



November 5, 2020

Gavin McCabe
Chair, Compliance Offset Protocol Task Force
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Initial Draft Recommendations of Compliance Offset Protocol Task Force

Dear Chairman McCabe,

I am writing on behalf of Sequoia Riverlands Trust (SRT) to comment on the Initial Draft Recommendations of the Compliance Offset Protocol Task Force (COPTF). SRT is a regional, Land Trust Alliance-accredited nonprofit that holds fee title, conservation easements or deed restrictions on over 40,000 acres of habitat and agricultural land, primarily in Fresno, Tulare, Kings, Kern and San Luis Obispo Counties. As a founding member of the Southern Sierra Partnership—a coalition of business and conservation organizations that also includes Audubon California, Sierra Business Council, Tejon Ranch Conservancy and The Nature Conservancy—SRT has contributed to climate adaptation planning for a seven-million acre region stretching from the peaks of the Sierra Nevada and Tehachapi Mountains to the center of the San Joaquin Valley.¹ We also have extensive experience with soil composting, and with monitoring and measuring soil carbon, on our fee title preserves.

SRT is grateful to see that the Initial Draft Recommendations recognize the importance of agricultural land in combatting climate change. We are also pleased that the COPTF supports adoption of a protocol for avoided conversion of grasslands.

¹ Southern Sierra Partnership. 2010. *Framework for Cooperative Conservation and Climate Adaptation for the Southern Sierra Nevada and Tehachapi Mountains*. Available at <http://www.southernsierrapartnership.org/ssp-framework.html>.

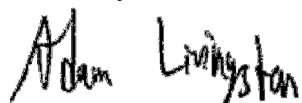
But we were surprised at the report’s dismissal of soil composting on rangeland as economically infeasible, due to the costs of “procurement, transportation and spreading of the compost.”² These expenses vary by location, but on actively grazed lands, the primary ingredient of compost—manure from grazing animals—is generated onsite, which should limit costs for procurement and transportation. Composting facilities are also eligible for Natural Resource Conservation Service Environmental Quality Incentive Program (NRCS EQIP) funding, which can provide additional help in lowering economic barriers.³

If soil composting is economically feasible on even a small portion of California’s rangeland, establishment of a protocol and funding sources to encourage its use could help to meet the state’s climate goals. The Initial Draft Recommendations note that “this practice could sequester significant carbon across California’s grasslands,”⁴ and as a participant in one of the studies cited by the COPTF,⁵ SRT has seen the benefits of soil composting first hand. We also have extensive experience with monitoring and measuring soil carbon on our rangeland preserves and, through our pioneering Earth Academy Program, we are passing this knowledge on to the next generation.

A soil composting protocol, connected to funding for carbon offsets, would help SRT and other landowners to implement this practice more widely, and accelerate California’s progress toward carbon neutrality. For this reason, we respectfully urge the COPTF to reconsider its decision not to recommend a protocol for soil composting on rangeland.

We appreciate your consideration, and would welcome the opportunity to discuss these issues further.

Sincerely,



Adam Livingston
Director of Planning and Policy
Sequoia Riverlands Trust

² Compliance Offset Protocol Task Force. 2020. Initial Draft Recommendations. Available at https://ww2.arb.ca.gov/sites/default/files/2020-10/offsets_task_force_draft_report_100720.pdf.

³ U.S. Department of Agriculture. 2016. Conservation Practice Standard: Composting Facility. Available at https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs143_026122.pdf.

⁴ COPTF, 2020.

⁵ Silver, W.L., Vergara, S.E., and Mayer, A. 2018. Carbon Sequestration and Greenhouse Gas Mitigation Potential of Composting and Soil Amendments on California’s Rangelands, *California’s Fourth Climate Change Assessment*.