

## VCS AFOLU-ALM Sustainable Fire and Grazing Methodology Comments from SunOne Solutions

### General Comments:

Aggregation - It seems that aggregation of strata is possible but not mentioned much. Can you have strata across a region? We need more clarity about how aggregation will specifically work.

Project start date – is there a look back period?

Clarification – are both fire and rangeland management requirements for eligibility?

### Specific Comments:

Pg. 4 (I.2) - Additionality - only financial additionality mentioned here, BUT in Section II.3 mention using CDM A/R tool. Consider elaborating on additionality.

Pg. 5 (I.3) – Applicability conditions - Why are A, B and D present tense and C future tense? It appears that C should also be present tense “is” and not “will”, as the future tense contradicts with other areas of the document. Is animal husbandry and/or wildlife conservation not required on the land prior to project start but is a requirement as a part of future management?

Pg. 5 (I.3)- Explanation/Justification — broaden definition to include conversion to other non grazing grass land uses (e.g. development not just cropland). **Currently reads (pg. 5):** “ ii) land that is grassland that will remain so or be converted to croplands, with accompanying SOC loss, in the absence of the project. “

Pg. 6 (I.4) - CO<sub>2</sub> emissions from grazing animals = conflicting information in Table 2 and later in Section 2.4.2

Pg. 8 (I.5.3) - Soil Sampling/Model calibration - Every 3-10 years re-calibrate soil model; what calibration interval do you use then? Why would you need to measure more frequently? Better guidelines on sampling frequency would be beneficial.

Pg. 8/9 –(II.1) – Better defined “under the control of the project participants” there should be an opportunity for distance to be a factor. It does not make sense to take cattle and transport state to state, so there should be a state limit or some other ability to segregate land owner’s properties that may be located in multiple different states. Contradiction in section III as well.

Pg. 10 (II.4.3 and II.4.4 ) - Tool names and numbers are reversed / confused and different than charts on back

Pg. 12 (III.1.6) - Replace “equivalent” with “similar” in section III.1.6 because soil stratification is similar to A/R methodology (equivalent is a strong word).

Pg. 14 (III.2) – This section is mis-numbered and mis-labeled. Says “five” sources of leakage, but only 4 are named. In addition, (a) and (b) are labeled but (c) and (e) are not, and (d) is not even listed. The corresponding Table 3 then lists the then in reverse order (i.e. (e) is first and (a) is last.

Pg. 17 (IV.3.1) – 30 cm tend to be the industry standard, and what is used in the most common soil models. The additional C from 30 – 40 would be minimal at best. Why choose 40cm?

Pg. 18 (IV.3.3) – There is language to reconcile using the buffer if one’s modeling has been to optimistic. But what if you’ve been too conservative in your project model of C and measure actual C sequestered is greater than anticipated? Do you get the additional offsets?