

**Comment 1 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Victoria

Last Name: Evans

Email Address: Victoria.Evans@ERM.com

Affiliation: ERM

Subject: Rice Protocol Comments for CalAg

Comment:

Enclosed find a copy of comments on the rice protocol on behalf of CalAg (prepared by ERM and Cooper White and Cooper)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-mar28-newprotocol-ws-UDMCZQdqU2EAYQIW.pdf>

Original File Name: CalAG CWC ERM White Paper ARB Workshop.pdf

Date and Time Comment Was Submitted: 2013-03-29 12:55:58

No Duplicates.

## **Comment 2 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Rachel

Last Name: O'Reilly

Email Address: [Rachel@wildlifeworks.com](mailto:Rachel@wildlifeworks.com)

Affiliation:

Subject: Vote of SUPPORT to include REDD in AB 32 and my story...

Comment:

Hello,

I am a CA citizen, born in San Francisco and raised in Marin county. I'm writing in support of including REDD (Reducing Emissions from Deforestation and Degradation) offset credits in California's Cap and Trade Program, (AB 32).

I am an employee of CA based company, Wildlife Works Carbon - the world's leading REDD project development and management company. In my business development, marketing and sales roles, I have been a part of building the voluntary market place for VCS and CCB REDD+ credits.

I have witnessed first hand the profoundly positive transformation taking place on the ground at our flagship REDD+ project in the Kasigau Corridor of Kenya. This project is the world's first REDD project to achieve validation, verification and issuance under both VCS and CCB (gold level distinction) and is the model of a successful REDD project for world.

When you visit our Kasigau Corridor REDD+ project Kenya, the direct benefits of carbon finance are clear and the project area is an oasis of transformation compared to surrounding areas. The forest is protected and thriving, children are going to school, adults are going to work, wildlife is roaming free, and there is a community of approximately 80,000 people that understand REDD+ and the important role they play in it. It's apparent that the community takes their role in the success of the project very seriously and is joyful with appreciation for having the opportunity to do so while building a brighter future for themselves and future generations.

You also see local job creation everywhere in a way that is relevant to solving the underlying issues of deforestation and creating a sustainable future. You see brave rangers protecting the increasingly threatened African Elephants that migrate through the project. You see dedicated staff tending to tree planting, seed nursery and jojoba programs, for both reforestation and food security purposes. You see teams building water catchment structures to solve water issues. You see small enterprises like our sustainable charcoal program working. You see women's groups gathered and strategizing about educating the community about HIV, creating leadership and small enterprise opportunities for women, and training women to be self sufficient. You see a beautiful, richly bio-diverse forest protected with a community that is

passionate about their purpose... A purpose that we all have a vested interest in.

Most importantly the transformational change is measurable, transparent, and credible offering companies an inspiring offset solution that is virtually risk-free.

My job is to tell the remarkable story of our REDD+ projects in Kenya and The Democratic Republic of Congo. In doing so, I engage corporations to voluntarily offset their unavoidable emissions with our high-impact REDD+ credits. With the support of my colleagues, the excellent leadership of our Founder and CEO, Mike Korchinsky, and our customers we have been successful in creating demand in the voluntary marketplace for REDD+ offsets.

Corporates and organizations who have purchased REDD+ offsets from Wildlife Works include: Microsoft, Allianz, UPS, Marks & Spencer, Eneco Energy, PUMA, and La Poste to name a few.

California has the opportunity to solidify itself as the world's leader in REDD by developing protocols for sector-based offset credits from REDD in AB 32. In many ways, CA already has been a strong leader in REDD: CA organizations - such as the Governors Climate and Forests Task Force (GCF) and Avoided Deforestation Partners (ADP) - are now global leaders in pioneering public-private partnerships for sustainable land use and development. California companies - such as Wildlife Works and Terra Global Capital - are now the world's leading REDD+ development and management firms. California technology and software corporations are now leading the rapidly growing industry of earth monitoring technologies, from ESRI's remote sensing software to Google's partnership with the indigenous Suruí for handheld GPS mapping & monitoring systems. Finally, California universities - from Berkeley to Stanford to Santa Barbara - are now global leaders in land use change, climate, and REDD+ research and development. This growth of California leadership in REDD+ is creating unprecedented advances in conservation and climate science, while also generating jobs, revenue, and education right here at home.

As a concerned CA citizen, an employee of a CA company, and someone working with CA corporates that want to use REDD in their emissions reduction programs, I urge the California Air Resources Board to send a positive market signal with regards to formalizing protocol for the inclusion of REDD+ within AB 32 legislation. Including REDD+ not only makes good business sense for California commerce, but also advances one of the most important global climate change mitigation strategies of our time.

