

May 18, 2020

Climate Action Reserve,

I write with concerns about the proposed additionality and permanence measures in the Soil Enrichment Protocol that is currently being considered by the Reserve. As an ecosystem-climate scientist with expertise in Natural Climate Solutions (NCS), and previous work experience in the carbon-climate-policy space, I am wary of NCS offset protocols that could put at risk the integrity of land-based offsets.

While I appreciate the challenges with accounting for and implementing offset projects for soil carbon and agricultural practices, I worry that a voluntary offset methodology that gives credit for non-additional and non-permanent activities risks threatening the integrity of the offset market, and the offset mechanism as a legitimate tool in climate change mitigation. I don't believe agriculture's inherent accounting challenges should be grounds for reducing program-wide offset integrity standards.

Two components of the proposed protocol concern me the most.

1. **Additionality.** While the protocol requires that a project demonstrate a change in practice, there is no comparison to any kind of common practice metric that ensures additionality. Treating any change in practice that reduces emissions as additional is contrary to the core tenets of additionality – which require some kind of comparison to common practice or business-as-usual. This comparison should be done, as in the Improved Forest Management protocol, with the use of some sort of reliable, continuously updated, and spatialized data. I worry that soil carbon offsets will be granted for projects with questionable additionality.
2. **Permanence.** Land-based offsets struggle with the fact that carbon stocks are relatively easily disturbed and released into the atmosphere. This is especially true in agriculture, where a single large tillage or disturbance event can reverse decades of carbon storage. Without true permanence (recognizing that 100-year permanence is a useful, but arbitrary time limit), offsets are simply short delays in inevitable emissions, or very temporary storage activities. To assume, without monitoring, that reversal risk is de minimis for years to decades after monitoring ceases (as in section 3.5.5), just because a grower has kept up a practice for “at least 5 years following the conclusion of the crediting period,” seems unwise and shortsighted, and will inevitably result in reversals that aren't accounted for.

I appreciate the opportunity to provide comments, and look forward to protocol revisions.

Sincerely,

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