



November 30, 2016

Climate Action Reserve
601 West 5th Street, Suite 650
Los Angeles, CA 90071

Submitted by email to policy@climateactionreserve.org

**Re: Environmental Defense Fund Comments on the Climate Action Reserve
Grassland Project Protocol v2.0**

Dear Climate Action Reserve:

Environmental Defense Fund (EDF) acknowledges the Reserve for its continual efforts to create and simplify agriculture-based carbon offset protocols. Like the Reserve, EDF is committed to using the best available science to develop and expand the necessary infrastructure for farmers and ranchers to generate revenue through greenhouse gas reducing protocols and projects. The Grassland Project Protocol provides an important opportunity for farmers and ranchers throughout the conterminous United States. This protocol provides support to keep grasslands as grasslands and has the future potential to be combined with other protocols which reward land stewards for implementing practices that decrease and avoid greenhouse gas emissions.

EDF listed and has begun development of the first two pilot projects under this protocol. Going through this process has raised a number of challenges and opportunities for improvement in the finalization of these projects and the development of future projects. We appreciate that the thoughtful work the Reserve staff has put into the development of Version 2.0.

Please accept the following feedback from EDF in response to the public solicitation for comments on the Grassland Project Protocol v2.0. We have organized our comments according to the sections of the protocol.

2.2 Project Definition

- The inclusion of irrigated grasslands as eligible project area is a welcome change. Landowners may employ irrigation to supplement vegetative productivity for grazing animals on grasslands that still store carbon in the soil and are at risk for cropland conversion. (p. 5)

3.2 Project Start Date

- We fully agree with the change to allow credit generation to begin upon project submittal, when a landowner commits to protecting grasslands. Relying upon the easement start date can be a cumbersome requirement due to slow legal processes. (p. 12)
- This amendment also simplifies the process of cooperative development, allowing the reporting period to line up for multiple projects submitted together in a cooperative.

3.3 Additionality

- The proposed change in the suitability threshold allows for increased customization of geographic, climatic, and soil quality factors to localized regions. It is useful for projects to be able to use state or county level assessments of conversion pressure from grassland to cropland to indicate additionality, as they may be more accurate than any national-level assessment. (p. 16)

5.4 Ensuring Permanence of GHG Emission Reductions

- We support the decision to allow an accredited land trust to employ a Contract PIA without having to contribute credits to the risk buffer pool. This change allows land trusts that have strong financial standing and commitment to protect their lands to create offsets without having to amend their property deeds. (p. 53)

6.4 Monitoring Ecosystem Health

- The requirements for rangeland health assessments are a reasonable change. They ensure that ecosystem health is monitored once every six years, and if degradation of the landscape occurs, then there is a plan in place to improve it. The requirement is not too strict, but allows for longer-term reversals of carbon pools stored in the soil to be accounted for, ensuring accuracy of quantification methods. (p. 57)

We appreciate the effort the Reserve is making to strengthen opportunities for agriculture's participation in carbon markets. Adoption of the Grassland Project Protocol V2.0 will be an important step to develop and expand a robust offset market which delivers both economic and environmental benefits. We look forward to continuing to work with the Reserve to create the most accessible carbon market possible. Thank you for your consideration of these comments.

If you have any questions regarding the comments made in this letter, please contact:

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