

**Comment 1 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: David

Last Name: Phillips

Email Address: dphillips@chugach.com

Affiliation: Chugach Alaska Corporation

Subject: Comments on the June 20 ARB Workshop

Comment:

Please find Chugach Alaska Corporation's comments on the June 20th workshop uploaded.

Sincerely,

Dave Phillips

Chugach Alaska Corporation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-june-20-offsets-ws-AmFUOgB0WGxQN1Az.pdf>

Original File Name: Chugach Alaska June 20 ARB Workshop Comments.pdf

Date and Time Comment Was Submitted: 2014-06-27 13:05:29

No Duplicates.

**Comment 2 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Debbie

Last Name: Reed

Email Address: dreed@drdassociates.org

Affiliation: Coalition on Agricultural Greenhouse Gas

Subject: Comments on Informal Rice Protocol Discussion Draft 6-20-14

Comment:

Please see attached comments from C-AGG on the 6-20-14 discussion draft of the Rice Cultivation Offset Protocol. C-AGG greatly appreciates the efforts and work of the ARB and the continued engagement with stakeholders in developing an effective protocol that will engage the agricultural sector in voluntary GHG mitigation efforts in a manner that provides substantial co-benefits to society.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/2-june-20-offsets-ws-VTYBKlc3WW0KawVa.docx>

Original File Name: C-AGG Comments on ARB Informal Rice Cultivation Protocol Discussion Draft 6-20-2014.docx

Date and Time Comment Was Submitted: 2014-06-27 14:33:49

No Duplicates.

**Comment 3 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Derik

Last Name: Broekhoff

Email Address: derik@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: Comments on Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols
Comment:

Please see the attached comments from the Climate Action Reserve on ARB's proposed Rice Cultivation Offset Protocol and proposed updates to the existing livestock, ODS, and forest offset protocols. We appreciate the opportunity to provide feedback on these drafts and look forward to their adoption.

Derik Broekhoff

Vice President, Policy

Climate Action Reserve

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-june-20-offsets-
ws-BWZdN1U9UW9SNVcj.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-june-20-offsets-
ws-BWZdN1U9UW9SNVcj.pdf)

Original File Name: Climate Action Reserve Comments on ARB Compliance Protocols.pdf

Date and Time Comment Was Submitted: 2014-06-27 16:39:40

No Duplicates.

**Comment 4 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: VICTORIA

Last Name: EVANS

Email Address: vevans@carbonvp.com

Affiliation: Carbon Venture Partners for CalAg

Subject: Comments on Updated Discussion Draft, Rice Cultivation Offset Protocol
Comment:

See attached file with comment letter from Carbon Venture Partners
on behalf of CalAg and CalAg Aggregator

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-june-20-offsets-
ws-BWYBcQFwVFhVJwhn.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-june-20-offsets-
ws-BWYBcQFwVFhVJwhn.pdf)

Original File Name: CVP to ARB FINAL Comments Rice COP June272014.pdf

Date and Time Comment Was Submitted: 2014-06-28 12:48:22

No Duplicates.

Comment 5 for Cap and Trade Offset Protocols Workshop (june-20-offsets- ws) - 1st Workshop.

First Name: Patrick

Last Name: Wood

Email Address: patrick@agmethaneadvisors.com

Affiliation: Ag Methane Advisors

Subject: Ag Methane Advisors Comments Re: June 20 proposed COP Livestock Protocol draft
Comment:

Attached please find Ag Methane Advisors comments regarding the COP Livestock Protocol Discussion Draft published on June 20, 2014.
Thank you for the opportunity to submit these comments.

In addition, we'd like to note the confusion around dates to submit comments. The June 20 published presentation said comments were due by midnight on June 30. Personal communication with CARB staff clarified this actually meant 11:59 PM on June 29. however, the site used to submit this comment said July 11. This confusion presents substantial challenges for meeting CARBs deadlines, and composing comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-june-20-offsets-
ws-UDEFZAdrU2UGdAFp.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-june-20-offsets-
ws-UDEFZAdrU2UGdAFp.pdf)

Original File Name:

AgMeth_CommentsRE_CARB_COP_Livestock_6.20.14DiscussionDraft.pdf

Date and Time Comment Was Submitted: 2014-06-29 08:19:28

No Duplicates.

