

Comment Reference #	Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
1_14050	1 Introduction	relation to other standards?	To prevent an 'overkill' of standards, it would be helpful to include a comment how this standard relates to other, existing, standards	Other programs are currently addressed as follows: - Section 5.3 of the Standard identifies how claims and assets from other programs can be used with SD VISTA. - The SD VISTA Program Guide includes a section 2.3, Concurrent Use of SD VISTA and Other Programs which states "The concurrent application of SD VISTA with the Verified Carbon Standard (VCS) and the Climate, Community & Biodiversity (CCB) Standards is facilitated through combined templates and validation/verification procedures. Verra welcomes opportunities to work with other programs on similar streamlining."
1.2_13735	1.2 Scope of the SD VISTA Program	SD VISTA scope	It is worthwhile to include sustainable tourism and handcraft among examples of projects	Noted support for inclusion of sustainable tourism and handcraft among project examples.
1.2_14051	1.2 Scope of the SD VISTA Program	Reason for choice of scope	To put the standard into context it would be relevant how/ why this particular scope was chosen (e.g. to delineate with existing/ other standards?!) Any discussions with other standard proposers/ suppliers?	SD VISTA's scope is intentionally broad at this stage. At SD VISTA's outset and during the course of its development Verra has had discussions with providers of other standards and tools that may overlap with or fall under the current SD VISTA scope about complementarity and potential redundancies. We will continue to work with them, and potentially refine SD VISTA's scope, as standardization and assessment of sustainable development benefits evolves. The next review and potential update of the Program is scheduled for 2020
1.2_14071	1.2 Scope of the SD VISTA Program	Scope	I am concerned about the conclusion of forestry within your scope. The standard itself doesn't nearly have adequate safeguards in place for certifying forestry projects (perhaps the same is true of other sectors?). Would you be comfortable issuing SD Vista assets/claims for projects in forests that are not well-managed?  An easy fix would be requiring FSC certification, which some of your VCS methodologies do. Otherwise, how will you approach this?	In the same way as for any other project scope, projects where the primary activity is somehow related to agriculture, forestry or other land use will be assessed by auditors qualified for that scope (including FSC auditors) as having achieved net positive sustainable development benefits. Such benefits will be demonstrated using clearly defined methods, one of which may be FSC certification.
1.3_14052	1.3 Language	Language limitation	I appreciate it's a challenge to offer something in multiple languages. To ensure wider pick up/ roll out, what guidance/ support will be offered to enable translation/ access in other languages? If none then note this could affect the success of the standard as reaching only 'elite' (limited stakeholders).	While the English language versions of all SD VISTA program documents shall take precedence, any stakeholder wishing to make an official translation of an SD VISTA document should contact Verra. A footnote will be added to the Standard to this effect.  Verra recognizes that this could limit the uptake and impact of SD VISTA but does not have the resources to undertake translations itself or to review project documents submitted in languages other than English.
2.1_13848	2.1 Project Goals, Context and Long-term Viability	typo	Section #164, seems like a typo	Addressed
2.1_14007	2.1 Project Goals, Context and Long-term Viability	2.1.3- Scope	Further specification on the scope of causal chains and what constitutes "unintended consequences" would be helpful	Causal chains are very important to SD VISTA, and Verra recognizes the need to develop guidance around causal chains in general as they are not familiar concepts to most. We note the suggestion to include further specification on scope in particular.  A footnote has been added explaining unintended effects as follows: "Unintended effects of the original objectives of the activity may include a variety of effects, such as rebound effects (reduction in expected gains from new technologies that increase the efficiency of resource use due to behavioral or other systemic responses); effects in sectors or regions other than the targeted sector or region; effects on stakeholder groups other than those targeted by the activity; effects on behavior once an activity is announced but before it is implemented (such as early action); or lack of compliance or enforcement. Unintended effects may be positive or negative. Adapted from the World Resources Institute's Policy and Action Standard."

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2.1_14041	2.1 Project Goals, Context and Long-term Viability	Project sustainable development objectives shall be reassessed every ten years.	Please clarify if this also means that baseline impacts should also be reassessed every ten years.	Revised to "Project sustainable development objectives shall be reassessed every ten years to ensure that they are still appropriate for the development context, taking into account the current status of stakeholder well-being, natural capital and ecosystem services and any impending changes to same." Included further detail about the process for this reassessment.
