CLIMATE ACTION RESERVE

Grassland Project Protocol v2.0

Public Comment

November 15, 2016

This material is based upon work supported by the Natural Resources Conservation Service, U.S. Department of Agriculture, under number 69-3A75-16-025

Agenda

1. Background
2. Presentation of proposed changes
3. Audience questions
4. Next steps

Section 1

BACKGROUND

Background

- **July 22, 2015**: GPP v1.0 adopted
- **September 2015**: Awarded USDA NRCS Conservation Innovation Grant for outreach, implementation, and pilot projects
- **Spring 2016**: Released Project Development Handbook, conducted stakeholder outreach
- **July 2016**: Listed 2 pilot projects in Colorado
- **September 2016**: Initiated protocol update

GPP v2.0 Timeline

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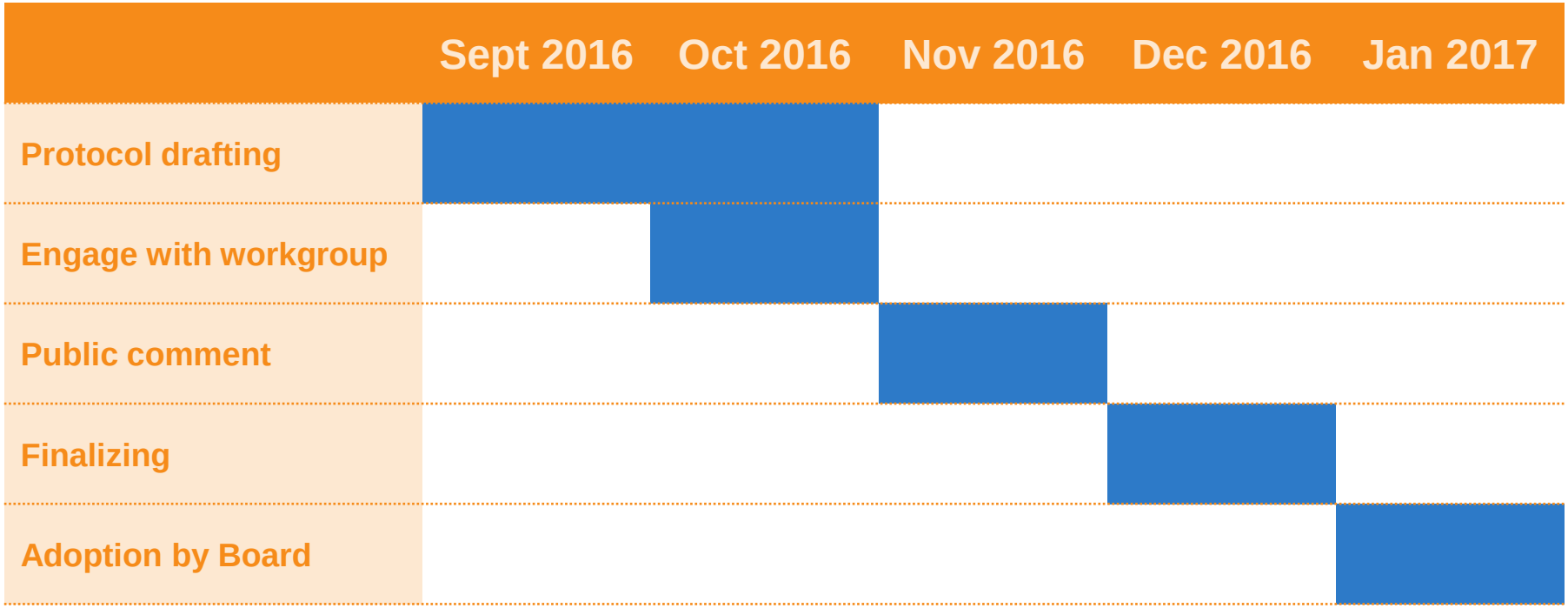

Section 2

PROPOSED CHANGES

GPP v2.0 highlights

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Major changes in bold

- Allow for irrigation of project area
- **New start date option**
- **New options for suitability threshold**
- **Ecosystem health assessments**
- Remove accounting for shrubs
- Reduce buffer pool contribution for accredited land trusts
- Updated soil texture class names
- Minor language improvements