REDD+ is an effective and cost efficient tool in stopping the 17% of global annual greenhouse gas emissions caused by deforestation by ensuring that standing tropical forests are valued for the carbon and ecosystem services they provide to the global economy.

We continue to lose an area of tropical forest three times the size of San Francisco every day. The world simply cannot afford to wait.

With sincere hope and thanks for your consideration,  
Rachel O'Reilly  
17 Shelley Drive  
Mill Valley, CA 94941

415-328-3974

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-04-07 16:10:52

No Duplicates.

## **Comment 3 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Raphael  
Last Name: Bruneau  
Email Address: raphael.bruneau@biothermica.com  
Affiliation:

Subject: Support for Timely Adoption of CMM

Comment:

Biothermica would first like to thank the California Air Resources Board (ARB) for the opportunity to provide comments in the context of the offsets workshop held in Sacramento on March 28, 2013.

Our comments are provided from the perspective of a coal mine ventilation air methane (VAM) carbon project developer and technology owner, having developed and implemented the first VAM destruction project at an active coal mine in America. This project is currently registered with the Climate Action Reserve (CAR), and follows the guidance of CAR's Coal Mine Methane (CMM) Project Protocol.

Biothermica strongly supports ARB in its efforts to bridge the expected gap between the supply and demand for high quality and additional offsets over the cap and trade program's compliance periods. We do believe that CMM offsets can significantly contribute to these efforts and help maintain the cost of compliance at a reasonable level for covered entities.

Based on our expertise in this field, we remain fully available to share our experience with ARB and ensure that the CMM Protocol is in accordance with the reality experienced by CMM project developers.

We have also acknowledged the planned adoption schedule, which mentions Board consideration in Fall 2013 and a Protocol effective date in Spring 2014. While we understand and respect ARB's administrative constraints, we do wish to underline the importance of not delaying this schedule in order to ensure CMM projects will be able to deliver offsets in time for the second compliance period.

Indeed, in order to fully move forward with these projects, developers and investors need framework certainty, which will only be achieved following the final adoption of the CMM Protocol by ARB. Following this adoption, several activities must take place before new CMM projects can ultimately start supplying offsets to the system. These activities, typically spread out over fifteen months, include construction, commissioning, monitoring, verification and final offset issuance by ARB.

In this context, we also strongly support ARB with regard to the recognition of rigorous early action programs such as CAR and the Verified Carbon Standard (VCS). This will indeed provide covered entities with a quicker access to high quality offsets generated

under these programs.

Sincerely,

Raphaël Bruneau  
Director – Carbon Markets  
Biothermica Technologies Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-mar28-newprotocol-ws-VmRTZQc3UTECKVBg.pdf>

Original File Name: 2013-04-19\_Biothermica Comments\_Offsets.PDF

Date and Time Comment Was Submitted: 2013-04-19 13:51:58

No Duplicates.

**Comment 4 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Claire  
Last Name: Halbrook  
Email Address: cehu@pge.com  
Affiliation: PG&E

Subject: PG&E Comments on New Offset Protocols

Comment:

PG&E Comments on New Offset Protocols

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-mar28-newprotocol-ws-UlIGZ1wCV2EEXQZl.docx>

Original File Name: PG&E Comments on Offset Protocols.docx

Date and Time Comment Was Submitted: 2013-04-19 15:32:36

No Duplicates.

**Comment 5 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: VICTORIA

Last Name: EVANS

Email Address: [victoria.evans@erm.com](mailto:victoria.evans@erm.com)

Affiliation:

Subject: CALAG Comments on Rice Protocol Development

Comment:

Enclosed find comments to ARB on behalf of CalAg.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-mar28-newprotocol-ws-UzBSNQZrADJWNwNc.zip>

Original File Name: CalAg CWC ERM Supplemental Public Comments Rice v3FINAL 04222013\_.zip

Date and Time Comment Was Submitted: 2013-04-22 13:29:25

No Duplicates.

**Comment 6 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Ron

Last Name: Hughes

Email Address: ron.hughes@solvay.com

Affiliation:

Subject: Inclusion of methane reduction projects at trona mines in the Coal Mine Methane protocol

Comment:

Solvay Chemicals, Inc. encourages CARB to consider including methane reduction projects at minining operations producing minerals other than coal in the Coal Mine Methane (CMM) protocol.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-mar28-newprotocol-ws-BnVROFU4U3YKbQN6.pdf>

Original File Name: Solvay comments to CARB on the CMM protocol 4-21-22.pfd.pdf

Date and Time Comment Was Submitted: 2013-04-22 14:24:30

No Duplicates.

