I would like to strongly recommend against any changes that could even potentially increase the burdensome nature of Offset verification. They are already more than burdensome enough for all parties, including ARB staff. Offsets are the only tool we have for removing GHG’s from the atmosphere, or as we like to call it climate repair. The carbon cap can only reduce further damage. While offset trading incentivizes the development of climate repair projects and technologies.

While Carbon offsets are an excellent cost containment mechanism, their moats important function is and should continue to be GHG emission reductions. In order to retain this function the offset program and the cap and trade program in general needs to stay focused on climate change and reducing GHG in the atmosphere. Adding regulations or implementing policies that seek to benefit the environment in ways unrelated to climate change will only hamper the cap and trade programs ability to function. This process, at it’s least harmful, could make the cap and trade program to cumbersome for some to participate in. Slowing or even stopping the development of the carbon offset projects, or discouraging others from reducing their emissions further than necessary. At its worst it could allow companies to defer real reductions in GHG emissions. Potentially buy awarding additional benefits for GHG reductions from specific locations or facilities, or double counting reductions of GHGs that have additional consequences to global warming, or awarding carbon offsets for public works unrelated to climate change at all. I recognize that the CARB has more environmental concerns than just climate change. And I understand that some air pollutants which have little to no impact on climate change can be very harmful to human health. Those environmental issues should have their own independent programs specifically designed for each separate problem. I do believe however that climate change is the most significant natural crisis facing humanity right now and the one that requires the most attention.

One change I would recommend is to change the global warming potential of all GHG’s to reflect a shorter time frame then 100 years, and there for a more urgent goal. The time frame used to determine the GWP for various different GHG’s should more closely match the time frame in which we want to return to normal climate temperatures, or at least normal warming rates. Far to much irreversible ecological damage will have occurred 100 years from now for that to be our goal. Aggressively I propose a 20 to 25 year time frame perhaps one day even 10 years.