



U.S. Grassland Project Protocol Version 2.1 ERRATA AND CLARIFICATIONS

The Climate Action Reserve (Reserve) published its U.S. Grassland Project Protocol Version 2.1 (U.S. GPP V2.1) in February 2020. While the Reserve intends for the U.S. GPP V2.1 to be a complete, transparent document, it recognizes that correction of errors and clarifications will be necessary as the protocol is implemented and issues are identified. This document is an official record of all errata and clarifications applicable to the U.S. GPP V2.1.¹

Per the Reserve's Program Manual, both errata and clarifications are considered effective on the date they are first posted on the Reserve website. The effective date of each erratum or clarification is clearly designated below. All listed and registered grassland projects must incorporate and adhere to these errata and clarifications when they undergo verification. The Reserve will incorporate both errata and clarifications into future versions of the protocol.

All project developers and verification bodies must refer to this document to ensure that the most current guidance is adhered to in project design and verification. Verification bodies shall refer to this document immediately prior to uploading any Verification Statement to assure all issues are properly addressed and incorporated into verification activities.

If you have any questions about the updates or clarifications in this document, please contact Policy at policy@climateactionreserve.org or (213) 891-1444 x3.

¹ See Section 4.3.4 of the Climate Action Reserve Program Manual for an explanation of the Reserve's policies on protocol errata and clarifications. "Errata" are issued to correct typographical errors. "Clarifications" are issued to ensure consistent interpretation and application of the protocol. For document management and program implementation purposes, both errata and clarifications are contained in this single document.

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Section 2

1. Preparation of Soil for Moderate Seeding Activities (CLARIFICATION — June 28, 2023)

Section: 2.2 (Project Definition)

Context: Section 2.2., page 6, currently states that “An AGC project may involve moderate levels of seeding, organic fertilizer application (i.e., manure, compost, etc.), haying, forage harvesting, livestock grazing and/or irrigation as part of the project activity,” but does not specify whether activities that would qualify as preparation for “moderate seeding activities” that may break the project soil but that promote grassland health in the long-run are allowed.

Clarification: This section now states that:

“An AGC project may involve moderate levels of restorative seeding (including low-impact seeding preparation activities, such as disking²), organic fertilizer application (i.e., manure, compost, etc.), haying, forage harvesting, livestock grazing and/or irrigation as part of the project activity.

Section 3

2. Suitability Threshold Assessment Occurrence (ERRATUM — June 28, 2023)

Section: 3.3.1.2 (Suitability Threshold)

Context: Section 3.3.1.2, page 18, currently states that “The entire [Grassland] project area must be assessed using a single version of the LCC [Land Capability Classification] and a single suitability threshold” to demonstrate whether a project area is suitable for conversion to cropland (to pass the performance standard test), but does not specify whether this assessment only needs to occur at the initial project verification or if suitability needs to be reassessed at each verification throughout the project crediting period.

Correction: This section now specifies that:

“The entire project area must be assessed using a single version of the LCC and a single suitability threshold at initial verification”.

² Disking, also known as rotational or strip disking, is defined by the [NRCS](#) as “the light disking of strips of well-established grass stands that leaves much of the vegetation intact, but exposes 50% of the ground to bare soil.” Once established, grassland fields need management so that the grasses do not crowd out forbs and legumes over time. Disking can help enhance the wildlife habitat value of the managed grassland acres by increasing the amount of open ground networks under the grass canopy, and by encouraging a diverse forb/legume community. Disking should be conducted in accordance with the most recently updated [USDA CRP guidelines](#) (for the state in which the project area is located if available).

Section 3

3. Major Land Resource Area Assessment Occurrence (CLARIFICATION — June 28, 2023)

Section: 3.3.1.2 (Suitability Threshold)

Context: Section 3.3.1.2, page 19, “Option 1: Default Land Capability Classification Threshold Based on Major Land Resource Area” does not specify how often project area MLRAs must be assessed and confirmed by verifiers.

Clarification: This section now includes the following clarification:

“Project area MLRAs should be confirmed for appropriateness by verifiers upon initial verification. Once confirmed, the project shall continue to use the original MLRA delineation for the project area. Note that in cases of project area expansion, the new area must be assessed for eligibility against all parts of the performance standard test, meaning that MLRA stratification will need to be completed for the new project area and verified upon the first/next verification after the project expansion.”

Section 3

4. Criteria for Qualified Conservation Easements (CLARIFICATION — July 18, 2023)

Section: 3.5.1 (Qualified Conservation Easements)

Context: Section 3.5.1, page 27, lacks a clear and complete list of requirements for Qualified Conservation Easements (QCEs) as defined by the protocol, and is missing a key criterion that is required in Appendix D4 for a conservation easement to qualify as a QCE.

Clarification: This section now includes the following requirement:

“It is required that all QCEs include enforceable provisions for the ongoing monitoring of compliance with the terms of the easement” (as was already required by Appendix D4).

