

## Summary of Public Comments

The draft methodology for UFCPI404 - Urban Tree Plantation Methodology for India Version 1.0 underwent stakeholder and public consultation from November 7, 2023, to January 7, 2023. The document now incorporates a comprehensive list of received comments along with corresponding responses from the developer.

### Section 4 - Boundary

I.	Section 4 - Boundary – Lying Dead Wood	<p>Standing dead wood has the potential to store/sequester carbon. But lying dead wood, or dead wood that is disposed of in landfill can potentially increase CO<sub>2</sub>/methane emissions. Is the project administrator required to account for emissions from lying dead wood or emission reductions from processing the dead wood at a methane plant?</p> <p>If so this may be significantly challenging, especially in public parks where the project administrator may have no control over this aspect of the project.</p> <p>How does the PA ensure its monitoring and documentation?</p>
Reply	<ul style="list-style-type: none"> <li>Section 4 - Boundary - Lying Dead wood carbon Pool is marked as “NO”. There is no need to account for lying dead wood. (Supported by the Explanation/Justification of Lying Dead Wood carbon pool within project boundary)</li> </ul>	
2.	Section 4 – Sampling required; 4.1. Sample size determination	<p>What is done in case of plant mortality more than the permissible limit? Or in case of replantation? (not planting the same species to replace the</p>

		dead ones) although the carbon offset value change might be negligible, do we have a reference value/limit?
<b>Reply</b>	<ul style="list-style-type: none"> <li>Referring to Global Carbon Check Standard V2.0 - “Buffer Stock Account Requirement”. The project proponent may not claim credits for any increased sequestration until the losses resulting from the reversal have been recovered.</li> <li>Also Referring to GCACH Standard V2.0, Section 2.14 - Project description or methodology change.</li> <li>No pre-set reference values or limits are marked toward the changes that may arise due to various circumstances towards change in project.</li> </ul>	

### Section 5 - Additionality

<b>3.</b>	Section 5 - Additionality, Step 1	<p>Is there an exception considered in a point where some non-native/invasive plantations are cut down and replaced with native habitats/trees?</p> <p>The performance benchmark when ascertaining additionality is 10-12 sqm/capita of canopy cover or 1.2 to 1.4 Ha of canopy cover per 1000 population – Does this apply to the metropolitan region in which plantation is occurring or to the locality within the region? – So is this criteria being set for Mumbai city for example or for Andheri within the city?</p>
	Section 5 - Additionality, Step 2	<p>It may be prudent to consider the latter as well as some cities like Mumbai average a higher baseline figure because of large green cover areas like SGNP within its borders, however, the city itself has a much lower green cover.</p>
<b>Reply</b>	<ul style="list-style-type: none"> <li>Following Section 2 - Global Carbon Check Standard Version 2.0, Para - Eligibility Requirement for Urban Forest Project.</li> </ul>	

- There is no exception or special consideration where the cutting down of invasive alien species (which can incorporate banned species) plantations is permitted, and if they are then replaced with native habitats or trees.
- The removal of invasive alien species (which can incorporate banned species) , replaced with the plantation of native species, will be considered towards additionality and in the process of issuing carbon credits.
- The identification of invasive alien species (which can incorporate banned species) should be supported by government-sourced publications, notifications, or reputable journals and research papers published on respected platforms. It is essential to note that GCACH reserves the right to withhold approval for any journals or research papers that do not seem of being respected and renowned.

Section 5 - Additionality, Step 2, “The performance benchmark when ascertaining additionality is 10-12 sqm/capita of canopy cover or 1.2 to 1.4 Ha of canopy cover per 1000 population”

- The decision regarding the baseline boundary is contingent upon how it is generated. If the baseline boundary is established for a metropolitan area, then the determination of additionality would be dependent on the metropolitan boundary (e.g., Mumbai). Conversely, if the baseline encompasses a specific locality or region, the boundary for additionality must align with that local region (e.g., Andheri).

4.	Section 5 - Definitions	It would be useful to add a more detailed definition of urban areas and potential references for the project administrator.
Reply	<p>Acknowledged - updates will be implemented to prevent any future confusion.</p> <ol style="list-style-type: none"> <li>1. Urban areas will adopt the definition provided by the Census Bureau of India.</li> <li>2. Additionally, various definitions will be incorporated to enhance clarity</li> </ol>	

regarding the types of urban forests.

