

From: MARCIA TRUMP [mailto:cm.trump@verizon.net]

Sent: Wed 5/20/2009 6:49 AM

To: Climate Change Workshops@ARB

Subject: Support for high-quality offsets from diverse registries for California GHG cap and trade system

Dear California Air Resources Board:

In response to the California Air Resources Board's request for public comments on the criteria for California compliance offsets in a future greenhouse gas (GHG) cap and trade program, Cool Climate LLC dba AtmosClear would like to stress the absolute need for CARB including as compliance-grade GHG offsets from a diversity of GHG standards namely the American Carbon Registry (ACR) and Voluntary Carbon Standard (VCS) as well as the Climate Action Reserve (CAR).

AtmosClear is an offset provider in the North American carbon market. We work with a diversity of offset buyers and projects located throughout the United States, and in particular have clients and potential large-scale offset projects located in California. We are a 2003 founding member of ACR (formerly Environment Resources Trust - ERT), are registering VCS projects, and are an active corporate participant in the Climate Action Reserve's Reporting Protocol Working Groups. As such, we understand quite well the very real, monetary benefits to the citizens of California and for CARB of including compliance-grade offsets from different GHG registries and standards into any state cap and trade program.

A diversity of compliance-grade offsets from the major, industry-recognized and ISO-standard based registries, such as ACR, VCS and CAR, will best serve California's cap and trade market and California's offset buyers for several reasons. First, all of these registries meet the universally accepted ISO standards (ISO 14064-2) set up for GHG projects where the bar has been set high in terms of offset verifiability, conservativeness, and additionality/eligibility to ensure only high-quality projects are approved. Second, permitting buyers to purchase offsets from a diversity of registries promotes (i) price competition, (ii) continually raises the quality of all registries' protocols/standards, and (iii) provides the broadest offset diversity, which is needed to meet buyer demand.

In summary, as a participant in the California offset market, AtmosClear strongly urges CARB to officially recognize compliance-grade offsets from all high quality GHG programs and registries with rigorous scientific, ISO-based standards such as the American Carbon Registry, Voluntary Carbon Standard and Climate Action Reserve. We appreciate such consideration by the California Air Resources Board, and welcome any discussion or questions you may have regarding our recommendation.

Sincerely,

Sid Embree, President and Founder

Dr. Marcia Gowen Trump, Director of Technical Services
Cool Climate LLC dba AtmosClear

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