

The California Council for Environmental and Economic Balance (CCEEB)  
Response to the CARB Proposed Policy Statement on Voluntary Early  
Actions to Reduce Greenhouse Gas Emissions

In accordance with the February 6, 2008 request that written comments be submitted to CARB by February 19, 2008 on the Proposed Policy statement on Voluntary Early Actions, CCEEB submits the following comments.

CCEEB cites by reference those provisions of AB 32, 2006 (§ 38562 (b)(1) and (b)(3)) that call for appropriate credit for implementation of voluntary early reductions of greenhouse gasses. We also agree with the staff draft of the proposed policy that it is critical for the Board to encourage voluntary early actions in order to achieve the goals of AB 32.

The staff draft also properly points out that uncertainty about how AB 32 will be implemented has made some companies reluctant to implement early actions. CCEEB believes for a CARB Policy on Voluntary Early Actions to be effective that it must dispel as much uncertainty as possible before the promulgation of final rules to implement AB 32. As such, we recommend that the Proposed Policy be augmented as follows:

CCEEB recommends that the Board expand the Proposed Policy to include a Statement of Intent of CARB's intention to adopt and implement quantification methodologies that establish the baseline threshold that a Proposed Voluntary Early Action must meet to establish, on its face, that the proposed reduction is real, permanent, verifiable and enforceable.

While such a Statement does not guarantee that a particular proposal will ultimately be granted credit, it is consistent with AB 32 and acknowledges that CARB intends to grant credit to voluntary projects that meet baseline quantification criteria in its final rules. CCEEB believes that the adoption of quantification methodologies that provide the basis to demonstrate proposed voluntary early actions emission reductions are real, permanent verifiable and enforceable will provide project proponents the level of certainty needed to pursue regulatory and financial support for projects prior to the adoption of final rules.

In order to advance this approach, CCEEB recommends that CARB direct staff to request recommendations for such quantification methodologies and that submittals be reviewed and evaluated in accordance with criteria that balances a reasonable level of certainty to encourage voluntary early actions with the need for more detailed provisions that could be expected in a final rule.

Thank you for this opportunity to comment. CCEEB looks forward to working together with you in the development of such a Policy and resulting methodologies.