



## Comments regarding proposed modifications to Compliance Offset Protocol U.S. Forest Projects

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### Introduction

SCS understands that minor changes to the Compliance Offset Protocol U.S. Forest Projects (“the Protocol”) have been proposed. SCS appreciates the ability to suggest improvements to the Protocol. SCS has the below comments, which have been grounded in SCS’ experience with the Protocol thus far and SCS’ far-reaching expertise in verification of offset projects. SCS hopes that these comments will be taken into due consideration.

## Comments

No.	Section(s)	Language	Comment
1	6.2.1.2 Step 2	“To determine if initial above-ground standing live carbon stocks per acre expressed (ICS) in MTCO <sub>2</sub> -e, are above or below Common Practice, perform the following steps”	We suggest changing “carbon stocks per acre expressed (ICS) in MTCO <sub>2</sub> -e” to “carbon stocks per acre (ICS) expressed in MTCO <sub>2</sub> -e” for greater clarity.

No.	Section(s)	Language	Comment
2	6.2.1.2 Step 4	"Estimate independently baseline carbon stocks for all other required onsite carbon pools identified for the offset project..."	The meaning of the term "independently", as used here, is unclear. It is also unclear whether the presumed intended meaning is accurate. Standing live below-ground carbon stocks, for example, are typically not estimated independently of standing live above-ground carbon stocks because below-ground stocks are estimated as a function of above-ground stocks using the Cairns equations.
3	6.2.1.2 Step 4	"...and the portion of harvested above-ground standing live carbon stocks for species delivered to the mill, used for calculating harvested wood products)."	Unfortunately, this language subtracts clarity rather than adding it. It does not appear to be necessary, and, aside from being confusing, appears to conflict with the requirement to "produce a final baseline for all onsite carbon pools" (since harvested wood products is, arguably, not an "onsite" carbon pool). It is suggested not to be inserted.

No.	Section(s)	Language	Comment
4	6.2.1.2 Step 4	"Average the modeled results of each independent carbon pool, so that a single annual averaged value for each carbon stock results."	See the above comment regarding the term "independent". Also, the term "stock" is inconsistent with common usage of the term. Please considering replacing with "pool" (assuming that is what was meant).
5	6.3.2	"...and will not change over the course of the offset project life."	The term "life" has been added to Section 6.3.2 but not to the corresponding text in Section 6.2.3. Unless this difference is intentional, it is recommended that the changes be applied consistently.