

January 23, 2023

Dallas Burtraw, Chairman
Independent Emissions Market Advisor Committee
CalEPA
1001 I Street
Sacramento, CA 95814

Electronic Submittal: iemac@calepa.ca.gov

The Verified Emission Reduction Association (VERA) is appreciative of the opportunity to comment on the draft 2022 IEMAC report. The report focuses on a number of important issues, including touching on the continued use of offsets under the Cap-and-Trade Program. VERA is a coalition of individual companies with vast experience in achieving real GHG reductions for cost-effective use in California's Cap-and-Trade 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 has previously commented on IEMAC reports as you have focused on offset policy before. This current draft continues that theme with a chapter on Carbon Market Design post-2030 which includes a recommendation which insinuates that the validity of offsets under the California program should be questioned, especially those related to forestry projects. Such an ex-post analysis would be in addition to the myriad of agency and independent third-party reviews already conducted. We believe such an additional step is unnecessary and undermines the program.

CARB has fully litigated this issue and recently held a workshop on the Forestry Protocol. VERA's comments after that workshop are attached for reference. As developers of compliance-grade offsets, VERA's members stand at the ready to discuss with the IEMAC the rigorous work being done to ensure these reductions meet all the AB 32 mandates of being real, enforceable, quantifiable, verifiable and permanent. If the IEMAC, or individual members, would like such a meeting, I can be reached at jon@tradesmanadvisors.com.

Sincerely,

/s/

Jon Costantino
on behalf of VERA

December 15, 2022

Ms. Rajinder Sahota
Deputy Executive Office
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Electronic Submittal: [Workshop Docket](#)

The Verified Emission Reduction Association (VERA) is appreciative of the November 30, 2022 workshop – “Discussion of U.S. Forest Projects Compliance Offset Protocol and Relevant Science, Data, and Tools”. The workshop was a good reminder of the rigor of the California Air Resources Board’s (CARB) compliance offset program in general, but specifically on forests. VERA is committed to working with CARB, and other vital stakeholders, next year as the Cap-and-Trade regulation and offset protocols are amended and updated.

VERA is a coalition made up of individual companies with vast experience in achieving real greenhouse gas (GHG) reductions for 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 defend the use of, and to maximize the benefits of offsets to contain costs and provide co-benefits. Additionally, VERA supports the development of new and innovative technologies that can be deployed at scale to achievable additional GHG reductions that could otherwise not be achieved through command-and-control regulations alone.

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 state law. 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 repeated inclusion of offsets as a GHG reduction policy option, both in statute and regulation, recognizes the myriad of benefits to California’s environment and economy in all areas of the state, including; tribal, rural and urban communities. VERA supports CARB’s consistent recognition that many of the approved offset projects provide direct environmental benefits to California.

The Workshop focused on both the validity of the adopted Forestry Protocol, and ways to improve its implementation. As a group, VERA is focused on maximizing the use of compliance-grade offsets in California and the overall policy framework surrounding offset usage. Our membership is made up of individual offset developers, each with distinct technical and practical expertise in securing GHG reductions from the four main

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

CARB-approved protocols. Given its focus on policy, VERA will not be submitting detailed technology recommendations for the Forestry protocol, but we are supportive of using the latest science and technology as this important pillar of the Program is updated, but we continue to highlight that efficient and streamlined issuance and verification is a critical aspect to the continued success of the CARB compliance offset program.

The importance of well managed forests and agriculture lands, as well as, other natural and working lands—grasslands, rangelands and wetlands, has been repeatedly stated in the 2022 Scoping Plan Update. The NWL policy being sought is consistent with the underpinnings of carbon offsets—that a voluntary, incentive-based policy mechanism is needed to motivate non-regulated but interested stakeholders to take action at scale. The recognition that natural climate solutions – a set of strategies which manage natural and working ecosystems to avoid GHG emissions or enhance carbon sequestration – will provide a portion of California’s negative emissions in the future is a strong signal contained within the Scoping Plan update. Both the 2030 and 2045 targets become harder to achieve without the recognition and use of verified carbon offsets.

Conclusion

VERA’s members are committed to helping the State meet its carbon reduction and broader policy goals through the continued generation and use of high-quality compliance-grade offsets. VERA can be reached through Jon Costantino at Tradesman Advisors, via email at jon@tradesmanadvisors.com.