

**Comment 1 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Ann

Last Name: Chan

Email Address: achan@ccap.org

Affiliation: Center for Clean Air Policy

Subject: CCAP recommendation on future CA RED offsets program

Comment:

CCAP thanks the Air Resources Board for the opportunity to comment on the proposed design elements of the California RED offsets program. Attached please find CCAP's recommendations.

Attachment: [www.arb.ca.gov/lists/sector-based-ws/1-](http://www.arb.ca.gov/lists/sector-based-ws/1-ccap_summary_and_recommendations_on_future_california_red_offsets_program_final_july_22.pdf)

[ccap_summary_and_recommendations_on_future_california_red_offsets_program_final_july_22.pdf](http://www.arb.ca.gov/lists/sector-based-ws/1-ccap_summary_and_recommendations_on_future_california_red_offsets_program_final_july_22.pdf)

Original File Name: CCAP Summary and Recommendations on future California RED offsets program FINAL July 22.pdf

Date and Time Comment Was Submitted: 2010-07-27 18:02:19

No Duplicates.

**Comment 2 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: John

Last Name: Niles

Email Address: jniles@tropicalforestgroup.org

Affiliation: Tropical Forest Group

Subject: Establishing Conservative, Transparent REDD Baselines

Comment:

Dear ARB staff,

Please find the Tropical Forest Group's comments on REDD and
sectoral crediting under AB32.

Thank you for your consideration.

John O Niles

Director, Tropical Forest Group

Attachment: www.arb.ca.gov/lists/sector-based-ws/2-tfg_july30_2010_arb_submission.pdf

Original File Name: TFG July30 2010 ARB Submission.pdf

Date and Time Comment Was Submitted: 2010-07-30 14:13:43

No Duplicates.

**Comment 3 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Julia

Last Name: Gardiner

Email Address: jgardiner@tnc.org

Affiliation: The Nature Conservancy

Subject: Recommendations to include REDD offsets in CA's cap-and-trade program

Comment:

Please find attached a comment letter submitted on behalf of The Nature Conservancy and ten other organizations in response to the July 30th workshop on REDD and cap-and-trade in California.

Attachment: www.arb.ca.gov/lists/sector-based-ws/3-081910reddcoalitionletterfinal.pdf

Original File Name: 081910REDDCoalitionLetterFINAL.pdf

Date and Time Comment Was Submitted: 2010-08-19 16:21:48

No Duplicates.

**Comment 4 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Zoe

Last Name: Ryan

Email Address: zoe.ryan@fauna-flora.org

Affiliation: Fauna & Flora International (FFI)

Subject: Comments on proposal for inclusion of sub-national RED within AB32

Comment:

Fauna & Flora International (FFI) is pleased to provide the attached comments in regards to the California Air Resources Board proposal for inclusion of sub-national RED as an approved offset category under the AB 32 legislation.

Attachment: www.arb.ca.gov/lists/sector-based-ws/4-ffi_comments_on_ab32_sector_based_redd_-_final.pdf

Original File Name: FFI_Comments on AB32 sector based REDD - FINAL.pdf

Date and Time Comment Was Submitted: 2010-08-20 06:45:14

No Duplicates.

**Comment 5 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Toby

Last Name: Janson-Smith

Email Address: tjanson@conservation.org

Affiliation: Conservation International

Subject: REDD pilot project crediting proposal

Comment:

Please find attached joint comments from:

Conservation International

Environmental Defense Fund

The Nature Conservancy

Pacific Gas & Electric Company

Sacramento Municipal Utility District

Modesto Irrigation District

City of Redding

City of Roseville

Turlock Irrigation District

New Forests

Attachment: www.arb.ca.gov/lists/sector-based-ws/5-redd_pilot_project_crediting_proposal.pdf

Original File Name: REDD pilot project crediting proposal.pdf

Date and Time Comment Was Submitted: 2010-08-20 09:22:15

No Duplicates.

Comment 6 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based- ws) - 1st Workshop.