2.1_14066	2.1 Project Goals, Context and Long-term Viability	Causal chains	In our technical working group to develop the Ecosystem Services Procedure, we were advised to not claim 'causality.' We settled on 'contribution,' which is more credible.	The causal chain deriving from an SD VISTA project activity should show how directly that activity is related to the impact (e.g., whether the activity itself was the cause or whether it was only one contributing factor). For example, an activity might not cause an impact, but it could claim to have caused the output or outcome that contributes to that impact.  This sensitivity to language will be highlighted in the assessment of causal chains and, most importantly, SD VISTA claims and assets.
2.1_14067	2.1 Project Goals, Context and Long-term Viability	2.1.4	"If it is directly caused by project activities, any negative output, outcome or impact shall be mitigated." You will allow negative impacts directly caused by the project??	Negative impacts are a potential part of SD VISTA projects; however, SD VISTA requires that they be mitigated. For example, waste pickers organizing into co-operatives that would have more bargaining power over the price point of the recycled materials they sell would have many benefits to members of the co-operative. However, if membership in the co-operative was limited to people older than 16, children and some teenagers would lose out on income generating opportunities. In this case, a mitigating factor could be that the co-operative pays school fees for members' children.
2.1_14068	2.1 Project Goals, Context and Long-term Viability	2.1.5	I didn't understand this clause until I read sections 3 and 4. It would be more clear if you switched the order (shall demonstrate positive impacts using 3 or 4 or both; then the clarification that you don't need to do one or the other if you are not impacting them).	Revised accordingly.
2.1_8722	2.1 Project Goals, Context and Long-term Viability	2.1.1 The SDG which the project focuses on should also identify its sub-objectives, how they are positively inter-related and which expected externalities they help avoiding.		The elements you suggest are meant to be captured in the causal chain(s) required by 2.1.3-2.1.4.
2.1_8723	2.1 Project Goals, Context and Long-term Viability	2.1.9 The mention of financing mechanisms and types could also be helpful as financing sources are different from a step to another one for the implementation process		This is meant to be captured by 2.1.14, "The financial mechanisms utilized by the project...shall provide an adequate flow of funds for project implementation to achieve the project's sustainable development benefits."
2.2_13847	2.2 Stakeholder Engagement	Typo	Typo	Addressed
2.2_13849	2.2 Stakeholder Engagement	Numbering a bit confusing	I would suggest re-labeling 3), 4) and 5) to something different - such as A), B), and C)	Suggestion noted. Use of 1) as list numbering is standard Verra format.
2.2_13850	2.2 Stakeholder Engagement	Typo	and the marginalized and/or vulnerable groups.	Addressed
2.2_13851	2.2 Stakeholder Engagement	Improper Bolding	the "T" should not be bold	Addressed
2.2_14010	2.2 Stakeholder Engagement	2.2.3	All assessment of costs, risks and benefits shall include those that are direct and indirect and include those related to social, cultural, environmental and economic aspects and to human rights, gender inclusive and rights to lands territories and resources	Proposal to include "gender inclusive" to the lists of issues that costs, risks and benefits could be related to. However, gender is covered already in this paragraph by the words "social" and "cultural".

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2.2_14073	2.2 Stakeholder Engagement	2.2.1 & 2.2.2	Is there a difference? Both instructions seem to require the same information.	2.2.1 Refers to stakeholder identification and assessment, and 2.2.2 explains how the results of that identification and assessment should be described.  Accordingly, the final sentence of 2.2.2, "Stakeholders who have rights to resources or land that may be affected by project activities shall be clearly identified" has been moved to 2.2.1.
2.4_13852	2.4 Legal Status and Rights	Sentence not included in list	This sentence seems to be the first indent and thus, should start as A). The remaining letters should be revised.	Addressed
2.5_13853	2.5 Grouped Projects	Remove period	There should be no period	Addressed
2.5_13854	2.5 Grouped Projects	"Without-project" seems incomplete	"without-project scenario"	Addressed
2.6_13855	2.6 Project Description Deviations	Incomplete sentence	Incomplete sentence	Revised to complete the sentence by including the word "impacts", which was missing in the consultation version.
3_14056	3 Benefits for People and Prosperity	3 & 4 more explicitly linked	Projects which (in short term) benefit people/ prosperity but don't directly review planetary impact, are *not* sustainable - not environmentally and thus ultimately also not socially nor economically.	See response to comment #4_14055.
