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Gavin McCabe
Chair, Compliance Offset Protocol Task Force
California Air Resources Board
1001 I Street
Sacramento, CA 95814

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As the Offset Protocol Task Force (Task Force) winds down, and in anticipation of the Task Force's recommendations being incorporated into the start of the 2022 Scoping Plan process, the Verified Emission Reduction Association (VERA) appreciates this final opportunity to submit comments on the Task Force's Final Draft Report. We would also like to give sincere thanks to the Task Force members for their time and commitment to this important effort.

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 the state law which codified the use of offsets in the Program also had the foresight to seek ways to improve the offset 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.

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 Program. We believe they are an effective component to help accomplish the Programs' lofty goals.

We commend the Task Force for addressing both individual protocol issues and ideas, but also looking at fundamental program issues that could be improved to support the goal of additional in-state offset development. VERA generally supports the recommendations to improve the program, but would like to specifically highlight the following programmatic recommendations as being particularly worthwhile to pursue by CARB.

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

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- Recommendation A1 - Improve invalidation requirements
- A2 - Allow offset usage limits to be traded among compliance entities
- A4- Recognize that compliance grade offsets can be a tool for helping achieve other state and federal climate policy initiatives
- B5 - Project development loans and subsidies
- B6 - Project consolidation across fragmented tribal land ownership
- B8 - Project inventory and verification streamlining
- D15 - Support aggregation of project participants
- D16 - Improve efficiency and transparency of the CARB review process
- D17 - Make CARB guidance regularly and publicly available

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. The reduction of unregulated GHGs achieved by offsets 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 needs to continue.

Conclusion

VERA is committed to a robust offsets market and the continued environmental and economic opportunities associated with high-quality compliance offsets. VERA can be reached through Jon Costantino at Tradesman Advisors, via email at jon@tradesmanadvisors.com.

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