This section now also includes the following table of QCE requirements for clarity:

Table 3.1. Protocol Requirements for Qualified Conservation Easements (QCEs)

Requirements
The QCE includes a statement indicating that the easement is granted pursuant to the state enabling statute for conservation easements for the state in which the project is located (e.g., California Civil Code Section 815).
The language of the QCE is sufficiently clear to reasonably prevent cultivation on the entire project area. I.e., the easement includes terms that prevent the conversion of the project area from grassland to another land use, such that avoidable reversals are sufficiently precluded as long as the easement is enforced. For example, whereas a basic conservation easement may only restrict the subdivision and/or development of the project area, a QCE would also restrict activities such as plowing and farming, which could release carbon stored in the soil

The QCE dedicates the project area to grassland cover and includes terms that prevent the conversion of the project area from grassland to another land use, such that avoidable reversals are sufficiently precluded as long as the easement is enforced (i.e, for the duration of the crediting period AND for at least 100 years after credit issuance).
The QCE specifies any land within the project area where activities resulting in a land use other than grassland are allowed and, subsequently, excludes the affected land from the project area to avoid risk of a reversal due to such activities. To satisfy this requirement, the QCE may make reference to the carbon project and simply specify that any non-grassland land use must occur outside of the specified project area.
The QCE includes enforceable provisions for the ongoing monitoring of compliance with the terms of the easement.
The QCE incorporates and requires environmental best management practices for rangeland management (this is not required for QCEs, but is highly recommended).

Note, there are additional provisions for project conservation easements that the Reserve strongly encourages but does not require. For enhanced transparency and legal clarity, the conservation easement should explicitly 1) refer to, and incorporate by reference, the terms and conditions of the PIA and the GHG reduction rights agreement, thereby binding both the grantor and grantee – as well as their subsequent assignees – to the terms of the agreements for the full duration of the grassland project’s minimum time commitment, as defined in Section 3.5 of this protocol; and 2) make all future encumbrances and deeds subject to the PIA.

Section 3

5. Regulatory Compliance Examples (CLARIFICATION — June 28, 2023)

Section: 3.6 (Regulatory Compliance)

Context: Section 3.6, page 28, states that:

“As a final eligibility requirement, Project Owners must attest that project activities do not cause material violations of applicable laws (e.g., air, water quality, safety, etc.). To satisfy this requirement, Project Owners must submit a signed Attestation of Regulatory Compliance form⁴¹ prior to the commencement of verification activities each time the project is verified. Project Owners are also required to disclose in writing to the verifier any and all instances of legal violations – material or otherwise – caused by the project activities. Where a temporary or emergency restriction or regulation is in force during the reporting period, it shall be included in the assessment of the project’s regulatory compliance.”

This description lacks clear guidance regarding the types of regulations and documentation that verifiers should review to assess regulatory compliance for grassland projects, as they are not facility-based projects that can easily be tied to regulatory databases that monitor projects for compliance with local, state, and federal air quality and water quality laws, etc.

Clarification: This section now provides examples of the types of regulations and relevant documentation verifiers should review to assess whether a grassland project passes the regulatory compliance test. It now states that:

“As a final eligibility requirement, Project Owners must attest that project activities do not cause material violations of applicable laws (e.g., air, water quality, safety, etc.). To satisfy

this requirement, Project Owners must submit a signed Attestation of Regulatory Compliance form prior to the commencement of verification activities each time the project is verified. Project Owners are also required to disclose in writing to the verifier any and all instances of legal violations – material or otherwise – caused by the project activities. Project Owners must disclose in writing to the verifier all instances of violations of laws that directly protect grasslands, wildlife, water quality, or other environmental benefits, and which result in criminal or civil penalties. Project owners must also disclose any violations or activities that disrupt compliance with conservation easement requirements for the project area. Additionally, if applicable, project owners must be able to provide the verifier with grazing permit documentation upon request. Where a temporary or emergency restriction or regulation is in force during the reporting period, it shall be included in the assessment of the project’s regulatory compliance.”

Section 5

6. Definition of a Reversal (ERRATUM— June 28, 2023)

Section: 5.4 (Ensuring Permanence of GHG Emission Reductions)

Context: Section 5.4 Ensuring Permanence of GHG Emission Reductions, on page 52 of the protocol, states that:

“Identification of a reversal is a binary decision based on area; either an area is subject to a reversal or not. For example, if the Grassland Owner decides to plow and cultivate a 10-acre portion of the project area, that entire 10-acre portion shall be considered to have experienced a complete and avoidable reversal. If an area is subject to a reversal, then the quantity of soil carbon reversed is considered to be equal to total number of CRTs issued for reversible emission reductions on that specific portion of the project area. For the purposes of this protocol, reversible emission reductions are those related to the avoided loss of organic carbon in soil and belowground biomass (Equation 5.3) for which CRTs were issued for reporting periods during the 100 years prior to the date of the reversal.”