Irrigation

PROPOSAL: No restriction on irrigation during project

- GPP v1.0 prohibits irrigation of the project area
- Stakeholders suggested that moderate irrigation can improve rangeland health without any significant drawbacks
  - **Q**: Negative consequences of allowing irrigation?
- May increase electricity emissions related to pumping

New start date option

- **PROPOSAL**: Submittal may define start date
  - Very common approach for forestry
  - Project is “submitted” when the form is uploaded and the “submit” button is clicked in the registry software
- Only applicable before the project easement is recorded
- Easement must still be in place prior to completion of verification
- Simplifies cooperative management

Accounting for shrubs

PROPOSAL: Drop shrubs entirely

- GPP v1.0 does not properly account for shrubs in the context of fire and reversals
- After a year of outreach, zero stakeholders have expressed interest in accounting for shrubs
- Adds a large amount of effort and complexity to quantification and verification
- Could be re-worked and added back in the future
- **Q**: Negative consequences of dropping shrubs?

Risk of financial failure

PROPOSAL: $Risk_{FF}$ = 0% where the PD is an accredited land trust

- Current protocol applies 10% $Risk_{FF}$ for projects without the Recorded PIA, subordination clause Type I
- Land Trust Accreditation Commission requires proof of financial resources to support the easement into the future, including legal costs
- Accredited land trusts can, categorically, be viewed as a stable counterparties for the PIA

Soil texture class names

PROPOSAL: Rename the three soil texture classes

- Current names can be confusing with the various qualifiers used in the soil survey
  - E.g., “Sandy loam” = “Sand”
- Recommended by contractors

GPP v1.0	GPP v2.0
Sand	Coarse
Loam	Medium
Clay	Fine

Suitability threshold options

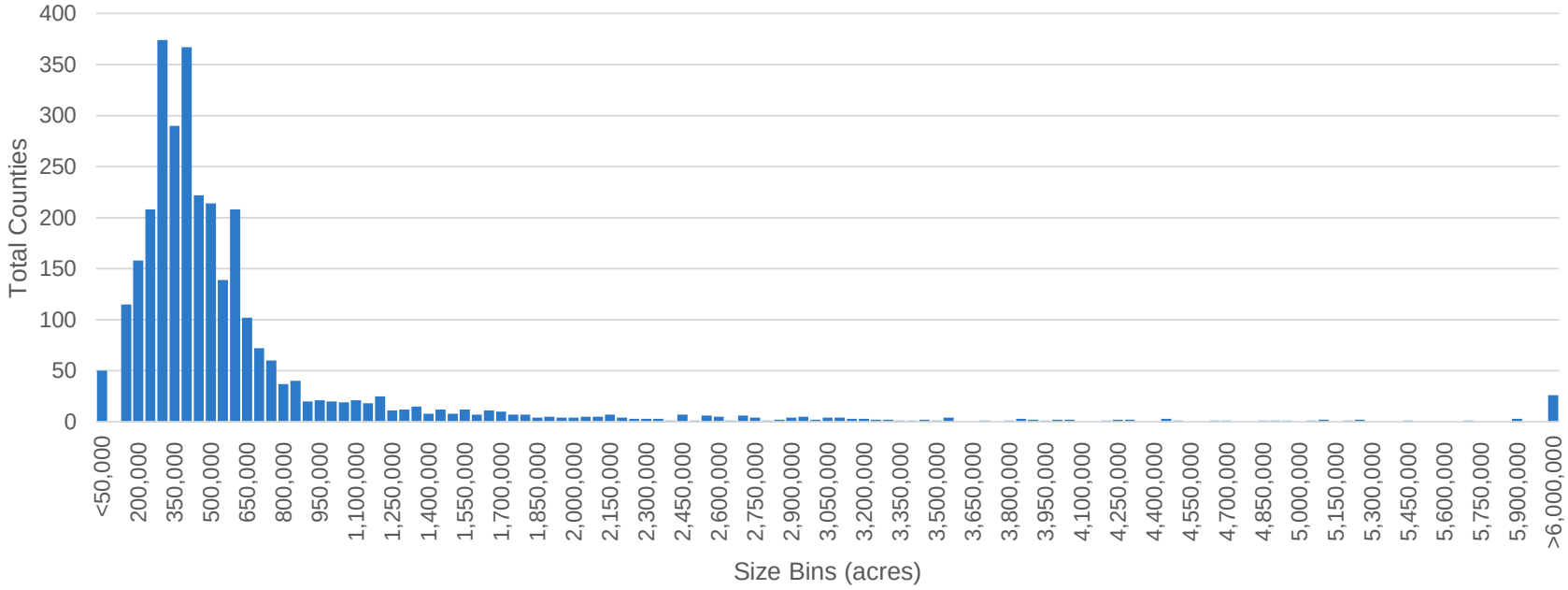
- **PROPOSAL**: three new options to define suitability threshold
  - Option 1: Large-scale default *(either national value of 75%, or state-level values based on analysis)*
  - Option 2: County-level default
  - Option 3: Local assessment
- Stakeholder feedback that national default was too restrictive for many areas
- **Q**: Would the state-level analysis-based default be preferable to the current national default?

