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This comment was received via email by the VCS Association.

Page	Topic	Comment
3	Applicability	Regarding the limitation of this methodology to lands owned fee simple: It is currently unclear how carbon rights fit into the "package" of rights that come with fee simple ownership. Sometimes in project design, a project developer, who owns land fee simple, will assign some or all of the carbon rights to an investor via contract to fund startup costs. We encourage that the language in the methodology be clarified, so that it does not result in the exclusion of projects that would otherwise fit the criteria for use. Suggested footnote: "Transfer of some or all of the associated carbon rights to an entity other than the project developer, when part of project design and funding structure, would not exclude a project in which the lands are otherwise owned fee simple by the developer."
4	Pools	Regarding the inclusion of the litter pool: The VCS standard does not require the inclusion of litter in project carbon accounting. Unless a lookup table is allowed/provided, this inclusion could add unnecessary cost and complexity to projects and might be excessive from a cost/benefit standpoint.
25	Primary Leakage	For the optional customized leakage assessment, it doesn't seem to consider the situation where land is acquired from another entity that has historically practiced intense or destructive harvesting practices, which are then changed when the new owner acquires the land. The way it is worded, the current owner would be required to self audit, but in reality it would be more appropriate to audit the previous owner in such a situation.
29	Baseline reassessment	Annual monitoring and adjustment of the baseline is not required by the VCS standard and is seen to be too frequent and onerous for a number of reasons: For one, project developers need some confidence that the good practices that they are engaging in will have some fairly known pay back over at least 5 years. With a frequently changing baseline, returns on investment in new practices would be too uncertain. Second, of course there is the transaction cost related to frequent updates. We suggest the annual baseline monitoring and adjustment be changed to every 5 years at verification.