4_14042	4 Benefits for the Planet	All natural capital and ecosystem services have benefits to people. But could be considered double-counting if accounted and commoditized as both a benefit to the planet and a benefit to people.	Please provide more clarity on projects that benefit ecosystem services which in turn benefit people. For example, coastal wetland project that protect people/assets from storms--can they be benefits for people (people or assets protected) or planet (e.g. flood storage capacity), but not both (to avoid double-counting of benefits)?	Revised causal chain section to provide better guidance on how to identify which impacts are related to people and prosperity and which are related to planet. Projected impacts and monitoring plans should be described in the project description section to which they pertain, even if they relate to the same activity. Claims can be made about all of the benefits derived from any one activity.
4_14055	4 Benefits for the Planet	discard project w no benefits for planet?	Considering the precarious (and increasingly so) planet, would projects, especially aiming to use this standard not minimally require positive impact - or at least mitigate/ prevent bad planetary impact?	SD VISTA is meant to be flexible enough to be used by projects that have no significant impacts (negative or positive) for natural resources and natural capital. Such projects may deliver multiple positive benefits for stakeholders but, as a consequence of the nature of their work, have very little influence or impact on natural capital or ecosystem services.  All of the project's impacts, including possible unintended consequences, are mapped in the causal chain. If anything in the causal chain would impact the planet, then the project needs to use Section 4, Planet, and demonstrate net positive impact on natural capital and/or ecosystem services.
4.1_14011	4.1 Natural Capital and Ecosystem Services at Project Start	missing word ?	4.1.2 If a project is using the scenario method for quantifying the impact of project activities, natural capital and ecosystem services conditions potentially affected by the project that would be affected in the without-project scenario shall be set out in the project description.	Addressed by revising the sentence in question to "Where a project is using the scenario method for quantifying the impact of project activities, a without-project scenario shall be set out in the project description for natural capital and ecosystem services conditions potentially affected by the project."
5_14043	5 Claims and Assets	Basis for creating claims or assets	Would be helpful to restate and clarify here that claims or assets can relate to SDG targets or other impacts in the project's causal chain (connecting the project impacts to the SDG target)	Added the following sentences to the introduction to Chapter 5: "SD VISTA claims and assets are both representations of project benefits as they relate to Sustainable Development Goal Targets or other project impacts. Each claim and asset shall be associated with an effect of project activities that is documented in the project description in a causal chain."
5.1_13856	5.1 OPTIONAL: SD VISTA Claims	Incomplete sentence	Incomplete sentence	Addressed



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5.2_14069	5.2 OPTIONAL: SD VSta Assets	Assets	I find the standard surprisingly open about defining assets. Although it is in keeping with the rest of the standard to have methodologies for demonstrating benefits brought forward for approval, the decision to create an asset seems to be a higher order decision. I would think that Verra would be in a better to take a position on which assets it will support, and funnel investment and activity towards these. I don't see credibility or critical mass being achieved by a series of unlinked assets being developed independently.	See response to comment #11_14008.
5.3_13875	5.3 Claims and Assets from Other Programs	Incomplete sentence	Incomplete sentence	Addressed
5.3_14070	5.3 Claims and Assets from Other Programs	More detail on claims	The section refers to both claims and assets, but most of the requirements relate to assets. Have you worked out how to handle claims from other programs, such as FSC ecosystem services claims (or even FSC certification claims)?	Verra agrees that this section needs to better describe how claims from other programs will be considered, especially if the other program's claims can be sold or transacted in the same way that SD VSta assets can or if there is some claim of additionality involved.  In some cases, such as that of a project proponent where the entire project area is FSC certified, the project proponent will be able to claim FSC certification and make SD VSta claims simultaneously -- one should not impact the other as long as both are clearly certified, since neither can be sold or has additionality requirements. SD VSta claims will not be applicable to products.
6_14009	6 SD VSta Project Assessment	Auditors	Information on the level of domain expertise necessary for auditors in various development fields would be helpful.	Auditors will need to demonstrate competencies in a given sector and shall have at least three years of relevant work experience or an equivalent combination of education and work experience.
