



Nature's Registry  
P.O. Box 345  
Brodhead, Wisconsin

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Ms. Tica Lubin  
Associate Director Registry Development  
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www.regen.network

Re: Submittal of TRS V2.0 for public review

Dear Tica,

Please find TRS V.2.0 for public review. This email explains (and highlights in the body of V. 2.0) the changes made to TRS Version 1.0 that contributed the evolution of V 2.0. It is our full intention at this time to retain Version 1.0 as an active version because nearly 1 million acres of grazing-related rangeland improvement projects are operating, and will continue to operate, under Version 1.0.

The changes made since Version 1.0 went through Regen Network review that are now included in Version 2.0 fall under several categories:

1. **Definitional:** Users asked us to explain certain terms. You will see in the Glossary of Terms the additions provided.

***For example — The following definition for “Additionality” was added and can be found on page 7.***

**Additionality:** A criterion to determine whether emission removals and reductions are real, measurable, and in addition to what would have happened in the absence of the project. TRS SOC V2.0 offers four tests of additionality; an ultimate test is measure to measure increases in soil organic carbon stocks.

2. **Process and Structural:** Users asked for greater clarity around additionality, buffers, buffer funding, changes, etc.

***For example —*** Additionality options are found under Task 1.7 starting on page 29.

***For example —*** Buffer and permanence content is found under Task 1.8 starting on page 34.



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3. **New tools to streamline confusion:** Users asked questions about how to determine certain metrics. We added tools into the Standard to improve communication.

**For example** — A permanence risk worksheet (aligned with a literature review white paper that will be made available on the AEI web site) is also found under Task 1.8 on pages 38-41.

4. **Creating Robust Flexibility:** Permanence time periods have been rapidly changing in the voluntary and compliance marketplace. TRS Version 1.0 has a 10 year post-crediting monitoring period; several standards require a 40 or 100 year minimum. To make the Standard as flexible as possible, we added variable monitoring periods to accommodate the market and customer goals, including a -40 year, -100 year, and -P (perpetual) option. With the perpetual monitoring period, we require placement of something akin to a conservation easements. We have also added a structured funding commitment during the monitoring periods.

**For example---** permanence time period options for Version 2.0 starts with a 40 yr minimum requirement, allows a 100 yr ramp up, and a perpetual (permanent removal) term that is introduced in Section 1.8 and further elaborated under Appendix 8, Pages 508-510.

At this time TRS Version 2.0 is what we wish to open for public comment.

We thank you ahead of time for this opportunity to obtain public feedback and look forward to learning how to better improve Version 2.0 through this process with Regen Network.

Bartlett Durand  
CEO, Nature's Registry