



## CARBONCREDIT SOLUTIONS INC

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

### Comments on the proposed Rice Cultivation Protocol

I believe that the proposed Rice Cultivation Protocol represents a giant step in the right direction by the California Air Resources Board. Comments made by other groups such as the Environmental Defense Fund, the Coalition of Agricultural Greenhouse Gases and, the International Emissions Trading Association are appropriate and deserve consideration by the board.

One of the items not specifically addressed in those comments relates to section 3.3.E which states that:

*Within 30 calendar days of a change of Offset Project Operator due to a change in land ownership, management or tenant occupancy, the new Offset Project Operator must submit to both ARB and the offset project registry (OPR) the following information which will be made public:*

- 1. The name, address, phone number, and E-mail address of the new Offset Project Developer;*
- 2. The name address, phone number and E-mail address of the original offset project operator and Authorized Project Designee, if applicable;*
- 3. The date of change of land ownership, management or tenant occupancy; and*
- 4. The signed attestations found in section 95975© of the Regulation.*

Monitoring changes in an OPO is no different than monitoring when early drainage has occurred. This is a monitoring activity that should be completed by the project developer rather than the ARB. That said, I would like the board to consider the following comments on this section.

1. The new OPO will have to create a CITTSS account in order to participate in the market. This means that the new OPO's contact information will be entered and stored when the CITSSS count is created. This information will be public
2. The old OPO's contact information will be in their CITSS account. Does it really need to be submitted again?
3. The 30 day period for reporting these changes is too onerous. 30 days simply isn't enough time to allow the people involved in the transfer of land or a farm to get the required information to the ARB. Monitoring these types of changes is the responsibility and the project developer who should have mechanisms in place to contend with these changes.



The Offset Project Developer is responsible for ensuring that there is continuity in a project when the OPO changes and should have documented procedures to deal with this eventuality in their offset project plan. It appears as though this section would in fact place some of the project developer's responsibilities in the hands of ARB if it left in the protocol.

In summary the intent of this section, proper monitoring of changes in OPO's is a project monitoring activity that must be done by the project developer. Evidence must be collected to demonstrate that a change in the OPO has occurred and this must be available for project verifier to review. I do not believe that the ARB should take on some of the responsibilities of the project developer.

Sincerely

A handwritten signature in black ink that reads "Alastair Handley". The signature is written in a cursive style with a light beige background behind the text.

Alastair Handley  
President Carbon Credit Solutions

