Comments for the CAR Draft Soil Enrichment Protocol (SEP) v1.0
Evergreen Carbon

1. SEP section 2.2.2 Defining the Project Area

   The meaning of "continuous" is not defined. The use of "within" seems to point to what's inside a particular field's boundary, i.e. a geographic boundary. This term can also refer to a temporal continuity. We recommend that the protocol defined consistency be congruent with the definition of what constitutes a 'field' and a field's subsections, meeting the field's designation for continuity.

2. SEP section 3.4.1.1 Defining the Baseline Scenario;

   We're concerned about the use of a "historical baseline period to produce a baseline schedule of activities". To determine 'baseline' conditions in a project period, the 3 previous years may not be appropriate to represent baseline carbon sequestration if the land is being put into agricultural production for the first time, or transitioned from another type of crop. For example: a new almond orchard is planted and uses winter cover crops in tree inter-rows. The baseline should be a comparable to "new almond orchard without winter cover crops", as opposed to the land use during the 3 previous years (which may have been cotton, a nitrogen fixing species, other crop, or just left fallow by the land owner) to accurately represent the impact of the soil enrichment practice within the current cropping scenario.

3. SEP section 3.4.1.2 Data Collection for Activities in the Baseline Scenario; Table 3.1 Minimum Data Parameters for Development of the Baseline Scenario (Irrigation)

   Irrigation efficiency should be included in required quantitative data and we encourage the addition of Irrigation Efficiency to column 3 - Quantitative Data in Table 3.1. This is also shown in the SEP Model Cal_Val_Ver Guidance - table 2.1 (practice category). The use of drip irrigation as compared to field flooding to surface water spraying may consume (and recharge to aquifers) is quite different from one another . Irrigation efficiency is more telling as the amount of water used by the crop/amount of water consumed in irrigation.

   Further to irrigation efficiency, field or boundary level Evapotranspiration should be included. Water foot-printing of project fields, as mitigated by the new practices, are critically important.

4. SEP section 3.4.1.2 Data Collection for Activities in the Baseline Scenario, "...remote sensing (e.g., satellite imagery, manned aerial vehicle footage, drone imagery), where requisite information on agricultural management practices can be reliably determined with these methods (e.g., tillage status, crop type, irrigation)."

   We request more guidance on what metrics can be used to decide if remote sensing can reliably determine the information? It will be too late to discover that a remote sensing wasn't applied

properly, or could have been reliably used as an alternative during the verification. Please expand on how requirements for use of remote sensing in describing historical management will be determined.

Right now, we don't see remote sensing as developed as bankable data. It still needs to be developed further with grower testing. Although technology is currently available for measuring and detecting reflectance, it is still difficult to differentiate between crop and cover crops.

5. SEP section 3.4.3.2 Payment Stacking

   The Enhancement Payments section can be updated to include 2018 Farm Bill. This bill provides for NRCS Conservation Innovation Grants program: https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/programs/financial/cig/

6. SEP sections 3.5.5 Alternative Mechanisms for Ensuring Permanence, and 3.5.6 Tonne-Year Accounting

   We note an absence of any discussion on aggregation. Can an aggregator use different mechanisms (a mix) in a project for ensuring permanence and/or in opting for TYA? This appears not to be an option for the PIA. Can different crediting scenarios be entertained by an aggregator, meeting the disparate needs for an aggregated large group of Field Managers.