Example state defaults

State	Suitability Threshold (min % of LCC 1-4 in project area)
California	**59%**
Colorado	**78%**
Montana	**89%**
Oregon	**74%**

Bounds for analysis

- **Q**: How much cropland should a county contain to be used to develop a county-level threshold?
- U.S. counties vary widely



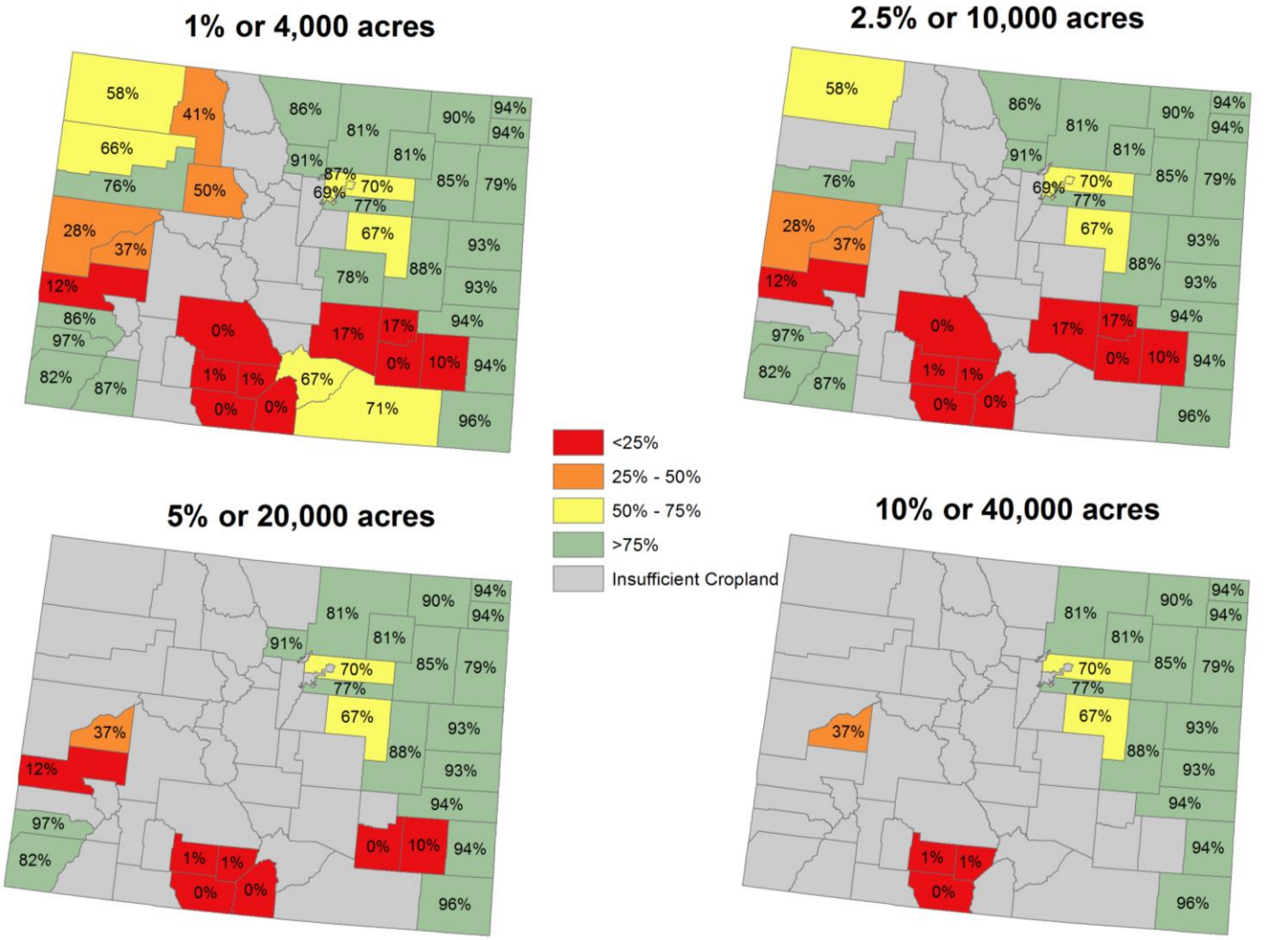
