ESI's Comments on the Public Comment Period for the California Tropical Forest Standard and Draft Environmental Analysis for public meeting to be held 15 November 2018

Key Comments

Chapter 6 section (e)2: is vague in the quantity of buffer credits required. This section states, "*Pursuant to Chapter 11, **a quantity** of sector-based offset credits from the credits issued by the implementing jurisdiction per year must be contributed to a sector-based crediting buffer account established for approved sector-based crediting programs and maintained by the ETS.*" Please consider adding details on what an appropriate quantity of buffer credits would be, or references section 11.2, or to methodologies to guide these estimates**.**

Chapter 8 section (b): Consider making the length of a reporting period longer than a year. Consider a minimum reporting period of 3 – 5 years. This section states, "*Each reporting period **reflects a one-year period**, covering the calendar year from January 1 through December 31*".

Section 9 (Third Party Verification): ARB's current requirements for verification of forest projects could not be practicably applied in a tropical setting particularly for field sampling. The standards of materiality and the use of the sequential sampling tool in its current form would require a verification field effort that would be time consuming and costly to implement in the tropics (e.g. a three-month field verification costing upwards of $100,000 for a project, much less a jurisdiction). The main reasons for this would be project size (many projects are 50,000 ha r greater), access and the number of verification plots that would have to be re-measured to pass sequential sampling.

We strongly recommend thinking through the requirements of verification and possibly easing them so that they could be implemented in a tropical setting, in a robust and reliable way that requires minimal professional judgement, while still maintaining rigor and integrity.

Chapter 3(d)(1): This section is somewhat vague on the level of accuracy required for remote sensing technologies. Please consider adding language detailing any required remote sensing accuracy levels.

Chapter 3(h): This section mentions the public availability of the information. Will there be a standardized language for reporting of these projects?

Chapter 4(d)(3): This section mentions that aboveground biomass must be utilized in the reference level and that IPCC methods must be utilized. Will these estimates be held to the same level of rigor as ARB US Forest projects?

Chapter 8(d): Is it likely that an acceptable level of uncertainty will be reached in these vast tropical forests; what is that acceptable level of uncertainty?

Chapter 9(a)(3): This section does not mention verification bodies being registered with ARB. Will OVBs require registration with ARB to ensure market confidence?

Chapter 11.3: This chapter does not include environmental risk. Why is environmental risk not included in the Risk Assessment?