



August 10, 2010

Dear VCS,

Please accept this comment regarding the Improved Forest Management – Logged to Protected Forests on Fee Simple Forested Properties methodology (3GreenTree Ecosystem Services Ltd. and ERA Ecosystem Restoration Associates Inc.).

The methodology does not specify whether or not public land owners are eligible. Within the Applicability section (1.2), it reads, “Privately owned and managed fee simple properties with extensive natural or native-species forest, where there is a threat of significant logging or related forest management practice where forests remain forest.” It is unclear whether public entities purchasing privately owned properties are applicable.

I believe that this methodology could be successfully applied to public entities purchasing forested land under Fee Simple (Title). I ask you to consider clarifying and designating public entities as an applicable ownership and management category. It would seem unnecessarily specific to limit this methodology only to private lands, and a simple clarification could prevent public agencies from needing to draft similar methodologies.

If you have any questions, please contact me directly at: [molly@clearskyclimatesolutions.com](mailto:molly@clearskyclimatesolutions.com)

Thank you,

Molly White

Project Developer  
ClearSky Climate Solutions  
p: (406) 721-3000 ext.1242  
f: (406) 721-5912  
e: [molly@clearskyclimatesolutions.com](mailto:molly@clearskyclimatesolutions.com)  
w: [www.clearskyclimatesolutions.com](http://www.clearskyclimatesolutions.com)