

## **Comment 1 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Luanne

Last Name: Clayton

Email Address: luanneclayton@sbcglobal.net

Affiliation:

Subject: Offset Protocols Under Cap and Trade

Comment:

Clearcutting is a corporate profit driven forestry management practice. It is practiced so that for-profit corporations can take as many \$\$ off the land as possible.

To include this practice as a way to offset carbon is to visit on California a very short term vision that in the long run will destroy our watersheds and water supply.

We need to limit pollution and invest in cleaner technology!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-25 19:35:15

No Duplicates.

**Comment 2 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Merry Kate

Last Name: Lowry

Email Address: wendatshinobsista@yahoo.com

Affiliation:

Subject: Rice Projects

Comment:

Staff plans to propose the addition of a new Rice Cultivation Projects Compliance Offset Protocol and updates to existing Compliance Offset Protocols under the Cap-and-Trade Regulation at the September 2014 Board hearing.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 13:23:25

No Duplicates.

### **Comment 3 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Jude

Last Name: Todd

Email Address: todd@ucsc.edu

Affiliation:

Subject: rice carbon offsets

Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation.

Carbon offsets are a greenwashing scam that more and more people are seeing through. We all need to REDUCE our carbon footprints, not palm off the responsibility to people in some other location.

Carbon offsets should be excluded from California's Global Warming Solutions Act AB32.

Sincerely,

Jude Todd, PhD

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 13:25:50

32 Duplicates.

## **Comment 4 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Mike

Last Name: Sliwa

Email Address: mikeyjonsliwa@gmail.com

Affiliation:

Subject: Rice Cultivation

Comment:

The dominant culture has been wrong in every endeavor. How do we know this? We're cultivating food so we can keep the "machine" of empire running. We can either keep playing the game of infinite growth on a finite planet, aka Jenga! OR we can begin to listen to those who have had the boot heel of this culture upon their collective throats. I'm gonna go with those whose ancestors have lived sustainably for the first 3 million years of the human experience. You can go with the rice protocol but sanity will clearly not be on your side...or life.

Attachment: [www.arb.ca.gov/lists/com-attach/10-offset-protocol-ws-UDIVPgdnWGwCYVR6.jpg](http://www.arb.ca.gov/lists/com-attach/10-offset-protocol-ws-UDIVPgdnWGwCYVR6.jpg)

Original File Name: image.jpg

Date and Time Comment Was Submitted: 2014-03-26 13:54:08

No Duplicates.

**Comment 5 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: joyce  
Last Name: banzhaf  
Email Address: joycebanzhaf@yahoo.com  
Affiliation:

Subject: No to all carbon offsets, including rice offsets  
Comment:

Thanks !

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 16:06:53

No Duplicates.

## **Comment 6 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: John  
Last Name: Funicello  
Email Address: smallfarmagriculture@yahoo.com  
Affiliation:

Subject: No REDD rice!

Comment:

To the California Air Resources Board:

No one in America (with the possible exception of the corporations and the rich) needs a gimmick that allows polluters to continue to pollute.

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation.

Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Native peoples around the world have seen through the gimmicks and are opposed to such schemes as "cap and trade." Crops that are vital to the cultural survival of so many peoples are being damaged or are in danger of disappearing, because of gross manipulation of life in all its forms. Such things as this rice project you have before you must be cancelled.

Thank you in advance for taking this action.

Sincerely,  
John Funicello

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 16:04:06

No Duplicates.

## **Comment 7 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: stormy  
Last Name: ravenhawk  
Email Address: stormyravenhawk@yahoo.com  
Affiliation:

Subject: REDD  
Comment:

ALL WE NEED TO LIVE IS UNDER THE TREES.

OUR HOMES, OUR FOODS, OUR MEDICINES AND AIR WE BREATHE.

MAN DOES NOT LIVE ON RICE ALONE.

UNDERSTAND THE SACRED BALANCE OF ALL THINGS AND YOU WILL FIND  
UNDERSTANDING & BALANCE OF LIFE.

TREES NOT RICE!

REDD!  
THANK YOU

IN LAKE ECH (WE ARE ONE, WE ARE THE SAME. ONE BEING, ONE LIFE)

STORMY RAVENHAWK

Attachment: [www.arb.ca.gov/lists/com-attach/22-offset-protocol-ws-UGRcYlJnVDQDMVJq.jpg](http://www.arb.ca.gov/lists/com-attach/22-offset-protocol-ws-UGRcYlJnVDQDMVJq.jpg)

Original File Name: 484348\_451973471526705\_229119204\_n.jpg

Date and Time Comment Was Submitted: 2014-03-26 16:07:54

No Duplicates.

**Comment 8 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Judy  
Last Name: Lujan  
Email Address: clairseach42@yahoo.com  
Affiliation:

Subject: REDD  
Comment:

No REDD!!!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 16:21:55

No Duplicates.



**Comment 9 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Danilo

Last Name: Carranza

Email Address: danny.carranza@gmail.com

Affiliation: KATARUNGAN

Subject: Comment on No REDD Rice Manifesto

Comment:

Rice is life for peasant farmers around the world. It should not be used as a commodity to justify the continuing GHG emission that is killing the planet.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 16:09:27

No Duplicates.

## **Comment 10 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Carl

Last Name: Hitchens

Email Address: carlh1443@mac.com

Affiliation:

Subject: REDD Rice

Comment:

It is unconscionable to implement REDD (i.e., Reducing Emissions from Deforestation and Degradation) as part of the Cap-and-Trade regulation. Dubious at best and spurious at worse, to advance the continuation of carbon pollution with the slight of hand of good-practice-farming as an off-set is duplicitous and enabling of polluter indifference and insensitivity. Not to mention the cost to the environment and food supply by introducing GMO-altered plants. Contaminating the human food supply is not justified by fertilizer reproduction. Don't be dazzled by high-tech "solutions" suggested by the masters of deception like Monsanto. Common sense must rule over greed and slick and specious theorems based on self-interest research devoid of long-term proof of benefit against long-term detriment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 16:09:42

No Duplicates.