First Name: Kjell

Last Name: Kühne

Email Address: kjell.kuehne@gmail.com

Affiliation:

Subject: Double Counting, Discounting, Safeguards, Permanence, Shared Liability
Comment:

Dear Ms. Bamberger,

I would like to invite you to take the following comments into account for the elaboration of the Californian cap-and-trade regulation and using international REDD offsets within this mechanism:

1. Double Counting. The United States of America have assumed a voluntary economy-wide emissions reduction target. So has Mexico. A mechanism must be put in place to avoid any double counting towards UNFCCC-registered targets. Since the Mexican target is explicitly bound to external support which can be delivered through market mechanisms, it seems appropriate to allow Mexico to count the emissions reductions towards their target while not counting them towards the US target. If they were to be counted towards the US target, a previous negotiation with the Mexican government is necessary to clarify the conditions under which the Mexican government would be willing to exclude these offsets from their own accounting.

If this double counting issue were to be ignored, the offset mechanism would constitute a mechanism that reduces ambitions rather than emissions.

2. Discounting. An option to deal with double counting and also for taking the principle of common responsibility into account could be a discount of foreign offsets. With a 50% discount, double counting would be neutralized. With a further discount, the common responsibility of non-Annex I countries could be included in a standardized way. This may also be an alternative to a very ambitious crediting baseline.

3. Safeguards. Environmental and social safeguards should be required on an operational level. Proof that both relevant international and national law is respected should be required for registering any credits. This can be an incentive for implementing high social and environmental standards that have remained on paper so far. The establishment of realistic dispute resolution mechanisms should be promoted where these do not exist. Complete public transparency as to the flow of funds for initiatives resulting in credits could be required, providing a strong counterbalance to the risk of corruption.

4. Permanence. REDD+ or any forest related emissions reductions or sequestrations can and must not be equalized to emissions reductions from fossil sources without cautionary measures. If they are to be used as offsets, they must effectively guarantee that for the amount of time that the emissions they are offsetting stay in the atmosphere they effectively keep the carbon sequestered. In the face of a changing climate, this is difficult if not impossible to guarantee for trees. Therefore, robust mechanisms must be developed that can account for this risk of reversals. Without them, the offsetting mechanism will simply be an "ambition reduction

mechanism".

5. Shared Liability. One of the possible ways to deal with non-permanence in forest related emissions reductions could be to share liability for reversals among the seller and the buyer. Mechanisms which do that should be explored.

I thank you for the opportunity to comment on the draft regulation and I hope to have made a contribution that helps you write a regulation that especially serves future generations. They need our help and consideration.

kindly,

Kjell Kühne

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2010-08-20 12:02:10

No Duplicates.

**Comment 7 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Robert
Last Name: O'Sullivan
Email Address: r.osullivan@climatefocus.com
Affiliation: Climate Focus

Subject: Comments on Sector Based Crediting and Subnational REDD
Comment:

Thank you for this opportunity to provide comments. Comments from
Climate Focus and Climate Wedge are attached.

Attachment: [www.arb.ca.gov/lists/sector-based-ws/7-
climate_focus_and_climate_wedge_comments_on_arb_redd_20_aug_2010.pdf](http://www.arb.ca.gov/lists/sector-based-ws/7-climate_focus_and_climate_wedge_comments_on_arb_redd_20_aug_2010.pdf)

Original File Name: Climate Focus and Climate Wedge comments on ARB REDD 20 Aug 2010.pdf

Date and Time Comment Was Submitted: 2010-08-20 13:15:26

No Duplicates.

**Comment 8 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Kyle

Last Name: Danish

Email Address: kwd@vnf.com

Affiliation: Coalition for Emission Reduction Project

Subject: Comments of the Coalition for Emission Reduction Projects on the July 30 REDD Workshop

Comment:

Attached are the comments of the Coalition for Emission Reduction Projects on the July 30, 2010 workshop on REDD sectoral crediting. We appreciate this opportunity to provide our input. Please do not hesitate to contact us if you have any questions or would like additional information.

Attachment: www.arb.ca.gov/lists/sector-based-ws/8-coalition_for_emission_reduction_projects_comments_on_arb_7.30.2010_redd_presentation.pdf

Original File Name: Coalition for Emission Reduction Projects Comments on ARB 7.30.2010 REDD presentation.pdf

Date and Time Comment Was Submitted: 2010-08-20 13:39:19

No Duplicates.

**Comment 9 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Kate

Last Name: Horner

Email Address: khorner@foe.org

Affiliation:

Subject: FOE/GP Comments on Sector-based REDD crediting
Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/sector-based-ws/9-foe_and_gp_comments_to_arb_on_sectoral_redd_credits.pdf

Original File Name: FOE and GP Comments to ARB on Sectoral REDD Credits.pdf

Date and Time Comment Was Submitted: 2010-08-20 15:58:55

No Duplicates.

