

Proposal for a modification to American Carbon Registry methodology “Improved Forest Management Methodology for Quantifying Removals and Emission Reductions Through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands”

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UPM is in the process of developing an Improved Forest Management (IFM) project on its managed property in Minnesota, to be registered under the American Carbon Registry (ACR), and applying approved IFM methodology “Improved Forest Management Methodology for Quantifying GHG Removals and Emission Reductions through Increased Forest Carbon Sequestration on Non-Federal U.S. Forestlands.” Section C1 (p. 14) of the methodology specifies that “The baseline management scenario shall ... perpetuate existing onsite timber-producing species ...” In this region of Minnesota, at the time of the project start date (ca. 1997), the prevalent practice in northern hardwood stands was clearcutting followed by conversion to white spruce plantations (Cheryl Adams, UPM Blandin pers comm), where hardwood stands, considered un-productive and with no significant hardwood pulp (or other) market yet in place as of 1997, were typically converted to more productive white spruce plantations to produce raw material for secure softwood pulp markets. To align the project baseline management scenario with common practice at the time of the start date, UPM seeks a modification to the methodology to permit use of a baseline scenario involving replacing on-site species (e.g. converting to a plantation of another species) where it can be demonstrated to be common practice, as it was in northern Minnesota ca. 1997.

This approach would allow for the development of baseline management scenarios that more accurately represent the actual decisions of forest owners in the absence of carbon markets, and in fact many state extension agencies have at times recommended establishment of plantations through stand replacement, particularly in the case of pre-existing stands deemed under-stocked and with little potential for successful timber stand improvement.

We propose the following as a generic modification to the methodology, that could potentially apply to all projects, provided the baseline scenario can be substantiated in the project region and ca. the project start date with verifiable evidence, which would be provided in the project documentation and referenced in the GHG Plan.

We thus propose insertion of the following text in the methodology:

p. 6 (bottom of last paragraph)

“In developing the baseline scenario, exceptions to the requirement that the baseline management scenario shall perpetuate existing onsite timber-producing species may be made where it can be demonstrated that a baseline management scenario involving replacement of existing onsite timber-producing species (e.g. where forest is converted to plantations, replacing existing onsite timber-producing species) follows common practice in the region at the time of the project start date,

substantiated with credible evidence (e.g. reports or statistics on land use change or forest management practices published by state or federal agencies).”

p. 13 (first paragraph under Table 1)

“Where the baseline management scenario involves replacement of existing onsite timber producing species (e.g. where forest is converted to plantations, replacing existing onsite timber-producing species), the management regime should similarly be based on silvicultural prescriptions recommended by published state or federal agencies.”