

California Air Resources Board

Meeting to Consider a Process for Adoption of Greenhouse Gas Accounting Protocols for Compliance Purposes, Including Withdrawal of Board Adoption of Voluntary Protocols

Comments Submitted by TerraPass Inc., February 24, 2010

TerraPass, a San Francisco based company with more than 20 voluntary greenhouse gas emission reduction projects under management in the United States supported by more than 200,000 individual and business customers, offers the following comments to the California Air Resources Board (CARB) for the meeting scheduled on February 25, 2010:

- We appreciate the need for CARB to begin its process of adopting protocols for compliance purposes with a clean slate and including any reviews which might be required under the California Environmental Quality Act.
- We urge CARB to move quickly to adopt compliance protocols. Until very recently, emitters and others were actively investing in new emission reduction projects at unregulated sources, thus fulfilling the promise of voluntary actions to create early emission reductions that would not otherwise occur under AB 32. Unfortunately, private investment in new emission reduction projects has all but ceased in light of the uncertainties associated with acceptable protocols.
- To expedite its work, we recommend that CARB's initial protocol review-and-adoption process encompass a *group* of protocols. Such a process will be simpler and quicker for protocols which have already undergone public review and comment, and under which domestic projects are already verified. The impacts of such protocols can be established clearly and would involve little modeling or guesswork. Examples include Climate Action Reserve (CAR) and Voluntary Carbon Standard (VCS) protocols for landfill and agricultural methane projects and certain forestry projects.

We would be happy to answer any questions you may have. Thank you for your consideration.

Submitted by:

Adam Stern, Vice President for Policy and Strategy

TerraPass Inc.