



# CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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April 1, 2014

Ms. Yachun Chow  
Air Resources Engineer  
Rice Cultivation Protocol Manager  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

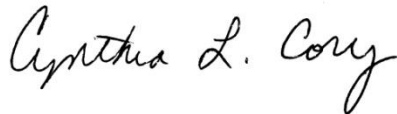
Submitted via email to: [ychow@arb.ca.gov](mailto:ychow@arb.ca.gov)

Dear Ms. Chow:

The California Farm Bureau Federation would like to submit the following comments on the Draft Rice Cultivation Protocol. Farm Bureau has been closely involved since 2006 in supporting research and policy efforts to find voluntary agricultural GHG emission reductions. We understand that high standards must be met for GHG emission reductions to meet the offset requirements of AB 32. But we are concerned that if there is not more innovative thinking about how to secure reductions from living ecosystems, that we are going to unfortunately eliminate many offset opportunities.

After participating in numerous discussions with ARB and others about the importance of incorporating an aggregation component in agricultural offset protocols, especially the Rice Cultivation Protocol, we were very disappointed to not see it included. To date, the GHG emission reductions found in agricultural settings are not large and are spread across numerous fields and owners. If ARB does not develop a way to cost-effectively combine these reductions, farmers will not be able to participate. Without aggregators, farmers will not have access to offset opportunities, which require interpretation and decision support systems developed by aggregators on behalf of individual farmers; and without aggregation of multiple fields and farmers, the entire effort is far more costly for project developers, aggregators, and farmers to participate in than any potential economic returns. This would mean the time, effort and funding put into the development of this protocol by the government, university and private parties would be for naught.

If ARB wants the agricultural community to participate in a meaningful way in GHG emission reductions, protocols will need to be designed to insure that can occur. A one-size fits all approach designed for industrial point sources will not work for agricultural fields. Numerous groups with vast expertise and experience in protocol development have provided ARB with detailed input on how to include aggregation and verification methods in the Rice Protocol and agricultural protocols in general. We urge you to include a model for aggregation in this version of the Rice Protocol so that a useful tool is available that farmers could afford to utilize.

A handwritten signature in black ink that reads "Cynthia L. Cory". The signature is written in a cursive, flowing style.

Sincerely,  
Cynthia L. Cory  
Director, Environmental Affairs