

*Estimating GHG Emission Reductions from Planned Degradation (Improved Forest Management)*

August 8, 2009

Dear VCS,

Please accept these comments regarding the Estimating GHG Emission Reductions from Planned Degradation (Improved Forest Management) Methodology. If you have any questions, please contact me directly at: [gthoumi@mgminter.com](mailto:gthoumi@mgminter.com)

Thank you,



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Comment Page 12: Project boundaries must also include legal boundaries.

Comment Page 14: Monitoring period should be no more than 5 years so as applicable under general internationally recognized best practices.

Comment Page 15: Eight carbon pools mentioned, inconsistent with rest of document.

Comment Page 30: Figure 3.1 An outline of timber harvest operations and the associated emission sources is illegible. Please reimage.

Comment Page 33: In snigging operations, there is a substantial opportunity for below-ground root damage of extent undamaged trees caused by soil compression due to machinery. How is this accounted for in the methodology?

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