

Green Diamond (Shana Leshko)

Two clarifications:

1. 3.6.2.2 - Could Ecology please clarify the types of areas that count as harvest retention areas to meet Basal Area retention requirements for even aged management? E.g. are riparian zones counted toward the harvest retention minimums?

2. Could Ecology please clarify the below conflicting statements around baseline calculations?

6.2.1 ♦ Estimating Baseline Onsite Carbon Stocks ♦ Private Land

Pg. 65 states "The baseline analysis effort must demonstrate that the counterfactual baseline ... is within statistical error bounds of the Common Practice value and, when averaged over the 100-year period, does not go below the Common Practice value determined for the project."

This seems to state that in no case can a project baseline be outside of 90% C.I. of FIA's Common Practice value, and never below Common Practice. Does the statement above only apply to Above Common Practice Projects? If so, please add language to explicitly confirm.

6.2.1.2 Determining Common Practice and the Initial Baseline

The first paragraph states "If the Initial Standing Carbon Stocks are at or below Common Practice, the provisional baseline is assumed to be the Initial Onsite Forest Carbon Stocks." Then this may be adjusted upwards based on tests for legal compliance, financial feasibility, and High Stocking Reference. In absence of those factors, then Baseline should equal ICS, correct? If so, the language highlighted above in 6.2.1 is contradictory to this.