Sheep Grazing in Vineyards Methodology Review

Public Comment Review Round

August 2023

CONTENT referenced by reviewer's comment *e.g. Section number + paste exact text*	REVIEWER'S COMMENT *Please paste the comment from the reviewer*	AUTHOR'S RESPONSE *Please describe how the comment was addressed and include new content in quotations*
1. *"The project proponent is required to provide evidence of ownership of the land, including documentation and or attestation of land tenure or ownership as well as contractual agreements with the land owner to graze sheep on the project area"*	1. *I'm not sure environmental stewardship / practice based eco assets need to have proof of ownership. As practice-based can be ex post, if proof the regenerative practice occurred, then value can flow. Period.*	*With regard to proof of ownership and other required documents I agree with your comment in principle for Environmental Stewardship credits. This is largely an RND requirement to avoid potential legal issues and I'm working on ways to deal with it after the pilot round. I don't understand the legal issues well enough to push back on that advice in the short term. The initial methodology will be limited to use in California so I'm not concerned about the negative implications for this version and unless the change can happen quickly I'll leave the requirement for this version.* *My take, like your conclusion, is that regenerative practices should be rewarded. Putting land tenure requirements into the*

		mix will remove potentially many Earth Stewards around the world from participating in practices if this documentation is required. In my mind we are effectively paying for the resources (human, mechanical…) to implement a practice and not treating a natural resource as an asset than can be owned so importance of land ownership is reduced. That said, there might still need to be some proof that a practice is legal.
2. "in digital format to the project proponent system"	*2. what's the project proponent system?*	**This will be reworded to "in digital format to the project proponent"**
3. minimum project durations	*3. great idea. Giving some certainty credits can be originating for awhile, but then expecting evolution of methodology instead of the methodology being stagnant, great call!*	Thank you
4. Grazing management plan	*4. is working with a "qualified grazing specialists" a bottleneck or potentially prohibitive cost to the project proponent?*	The requirements of the grazing plan are minimal so the shepherds or contract grazer would be qualified to fill that out. No change in the current text is planned.
5. 5.1	*5. It's not clear to me how the hours spent in a grazing area could be verified. What's to prevent recording more hours than were actually spent? This variable of hours seems like it could drastically change the number of credits issued?*	At present the the only required evidence to document grazing start and end times are the photos taken at the beginning and end of a grazing event. The photos are required to be acquired within 30 minutes of the start and end times. The timestamp can be used to back up what is recorded. This isn't in the methodology but we are working with OurSci to develop an app for shepherds to record required data for the methodology and entries will be timestamped. None of these are cheat-proof but seem

		adequate.