**Comment 11 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Jacqueline  
Last Name: Villagomez  
Email Address: j-jacqueline@att.net  
Affiliation:

Subject: No genetically modified rice  
Comment:

I am concern about the the use of genetically modified so-called "Golden Rice" of Monsanto, because it causes irreversible damages to nature. Instead we need to find sustainable ways to use nature.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-26 18:03:49

No Duplicates.

**Comment 12 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Tabitha

Last Name: Thomasson

Email Address: tabithathomasson@windstream.net

Affiliation:

Subject: We don,t need you new rice product.

Comment:

We don,t need your gmo rice.

Keep the forest and land the way god made it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-27 02:26:32

No Duplicates.

**Comment 13 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Anne

Last Name: Petermann

Email Address: [globalecology@gmavt.net](mailto:globalecology@gmavt.net)

Affiliation: Global Justice Ecology Project

Subject: No Forest Carbon Offsets in CA or anywhere

Comment:

Please see the attached booklet for our concerns about REDD and other similar forest carbon offset schemes. Also go to the following link for "A Darker Shade of Green: REDD Alert and the Future of Forests," a 26 minute film on the dangers of REDD for communities in California as well as Indigenous Peoples in forest rich countries.

<https://www.youtube.com/watch?v=FPFPUhsWMAQ>

Attachment: [www.arb.ca.gov/lists/com-attach/38-offset-protocol-ws-Uz1QOQZ1VmBVNwJm.pdf](http://www.arb.ca.gov/lists/com-attach/38-offset-protocol-ws-Uz1QOQZ1VmBVNwJm.pdf)

Original File Name: NoReddPapers\_Download.pdf

Date and Time Comment Was Submitted: 2014-03-27 07:05:05

No Duplicates.

## **Comment 14 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Jo

Last Name: Woodman

Email Address: [jw@survivalinternational.org](mailto:jw@survivalinternational.org)

Affiliation: Survival International

Subject: Alternative approaches that do not violate rights

Comment:

Survival International, the worldwide movement for tribal peoples' rights, is deeply concerned about this program. REDD is inherently geared towards benefiting polluting companies, that will use REDD to cheaply 'offset' their carbon emissions, rather than actually reduce them. It risks violating the rights of the tribal and indigenous peoples on whose land these projects will be implemented, including their rights under the UN Declaration on the Rights of Indigenous Peoples and under ILO Convention 169. Governments that support and finance these programs will be liable for violations of these rights.

Alternatives to REDD exist, and the Government of California would be advised to focus its resources into supporting the land rights of tribal and indigenous peoples, and into supporting their efforts to protect and sustainably manage their forests, whilst simultaneously ensuring that the emissions of polluting industries in the state of California are effectively reduced rather than 'offset'.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-27 09:43:45

No Duplicates.

**Comment 15 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Tamra  
Last Name: Gilbertson  
Email Address: tamra@carbontradewatch.org  
Affiliation:

Subject: No Rice Offsets! No REDD! No Carbon Trading!  
Comment:

Dear Mary Nichols and members of CARB;  
Carbon Trade Watch, an international watchdog and think tank on the adverse impacts of carbon trading and offsets, writes to urge you to reject and definitively cancel CARB's proposed rice cultivation offset protocols and all of its adopted and proposed offset protocols as well as cap-and-trade.  
Our expert research has repeatedly demonstrated that carbon trading and carbon offsets including REDD are a scam and make global warming worse. Please see the library of our reports:  
<http://www.carbontradewatch.org/>  
Please enter into the public record our book, The No REDD Reader, which features ground-breaking articles about the extractive industries behind REDD, how REDD threatens the survival of Indigenous Peoples in Voluntary Isolation in the Peruvian Amazon, and other key issues.  
For AB32 to propose solutions to global warming, it must not include carbon offsets or carbon trading. There is no substitution to capping pollution at source.  
Sincerely,  
Tamra Gilbertson

Attachment: [www.arb.ca.gov/lists/com-attach/42-offset-protocol-ws-WzVQOVEPVHUAY1M3.pdf](http://www.arb.ca.gov/lists/com-attach/42-offset-protocol-ws-WzVQOVEPVHUAY1M3.pdf)

Original File Name: No REDD - Reader - IMPORTANT.pdf

Date and Time Comment Was Submitted: 2014-03-27 11:26:18

No Duplicates.

## **Comment 16 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: James  
Last Name: Loacker  
Email Address: jdloacker@hotmail.com  
Affiliation:

Subject: rice cultivation offset protocol  
Comment:

Climate change is a looming problem for us all. And I applaud you for trying to come up with solutions to combat it. However, I believe that offsets such as the current rice cultivation offset protocol under consideration, as well as other offsets in kind, provide no solution to the problem. And may even make matters worse by believing that they do. Hence, they should be excluded from California's Global Warming Solutions Act AB32. Thank you for letting me comment on this matter.

Sincerely,  
James Loacker

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-27 13:14:35

No Duplicates.



**Comment 17 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Sandra  
Last Name: Skenadore  
Email Address: slswolf49@yahoo.com  
Affiliation: Concerned tribal member

Subject: No REDD Rice Manifesto  
Comment:

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-27 14:53:18

No Duplicates.

**Comment 18 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Linda  
Last Name: Crosby  
Email Address: lindakcrosby@msn.com  
Affiliation:

Subject: Rice Cultivation Projects Compliance Offset  
Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.  
Sincerely,

Linda Crosby

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-27 16:54:49

No Duplicates.

