-year Crediting Periods. Therefore Project Proponents are not required to monitor and verify, only to document project continuance, after the end of the final Crediting Period in which deforestation is projected, in order to continue receiving periodic refunds of earlier buffer contributions in the event of no reversals.</p> <p>After the end of the final Crediting Period, Project Proponents who provide, at least every five years, geo-referenced photo or satellite documentation that the forests where planned deforestation was prevented remain intact, with no losses or incursions exceeding a <i>de minimis</i> threshold of 3% of the project area, will continue to receive periodic refunds. If losses or incursions exceed this threshold, or Proponents fail to provide such documentation, ACR retains any remaining buffer contribution per the Forest Carbon Project Standard Chapter 5 Section F.</p>