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W. James Wagoner
Air Pollution Control Officer

Robert McLaughlin
Asst. Air Pollution Control Officer

December 15, 2014

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on Amendment to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms: Compliance Offset Protocol Rice Cultivation Projects

Dear Clerk of the Board:

The Butte County Air Quality Management District (District) appreciates the California Air Resources Board's (CARB) ongoing efforts to develop new offset protocols and specifically appreciates the efforts made to develop a streamlined Rice Cultivation Protocol. Approximately 100,000 acres of rice are planted in Butte County annually and the proposed protocol provides an avenue for growers to positively impact climate change and be rewarded for providing compliance offsets for other industries.

The District notes the protocol relies on complex modeling and supports CARB's efforts to streamline the quantification process. The current protocol does not lend itself to individual growers readily enrolling projects in the program and will mostly likely rely on other entities to coordinate and manage rice growing acres enrolled in the protocol. The District supports future efforts to streamline the process even further and encourages CARB to work toward developing a more "user friendly" protocol.

In regards to rice straw removal, the District understands that additional time is needed to assess the impacts of baling on the environment and wildlife. While CARB is not proposing to add this project activity to the currently proposed compliance offset protocol, the District encourages CARB to continue to review and evaluate rice straw baling as an acceptable activity as this effort could help reduce acres that may otherwise be considered for managed burning.

The District also understands that CARB will continue to review the feasibility of including Nitrous Oxide (N₂O) and Carbon Dioxide (CO₂) emissions as credible greenhouse reductions under the Rice Cultivation protocol. Since projects already require quantification, verification, and record keeping, the District encourages CARB to continue efforts to capitalize on reductions for these additional greenhouse gases.

Thank you for the opportunity to comment on the proposed regulations and please contact me with any questions you may have.

Sincerely,

A handwritten signature in blue ink, appearing to read "W. James Wagoner".

W. James Wagoner
Air Pollution Control Officer
Butte County Air Quality Management District