**Comment 19 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Sofia  
Last Name: Parino  
Email Address: sparino@crpe-ej.org  
Affiliation: Center on Race, Poverty & the Environmen

Subject: No offsets  
Comment:

Please see attached letter.

Attachment: [www.arb.ca.gov/lists/com-attach/51-offset-protocol-ws-BjUGLgY1B2wBKVNl.doc](http://www.arb.ca.gov/lists/com-attach/51-offset-protocol-ws-BjUGLgY1B2wBKVNl.doc)

Original File Name: 3.28.14 Comments on Rice Offset.doc

Date and Time Comment Was Submitted: 2014-03-28 13:07:35

No Duplicates.

## **Comment 20 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Laurie  
Last Name: Koteen  
Email Address: lkoteen@berkeley.edu  
Affiliation: UC Agriculture and Natural Resources

Subject: comment  
Comment:

To Whom It May Concern,

I intend to comment on the draft rice management protocol, however, I am currently too busy with other activities to properly review it by the deadline. If that is ok, I will submit detailed comments within the next few weeks.

My expertise in this matter stems from my previous work as a postdoctoral researcher. In that post, I worked in the San Francisco- San Joaquin Delta measuring CO<sub>2</sub> and CH<sub>4</sub> fluxes using the eddy covariance method. My work was performed in one rice field, as well as several other land use types.

thank you,

Laurie Koteen, Ph.D.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-28 15:05:09

No Duplicates.

**Comment 21 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Brett

Last Name: Cease

Email Address: brettw.cease@gmail.com

Affiliation:

Subject: Cancel the Rice Cultivation Projects!

Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,

Brett

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-28 16:07:05

No Duplicates.

**Comment 22 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Larry  
Last Name: Lohmann  
Email Address: larrylohmann@gn.apc.org  
Affiliation: The Corner House

Subject: Rice offset protocol  
Comment:

It is important that the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols be cancelled.

Experience has confirmed that offsets and carbon trading are a false solution to climate change. They must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,  
Larry Lohmann

Attachment: [www.arb.ca.gov/lists/com-attach/54-offset-protocol-ws-VjVRNlMgBzZWPwZo.pdf](http://www.arb.ca.gov/lists/com-attach/54-offset-protocol-ws-VjVRNlMgBzZWPwZo.pdf)

Original File Name: carbonDDlow.pdf

Date and Time Comment Was Submitted: 2014-03-29 02:37:53

No Duplicates.

**Comment 23 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Tom  
Last Name: Goldtooth  
Email Address: ien@igc.org  
Affiliation:

Subject: No REDD Rice Manifesto from 30 countries  
Comment:

To the California Air Resources Board,  
On behalf of over 125 organizations from 30 countries, I respectfully submit the No REDD Rice Manifesto to you to request that you cancel the proposed Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Carbon offsets, REDD and carbon trading are false solutions to climate change and must be excluded from California's Global Warming Solutions Act AB32. The vast diversity of the signatories of the No REDD Rice Manifesto includes social movements of Indigenous Peoples, peasants, organic farmers, anti-GMO activists, environmentalists, scientists, women, youth, and cooks from California and all regions of Mother Earth. The world is uniting to stop the State of California from using our sacred staple crop for carbon offsets. Our food is not a sponge for your pollution. Our agriculture can not be used as an excuse for California's big polluters like Chevron to continue to spew greenhouse gas emissions and destroy the climate. Our climate and our future are not yours to destroy. Mother Earth and her peoples respectfully call on you to definitively reject rice offsets and cut emissions at source.  
Sincerely,  
Tom B.K. Goldtooth  
Executive Director of the Indigenous Environmental Network

Attachment: [www.arb.ca.gov/lists/com-attach/55-offset-protocol-ws-UjwCawNdVHVNgRg.pdf](http://www.arb.ca.gov/lists/com-attach/55-offset-protocol-ws-UjwCawNdVHVNgRg.pdf)

Original File Name: No REDD Rice Manifesto with sign-ons.pdf

Date and Time Comment Was Submitted: 2014-03-29 08:20:37

No Duplicates.

**Comment 24 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Kenneth  
Last Name: Ruby  
Email Address: kennethgem@yahoo.com  
Affiliation:

Subject: No REDD Rice Manifesto  
Comment:

To the California Air Resources Board:

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-29 12:05:11

No Duplicates.



**Comment 25 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Heidi  
Last Name: Pringle  
Email Address: hepringle@verizon.net  
Affiliation:

Subject: Global Warming Solutions Act AB32  
Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.  
Sincerely,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-29 20:20:40

No Duplicates.

**Comment 26 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Lydia  
Last Name: Garvey  
Email Address: wolfhowlmama@yahoo.com  
Affiliation:

Subject: Protect Our environment/health & Native Rights!  
Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you

Lydia Garvey Public Health Nurse

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-29 21:33:40

No Duplicates.

**Comment 27 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Naie u prue Marma

Last Name: Marma

Email Address: maryprue\_04@yahoo.com

Affiliation:

Subject: Attend

Comment:

nterrested to attend and discuss on this kind of programme. plz  
share for participate fund details

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-30 01:34:11

No Duplicates.

**Comment 28 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Kim F  
Last Name: Floyd  
Email Address: kimffloyd@fastmail.fm  
Affiliation:

Subject: REDD Offsets  
Comment:

I am opposed to the proposed offsets. Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,  
Kim F Floyd  
5375 Shirley J. Lane  
Wrightwood, CA 92397

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-30 09:56:08

No Duplicates.

