

**COMMENTS TO THE CALIFORNIA AIR RESOURCES BOARD WHITE PAPER AND WORKSHOP (OCTOBER 28, 2015)
ON “2015 CAP-AND-TRADE WORKSHOP ON SECTOR-BASED OFFSETS”**

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NOVEMBER 16, 2015

MSU is leading the 2015 - 2016 GCF Project in Indonesia that includes all six Indonesian Member Provinces. The team from MSU also led the first GCF-Indonesia Project with East Kalimantan (2014 – 2015). Jay Samek attended the CA ARB workshop in Sacramento on October 28, 2015 and used that opportunity to provide feedback to the CA ARB, as well. The comments here reiterate much of what Mr. Samek said at the workshop, and, we hope, provide essential input as the CA ARB looks closely at the technical details required for implementing jurisdictional REDD+ projects internationally and the integration of such project GHG reductions as offset credit in the CA ARB cap-and-trade program.

REL: Reference Emission Levels

MSU recommends that the CA ARB look closely at the various implementation modalities for Reference Emission Level. The ROW recommendations suggest one method, a 10-year historic average. One alternative to the 10-year average is a linear trend extrapolation, and there are others. REL criteria should be clearly defined: time period for baseline analyses, pools of carbon included, definition of forest, level of data (Tier 1, 2 or 3 – as per IPCC), primary method and data used to determine activity data and emission factors. Method for determining emissions: stock-difference or gain-loss. Such specifics are mandatory if credible RELs are to be developed. Assigning a “one-size-fits-all” method to each country/jurisdiction, however, is not recommended. MSU would be willing to participate in any ARB technical workshop focused on REL.

MRV: Monitoring Reporting and Verification

The White Paper indicates the required us of a “stringent” measurement, monitoring, reporting and verification (MRV) system and reports that the ROW recommends an MRV process be transparent and include 3rd party verification (1 paragraph pp 27 – 28). The MRV presentation at the October 28th workshop only provided an example of the potential use of LiDAR data for measuring carbon. LiDAR does not offer an MRV system or process, it is only a tool for measuring carbon stock, and it has questionable operational capacity, particularly in the international context.

MSU recommends that the ARB review methods for quantifying activity data and establishing emission factors as well as identify potential operation protocols for assessing forest degradation and for monitoring deforestation and degradation. In addition, MSU recommends that the ARB broaden its view on MRV to align more closely with the International REDD Readiness efforts in GCF member states

and countries. MRV encompasses much more than simply measurement of carbon stock. MSU would be willing to participate in any ARB technical workshop focused on MRV.

Drivers of Deforestation and Degradation

The White Paper mentions the importance of drivers in the context of establishing the reference emission level and in the context of minimizing leakage. Underlying and proximate drivers of deforestation and forest degradation should be well documented, and more important, valid. Erroneous assumptions and conclusions regarding the drivers can, at the very least, undermine potential GHG reductions through planned interventions, and has the grave potential to cause great injustice to local people. The analyses of the drivers should be tied closely to the analyses identifying land use land cover changes and degradation used to determine reference emission levels. Methods that provide spatially explicit “hot spot” maps where deforestation and degradation occur are essential for assessing the drivers as well as identifying intervention strategies and then monitoring efficacy. MSU would be willing to participate in any ARB technical workshop focused on Drivers.

Safeguards

Perhaps the most challenging and important aspect of developing sector-based off sets is how social safeguards are handled. The White Paper indicates that the ROW recommendations ensure social safeguards are in place. As noted, reporting of safeguards, sustainable management, and non-carbon benefits of REDD should be addressed at COP 21. CA ARB should look closely at any forthcoming policy direction and consider how to develop policy-consistent, enforceable safeguards at the subnational level.

The White Paper and the ROW California-Acre-Chiapas Paper (Appendix A) mention REDD+ Social & Environmental Standards (SES) and other standards. Consistent implementation of standards will require robust detailed protocols, safeguards information systems, and capacity building. MSU would be willing to participate in any ARB technical workshop focused on Safeguards.