6.1_13876	6.1 General Requirements	Missing the word "to"	shall be limited to five percent.	Addressed
6.1_14044	6.1 General Requirements	Verification frequency	Suggest changing verification frequency to allow a project developer to select the timing for the initial verification, and then requiring verification at least every 5 years after the initial verification. This would be in line with the VCS approach for forestry projects and acknowledges that the first verification for some projects (e.g., tree planting) may not be justified in the first 5 years.	Verra maintains that it is important for projects to undergo some form of verification within the the first five years following validaion to ensure that they are being implemented in line with validated project design. This is due to the social impacts that development projects can have. Even a project has not been able to deliver benefits, it is important that it has initiated activities according to its implementation plan and is on track to deliver benefits.  We recognize that requiring projects to verify prior to benefit delivery may cause financial hardship. However, if we allow projects to verify more than five years after the initial verification, and any one project gets too off track, it could result in investors losing confidence in other SD VSta projects.
6.2_13877	6.2 Validation/Verification Body Requirements	Unclear the expertise required	Seems like VVB could have, for instance, an expertise in education but would be allowed to validate/verify a project's health SDG. I think the organization and staff competencies should be specific to the SDG that are auditing.	Verra will add something to the effect of how an organization will only be able to audit within its demonstrated sectoral scopes to this section.  6.2.2 Sets out how the audit team must demonstrate relevant sectoral and socio-cultural experience; this will be amended to say "on a per-project basis".
6.2_13878	6.2 Validation/Verification Body Requirements	Wrong word	joint, not join	Addressed
6.2_13893	6.2 Validation/Verification Body Requirements	SD VSta scope	I suggest to include tourism and handcraft sectors in the scope	Noted support for inclusion of sustainable tourism and handcraft among scopes. Tourism will definitely be added.

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6.3_13879	6.3 Validation and Verification of Grouped Projects	Missing parentheses	Missing parentheses at the end of the sentence	Addressed
7_13880	7 Glossary	Missing periods	Some of the definitions end with periods, while some of the sentences do not end with a period. It would probably be best to be consistent and have all sentences in the Glossary end with periods.	The definitions with more than one sentence end in periods; if a definition consists of only one phrase it and is not full sentence it doesn't have a period. This is Verra standards convention.
9_13881	9 Acknowledgements	Additional acknowledgements	Just a suggestion, but you might also want to acknowledge those who contributed edits, because it was a very time consuming process.	Suggestion noted.
9_14053	9 Acknowledgements	Additional stakeholders to include	To get better leverage and ownership of the SDG standards I would encourage wider/ deeper engagement with the development/ humanitarian sectors as they play crucial roles in the potential to achieve the SDGs in a wide variety of (especially) challenging settings.	Verra would very much appreciate suggestions and connections to folks from these stakeholder groups.
10_14054	10 Appendix 1 SD VISTA Climate Module	User guide?	Will it come with a user guide or similar to help potential users get acquainted with how to successfully complete it/ ensure best take up?	The <i>SD VISTA Program Guide</i> sets out rules for actors involved in implementing the Program.  Additionally, Verra intends to provide a general guidance document for users or more specific guidance on topics, such as causal chains. Work on such guidance will begin shortly after SD VISTA's launch.
11_14008	11 Appendix 2 SD VISTA Asset Methodology Requirements	Merging Proposed Methodologies	Further guidance on how Verra intends to merge proposed methodologies for various asset classes would be helpful	Verra will evaluate new asset types and methodologies through the concept note review process, as set out in the Program Guide. As part of the concept note review process, methodology developers will be required to demonstrate that their proposed asset and/or methodology is distinct from existing assets and methodologies, such that an existing methodology could not be reasonably revised to include the process to create the proposed asset or to include the activities included within the proposed methodology.  Some minor clarifications to this effect have been added to Section 5.2.2 of the Program Guide to help clarify this. Additional guidance and instruction will be included within the SD VISTA Methodology Concept Note Template, when that is created prior to the official launch of the program.
11.2_14045	11.2 M2 Scope of SD VISTA Methodologies	Validation deadline is inconsistent with VCS guidance on forestry projects	Suggest allowing AFOLU projects to be validated within 5 years of the project start date.	The requirement was updated to allow AFOLU projects five years to complete validation.