**Comment 7 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Rachel  
Last Name: Tornek  
Email Address: [rachel@climateactionreserve.org](mailto:rachel@climateactionreserve.org)  
Affiliation: Climate Action Reserve

Subject: Climate Action Reserve Comments on New Offset Protocols

Comment:

Please find the Climate Action Reserve's comments on the addition of new offset protocols to the California GHG cap-and trade program attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-mar28-newprotocol-ws-BWZcO1ckUV0AZQRr.pdf>

Original File Name: CAR Comments on New Protocol Workshop 042213.pdf

Date and Time Comment Was Submitted: 2013-04-22 14:40:43

No Duplicates.

## **Comment 8 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Kenneth

Last Name: Gibson

Email Address: kennethgibson@gmail.com

Affiliation:

Subject: Coal-mine Methane and Rice Cultivation Protocols for California Cap and Trade

Comment:

The protocols are potentially cause for an increase in the generation of greenhouse gases (GHGs).

If we take the position that coal mining is essential to "economic growth" or "energy sufficiency" we have lost the battle to limit GHGs before it begins. Any subsidy for the production of coal should simply be eliminated. No such subsidy should be added. The release of methane should be capped since this is a potent methane gas. If coal producers can't stop this release they should be shut down. If that law isn't on our books, it should be added.

California can't be the rear guard on fighting global warming.

Among the States we must be a leader and among nations the United States must become a leader.

Planting rice is a short term sop. Increased cultivation activity will cause the use of additional fuel and a permanent release of GHGs, while the rice plants will absorb atmospheric carbon for a single growing season. As soon as the plants die they will begin to release GHG's including potent methane. Credits should be earned by planting and pledging to maintain redwoods - *sequoia sempervirens* - for their natural life. At the very least the generation of credits should require the lease of "harvestable tree" lands and not cutting trees down. The point is credits should be earned by actions that will make a difference of the long term. We are in a forty-year battle. We must make substantive changes to the way we use, generate and store energy and replace our entire energy and transportation infrastructure. The stop-gap measures need a forty-year life just to bridge us to that future.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-04-22 21:58:50

No Duplicates.

## **Comment 9 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Peter  
Last Name: Miller  
Email Address: pmiller@nrdc.org  
Affiliation: NRDC

Subject: Comments on Proposed Addition of Coal Mine Methane and Rice Cultivation Offset Protocols

Comment:

April 23, 2013

Steve Cliff, Branch Chief  
Climate Change Program Evaluation Branch

Rajinder Sahota, Manager  
Climate Change Program Operating Section

California Air Resources Board  
1001 "I" Street, Sacramento, CA, 95812

Re: Comments on Proposed Addition of Coal Mine Methane and Rice Cultivation Offset Protocols to the Cap-and-Trade Program.

Dear Mr. Cliff and Ms. Sahota:

On behalf of the Natural Resources Defense Council (NRDC) and our more than 80,000 members in California, we appreciate the opportunity to comment on the proposed addition of coal mine methane and rice cultivation offset protocols to the cap-and-trade regulations.

Over the past six months, the ARB has made very substantial progress on developing and adopting the regulatory infrastructure necessary to incorporate compliance offsets into the cap and trade program, including the approval of two offset registries, and continued advances in verifier training and accreditation. The ARB is to be commended for providing advance notice of consideration of two new offset protocols, holding a public workshop, and convening technical working groups. This clear and informative public process will build confidence and credibility in the program.

In general, we believe that the proposed rice cultivation protocol offers a good opportunity to expand the array of offset project types eligible for use for compliance in the cap-and-trade program. In addition to offering emission reductions which can meet the requirements of AB32, the rice protocol provides an opportunity to explore issues associated with agricultural offsets. Emission reductions in the agricultural sector are often different from other protocol project types, because of the high level of temporal and spatial variability and complex chemistry associated with nitrogen and soil carbon. While these issues present challenges, the potential for co-benefits from the rice cultivation protocol is

significant and there is a substantial opportunity for in-state projects.

In contrast, we believe that the proposed coal mine methane protocol raises a number of difficult issues and concerns relative to its use in the cap-and-trade program. First, by providing additional revenue to active coal mining operations, the availability of offset credits has the potential to make coal-mining more profitable and thereby increase the amount of coal mining and combustion. ARB staff recognizes this possibility and has proposed to consider inclusion of a leakage discount factor to account for increased production, but the effectiveness of the factor - as yet undeveloped - in deterring potential leakage is by no means assured.. Second, even if the emission reductions were fully additional, coal mine methane offsets do not provide any co-benefits, unlike the rice cultivation protocol (and, if leakage occurs, could in fact exacerbate co-pollutant emissions). Third, because there is no coal mining in California, the coal mine methane protocol would not generate any in-state projects or associated in-state co-benefits. Finally, we appreciate ARB's exclusion of mountaintop removal mines from the list of eligible projects, but the inclusion of any active mines - in particular surface mines - presents serious environmental concerns. ARB must consider the implications of proposing to allow offsets generated from projects at out-of-state surface mines to be used for compliance with its landmark climate change statute. These issues are exacerbated due to the very large volume of potential offset credits, estimated by staff at 50-100 million tons CO<sub>2</sub>e cumulative by 2020. While we look forward to evaluating the proposal under development by the technical working group, NRDC is skeptical that the coal mine methane protocol is a good fit for California's AB32 cap-and-trade program.

