

**Comments on the Climate Action Reserve Rice Cultivation Project Protocol
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1. Page 11, Section 3: The project start date eligibility rule states 6 months prior to submission to the Reserve. However, later in page 12, under Section 3.2, it is stated that for 12 months from the Effective Date of the protocol, eligible start date is after September 1, 2009. This is confusing. Page 11, needs to be revised to state the eligibility requirement for the first 12 months and then after that.
2. Page 14, Table 3.1: If rice straw does not have a developed market, is this a viable project activity? Have other activities been considered like mid-season drainage, which is associated with methane reductions. Are leakage emissions considered from baling including new equipment use, transport and processing of the straw?
3. Page 19, SSR 6: it is understood that significant variability in yield exists in crops from one year to the next. In light of this fact, is it reasonable to ask project developers to quantify and deduct these emissions?
4. Page 24, Section 5.1.2: It is stated that the model must be run for 20 years prior to the start date of the project. It is unclear what is to be done with the results of these model runs.