

Archive of Substantive Email Comments Received 5/21/09 during the Public Meeting on Reviewing and Approving Offsets in a CA Cap-and-Trade Program

Policy and Strategy

One of the reasons California has produced relatively few offsets in the voluntary market to date is that the state already regulates some of the most likely GHG emission sources (e.g., landfills). Will CARB consider these opportunities even if they happen out of state? Landfills aren't part of the cap & trade part of AB 32, yet landfill sources could contribute significant GHG reductions. Thanks. – Adam

Adam Stern

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What will be the ARB & public process for projects where there is an ambiguity in evaluating the project against the adopted protocols (example, questionable additionality)?

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ARB:

As someone who has traded criteria pollutants in California, the presentation today, while thorough, appears to be complicated and costly. I would recommend that we do whatever we can to keep costs down to inspire offsets projects to occur. If the process becomes too cumbersome or too costly, the process will inhibit the implementation of green projects that could result in offsets. Toward that end, I would recommend that ARB consider:

- Mirror the ARB 32 cap and trade program after current the current criteria pollutant cap and trade market. This is something stakeholders understand and should be easy to implement
- Use the local Air District staff for validation and verification. Adding a 3rd party sounds expensive, a cost project developers may not wish to bear. It would be best to use existing resources to do this
- For permanence, local Air Districts may be needed to rewrite permits. So again their involvement would be key to success in the project.

Thanks for considering these points and keeping costs to a minimum as we move forward. I think these concepts were suggested earlier here and there; I provide them so as to have them recognized as a general theme for discuss and the approach going forward.

Regards,

Bill Buchan

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3 Degrees, Inc.

What is the process and timing for converting ARB “approved” voluntary offset protocols into ARB approved compliance offset protocols? Will this occur any sooner than the broader process of developing compliance offset protocols?

Comment: the meeting notice was very short which may explain the low attendance. Can you give more advanced notice?

Gabe Petlin

Director, Regulatory Affairs and Carbon Markets

3Degrees

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