



NATIONAL ASSOCIATION OF STATE FORESTERS

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June 28, 2024

Sasha Strohm
Program Manager, Growing Climate Solutions Act
USDA Agricultural Marketing Service
1400 Independence Avenue, SW
Washington, DC 20250

Doc. No. AMS-LP-24-0012 “Proposed Rules for Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program”

Dear Ms. Strohm:

Since its inception in 1920, the National Association of State Foresters (NASF) has served as a leading authority on forest management in the United States. NASF’s membership is composed of the directors of forestry agencies in the 50 states, five U.S. territories, three nations in compacts of free association with the U.S., and the District of Columbia. NASF offers the following response to the questions posed regarding the Proposed Rule by the Agricultural Marketing Service on the Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program, as authorized by the Growing Climate Solutions Act.

Question 1: How should USDA define the terms “consistency,” “reliability,” “effectiveness,” “efficiency,” and “transparency” (see 7 U.S.C. 6712(c)(1)(A)) for use in protocol evaluation?

NASF approved “[The Elements of a Credible Forest Carbon Markets Program](#)” by resolution on September 19, 2023. The approved policy statement highlights seven essential elements of a Credible Forest Carbon Markets Program. NASF believes the follow seven elements answer how the USDA should define consistency, reliability, effectiveness, efficiency, and transparency:

- Provide a statistically valid measurement of the baseline carbon offset that would be expected on a property in the absence of the carbon project.
- Use available scientific data to estimate the amount of additional offset carbon that the project will sequester compared to the baseline.
- Have a transparent method to account for leakage.
- Clearly identify the length of time offsets project will exist.
- Adjust offset credit amounts through an assessment of the risks associated with occurrences that could lead to reversals (i.e., wildfire, insect and disease, hurricanes); or

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provide some other method to protect the purchaser from these risks, such as providing a bank of unused credits that can be drawn on in the event of loss.

- Offer a method that acknowledges any co-benefits the project may create.
- Be subject to ongoing monitoring, reporting and verification.

Question 2: What metrics or standards should USDA use to evaluate a protocol's alignment with each of the five criteria to be defined in Question 1? What should USDA consider as minimum criteria for a protocol to qualify for listing under the Program?

NASF believes the metrics should at a minimum include a transparent method for estimating project leakage and clearly describe in narrative terms how the project generates additional climate mitigation benefits beyond the baseline scenario (“additionality”). Metrics should use the best available scientific data to evaluate the protocols alignment with each of the five criteria.

USDA should evaluate existing protocols associated with carbon registries, however, should not solely rely on these protocols and standards when building its own protocols and standards to ensure necessary criteria (real, additional, verifiable, permanent, and enforceable) are properly reviewed, considered, and met. The metrics should at a minimum include:

- A transparent method for estimating project leakage
- A clear description in narrative terms how the project generates additional climate mitigation benefits beyond the baseline scenario (“additionality”). Baseline calculations for forest carbon offset projects should be based on current property usage rather than comparing a property to the surrounding landscape to ensure credits are being issued based on additionality rather than productivity or past land use.
- In addition, permanence should be defined in a way that makes sense for the atmosphere; for forest carbon offsets, sequestered carbon should be required to be retained from the atmosphere for a significant time period in line with the expected period of time of emitted carbon – or additional carbon should be sequestered per offset credit to make up for the lack in a project timeline (ex: carbon expected to be sequestered for 100 years as part of a project may be equivalent to ¼ of the carbon emitted if the emitted carbon is expected to last for 400 years).

Metrics should use the best available scientific data to evaluate the protocols alignment with each of the five criteria – real, additional, verifiable, permanent, and enforceable.

Question 3: In general, after a new protocol is published, how long does it take for a project to use the protocol and be issued credits (i.e., what is the lag time between protocol publication and first credit generation)?

NASF supports new protocols to be used as soon as practical if it is defensible, has a transparent method to account for leakage, and requires projects to include a clear

description of how they generate additional climate mitigation benefits (additionality). In addition, voluntary markets must have time to implement the new protocols for the market to function properly.

Question 4: Which protocol(s) for generating voluntary carbon credits from agriculture and forestry projects should USDA evaluate for listing through the Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program?

Protocols that employ forestry best management practices to generate additional climate mitigation benefits should be the priority. USDA should also prioritize protocols that recognize the climate mitigation benefits of carbon stored in wood products and using wood products in place of other building materials with higher carbon footprints (e.g. concrete, steel). There is also an understanding that substantial portions of the carbon stored in a forest are stored in the soil. Increasing soil carbon or reducing soil carbon loss need to be considered.

Question 5: For any protocol(s) identified under Question 4...

NASF does not favor any protocol over another if it is transparent, defensible and scientifically validated.

Question 6: How should USDA evaluate technical assistance providers (TAP)? What should be the minimum qualifications, certifications, and/or expertise for a TAP to qualify for listing under the Program?

NASF recommends TAP not impose barriers and costs on forest landowners that outweigh the financial benefit of participating in voluntary carbon markets. In addition, we recommend TAP have scale and scope that cover a large geographic area as not to have competing requirements among competitors.

Question 7: Should the qualifications and/or registration process be different for entities and individuals that seek to register as a TAP?

NASF does not believe that there should be separate qualifications or registration process for TAP. Specifically, the USDA should not impose requirements for TAP that includes the same administrative, requirements, and barriers as is required by Technical Service Providers for NRCS. This process is not conducive to getting work on the ground.

Questions 8: What should be the minimum qualifications and expertise for a third-party verifier to qualify for registration under the Program?

NASF supports minimum qualifications and expertise akin to an Independent Certification. Certification requires verifying compliance with a set of Standards during full certification and periodic surveillance audits. This should be accomplished by independent, qualified, and accredited third-party auditors. Auditors should meet professional standards established by an independent accreditation body such as the American National Standards Institute (ANSI). In addition, third-party verifiers should not be associated with a carbon registry, project seller, or project buyer of forest carbon offsets, as these are potential conflicts of interest. NASF encourages the Program to consider agricultural and forest related offsets separately.

Thank you for the opportunity to share our perspectives. We are pleased to answer any questions and would welcome any follow-up communications.

Sincerely,

A handwritten signature in blue ink that reads "Scott L. Phillips". The signature is written in a cursive style with a large initial 'S'.

Scott Phillips
President, National Association of State Foresters
South Carolina State Forester