## **Comment 29 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Ramsey  
Last Name: Sprague  
Email Address: kxlblockade@riseup.net  
Affiliation: Tar Sands Blockade

Subject: No REDD Rice, No Rice-based Carbon Credits  
Comment:

We, the undersigned Indigenous Peoples, peasants, fisherfolks, immigrants, women, youth, cooks and civil society of the world gathered in Bali to protest the WTO, know that rice is a sacred staple crop which feeds billions of peoples worldwide. We, who courageously resist efforts to impose the use of genetically modified so-called "Golden Rice" of Monsanto, now unite to defend rice from being used as a part of capitalism of nature and carbon markets - "REDD Rice".

Since 2007, the United Nations, World Bank and fossil fuel polluters like Shell and Chevron and mining company Rio Tinto, have been pushing a carbon trading regime called REDD1 (Reducing Emissions from Deforestation and Degradation). REDD uses agricultural land, soils, forests and tree plantations as sponges for greenhouse gas emissions. Now these climate polluters want to use rice as an offset for their pollution instead of reducing emissions at source. Market-based solutions for addressing the climate crisis are a false solution.

We do not want our rice paddies or rice beds to be excuses for more pollution which causes global warming and typhoons. For peasant farmers, REDD+ constitutes a worldwide counter-agrarian reform and perverts the task of growing food into "farming carbon." The UN and northern industrialized countries have introduced other false solutions to climate change such as "Climate-Smart Agriculture". In Africa, where climate-smart carbon credit projects are being promoted, peasant farmers are starting to resist the use of their lands and soil for carbon sequestration, which is a carbon market scheme of capitalism. These new soil carbon markets are opening the door for more GMO crops and land grabs.

"Climate-ready" seeds and other supposed GMO climate fixes like "REDD Rice" are just more attempts of the biotech industry and agribusiness to deform, patent and control our seeds, grab our fields, privatize our soils and turn us into landless, indentured servants of capitalism.

Slated for next spring 2014, California may include rice cultivation as carbon offsets in its climate change law known as California's Global Warming Solutions Act (AB32). The proposed rice cultivation offset protocol will pretend to reduce emissions through a cropland agricultural protocol using for the first time, a BIO- GEO-CHEMICAL model, which supposedly "emulates" soil processes. One of the methods for supposedly cutting emissions is to replace wet seedlings with dry seedlings. This will include growing GMO rice and the use of genetically modified "soil nutrients".

China and California would be working with biotechnology companies that would privatize, patent and sell genes that supposedly allow rice plants to use less fertilizer. As part of economic globalization, this gene-knowledge and rice offsets would be sold

to the highest bidder to meet their emissions reduction targets on the emerging global market for carbon credits.

If applied on a massive scale, genetically modified REDD Rice could contaminate rice farmers' lands and seeds with enormous adverse environmental, social and cultural consequences.

- No to Privatization and Commodification of Rice!
- No WTO of our RICE!
- No WTO of Nature, Food and Life!
- NO REDD Rice!

Honoring our martyrs who have fallen for defending our land and territories, we commit to defend rice as Life and part of our movement for food sovereignty. We oppose using rice as part of the carbon market. We oppose the corporate genetic manipulation of our rice. We oppose the Green "Greed" Economy being pushed by the WTO that privatizes Nature as "environmental goods and services". Defend our Mother Earth and say NO! to the trading of Life and the air that we breathe and the food that we eat.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-30 12:34:22

No Duplicates.

**Comment 30 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Kartini  
Last Name: Samon  
Email Address: kartini@grain.org  
Affiliation:

Subject: Stop Proposed Rice Cultivation Offset Protocol  
Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Carbon offsets and carbon trading are false solutions to climate change, it will not solve the problems rather creating permit to polluting for big industries and allowing states to do Business as Usual.

GRAIN's research has shown that a sustained focus on peasant-based agroecological practices oriented toward restoring organic matter to soils could capture 24-30% of the current global annual greenhouse gas emissions. Turning rice fields into carbon sink will only drive us further from the real solutions and destroy the source of livelihood for million of people, thus it must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,  
Kartini Samon  
GRAIN

Attachment: [www.arb.ca.gov/lists/com-attach/62-offset-protocol-ws-VDNXIwdnWWMCagYr.pdf](http://www.arb.ca.gov/lists/com-attach/62-offset-protocol-ws-VDNXIwdnWWMCagYr.pdf)

Original File Name: grain-4811-climate-summit-don-t-turn-farmers-into-climate-smart-carbon-traders.pdf

Date and Time Comment Was Submitted: 2014-03-30 19:55:58

No Duplicates.

**Comment 31 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Simone

Last Name: Lovera

Email Address: [simone.lovera@globalforestcoalition.org](mailto:simone.lovera@globalforestcoalition.org)

Affiliation: Global Forest Coalition

Subject: rice cultivation offsets

Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.  
Sincerely,

Simone Lovera  
executive director  
Global Forest Coalition  
<http://www.globalforestcoalition.org>

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 09:16:21

No Duplicates.



## **Comment 32 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Luan

Last Name: Marks

Email Address: luanmakesmarks@yahoo.com

Affiliation:

Subject: Rice Cultivation Project Protocol

Comment:

I am writing now because I am very concerned that the carbon offset protocols under the Air Resources Board's jurisdiction do not reflect environmentally sustainable practices and that their drafting has been subject to excessive influence from the same corporate interests designated as polluters. I have researched this in depth. Recent proposed protocols include the Mine Methane Capture protocol and the Rice Cultivation Project protocol. Both of these were written in tandem with input from "stakeholders," meaning some of the same vested industry interests, and both of them are written for the fossil fuel industry and big agriculture. Neither of them offers a truly viable alternative option, at a time when alternatives in both energy and agriculture do exist. Why aren't the energy offsets being written for solar, wind, and geothermal development? Why doesn't the rice offset reflect the environmental developments to protect wetlands or acknowledge the System of Rice Intensification or the organic/permaculture movements that have become globally widespread?