Bounds for analysis

- Example options for minimum cropland for analysis (use the larger of the two values):

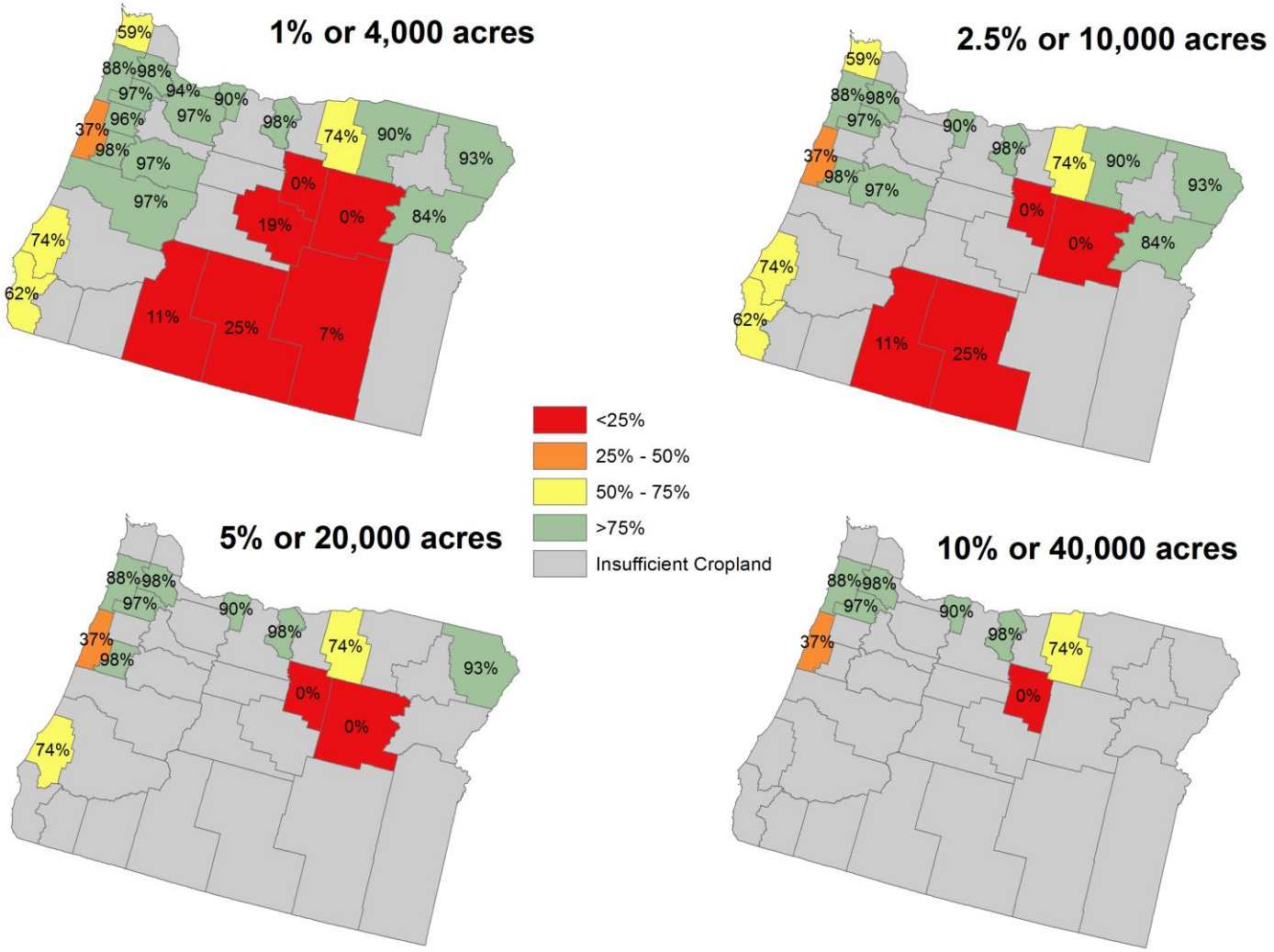
Option	% Area	Acres	Notes
A	25%	100,000	Seems highly conservative
B	10%	40,000	Still fairly conservative
C	5%	20,000	Reasonable compromise?
D	2.5%	10,000	Reasonable compromise?
E	1%	4,000	Is this getting too small?