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2.2_13882	2.2 History	Standards probably should not be plural	Standard Development Advisory Committee	Addressed
2.3_13883	2.3 Concurrent Use of SD VISTa and Other Programs	Write our Acronym	Verified Carbon Standard (VCS)	Addressed
2.5_13884	2.5 Roles and Responsibilities	Verra Registry?	Will there be an actual Verra Registry or a Verra-approved registry such as Markit and/or APX?	Markit and APX won't be providing registry services for SD VISTa; for the foreseeable future database functions will be provided on the Verra website.
3_13885	3 SD VISTa Principles	Capital t	The	Addressed
4_14057	4.4 Listing, Registration, Verification Posting and SD VISTa Asset Issuance	Empty section 4.4	It's not clear how this empty section relates to the others. It's hard to judge what is missing and how relevant that is.	This was just a typo; it was simply meant to be the section header for section 4 Listing, Registration, Verification Posting and SD VISTa Asset Issuance.
4_14064	4.4 Listing, Registration, Verification Posting and SD VISTa Asset Issuance	"Representation"	I find this term a bit cumbersome. Is it already in common use (e.g. by VCS)?	See response to comment #4.1_14058.
4.1_14058	4.1 Introduction	Meaning of 'representation'	I find the term 'representation' a bit cumbersome. Is this already a standard term (e.g. for VCS)?	"Deed of representation" is a term used for a signed legal document, especially one regarding legal rights. The representations referred to in the Program Guide are all defined terms, so while "representation" will be an unfamiliar term to many, it will be defined and there are templates for all representations.  Representations are used in the VCS Program.
4.10_14037	4.10 Quality Control of Registered Projects	4.10.6 Statute of Limitations. Compensation statute of limitations is the later of (1) 6 years after the date of issuance of the relevant SD VISTa assets, or (2) 12 mos after the date upon which a second verification report is accepted by the Verra registry.	Propose that statute of limitation should be the earlier of (1) 6 years after the date of issuance of the relevant SD VISTa assets, or (2) 12 mos after the date upon which a second verification report is accepted by the Verra registry.	"Later of" is more conservative and matches VCS Program protocol for VCUs.
4.3_14059	4.3 Pipeline Listing	Choice of terminology: pipeline	I find the term pipeline to be a little too 'insider baseball.' Will this make sense to an external audience and potential users wanting to use the system? Why not just refer to a listing of projects?	The terms "pipeline" and "listing" have specific meaning with respect to the Verra project database. Projects are in the development "pipeline" until they have been validated. They can "list" on that pipeline to demonstrate that they are using the SD VISTa Program in some way, but they can't be "registered" SD VISTa projects until they are validated. A "listed" project is the same as a "pipeline" project.  While Verra is of the opinion that the concepts are sound, we will explore two things in response to this comment. First, we will consider eliminating use of the term "pipeline" and simply referring to "listed" and "registered" projects. Second, we will consider include a diagram to make the listing/validation/registration/verification process more clear.
4.5_14061	4.5 Project Registration	Pipeline versus registration	You can list the project in the pipeline before validation, but only register it afterwards? Will the significance of the difference be clear to all?	See response to comment #4.3_14059.  The distinction between "listed" and "registered" projects will become more important once we add in a procedure for projects that are reviewed at the tier 1 level (by first or second parties); we need to find a way to ensure that those projects are distinguished from projects reviewed at the tier 2 (third party) level via validation and verification.
4.6_13886	4.6 Document Review	Missing parentheses	(those submitted for registration or verification posting),	Addressed
4.6_13887	4.6 Document Review	There should be the	The final day of 30-day public comment period	Addressed

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4.6_13888	4.6 Document Review	Should probably add administrator	The Verra registry administrator	See response to comment #2.5_13884.
4.6_14062	4.6 Document Review	4.6.3: Issuance by other standards	How would you treat certification to other standards or specifically FSC ecosystem services claims?	<p>Certification under other standards is fine as long as any saleable, tradable claim/credit/unit/asset certified under that standard is not the same as the sustainable development benefit represented by the verified SD VISTa asset. If the two assets are the same, only one can be issued.</p> <p>This would be true for any "sponsored" FSC ES claims. If, in the future, products can be labeled with FSC ES claims those would not constitute "saleable, tradable claims" since there is no direct sponsorship of one specific claim.</p>
4.6_14063	4.6 Document Review	Accuracy review	I certainly see the rationale for the accuracy review, but it seems to contradict one of the early statements in this document that Verra is not involved in decisions. The scope seems to go very much to quality and approval.	Accuracy reviews are intended to ensure that the auditor has performed its job -- to ensure compliance with SD VISTa rules and requirements. Verra does not perform accuracy reviews on all projects. For VCS from 2016 to present we've conducted accuracy reviews on around a third of projects; we aim to do them for 50% of projects and we expect that as SD VISTa evolves our reviews will be about at that level.