I am attaching a copy of a document that summarizes my research on the latter offset.

Attachment: [www.arb.ca.gov/lists/com-attach/64-offset-protocol-ws-BXddMlc1BzEFXAJh.doc](http://www.arb.ca.gov/lists/com-attach/64-offset-protocol-ws-BXddMlc1BzEFXAJh.doc)

Original File Name: Rice Cultivation Offset Protocol Comments.doc

Date and Time Comment Was Submitted: 2014-03-31 10:26:15

No Duplicates.

## **Comment 33 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Boaventura

Last Name: Monjane

Email Address: boa.monjane@gmail.com

Affiliation:

Subject: Cancel the Rice Cultivation Projects Compliance Offset Protocol

Comment:

To the California Air Resources Board;

Dear members of the California Air Resources Board,

Find attached our declaration and some worst cases of REDD-type projects in Africa as well as a report on the Sengwer Report on the indigenous people evictions in Kenya.

In short we demand that you, please, cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets and carbon trading are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,

Boaventura Monjane

For the No REDD in Africa Network

Attachment:

Original File Name: Declaration-Report-Worst REDD projects - NRAN.pdf

Date and Time Comment Was Submitted: 2014-03-31 12:22:30

No Duplicates.

## **Comment 34 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Linda  
Last Name: Delair  
Email Address: lindadelair@hotmail.com  
Affiliation:

Subject: No REDD Rice Manifesto  
Comment:

I, Linda Delair, stand with all intelligent, life loving people who completely reject the use of any GMO products anywhere on Earth. We, the undersigned Indigenous Peoples, peasants, fisherfolks, immigrants, women, youth, cooks and civil society of the world gathered in Bali to protest the WTO, know that rice is a sacred staple crop which feeds billions of peoples worldwide. We, who courageously resist efforts to impose the use of genetically modified so-called "Golden Rice" of Monsanto, now unite to defend rice from being used as a part of capitalism of nature and carbon markets - "REDD Rice".

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 14:35:08

No Duplicates.

**Comment 35 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Maisa  
Last Name: Arias  
Email Address: maisa@pachamama.org  
Affiliation: The Pachamama Alliance

Subject: Please Cancel the Rice Cultivation Projects Compliance Offset Protocol  
Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.  
Sincerely,  
Maisa

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 14:42:47

No Duplicates.

## **Comment 36 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Bruce  
Last Name: Linguist  
Email Address: balinquist@ucdavis.edu  
Affiliation:

Subject: Rice protocol comments  
Comment:

### 2.2 Early drain activities

Unclear to me why 75% heading is used. Usually 50% heading is referred to.

Unclear how these samples are to be taken. Are you referring to a percentage of plants or panicles? These are different. A plant contains a number of panicles. The primary panicle usually reaches heading before the secondary or tertiary panicles.

Also, not sure why a sample needs to be taken so close to the inlet. This is a very unrepresentative portion of the field. Two problems with this (1) The inlet water is cold in many irrigation districts and these plants will be significantly delayed relative to the rest of the field (2) often the rice stand is very sparse so close to the inlet because the water comes into the field at a high volume which can uproot young seedlings.

Depending on who is taking these samples they can pick samples to suit their desires. Even within a relatively uniform field check, there can be a difference in crop development of over a week.

The protocol assumes that all rice varieties and in all years the field can be drained at this time period. Most crops develop on a basis of degree days (DD) so that in a cool year it takes longer to reach a certain growth stage than in a warmer year. Very little work has been done on looking at growth stages following heading. Also, it is safe to assume that varieties differ in this regard. I would suggest making the drain date based on a particular growth stage rather than a number of days after a certain stage. In the south, a lot of draining occurs around R7 which is approximately 3 weeks after heading but this is approximate (varies with variety and seasonal temps). R7 is also a defined growth stage that is relatively easy to determine in the field.

### 2.3 Alternate Wet and Dry Activities

The AWD procedure dictates that the soil must remain above 35% moisture level. What is this? Is this 35% of what? This needs to be clarified as there are many different ways to determine soil moisture.

What research is this 35% moisture based on? I assume it is to minimize N<sub>2</sub>O emissions. However, low N<sub>2</sub>O emissions is more likely to be the result of good water and N management. Fields should not be drained or allowed to dry when there is a lot of N in the soil.

How is a grower going to tell when the top 10 cm is not saturated but remains above 35%?

The biggest problem with this is that fields are highly variable with some parts likely to be still flooded while other parts are aerobic. The protocol mentions that saturated parts of the field will not be credited but how will this be accomplished without either a lot of walking the field or sensors? In non-zero graded fields the fields are sloped so you will have flooded conditions at the bottom of the field but at the top you may achieve the desired soil moisture but only in a small uppermost part of the field. The rest of the field is a variation between saturated and this "ideal" point.

How will yield losses be handled?

Not clear why N<sub>2</sub>O is not accounted for in this protocol. Just about all research in this area show higher N<sub>2</sub>O losses associated with AWD compared to a continuous flood. The amount of N<sub>2</sub>O losses is highly variable. With poor water and N management (result of poor timing) N<sub>2</sub>O emissions can be extremely high. For example letting the field dry or drain shortly after fertilizer applications can result in high N<sub>2</sub>O emissions and denitrification losses. Alternatively, with good management N<sub>2</sub>O emissions (while perhaps higher) may be almost negligible.

### 3.1 General Eligibility Requirements

I am curious as to why the protocol requires that rice be grown of the same maturity. There is no indication in the literature that crop duration affects GHG emissions. Furthermore, by doing this one discourages growers from using shorter duration varieties which may save water. Really there is no published data suggesting any of the currently used US varieties differ in terms of emissions. I am aware of some publications that are forthcoming which show varietal differences. However, the research groups have not identified varietal characteristics of low emitters that the DNDC could use.

