In “Estimating changes in carbon storage in the Cragin Watershed Protection Project with the Southwestern Forest Restoration Methodology” the authors walk through the application of the methodology to a 64,000 acre area of ponderosa pine and mixed conifer managed by the Coconino National Forest in Arizona.

The authors apply the methods and estimate emission reductions. Key findings include:

- 83% of the area burns within 20 years
- 100% burns within 40 years
- Baseline carbon storage exceeds project carbon storage for more than 25 years
- No ERTs are issued until year 20
  (and negative ERTs exist in the years up to this point)

I have the following key concerns:

1. The proportional burn area seems several times too high – at this rate I would expect no forest to exist already. OR for superficial burns to be what is happening and has happened over the last 20 years
2. I can’t follow exactly how treatment emissions are included. If it is just through the change in stock then that would underestimate total emissions due to fossil fuels expended and non CO_2 gases released
3. I can’t see how a carbon project can work if no emission reductions are achieved for 20 years
4. How do negative emission reductions in the first 20 year work? Will the project have to pay the ACR for offsets bought from the registry to cover the negative? How would this be financially viable?

It remains my opinion after reviewing this report that even though fire treatments can have massive environmental and social benefits, the atmospheric benefit is not the means to achieve a sustainable financing source.