**Comment 6 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Robert

Last Name: Parkhurst

Email Address: rparkhurst@edf.org

Affiliation: Environmental Defense Fund

Subject: EDF Comments on Forest Protocol Revisions

Comment:

Please see EDF's attached comments on the proposed revisions to the Compliance Offset Protocol for U.S. Forest Projects.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-june-20-offsets-ws-Wz5VN1YxV1sKbwhn.pdf>

Original File Name: EDF Comments on Forest Protocol 062914.pdf

Date and Time Comment Was Submitted: 2014-06-29 20:00:09

No Duplicates.

**Comment 7 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Robert

Last Name: Parkhurst

Email Address: rparkhurst@edf.org

Affiliation:

Subject: EDF, CRC and WRID Comments on Rice Protocol

Comment:

Please see the attached comments from the Environmental Defense Fund, California Rice Commission, and White River Irrigation District on the Rice Cultivation Projects Compliance Offset Protocol.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-june-20-offsets-ws-Wz5SMFM0WScFYFIg.pdf>

Original File Name: EDF-CRC-WRID Comments on Draft Rice Cultivation Protocol 062914.pdf

Date and Time Comment Was Submitted: 2014-06-29 20:00:09

No Duplicates.

Comment 8 for Cap and Trade Offset Protocols Workshop (june-20-offsets- ws) - 1st Workshop.

First Name: Randall

Last Name: Hagenstein

Email Address: rhagenstein@tnc.org

Affiliation: The Nature Conservancy - Alaska

Subject: Support for removal of Alaska exemption

Comment:

Thank you for the opportunity to comment. Please see uploaded attachment. Text pasted below:

June 30, 2014

California Air Resources Board
1001 I Street
Sacramento, CA 95812-2828

Re: June 20 ARB workshop on revision of protocols, including forest projects protocol

I am writing on behalf of the Alaska Chapter of The Nature Conservancy to express our strong support for an amendment to the Compliance Offset Protocol U.S. Forest Projects to remove the Alaska exclusion so that Alaskan corporations and other eligible landowners may participate in the carbon market by developing compliance forest offset projects.

Alaska's coastal forests support among the highest standing carbon biomass of any terrestrial ecosystem. Removing the Alaska exclusion will give landowners an alternative to timber harvest and will reward sustainable forest management and protect important old growth forests. Allowing Alaska forest projects into California's carbon market will contribute to the success of the offset program.

Alaska forest carbon offset projects could generate millions of compliance offsets, while achieving social, environmental, and economic benefit to Alaska Native and resident populations.

The two largest forests in the National Forest system are located in Alaska. The Tongass National Forest in Southeast Alaska encompasses nearly 17 million acres and the Chugach National Forest in South-central Alaska more than 5 million acres. Adjacent to, or within the boundaries of these two large national forests, there exists nearly 1.5 million acres of private lands. According to the USDA's Forestry Sciences Lab, the baseline inventory for these southern Alaska forests average between 22 to 30 tons of carbon captured per acre.

When the ARB originally adopted the forest protocol, forest projects in Alaska were made ineligible "due to lack of region-specific data". Subsequently, region-specific data for the South-central and Southeast portions of Alaska was formally transmitted to the ARB in 2012; however, the exclusion of forest projects in Alaska has not yet been corrected.

In summary, the Alaska Chapter of The Nature Conservancy strongly supports removal of the Alaska exemption. This action, if taken, will enhance long-term carbon storage while protecting some of the

world's finest forest ecosystems.