### 3.2 Location

I have not seen, nor am I aware, of any published research where measured field emissions have been calibrated and validated using the DNDC model anywhere in the US. This whole protocol is based on the ability of the DNDC model to accurately predict emissions from these various mitigation practices. The model needs to be peer reviewed before this protocol goes into effect.

Appendix A Pg 48

Recording harvest date is mentioned twice: (a-3) and (a-7)

Appendix B: Table B DNDC input parameters.

Where do these numbers come from? These should be referenced. Some of the data look strange to me. For example, why the difference in Grain:Shoot:Root fractions between the various locations. Also, should not the sum of those fractions be equal to 1.0? They are for California but not MRD (0.78) and LGC (0.76). I also find it strange that the optimum temperature is so different among regions (20 vs 25). I do not believe this is supported by the literature. In step 2 it seems that one is adjusting the model to "fit" the data. In this case to fit the yields. This may require more or less thermal time to achieve the best fit. By adjusting this thermal time one is also changing the duration of the crop. Usually longer crop duration requires a longer flood period. However, in these cases your flood periods are fixed (farmers provide you with those).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 15:57:34

No Duplicates.

**Comment 37 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Robert  
Last Name: Parkhurst  
Email Address: [rparkhurst@edf.org](mailto:rparkhurst@edf.org)  
Affiliation: Environmental Defense Fund

Subject: EDF and CRC Comments on Draft Rice Cultivation Protocol  
Comment:

Please accept these comments on behalf of the Environmental Defense Fund and the California Rice Commission. We look forward to working with the California Air Resources Board over the upcoming months to improve this Draft in preparation for the Board meeting in September. Contact us with any questions you have regarding these comments.

Attachment: [www.arb.ca.gov/lists/com-attach/69-offset-protocol-ws-AWQHZVw7BTcDawJm.pdf](http://www.arb.ca.gov/lists/com-attach/69-offset-protocol-ws-AWQHZVw7BTcDawJm.pdf)

Original File Name: EDFandCRC Comments on ARB Rice Cultivation Protocol.pdf

Date and Time Comment Was Submitted: 2014-03-31 21:18:56

No Duplicates.

**Comment 38 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Lois

Last Name: Dalsin

Email Address: jandalsin@gmail.com

Affiliation:

Subject: Exclude Offsets from CA's Global Warming Solutions Act AB32

Comment:

To the California Air Resources Board:

I write to you from the heartland of Minnesota, USA, to ask that you cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation.

I stand in solidarity with peoples in over 125 organizations from 30 countries who reject rice cultivation offsets and using our food for carbon credits. Offsets are really not a solution to climate change, and need to be excluded from California's Global Warming Solutions Act AB32.

Thank you for this opportunity to comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-03-31 21:30:14

No Duplicates.



**Comment 39 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Valens  
Last Name: Dulmin  
Email Address: dulminvalens@gmail.com  
Affiliation:

Subject: Cancel The Rice Cultivation Projects  
Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.  
Sincerely,

Valentinus Dulmin / JPIC Franciscan Indonesia

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 00:03:41

No Duplicates.

**Comment 40 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Allison

Last Name: Basile

Email Address: basile.allison@gmail.com

Affiliation: DC Time Bank

Subject: Please cancel the Rice Cultivation Projects Compliance Offset Protocol

Comment:

Dear California Air Resources Board,

I am writing to ask you to please cancel the Rice Cultivation Projects Compliance Offset Protocol, and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. After working in international impact investing for four years, I've seen that offsets are a false solution to climate change, and I believe they must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,  
Allison Basile

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 07:52:33

No Duplicates.

## **Comment 41 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Olmedo

Last Name: Carrasquilla

Email Address: radiotemblor@gmail.com

Affiliation:

Subject: Sobre Redd con arroz

Comment:

Por este medio expresamos nuestra posición ante dicho tema. En la cual no estamos de acuerdo en que los arrozales y campos de cultivo sean excusas para seguir contaminado e incrementar el calentamiento global.

Además, esto genera un conflicto en Derechos Humanos, por que se partan del debido proceso y de la naturaleza de la vida y cultura de los pueblos.

También por que atenta contra la salud y ambiente de etas regiones importante que son una representatividad de la biodiversidad.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 09:01:08

No Duplicates.

**Comment 42 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Charles

Last Name: Purshouse

Email Address: charles.purshouse@camcocleanenergy.com

Affiliation:

Subject: Camco Comments on ARB Proposed Protocol Changes

Comment:

Please find attached letter containing our comments.

Charles

Attachment: [www.arb.ca.gov/lists/com-attach/74-offset-protocol-ws-BWZSNQdrAzMFbFU2.pdf](http://www.arb.ca.gov/lists/com-attach/74-offset-protocol-ws-BWZSNQdrAzMFbFU2.pdf)

Original File Name: CamcoComments\_ARB\_LivestockProtocolChanges\_March2014.pdf

Date and Time Comment Was Submitted: 2014-04-01 09:37:28

No Duplicates.

**Comment 43 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: No REDD  
Last Name: Working Group  
Email Address: noredd@igc.org  
Affiliation:

Subject: No Rice Offset Protocol, No REDD  
Comment:

To Governor Jerry Brown;  
To the Chair and members of the California Air Resources Board;  
The No REDD Working Group writes to respectfully request that you cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Carbon offsets and carbon trading are false solutions to climate change and must be excluded from California's Global Warming Solutions Act AB32. Offsets are a cynical emissions shell game at the service of polluters and financial speculators that do nothing to address global warming. Do not use our rice for carbon trading. Rice is food not an offset. California must cut GHG emissions at source. There is no alternative. Furthermore, you must stop allowing Shell to supposedly offset its Martinez refinery with Michigan's forests. You must also stop negotiating buyer or seller liability of forest carbon offsets with Chevron. CARB: Get out of bed with California's worst polluters and down to the work of transforming California's dependence on fossil fuels. We want real action now.  
The No REDD Working Group

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 09:02:54

No Duplicates.