4.7_13889	4.7 Issuance of SD VISTa Assets	Should probably add administrator	Verra registry administrator	See response to comment #2.5_13884.
4.7_14065	4.7 Issuance of SD VISTa Assets	What are SD Vista assets?	I understand what they are if they are used as labels on VCUs. If not used in this way, what are they?	As described in the glossary and in the Standard, an SD VISTa asset is a user-defined environmental or social unit that is generated according to an approved SD VISTa methodology, verified by an accredited auditor, recorded and has the potential to be transacted on the Verra registry system.
4.8_13890	4.8 SD VISTa Asset Retirements	Make account holder two words; in other places it is two words	account holder's	Changed to be one word in all instances to align with VCS Program Definitions.
4.8_13891	4.8 SD VISTa Asset Retirements	Add administrator	Verra registry administrator	See response to comment #2.5_13884.
5.2_14038	5.2 Step 2: Evaluation of Methodology Concept	5) Verra will evaluate the technical assessment team proposal against the following criteria: a) The proposal has identified a technical assessment lead that has demonstrated competency as an auditor, and is responsible for developing the assessment documentation as required in Step 7 below.	Please provide more clarity on how to demonstrate competency as an auditor. Does person need to be certified as an auditor or work for a firm that is certified to conduct audits?	An individual can demonstrate competency as an auditor by being an auditor with an approved validation/verification body (VVB) or with other demonstrated auditing experience in the relevant sector/la scope. Text clarifying this will be added to the Program Guide, and further guidance will be included within the SD VISTa Methodology Concept Note Template, which will be developed prior to the official launch of the SD VISTa Program.
5.7_14039	5.7 Step 7: Technical Assessment	Verra shall contract with the technical assessment team (as submitted in Section 5.1.3 and approved by Verra) to undertake assessment of the methodology documentation	Please provide more clarity on how fees for the technical assessment team be established. If these fees will be passed along to the methodology developer, then suggest that the methodology developer is consulted before contracts are signed.	Clarified that the methodology developer will be responsible for payment of the technical assessment team.
5.8_14040	5.8 Step 8: Final Verra Review and Approval	Methodology compensation	Suggest that Verra includes methodology compensation (per credit) like with the VCS program to help offset the costs incurred by the methodology developer	Noted support for a methodology developer compensation fee.



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4.2_14046	4.2 What challenges do you think that Tier 1 review would cause for investors or other supporters?	Public comment process as substitute for third party verification	It will be a challenge to get robust public comments from subject matter experts given the time and skill sets needed to review and lack of money to compensate people for this effort. Third party verification provides investors and other supporters with an independent, qualified assessment of the impacts. Suggest that only SD VISta claims can be generated via Tier 1 review.	<p>The public comment process isn't intended to substitute for third party validation/verification; there will be first- or second party review of the documents as well.</p> <p>The assessment conducted under Tier 1 would be less independent, as you point out.</p> <p>Noted support for only allowing SD VISta claims (not assets) to be created via Tier 1 review.</p>
4.3_14047	4.3 Are there restrictions other than those listed in Table 2 above that should be placed on use of lower-tier review?	Restrict Tier 1 to claims only	Suggest using Tier 1 for claims only; assets should be supported by the more rigorous Tier 2 review process.	Noted support for only allowing SD VISta claims (not assets) to be created via Tier 1 review.
4.4_14048	4.4 Are there that Verra should or could play in reviewing and/or ensuring quality of Tier 1 projects?	Verra's role in Tier 1	Given the potential shortcoming of the public comment and review process, suggest that Verra plays a role in reviewing all documentation that is submitted for Tier 1 review.	Noted support for Verra's review of all documentation submitted for Tier 1 review.
4.5_14049	4.5 To what extent do you think a project proponent should be held accountable for engaging with stakeholders once a project's design and/or monitoring report and substantiating documentation have been posted?	Length of public comment process	Seems unreasonable and time consuming to have an ongoing public comment process; should be adequate to have public comments period at validation and at each verification.	Noted support for public comment to be limited to during assessment periods.