

| Document content to be addressed | Clarifications and corrective action requests by Internal Review team | Summary of methodology element developer response | Assessment team conclusion |
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| Overview - currently under review by Verra | This is now approved | Update to reflect new status of Verra methodology - Changed to "approved" | OK |
| 1.3 - "project boundaries and precautions" | I would try to write this appendix in terms of general exceptions to the use of biochar, i.e. in forests and under certain practices (like leaving larger fragments), instead of justifying for a certain project. | That makes sense. However, doing so creates tension -- as illustrated by the previous comment -- if we impose restrictions on other project designs without a full understanding of their local conditions/constraints. Is there some middle way of creating a use case for our project that others can adopt if their local conditions match or modify if their parameters differ? Resolved by adding "outlined in this appendix" | OK with additional text |
| Conservation Burns - "invasive" | Doesn't it also impact native and non-invasive species? | Added - "and allow native species to regrow in the protected soil. Although less common, in some baseline scenarios waste biomass may be left to decay onsite. Like conventional combustion, this process releases most of the stored carbon back into the atmosphere. By instead creating biochar, conservation burns decrease carbon emissions when compared to either baseline." | OK |
| 2.3 "however more field trials are needed to confirm this number" | Will this effort include a research component? | We will record our data and results, but do not have a full study design in place to research this question. | OK - noted |

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| 2.4 - “appropriate burn date” | Should forest fire risk from the USFS or other agencies be included here? | How about identifying CalTopo as an example of a research tool that can also include resource agencies, commercial services, etc.? | Done - OK |
| 2.4 <i>Additional considerations</i> | <p>This is project specific, whereas here you might need to convert this into general specifications. For example, use this justifications to generate some rules for the allowance of burns, some checklist of things that should be verified in advance:</p> <ul style="list-style-type: none"> -enough precious precipitation to ensure an adequate biochar dampening and wind loss reduction - avoidance of flooding seasons - Burns should only be executed +/-2 days from rainfall etc etc- <p>I would reconcile this with Section 4: Parameters for Use in Future Projects</p> | <p>This section was deleted as it was too project specific and additional details added into 4.6.a “Ideally, burns will take place within two days of at least .15 inches of rain.¹ No burn activities should occur if the weather predicts winds greater than 14 mph. The <u>CalTopo</u> wind forecast mapping tool, along with fire risk tools from the United States Forest Service may be useful to project proponents.”</p> | OK with edits and additions |
| 3.2 - “soil health” | If applicable, fire is also needed to germinate native seeds in some regions | Added “ In some fire adapted ecosystems, conservation burns may mimic the pre-suppression conditions (temperature, duration, etc) needed to germinate native seeds.” | OK |
| Wildlife Mitigation and | It seems like a stretch to compare | I agree that slash piles differ from the indigenous | OK with changes |

¹ Wind and water parameters adapted from a conservation burn plan developed by the Island County Conservation District Project Manager. “Orcas Fire and Rescue Burn Permit Appendix: Conservation Burn Methodology”. Our project is similar in scale and ecosystem.

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| Recovery - "Revitalizing these practices" | burning slash for tree harvesting with indigenous burning which left the trees standing and burned the undergrowth. | practice. I do think there is a larger point about fire ecology and the value of pyrolytic burning as an appropriate landscape management method. We will edit to modify the inapt analogy while keeping the larger point. Changed to "Mimicking some aspects of these" which is acceptable | |
| 4.2.a- 35 degrees | Is this being written for a broad methodology or a specific project? Should 35 degrees be a methodology constraint? | That would limit biochar application to <10% slopes. Is there research on steeper slopes that would support a higher limit since some of our forest terrain may be >10% slope? | Fine to leave |