

Public Comment on Climate Action Reserve's draft Canada Grassland Project Protocol Version 1.0

Greetings,

It's great to see this avoided grassland conversion protocol taking a systematic and reasonable approach to addressing risks of conversion to annual crops, based on land capability and economic factors. The systematic assessment of reversal risk is also well done.

Some questions and comments:

3.3.1.2 Suitability Threshold – It's unclear why LSRS class 4 lands with severe limitations to crop production are considered "highly" suitable for conversion to cropland. Good to see site-specific assessment of limitations in the example for moisture on page 15, and in discussion in A.1.2. Suggest moving a summary of A.1.2 into 3.3.1.2 and including reference to Alberta's online AGRASID soils database as a resource, at: <https://soil.agric.gov.ab.ca/agrasidviewer/>.

3.5.2 Tonne-Year Accounting – Table is unclear about years 3 -20. Why not 17% instead of 18%-1%? Is this amount issued for each of these project years? When is 100% achieved?

5.1 100-year GWP – Include reference for values used.

5.2.1 Baseline Organic Carbon Emissions – Include reference to NIR and default factors.

5.3.4 Project Emissions from Grazing – Is it necessary to differentiate grazing season and grazing days?

5.4.1 Avoidable Reversals – If sufficient quantities of Climate Reserve Tonne (CRT) offsets are not available for compensation, why can only forest projects project CRTs from the Reserve be used? Why not repayment and / or offsets from other types of projects?

6.4 Monitoring Ecosystem Health – Important to see the outcomes based approach to preventing overgrazing by including a requirement for Rangeland Health Assessments during each verification period. Its also good to see that the Protocol developed by Alberta Environment and Parks is one of the options listed on page 61, although this reference (43) is missing from Section 10.

6.6 Monitoring Parameters – Very helpful to see this itemized list of parameters and data sources (calculated, measured, reference or operating records). Suggest indicating default values are described in the Appendices. Can other sources also be used and what quality, e.g. refereed papers?

8.5.2 Desk Review Verification – Suggest including AAFC's Annual Crop Inventory as a data source to establish both Baseline and Project conditions. Data are available from 2009 (not 2011 indicated on p 93). This may also help with measurements required in 6.6.

Appendix E – Suggest including an introductory paragraph. Were there penalties for reversals within the PCP, or just stopped payments?

Great work on moving this challenging concept forward.

Regards,

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