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Packwest

June 24, 2015

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

Submitted at the June 25 CARB Board Meeting

Re: Rice Cultivation Projects Compliance Offset Protocol

Dear Chairman Nichols and Members of the Board:

The undersigned on this letter represent rice growers and their partners in the Midsouth. We are submitting these comments to urge you to adopt the Rice Cultivation Projects Compliance Offset Protocol at the June 25, 2015 Board meeting. Although there are always questions and issues with anything new, it is time we moved on with these Rice Compliance protocols.

For the past four years, we have been working to develop carbon offset projects for rice grown in the Midsouth. We are active participants in the Natural Resource Conservation Service's Conservation Innovation Grant which created the Voluntary Emission Reductions in Rice Management Systems offset protocol adopted by the American Carbon Registry (ACR) in February of 2014. The science used to develop the Midsouth practices in the ACR protocol and this proposed ARB protocol was conducted with our growers.

We listed the first Midsouth rice cultivation offset project, ACR230, with ACR on December 29, 2014. The project includes 8 participating farmers, with 63 unique fields on 3,000 acres in Arkansas and Mississippi. The voluntary management practices that will be undertaken by farmers in this project include: early drainage, intermittent flooding, and increased energy and water use efficiency. For the first vintage of credits we have already secured a buyer, and our plan is to transition the project to a California cap-and-trade voluntary Early Action project for the second vintage of credits.

We have also secured two additional grants over the past two years to expand our work to include remote sensors to document implementation of the practices in preparation for verification under the proposed protocol. We understand that CARB and the California Department of Food and Agriculture (CDFA) have secured funds to help cover the costs of verification as a part of a pilot project. We encourage CARB and CDFA to use these funds to promote the piloting of cutting edge remote monitoring technology to strengthen in-field monitoring in addition to covering the cost of verification.

We urge the Board to adopt the protocol at the June 25th meeting so that we can continue and expand our work with rice growers in the Midsouth. The consideration of the rice protocol by

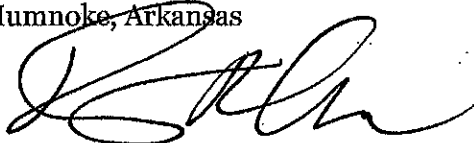
the Board has already been postponed twice. A signal from CARB encouraging the implementation of climate smart agriculture is important to growers who have been working on developing and implementing these practices and technologies over the past four years. The Midsouth participating rice growers have worked hard to help identify practices, measurement methods, and record keeping in support of this effort. Further delay will be a significant setback.

Let's move forward. We encourage the Board to pass the Rice Cultivation Project Compliance Offset Protocol at the June 25, 2015 meeting.

Sincerely,



Mark Isbell, Rice Grower
Isbell Farms
Humnoke, Arkansas



Dennis K. Carman, P.E. (technical coordinator)
Chief Engineer and Director
White River Irrigation District