



June 3, 2015

Ms. Mary Nichols
Board Chairman
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Submitted via web

Dear Chair Nichols and Board Members:

The Climate Action Reserve appreciates this opportunity to provide comments on ARB's proposed adoption of the Rice Cultivation Offset Protocol and its Draft Update of the Compliance Offset Protocol for U.S. Forest Projects. We support both of these efforts to expand on and improve ARB's compliance carbon offset program.

I. Adoption of the new Rice Cultivation Compliance Offset Protocol

The Climate Action Reserve is very supportive of the California Air Resources Board's (ARB) efforts to develop and approve new offset protocols for use in California's cap and trade program. In particular, the Reserve commends ARB staff on the extensive and rigorous effort that has gone into the development of the new Rice Cultivation Compliance Offset Protocol, and we urge ARB to adopt it.

The Reserve developed and adopted our own Rice Cultivation protocol in 2011 through our rigorous and transparent stakeholder-driven development process. We are pleased that ARB was able to build from and expand upon our voluntary protocol, and that it helped to inform the compliance protocol development process. The Reserve has been an active participant in ARB's technical working group for this protocol since it was convened in April 2013, where we have shared experience, insights, rationale, and resources from our protocol development process. The Reserve appreciates how ARB staff has actively engaged with stakeholders throughout ARB's own process, attempting to address and mitigate the concerns of the Reserve and of other stakeholders as they arose.

We are confident that the project activities and quantification methodologies contained within the Rice Cultivation Compliance Offset Protocol will provide regulatory-quality offsets for California that meet the regulation's requirements to be real, additional,



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quantifiable, permanent, verifiable, and enforceable. We encourage ARB to adopt this protocol, and look forward to the addition of another compliance offset protocol under California's cap-and-trade regulation.

II. Updates to the Forest Project Compliance Offset Protocol

The Climate Action Reserve also supports ARB's efforts to update and clarify various components of the Compliance Protocol for U.S. Forest Projects. We believe a few issues in the Draft would benefit from more clarification and we have separately submitted a letter with other co-signatories representing a range of interests that provides some recommendations for technical adjustments to that end. We encourage you to consider these adjustments and to adopt the updates to the Forest Project Compliance Protocol.

Sincerely,

Gary Gero,
President