



September 13<sup>th</sup>, 2019  
Craig Ebert  
President, Climate Action Reserve  
818 W. 7th Street, Suite 710  
Los Angeles, CA 90017

**RE: Climate Action Reserve’s Canada Grassland Protocol Version 1.0 Draft for Public Comment**

The following are comments provided by Edenfort, a joint venture between ClimeCo Corporation and Climate Smart Group, in response to version 1.0 Canada Grassland Project Protocol. We thank the Climate Action Reserve (CAR) for this opportunity to submit our comments.

Overall, we commend CAR for developing a Grassland protocol for Canada, giving ranchers and landowners an opportunity to participate in the voluntary carbon market. The flexibility in the requirements for permanence and project commitment through tonne-tonne accounting and tonne-year accounting, shows responsiveness to the concerns and risks experienced by landowners and ranchers.

We would like to submit the following comments and suggestions for the Canada Grassland Protocol:

Page Numbers	Topic	Comment
13 -15	3.3.1.1 Financial Threshold	<p>While it is made clear in the document that due to a lack of data a default financial additionality screening is not possible, we would like to emphasize that requiring a real estate appraisal means up-front costs which may lead to identifying that property as ineligible. Has a financial analysis been conducted on the typical costs for this type of appraisal and can that information be shared?</p> <p>Additionally, we would like to request clarification around point 2 (part f) on page 14. Does the Reserve anticipate that the “registered professional qualified in the field of specialty interest” that conducts a valuation for ongoing grassland management to be the same person or group conducting the real estate appraisal to evaluate if the land is suitable to be converted to grassland, or will this require a separate evaluation from an individual with specialized knowledge? Moreover, we would like clarification regarding the need for a second certified professional to review the appraisal report. Assuming the appraiser has appropriate qualifications, and</p>

		<p>that the entire report will be subject to verification, why does this section specifically require a second evaluation?</p> <p>We understand the need to have a strong, defensible, and standardized mechanism to evaluate financial additionality. However, we urge CAR to consider the full cost and burden of requiring Project Developers to hire two to three professionals to evaluate a site simply for eligibility. Grassland projects often have a relatively low offset output on a per-acre basis and may not be financially viable if upfront evaluation costs are too high.</p>
<b>20</b>	3.4 Project Crediting Period	<p>The United States-based protocol allows for a single 50-year crediting period, while the Canadian protocol has a crediting period of 30 years. What is the purpose of this difference?</p>
<b>44 - 45</b>	5.3.2 Project Emissions from Fossil Fuel and Electricity	<p>The need to monitor and report on fuel and energy usage when it will likely be low or <i>de minimus</i>, as stated in the protocol, can pose a challenge. Using conservative default factors provides a more cost-effective approach for a pool that will have limited effect on the overall GHG assertion.</p> <p>If CAR is unable to identify a conservative default factor, we suggest including a mechanism that would remove fuel and energy usage reporting requirements if they are quantified as <i>de minimus</i> after one or more reporting period.</p> <p>For example, if a project reports emissions attributed to fuel and energy use to be less than a pre-established percentage of total project emissions for three reporting periods, we suggest that CAR either deem those emissions negligible and remove the requirement for further reporting or allow the project to continue to report the emissions as an average from the previous years. This designation could be subject to verification that the landowner hasn't made major management changes that could result in a substantial increase in emissions.</p>

We again thank CAR for the opportunity to provide public comments.

Sincerely,

Edenfort Team