**Comment 44 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Claire  
Last Name: Halbrook  
Email Address: cehu@pge.com  
Affiliation: Pacific Gas and Electric Company

Subject: PG&E Comments on Proposed Rice Cultivation Offset Protocol Workshop  
Comment:

PG&E Comments on Proposed Rice Cultivation Offset Protocol Workshop

Attachment: [www.arb.ca.gov/lists/com-attach/76-offset-protocol-ws-BnZXNlIMWW8DWgZl.pdf](http://www.arb.ca.gov/lists/com-attach/76-offset-protocol-ws-BnZXNlIMWW8DWgZl.pdf)

Original File Name: PG&E Comments on Rice Protocol Workshop.pdf

Date and Time Comment Was Submitted: 2014-04-01 10:04:50

No Duplicates.

**Comment 45 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Jihan

Last Name: Gearon

Email Address: jihan.gearon@gmail.com

Affiliation: Black Mesa Water Coalition

Subject: Cancel Compliance Offset Protocols

Comment:

To the California Air Resources Board;

Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets are a false solution to climate change and must be excluded from California's Global Warming Solutions Act AB32.

Sincerely,

Jihan Gearon

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 10:43:45

No Duplicates.

**Comment 46 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: VICTORIA

Last Name: EVANS

Email Address: vevans@carbonvp.com

Affiliation: Carbon Venture Partners

Subject: Comments from Carbon Venture Partners for CalAg on ARB Rice Protocol

Comment:

Thank you for the opportunity to formally comment. Attached find written comments prepared by Carbon Venture Partners on behalf of CalAg on ARB's Informal Draft of the Compliance Offset Protocol for Rice Cultivation.

Attachment: [www.arb.ca.gov/lists/com-attach/78-offset-protocol-ws-WjlROAdrVWsBYgln.pdf](http://www.arb.ca.gov/lists/com-attach/78-offset-protocol-ws-WjlROAdrVWsBYgln.pdf)

Original File Name: Comments to ARB fr CVP on Inf Disc Draft Rice Offs Protocol (4-1-14)\_FINAL.pdf

Date and Time Comment Was Submitted: 2014-04-01 10:52:09

No Duplicates.



**Comment 47 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Barbara

Last Name: Haya

Email Address: bhaya@law.stanford.edu

Affiliation:

Subject: Comments on informal discussion draft Rice Cultivation offset protocol

Comment:

Please find comments attached.

Attachment: [www.arb.ca.gov/lists/com-attach/79-offset-protocol-ws-BWZcNQBsv2kHZFQ6.pdf](http://www.arb.ca.gov/lists/com-attach/79-offset-protocol-ws-BWZcNQBsv2kHZFQ6.pdf)

Original File Name: Comments from Stanford Law School on informal discussion draft Rice Cultivation offset protocol.pdf

Date and Time Comment Was Submitted: 2014-04-01 11:12:24

No Duplicates.

**Comment 48 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Alastair

Last Name: Handley

Email Address: alastair@carboncreditsolutions.com

Affiliation: Carbon Credit Solutions

Subject: Offsets are important.

Comment:

We support the rice cultivation protocol and the inclusion of carbon offsets California's Cap-and-Trade Regulation.

Additional comments specific to the rice cultivation protocol are in the attached document.

Attachment: [www.arb.ca.gov/lists/com-attach/80-offset-protocol-ws-VjVQOVA8WWdXNFU7.pdf](http://www.arb.ca.gov/lists/com-attach/80-offset-protocol-ws-VjVQOVA8WWdXNFU7.pdf)

Original File Name: Comments on Draft Rice Protocol v0-1 (2) rtp.pdf

Date and Time Comment Was Submitted: 2014-04-01 11:27:49

No Duplicates.

**Comment 49 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Leslie  
Last Name: Durschinger  
Email Address: leslie.durschinger@terraglobalcapital.com  
Affiliation: Terra Global Capital, LLC

Subject: Terra Global's Comments on the ARB Rice Offset Protocol  
Comment:

Please see the attached document  
Thank you  
Leslie

Attachment: [www.arb.ca.gov/lists/com-attach/81-offset-protocol-ws-UydVNgBzBSRVMIQL.pdf](http://www.arb.ca.gov/lists/com-attach/81-offset-protocol-ws-UydVNgBzBSRVMIQL.pdf)

Original File Name: Terra Global Comments on ARB Draft Rice Protocol - Final.pdf

Date and Time Comment Was Submitted: 2014-04-01 11:31:36

No Duplicates.

## **Comment 50 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Pamela Tau

Last Name: Lee

Email Address: ptleee14@gmail.com

Affiliation: Chinese Progressive Association

Subject: Rice Cultivation Projects

Comment:

To the California Air Resources Board;  
Please cancel the Rice Cultivation Projects Compliance Offset Protocol and all existing and proposed Compliance Offset Protocols under the Cap-and-Trade Regulation. Offsets and carbon trading are false solutions to climate change and must be excluded from California's Global Warming Solutions Act AB32.  
This is not only a false solution for California but is actually harmful to farmers and consumers who will be impacted by rice cultivation methods proposed by corporations like Monsanto and other bio-tech industry representatives.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-01 11:33:31

No Duplicates.

