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Electronic Submittal: [2022 Scoping Plan Comment Docket](#)

The Verified Emission Reduction Association (VERA) is appreciative your efforts to hold a three-day 2022 Scoping Plan Update Kick-Off Workshop series, and for the opportunity to comment early on in this important update. VERA is committed to working with California Air Resources Board (CARB), the AB 32 Environmental Justice Advisory Committee, and other stakeholders to ensure the continued role of regulated carbon offsets under the Cap-and-Trade Program and in the development of the State's 2045 Carbon Neutrality policies. Both the 2030 and 2045 targets become harder to achieve without the recognition and use of verified carbon offsets.

In many ways, this version of the Scoping Plan is as monumental as the original 2008 document which laid out the AB 32 framework. The 2022 Scoping Plan Update needs to address new climate neutrality goals, post-2030 carbon reduction goals, a structural review of the Cap-and-Trade program and implementation of the Governor's ZEV Executive Order all while balancing the need for continuity of program, the continued near-term air quality improvements and the needs of the State's historically disadvantaged communities, including rural and tribal communities. It truly will require another herculean effort by CARB.

VERA is made up of individual companies with vast experience in achieving real greenhouse gas (GHG) reductions for the cost-effective use in California's Cap-and-Trade Program (Program). VERA strongly supports California's efforts to reduce statewide GHG emissions through a market-based program, including the use of high-quality carbon offsets. VERA is pleased that state law has codified the use of offsets in the Program¹. We continue to support CARB's efforts to maximize the benefits of offsets to contain costs and support the development of new innovative projects and technologies on a scale not achievable through command and control regulations. We look forward to incorporating offsets into the 2045 CN framework

Offsets are important and beneficial to the overall goal of the State

VERA members are fully committed to the fundamentals of environmental integrity, ensuring that offsets are *real, quantifiable, permanent, verifiable, additional and enforceable* GHG reductions, as required under the

¹ http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB398

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Program. We believe they are an effective component to help accomplish the Programs' lofty goals including, establishing a program in which other jurisdictions can participate.

The Legislature's decision to codify offset use recognizes that offsets benefit the Program and California's environment and economy in tribal, rural and urban areas throughout the state. VERA supports CARB's recognition that many CARB-approved offset projects can, and do, provide direct environmental benefits to California.

The original AB 32 Climate Change Scoping Plan² laid out a vision for leadership and exportability of California's GHG program. It also highlighted that reducing in-state emissions alone would not solve the larger issue. Those original goals of global action for the benefit of California are being achieved with the use of offsets, both within and outside of California as the reduction of unregulated GHGs has enormous benefit to California's long-term goals of reducing the impacts of global climate change. The continued release of potent emissions such as methane, black carbon and refrigerants is of great concern and urgency. Offsets provide a viable mechanism to achieve the additional reductions necessary to help achieve the larger goal, and that is a foundational policy laid out in the Scoping Plan that needs to continue. For example, non-forestry projects help overcome the challenges of reducing emissions in hard-to-decarbonize sectors and supply chains, which is increasingly important for net-zero goals. These impacts are also laid out before you in great detail by the California Resources Agency's Safeguarding website. Moreover, science has shown that emissions of GHGs around the globe have a climatic impact on California and its waters.

Natural and Working Lands

The morning session of Day 2 focused on Natural and Working Lands. The scope of this session included the importance of well managed forests and agriculture lands, as well as, other natural and working lands—grasslands, rangelands and wetlands, as additional examples. The concepts presented are consistent with the underpinnings of carbon offsets—that a voluntary, incentive-based policy mechanism is needed to reach non-regulated but interested stakeholders. Recognizing that Natural Climate Solutions – a set of strategies which manage natural and working ecosystems to avoid GHG emissions or enhance carbon sequestration – can provide a significant portion of California's negative emissions in the near term, with numerous co-benefits should be a Scoping Plan priority. CARB's offset program is one of very few compliance programs globally that incentivize these kinds of management activities at scale on the landscape. VERA supports the pursuit of additional NWL carbon sequestration policies that are consistent with the current offset program's fundamentals.

VERA support for tribal community member on the EJAC

We are supportive of the Board's efforts to fill out the membership of the EJAC with a tribal member. VERA has participated in Cap-and-Trade rulemakings historically, and have consistently noted that offsets have a direct positive economic and environmental benefits for tribal and rural designated disadvantaged communities. For example, offsets have become the main source of discretionary income for the Yurok Tribe and offset revenues

² <https://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>

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have been instrumental in funding the purchase of 60,000 acres of traditional tribal forestlands and establish a fire department.³ Many offset projects are located in their parts of the state.

Conclusion

VERA is committed to helping the State meet its 2030 and 2045 goals. VERA can be reached through Jon Costantino at Tradesman Advisors, via email at jon@tradesmanadvisors.com.

³ <https://www.newyorker.com/news/dispatch/how-carbon-trading-became-a-way-of-life-for-californias-yurok-tribe>