Sincerely,

Peter Miller  
Senior Scientist

Alex Jackson  
Legal Director, California Climate Project

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-mar28-newprotocol-ws-BmgCdlYzBDQLUgdk.docx>

Original File Name: NRDC CMM & rice offset protocol comments 4-23-13.docx

Date and Time Comment Was Submitted: 2013-04-23 10:30:53

No Duplicates.

**Comment 10 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Thomas  
Last Name: Vessels  
Email Address: tvessels@vesselscoalgas.com  
Affiliation: Vessels Coal Gas, Inc.

Subject: Comments to March 28 2013 Cap and Trade workshop  
Comment:

Attached please find my comments to your workshop.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-mar28-newprotocol-ws-VjVcOwFyU2JXDgd3.docx>

Original File Name: CARB public comments.docx

Date and Time Comment Was Submitted: 2013-04-23 14:16:35

No Duplicates.

**Comment 11 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Nicholas

Last Name: Martin

Email Address: nmartin@winrock.org

Affiliation: American Carbon Registry

Subject: ACR comments on March 28 compliance offset protocols public meeting

Comment:

Thank you for the opportunity to comment in support of ARB's work to adopt additional compliance offset protocols for the California cap-and-trade market. Please find attached the American Carbon Registry's comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-mar28-newprotocol-ws-VDUHYIMgWFQAZVQ7.pdf>

Original File Name: ACR comments to ARB on March 28 Compliance Offset Protocols Meeting 4-23-13.pdf

Date and Time Comment Was Submitted: 2013-04-23 16:09:14

No Duplicates.

## **Comment 12 for Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@berkeley.edu

Affiliation: Union of Concerned Scientists

Subject: Comments on the development of two new compliance offset protocols for the cap-and-trade r

Comment:

Dear Mr. Cliff and Ms. Sahota,

Thank you for the opportunity to comment on CARB's consideration of rice cultivation and coal mine methane offsets protocols. As mentioned in your March 28 presentation, offsets credits must meet the same accuracy requirements as emissions under the cap, which means comparable levels of additionality, verifiability, and the treatment of measurement uncertainty. I appreciated CARB's statements at the March 28 public meeting that even though CARB was not yet able to fully answer questions about the level of additionality, verifiability, and conservativeness of its proposed protocols, CARB plans to perform these analyses as part of the process of developing these protocols and before making the decision to bring these protocols to the Board for adoption.

Below are some of the questions asked at the March 28 meeting related to additionality, verification, and conservativeness in slightly elaborated form, for further analysis during the protocol assessment process. These questions apply to both protocols.

On additionality:

- To what extent are the credited activities already occurring without offsets crediting? Why are they being performed? How are conditions changing that may cause implementation rates to increase or decrease in the near future without carbon offsets?
- Is the expected income from offsets credits large enough to incentivize an increase in the credited activities several times more than without-offsets implementation rates, taking into account monitoring and verification costs and the costs and risks to participating farmers/coal mine owners?
- In other words, what indications do you have that the protocols will effectively change activity implementation rates and avoid crediting more than a small proportion of credits from activities that would happen without the offsets program?

On verifiability:

- For the rice cultivation protocol, how are the changed timing of flooding and drainage, baling of straw and fertilizer use verified?
- For both protocols, are the values used to estimate project emissions reductions adequately verifiable by a verifier?

On "perverse incentives" and emissions measurement uncertainty:

- Might a coal mine methane offsets protocol increase the profitability of coal production and thus incentivize an increase in coal production, counter to the goals of AB 32?
- Where are the largest uncertainties in measuring changes in emissions from the credited practices?
- How large are the uncertainties when considered together?
- How does the protocol address those uncertainties in a conservative manner?

Thank you again for the opportunity to comment and raise questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-mar28-newprotocol-ws-VCFTNIQmBAgEYQJt.pdf>

Original File Name: UCS comments on Rice and CMM offsets protocol development.pdf

Date and Time Comment Was Submitted: 2013-04-23 16:41:08

No Duplicates.

**There are no comments posted to Cap-and-Trade Public Meeting to Discuss New Offset Protocols (mar28-newprotocol-ws) that were presented during the Workshop at this time.**