Sincerely,

Randall H. Hagenstein
Alaska State Director

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-june-20-offsets-
ws-B2RSNQBeVWcBbgNx.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-june-20-offsets-
ws-B2RSNQBeVWcBbgNx.pdf)

Original File Name: CA air resource board letter from TNC-AK.pdf

Date and Time Comment Was Submitted: 2014-06-30 11:33:17

No Duplicates.

**Comment 9 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Richard

Last Name: Saines

Email Address: richard.saines@bakermckenzie.com

Affiliation: Baker & McKenzie LLP

Subject: Climate Wedge LLC Comments on Proposed Rice Cultivation Offset Protocol
Comment:

Please see attached the comments of Climate Wedge LLC to ARB's
Proposed Rice Cultivation Offset Protocol.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-june-20-offsets-
ws-UjEAagdvAz0CZVIm.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-june-20-offsets-
ws-UjEAagdvAz0CZVIm.pdf)

Original File Name: Climate Wedge LLC Comments on Draft Rice Protocol.pdf

Date and Time Comment Was Submitted: 2014-06-30 15:53:32

No Duplicates.

**Comment 10 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Charles

Last Name: Purshouse

Email Address: charles.purshouse@camcocleanenergy.com

Affiliation:

Subject: Camco Comments on ARB June 2014 Proposed Protocol Changes

Comment:

Please find attached Camco's comments to the draft protocols released on June 20th.

Charles

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-june-20-offsets-ws-WzhXMABsUGBWP1Mw.pdf>

Original File Name: CamcoComments_ARB_ProtocolChanges_June2014.pdf

Date and Time Comment Was Submitted: 2014-06-30 16:22:35

No Duplicates.

**Comment 11 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Nick

Last Name: Facciola

Email Address: nick@originclimate.com

Affiliation: Origin Climate (formerly TerraPass)

Subject: Proposed Updates to the Livestock Protocol

Comment:

Please see the attached letter with comments on the potential updates to the Compliance Offset Protocol for Livestock Projects, June 20 discussion draft.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-june-20-offsets-ws-ATMGMAQ0VzBReVJi.pdf>

Original File Name: 2014.06-30 Comments on ARB Updates to Livestock Protocol.pdf

Date and Time Comment Was Submitted: 2014-06-30 18:28:47

No Duplicates.

**Comment 12 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Aaron

Last Name: Strong

Email Address: aaronlstrong@gmail.com

Affiliation:

Subject: Comments on Rice Cultivation Draft

Comment:

see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-june-20-offsets-
ws-USJTIQR3UGxWPgFm.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-june-20-offsets-
ws-USJTIQR3UGxWPgFm.pdf)

Original File Name: Strong_Haya_comments_on_discussion_draft.pdf

Date and Time Comment Was Submitted: 2014-07-03 13:27:06

No Duplicates.

**Comment 13 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Jeff

Last Name: Cohen

Email Address: jcohen@eosclimate.com

Affiliation: EOS Climate Inc

Subject: Comments on ODS protocol

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-june-20-offsets-ws-AmdXPgNxVFgGYQh6.pdf>

Original File Name: EOS_ARB ODS June2014Protocol .pdf

Date and Time Comment Was Submitted: 2014-07-03 13:37:34

No Duplicates.

**Comment 14 for Cap and Trade Offset Protocols Workshop (june-20-offsets-
ws) - 1st Workshop.**

First Name: Paul

Last Name: Mason

Email Address: pmason@pacificforest.org

Affiliation: Forest Trust Protocol

Subject: Re: Support for Inclusion of Forest Offset Projects in Alaska

Comment:

See attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-june-20-offsets-
ws-B2FUPQd0BzFQJVMn.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-june-20-offsets-
ws-B2FUPQd0BzFQJVMn.pdf)

Original File Name: forest_protocol.pdf

Date and Time Comment Was Submitted: 2014-07-09 13:39:49

No Duplicates.

There are no comments posted to Cap and Trade Offset Protocols Workshop (june-20-offsets-ws) that were presented during the Workshop at this time.