## Section 6 – Baseline

5.	Section 6- Procedure to define Baseline	Compliance with URDPI Guidelines of 10-12sqm of per capita tree cover for the population. Is there any guidance available on the boundary of the population? Does that refer to the Population of the locality where the project is located or the unit size( population of the Block/ District , population of the Municipal area ?
Reply	<p>The delineation of the population boundary is articulated in Section 3, specifically encompassing Application points 1 and 5. Identification of the population falls within the purview of the Census Bureau of India or, alternatively, under the aegis of UDA, PP's, private, municipal, or quasi-municipal entities. Notably, the inclusion of PP's and private townships is contingent upon their planned capacity to accommodate populations.</p> <p>Given that the most recent census was conducted over a decade ago, the methodology accommodates the use of the latest available data, primarily sourced from local self-governments like MC and UDA. This flexibility allows for the selection of data sources for Version 1.0 of the methodology, although this provision may undergo changes in subsequent revisions of the following methodology.</p> <p>Furthermore, the baseline boundary aligns with the criteria outlined in Section 3, encompassing points 1 to 6. Consequently, the population boundary corresponds to the baseline boundary.</p> <p>An update will be slated for UFCPI401 to address potential confusion surrounding population boundary specifications.</p>	

## Section 8 – Quantification

6.	Section 8.3 Carbon stock in dead wood	<p>In case the tree is dead , it means the leaves, branches and trunk is dried and dead. There should be some concrete mechanism to decide that the tree is dead and there are no possibilities of its revival.</p> <p>Once declared the tree is dead, It should be assumed that the dead tree will start decaying and there will be high probability of emission reversals from the decaying standing/ fallen trees, that should be taken into account appropriately.</p>
<b>Reply</b>	<p>For Section 8.3 on Carbon Stock in Dead Wood, methodology development group have leveraged AR TOOL I2 to enhance the quantification methodology for the dead wood. AR TOOL I2 offers a comprehensive approach, delineating various parameters for distinguishing dead trees. In order to enhance clarity and preemptively address potential confusion among methodology users in the future, a revision in Section 8.3.1 will incorporate a reference to AR TOOL I2.</p> <p>Furthermore, Section 8.3.2 highlights the identification of emission reversals resulting from dead wood. This is achieved by measuring the difference between two successive measurement periods, as outlined in the section. This method effectively captures and accounts for any emission reversals occurring within the project boundary due to dead trees.</p>	

## Appendix 2

7.	Appendix 2- DBH (Equation II)	<p>DBH is one of the fundamental tree growth attributes which is measured directly. I do not see any necessity of calculating the DBH from the basal area ( BA), if BA has no role in allometric equations.</p>
<b>Reply</b>	<p>Appendix 2 outlines the methodology for calculating ex-ante carbon credits for the project. The adoption of this method is motivated by two key considerations:</p>	

1. **Limited Tree Growth Ratio Data for Indian Tree Species:**  
 The challenge arises from the scarcity of reliable tree growth ratio data for various tree species in India. This scarcity makes it difficult to conduct predictive analyses that can robustly support ex-ante quantification.

2. **Challenges in Sourcing Comprehensive Data:**  
 Even when such data is available, it may not cover all tree species, or issues may arise concerning the acceptance of specific research journals or publications. Determining which sources to accept becomes a complex task, adding a layer of intricacy to the quantification process.

The incorporation of this methodology takes into account these challenges and strives to provide a pragmatic approach in the absence of universally applicable and comprehensive data.

## Tool - TOOL0001

8.	Section 4 – Sampling required; 4.1. Random sampling	Define random and systematic samplings. What methods are used in geotagging the sample size? For. E.g transects, quadrants, etc.
Reply	Section 4 – Sampling required; 4.1. Random sampling, “Define random and systematic samplings. What methods are used in geotagging the sample size? For. E.g transects, quadrants, etc.” <ul style="list-style-type: none"> <li>• According to UFCPI40I Version 1.0, there are no restrictions imposed on the acceptance and implementation of specific random sampling techniques.</li> </ul>	