**Comment 51 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Teresa

Last Name: Lang

Email Address: tlang@climateactionreserve.org

Affiliation: Climate Action Reserve

Subject: Comments in Support of the Rice Offset Protocol

Comment:

The Climate Action Reserve supports the decision by California Air Resources Board (ARB) to develop its Rice Protocol and strongly encourages the ARB Board to adopt this protocol. The Reserve developed our own Rice Cultivation Project Protocol in 2011, and has actively engaged throughout ARB's Technical Working Group process for the Rice Protocol. Based on these experiences, we believe that the ARB staff has done an excellent job on the Draft Rice Protocol, particularly in terms of working with stakeholders to resolve concerns and improving upon existing methodologies such as ours. While we have a number of comments on the Draft Rice Protocol, we do believe many of the Reserve's concerns may be easily resolved, and ultimately we support this protocol going before the Board for adoption in the near future.

Attachment: [www.arb.ca.gov/lists/com-attach/83-offset-protocol-ws-UTIAagRsAz1VMgdz.pdf](http://www.arb.ca.gov/lists/com-attach/83-offset-protocol-ws-UTIAagRsAz1VMgdz.pdf)

Original File Name: Climate Action Reserve Comments on ARB Rice Protocol 4-1-14.pdf

Date and Time Comment Was Submitted: 2014-04-01 11:30:02

No Duplicates.

**Comment 52 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Rick

Last Name: Saines

Email Address: richard.saines@bakermckenzie.com

Affiliation: on behalf of Climate Wedge

Subject: Climate Wedge Comments to Informal Discussion Draft Rice Cultivation Protocol  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/84-offset-protocol-ws-UjFUPIU9V2IVMlcj.pdf](http://www.arb.ca.gov/lists/com-attach/84-offset-protocol-ws-UjFUPIU9V2IVMlcj.pdf)

Original File Name: Climate Wedge Comments on Rice Cultivation Informal Discussion Draft.pdf

Date and Time Comment Was Submitted: 2014-04-01 11:44:11

No Duplicates.

**Comment 53 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Debbie  
Last Name: Reed  
Email Address: [dreed@drdassociates.org](mailto:dreed@drdassociates.org)  
Affiliation: C-AGG

Subject: Comments on Rice Protocol Discussion Draft  
Comment:

Thank you for the opportunity to submit these comments on behalf of the Coalition on Agricultural Greenhouse Gases (C-AGG).

Attachment: [www.arb.ca.gov/lists/com-attach/85-offset-protocol-ws-VzRcd1c3AzdXNgRb.pdf](http://www.arb.ca.gov/lists/com-attach/85-offset-protocol-ws-VzRcd1c3AzdXNgRb.pdf)

Original File Name: C-AGG ARB Comments Rice 4-1-2014.pdf

Date and Time Comment Was Submitted: 2014-04-01 11:52:29

No Duplicates.

**Comment 54 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Kyle

Last Name: Hemes

Email Address: khemes@winrock.org

Affiliation: American Carbon Registry

Subject: Draft Rice Comments - American Carbon Registry

Comment:

Thank you for this opportunity to comment. See uploaded document.

Attachment: [www.arb.ca.gov/lists/com-attach/86-offset-protocol-ws-VzYHYlAjAAwKbwhn.pdf](http://www.arb.ca.gov/lists/com-attach/86-offset-protocol-ws-VzYHYlAjAAwKbwhn.pdf)

Original File Name: ACR comments on ARB Draft Rice Protocol final.pdf

Date and Time Comment Was Submitted: 2014-04-01 11:55:05

No Duplicates.



**Comment 55 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Patricia  
Last Name: Oikawa  
Email Address: patty.oikawa@gmail.com  
Affiliation: UC Berkeley

Subject: general comments on rice protocol  
Comment:

I have attached my comments in a word document.  
Thank you.  
Sincerely,  
Patty Oikawa

Attachment: [www.arb.ca.gov/lists/com-attach/87-offset-protocol-ws-BmUFbAdrWGZQMwRq.docx](http://www.arb.ca.gov/lists/com-attach/87-offset-protocol-ws-BmUFbAdrWGZQMwRq.docx)

Original File Name: Comment for Rice Protocol OIKAWA.docx

Date and Time Comment Was Submitted: 2014-04-01 12:03:06

No Duplicates.

**Comment 56 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 57 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Cynthia

Last Name: Cory

Email Address: ccory@cfbf.com

Affiliation: California Farm Bureau Federation

Subject: Comments on Draft Rice Cultivation Protocol

Comment:

Please find attached comments

Attachment: [www.arb.ca.gov/lists/com-attach/89-offset-protocol-ws-BnQGaQNhUGYBWFI0.pdf](http://www.arb.ca.gov/lists/com-attach/89-offset-protocol-ws-BnQGaQNhUGYBWFI0.pdf)

Original File Name: Rice\_final\_040114.pdf

Date and Time Comment Was Submitted: 2014-04-01 14:47:16

No Duplicates.

**Comment 58 for Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) - 1st Workshop.**

First Name: Rori

Last Name: Cowan

Email Address: rcowan@scsglobalservices.com

Affiliation: SCS GLOBAL SERVICES

Subject: Comments on the Rice Cultivation Projects Draft Protocol

Comment:

Please accept my comments on behalf of SCS regarding the discussion draft of the Rice Protocol.

Attachment: [www.arb.ca.gov/lists/com-attach/90-offset-protocol-ws-VTRSJgBjBwsFcQBp.pdf](http://www.arb.ca.gov/lists/com-attach/90-offset-protocol-ws-VTRSJgBjBwsFcQBp.pdf)

Original File Name: ARB Rice Meth Comments 040114.pdf

Date and Time Comment Was Submitted: 2014-04-08 09:45:32

No Duplicates.

**There are no comments posted to Workshop on the Proposed Rice Cultivation Offset Protocol and Updates to Existing Offset Protocols (offset-protocol-ws) that were presented during the Workshop at this time.**