Template for Compliance Offsets Protocol Task Force Subgroup Reports

This template was developed to help provide consistency across the reports each Compliance Offsets Protocol Task Force (Task Force) subgroup produces. The items herein are taken from the discussion during the March 2, 2020 public Task Force meeting. In addition, subgroup members should review the Initial Statement of Reasons (ISOR) for the Compliance Offset Protocol (COP) Mine Methane Capture Projects as an example of the detail California Air Resources Board (CARB or Board) staff is required to provide to the Board and public during the development of a COP. The ISOR provides the rationale for developing a new protocol and an analysis of how all statutory and regulatory requirements are met.

I. INTRODUCTION AND BACKGROUND ON TASK FORCE SUBGROUP

List members of subgroup; name, stakeholder group, and affiliation.

Include a description of the subgroup purpose, and a brief summary of subgroup’s activities (e.g., internal meetings, communication with external stakeholders, etc.).

II. NEW PROJECT TYPE

A. Role of project type in climate change mitigation

Identify the greenhouse gases (GHG) that are released during business-as-usual (baseline) activities that the project is designed to reduce. Include a description of the activities that release GHGs (e.g., methane from coal mining), and what is currently happening with these GHGs (e.g., released to the atmosphere).

B. Development of project type

Describe the resources used to develop the project type (e.g., review of existing voluntary market offset protocols, stakeholder input or data, peer reviewed literature).

C. Description of project type

Describe the project type: information such as how the project provides GHG emissions reductions or provides GHG removal enhancements from applicable sources, sinks, or reservoirs.

D. AB 32 criteria

Describe how the project type meets the Global Warming Solutions Act of 2006, Assembly Bill 32 (AB 32) criteria: real, additional, quantifiable, permanent, verifiable, and enforceable (section 95802 of the Cap-and-Trade Regulation provides a definition for each criteria). If it does not meet all AB 32 criteria, describe why, what are the information/data gaps, and what is needed to meet regulatory requirements. Include
discussions to support the AB 32 criteria, such as a review of the best available science for quantification, and analysis of quantification risk and uncertainty.

  a. Real
  b. Additional
  c. Quantifiable
  d. Permanent
  e. Verifiable
  f. Enforceable

E. Direct environmental benefits in the State (DEBS)

Describe how the project type could provide direct environmental benefits in the State. Specifically, describe whether the project type provides for the reduction or avoidance of emissions of any air pollutant that would not be credited pursuant to the protocol in the State or a reduction or avoidance of any pollutant that is not credited pursuant to the protocol that could have an adverse impact on waters of the State.

F. Disadvantaged communities, Native American or tribal lands, and rural and agricultural regions

Describe how project type prioritizes disadvantaged communities, Native American or tribal lands, and rural and agricultural regions; further discussion of environmental justice issues can be included here.

G. Cost barriers

Describe the cost barriers for participants, including smaller participants, and recommendations for reducing these barriers.

H. Market/demand implications

Describe the potential U.S. and California offset supply, and the number of potential projects. A discussion of barriers to participation, other than cost could be included.

I. Joint development of projects

Describe how groups of project owners could jointly develop projects. The discussion should address how to lower project transaction costs for participants and enable a greater number of project owners to participate while protecting program integrity and transparency.

J. Leakage

Describe potential leakage associated with the project type and how it will be quantified and conservatively accounted for.
K. Perverse incentives

Describe potential perverse actions the project type may incentivize and their probability of occurring. A discussion of solution for any high likelihood perverse incentives should be included.

L. Jobs

Describe the project type’s effect on job creation.

M. Environmental Impacts

Describe potential environmental impacts of the project type. Using Section III of the linked Mine Methane Capture document (above) as an example, provide as much detail as possible on the Regulatory Settings, Beneficial Impacts, and Resource Area Impacts, including any potential Mitigation Measures.

III. MODIFICATION OF EXISTING COMPLIANCE OFFSET PROTOCOLS

For recommendations on modifications to existing Compliance Offset Protocols (COP), modify the new project type template (section II above) as follows:

Section A. May be skipped.
Section B. Describe the resources used to recommend modifications.
Section C. Describe the modifications to the project type.
For the remainder of the template describe how the modification may impact the specified category.

IV. REFERENCES

V. APPENDICES