This binary definition of a reversal fails to account for situations in which limited, discrete releases of SOC may occur as a result of emergency activities that break the soil on the project area but do not result in permanent conversion of the affected project area. For example, if a wildfire were to occur on a project area, a landowner may choose to temporarily sodbust parts of the project area to prevent any additional destruction of land during the wildfire event, with the intent of restoring those affected areas to grassland once all wildfire risk has been sufficiently averted. Due to the soil disturbance, a temporary release of SOC would occur during the initial sodbusting event but would eventually be re-sequestered during natural carbon cycling processes that would occur after restoration, ultimately returning the project SOC pools to near-baseline levels. In such an emergency case, the Reserve would not consider this temporary conversion as a reversal that needs to be compensated with CRTs.

Correction: This section shall now read:

“In most cases, identification of a reversal is a binary decision based on area; either an area is subject to a reversal or not. For example, if the Grassland Owner decides to plow and cultivate a 10-acre portion of the project area, that entire 10-acre portion shall be considered to have experienced a complete and avoidable reversal. If an area is subject to a reversal, then the quantity of soil carbon reversed is considered to be equal to total number

of CRTs issued for reversible emission reductions on that specific portion of the project area. For the purposes of this protocol, reversible emission reductions are those related to the avoided loss of organic carbon in soil and belowground biomass (Equation 5.3) for which CRTs were issued for reporting periods during the 100 years prior to the date of the reversal. However, for cases in which temporary disruption of soil carbon on minimal parts of the project area occurs as a response to emergency events or “acts of nature” that do NOT result in SOC emissions that exceed baseline SOC emissions, such temporary conversion events may be excluded from project quantification. In other words, temporary conversion of the project area that results in discrete, limited emissions of SOC may not be considered reversals that must be compensated for with CRTs, so long as the affected project areas are excluded from project quantification until project SOC pools are demonstrated to be restored to baseline project conditions. Examples could include sodbusting that occurs to create temporary, emergency breaks during a wildfire event, but may not include instances of tillage or disturbance for the purposes of converting the project area to a land use other than grassland. The minimal and temporarily disturbed soil area does not generate credits until the point of verifiable restoration of the soil and grassland to its original conditions or improved conditions.”

Section 6

7. Approval of Over-Grazing Prevention Mechanisms (ERRATUM— June 28, 2023)

Section: 6.2 (Monitoring Grazing)

Context: Section 6.2, on page 56, states that:

“Grassland projects must employ a mechanism to detect and prevent overgrazing on project lands, which is tailored to the specific conditions of their project and its ecosystem. It is up to each project developer to determine the appropriate means to safeguard the project against overgrazing. The project developer must obtain Reserve approval for the particular administrative means they will use to ensure project land is not overgrazed. Such approval must be obtained prior to listing of the project, and any changes to the mechanism must be approved by the Reserve prior to the completion of verification activities in a given reporting period.”

The Reserve, however, has determined that over-grazing prevention mechanisms should instead be approved upon confirmation of appropriateness by the verification body when the project goes through verification (instead of by the Reserve at project submittal).

Correction: This section shall now read:

“Grassland projects must employ a mechanism to detect and prevent overgrazing on project lands, which is tailored to the specific conditions of their project and its ecosystem. It is up to each project developer to determine the appropriate means to safeguard the project against overgrazing. The over-grazing prevention mechanism will be approved upon confirmation of appropriateness by the verification body when the project goes through verification.”

Section 6

8. Ecological Site Description Link (ERRATUM— June 28, 2023)

Section: 6.4 (6.4 Monitoring Ecosystem Health) – Footnote 83

Context: Footnote 83 currently directs readers to a broken link to determine the reference conditions for a project area using the USDA Ecological Site Descriptions (ESDs).

Correction: Readers may now access the ESDs at the following link:
<https://edit.jornada.nmsu.edu/catalogs/esd>.

Section 7

9. Interim Monitoring Report Submission Timing (ERRATUM — June 28, 2023)

Section: 7.4 (Reporting Period and Verification Cycle)

Context: Section 7.4, on page 69, states that:

“For any reporting period that ends prior to the end of the verification period (i.e., years 1-5 of a 6-year verification period), an interim monitoring report must be submitted to the Reserve no later than 90 days following the end of the relevant reporting period.”

Correction: To maintain consistency with the Reserve’s reporting deadline requirements for its other protocols, this section shall now read:

“For any reporting period that ends prior to the end of the verification period (i.e., years 1-5 of a 6 year verification period), an interim monitoring report must be submitted to the Reserve no later than 12 months following the end of the relevant reporting period.”

Section 8

10. Project Implementation Agreement Submission Timing (CLARIFICATION— June 28, 2023)

Section: 8.6.1 Project Eligibility and CRT Issuance

Context: Table 8.2. Eligibility Verification Items on page 78, lists a requirement for verifiers to “Confirm that the Project Owner has executed a PIA with the Reserve.” However, the Protocol lacks clarity regarding when and how execution of the PIA should be confirmed given that PIAs are typically drafted and signed after all verification activities have been completed and immediately prior to credit issuance.

Clarification: Because the PIA is not executed until project verification clarifications are resolved, the verifier may submit the verification report and statement to the Reserve for review (in the registry) prior to confirming that the Project Owner has executed the PIA. The verification report can indicate that the PIA will be checked before the verification is finalized or placeholder language can be placed in the report and updated prior to project approval by the Reserve.