



THE
CLIMATE
TRUST

Memo

To: Max DuBuisson, Climate Action Reserve
From: Mik McKee, Climate Trust
Re: Proposed changes to the Grasslands Project Protocol 1.0

Determining that a grassland property is suitable for and at risk of conversion to crop production is a critical component of demonstrating the avoided emission are additional. However, after assessing more than 10 projects under the Grassland Project Protocol (GPP v1) adopted in July, 2015, it has become clear that Land Capability Classification (LCC) is not the only physical factor that makes conversion possible. Precipitation and access to water for irrigation play a large role, and this can significantly impact the likelihood of conversion within different regions. California is perhaps the best example of this. Under the current protocol, high LCC values (V, VI, VII) make significant portions of the state ineligible. However sophisticated water transport infrastructure and the ability to irrigate arid portions of the state have resulted in substantial crop production.

The Climate Trust has a long history of working in carbon offset markets and has been recognized nationally as an organization that promotes high quality offsets by the Offset Quality Initiative. The Climate Trust believes that a fundamental component of high quality offsets is that the methodology used to quantify them is robust and defensible. Robust, defensible quantification methodology ensures that the offsets generated are indeed additional and real.

Taking the above into consideration, The Climate Trust's primary concern is that any change to the LCC be made with offset quality in mind. Of the three options that are currently being considered (national, state or county level LCC thresholds), TCT supports establishing the required percent of LCC I-IV at the state level. This would reduce the broad approach of a national-level LCC requirement and more accurately reflect conversion pressure at the regional level. It would not, however, open the program to areas of the country where potential for conversion is not real.

Ultimately TCT recognizes that the GPP can play an important role in slowing the conversion of grasslands to crop production, but a national-level LCC requirement may decrease the impact, particularly in drier states.

Invest with purpose.