**Comment 10 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments on Sector-Based Crediting and REDD
Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/sector-based-ws/10-sce_comments_to_carb_on_redd.pdf

Original File Name: SCE_Comments_to_CARB_on_REDD.pdf

Date and Time Comment Was Submitted: 2010-08-20 16:43:20

No Duplicates.

**Comment 11 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Lily

Last Name: Mitchell

Email Address: lmitchell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on REDD workshop

Comment:

Please find attached the comments of the Southern California Public
Power Authority on the ARB workshop held on July 30, 2010 on
sector-based crediting and subnational REDD.

Attachment: www.arb.ca.gov/lists/sector-based-ws/11-300226001lmm08201001_redd_workshop.pdf

Original File Name: 300226001lmm08201001 REDD workshop.pdf

Date and Time Comment Was Submitted: 2010-08-20 17:12:08

No Duplicates.

**Comment 12 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Ruben
Last Name: Lubowski
Email Address: rlubowski@edf.org
Affiliation: EDF

Subject: EDF CI Comments
Comment:

Please see attached comments.

Attachment: www.arb.ca.gov/lists/sector-based-ws/12-redd_arb_comments__edf-ci.pdf

Original File Name: REDD ARB comments _EDF-CI.pdf

Date and Time Comment Was Submitted: 2010-08-20 17:58:48

No Duplicates.

**Comment 13 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: David
Last Name: Antonioli
Email Address: ombcomm@arb.ca.gov
Affiliation: Voluntary Carbon Standard Association

Subject: Comments
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/sector-based-ws/13-vcsa_comments_arb_proposal_for_redd_20_aug_2010.pdf

Original File Name: VCSA Comments ARB Proposal for REDD 20 AUG 2010.pdf

Date and Time Comment Was Submitted: 2010-08-25 10:17:12

No Duplicates.

**Comment 14 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Louis
Last Name: Blumberg
Email Address: ombcomm@arb.ca.gov
Affiliation: Environmental Coalition

Subject: Comments
Comment:

See attachment.

Attachment: www.arb.ca.gov/lists/sector-based-ws/14-envirocoalition_letterfinal.pdf

Original File Name: EnviroCoalition_LetterFINAL.pdf

Date and Time Comment Was Submitted: 2010-08-25 10:21:35

No Duplicates.

**Comment 15 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Roger
Last Name: Williams
Email Address: ombcomm@arb.ca.gov
Affiliation: CARBON OFFSET PROVIDERS COALITION

Subject: ARB's July 30, 2010 Presentation re Sector-Based Crediting & Subnational REDD
Comment:

See Attachment.

Attachment: www.arb.ca.gov/lists/sector-based-ws/15-copc_comments_on_7_30_10_arb_presentation_re_redd__8_20_10_.pdf

Original File Name: COPC Comments on 7 30 10 ARB Presentation re REDD (8 20 10).pdf

Date and Time Comment Was Submitted: 2010-08-25 10:24:41

No Duplicates.

**Comment 16 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Brian
Last Name: Shillinglaw
Email Address: ombcomm@arb.ca.gov
Affiliation: New Forests

Subject: omments on ARB Public Workshop to Discuss Sector‐Based Crediting and Subnational Red
Comment:

see attachment

Attachment: www.arb.ca.gov/lists/sector-based-ws/16-newforests_comments_redd.pdf

Original File Name: NewForests_Comments_REDD.pdf

Date and Time Comment Was Submitted: 2010-08-26 07:58:08

No Duplicates.

**Comment 17 for Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-
ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: ombcomm@arb.ca.gov

Affiliation: The Nature Conservancy

Subject: RE: Comments on Sector Based Crediting and Subnational Reduction of Emissions
Comment:

see attached.

Attachment: www.arb.ca.gov/lists/sector-based-ws/17-tnccomments_07_30_10_reddworkshop_final.pdf

Original File Name: TNCComments_07_30_10_REDDWorkshop_Final.pdf

Date and Time Comment Was Submitted: 2010-09-03 13:07:08

No Duplicates.

There are no comments posted to Cap & Trade Public Meeting GCF Sector-Based Crediting (sector-based-ws) that were presented during the Workshop at this time.