

Please Note Comments Below for the Third Compliance Offsets Protocol Task Force

1) Academic peer review is a universally accepted practice to independently evaluate the quality of other scientists' work to establish scientific and public trust in research applications.

2) Excerpts from Brian Nowicki's letter of resignation* from the Task Force implies that the CARB offset program and existing protocols to quantify and verify emission reductions lack independent peer review as noted:

"I urge the Air Resources Board to engage an independent academic review of California's offsets program as a whole, and its implications for the integrity of California's greenhouse gas reduction program and its influence on the distribution of pollution within the state."

"The existing protocols should also undergo independent academic review—with full access to the project data—to determine the integrity of the credited reductions and the implications for the integrity of the Air Resources Board's cap-and-trade program."

3) Scientific peer review of the CARB program and protocols, per se, is suggested as a mandate of the Compliance Offsets Protocol Task Force to validate the scientific basis and commercial value of the CARB protocols and resulting offsets.

* https://ww2.arb.ca.gov/sites/default/files/202102/nowicki_brian_offsets_task_force_letter_020821.pdf