- *Median county size is 394,000 acres. Rounded up to 400,000 to get the acres to pair with the %*
- *Thus, counties above the median apply the %, counties below the median apply the fixed acreage*

Colorado county options



Oregon county options

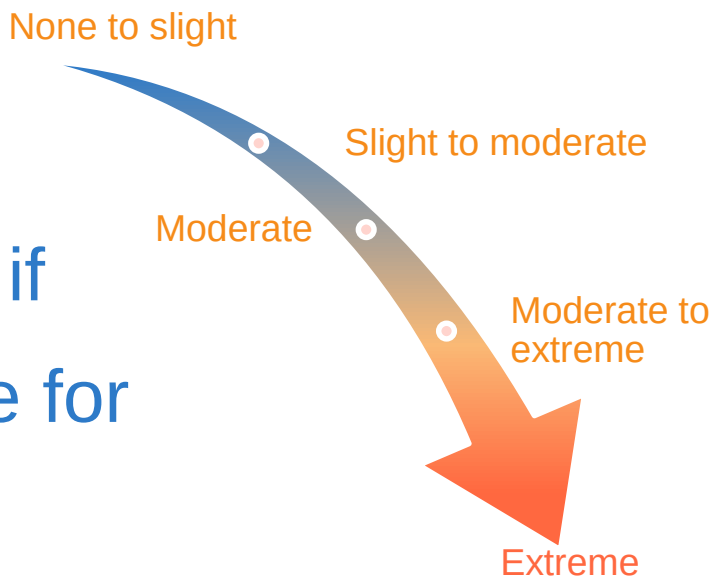


Ecosystem health assessments

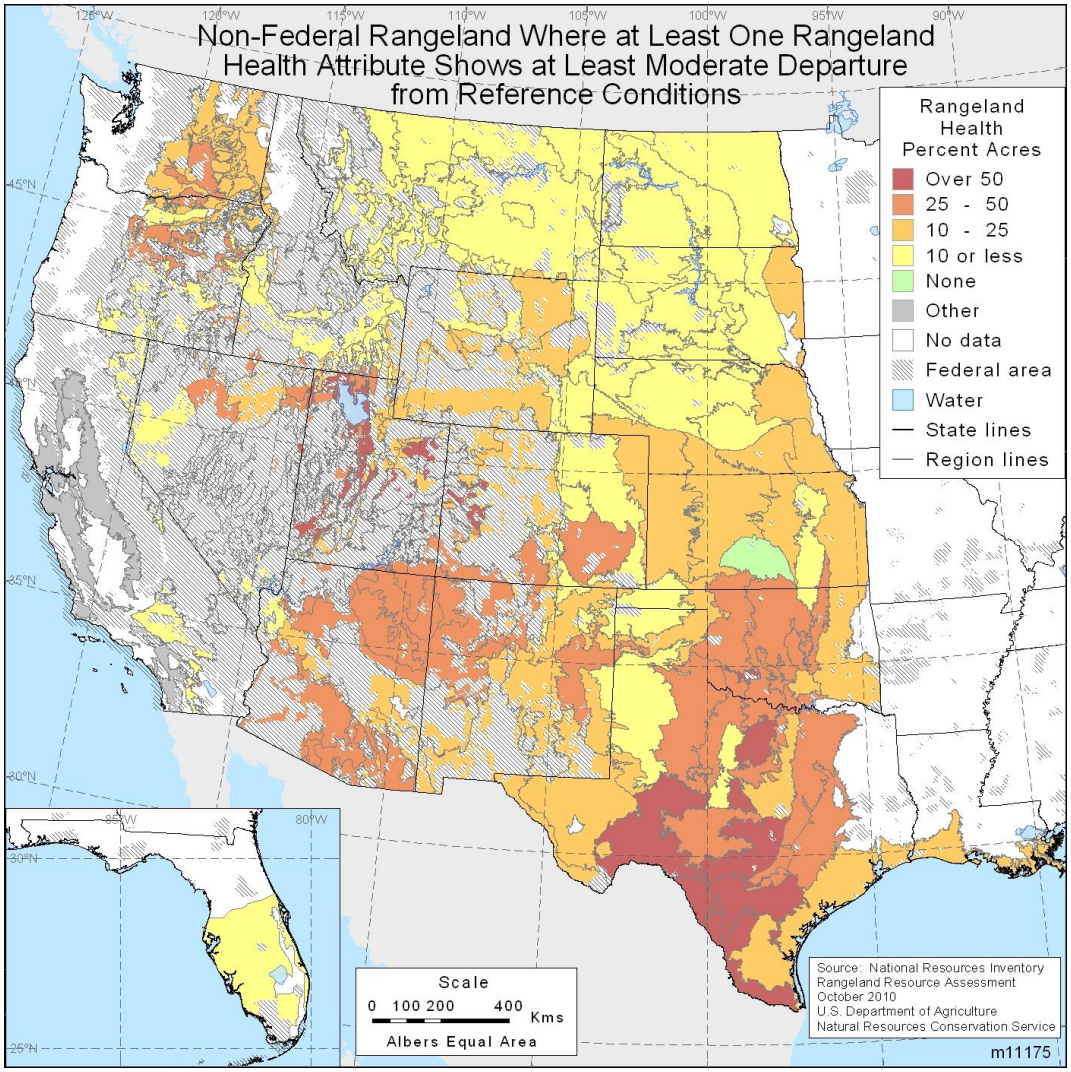
- **PROPOSAL**: periodic ecosystem health assessments are required for eligibility
  - Follow the BLM Rangeland Health Assessment protocol
  - 1st assessment completed before 2nd verification
  - New assessments at least every 6 years
  - Seriously degraded lands must show improvement
- Allows for a long-term view of the health of the project area, ensuring stability of belowground carbon pools
- Can help identify non-event-related reversals

Rangeland Health Assessment protocol

- Ecological Site Description for reference conditions for 17 different metrics
- Assess each metric on a scale of deviation
- Adaptive management to improve degraded areas
- Ineligible for reporting period if condition worsened over time for avoidable reasons



Rangeland health in the U.S.



Section 3

AUDIENCE QUESTIONS

Section 4

NEXT STEPS

Next steps

- Comments must be submitted no later than **Wednesday, November 30**
  - Submit comments to policy@climateactionreserve.org
  - Prefer MS Word format
  - Please organize by protocol section
  - All comments will be responded to and published online (January)
- Targeting adoption by Board in January, 2017