



Western Climate Initiative
c/o Western Governors' Association
1600 Broadway, Suite 1700
Denver, CO 80202
Attn: Janice Adair
Submitted via email to: westernclimate@gmail.com

Tuesday, October 07, 2008

Re: Proposal for WCI Offset Advisory Committee

Dear Chairwoman Adair, Co-chair Owens, and WCI Partner Representatives,

The Climate Trust believes that in order to develop a coordinated, comprehensive and effective greenhouse gas offset system as a part of the Western Climate Initiative, an Offset Advisory Committee ("Committee") should be established. Such a Committee would be comprised of a diverse cross-section of the offset market and would provide recommendations to the WCI partners on the design of a robust regional offset system.

This Committee would serve a *purely advisory role*, much as the Market Advisory Committee did for California in the AB 32 process. This committee would conduct its work in an open and transparent manner to ensure that stakeholders have the opportunity to provide input and additional expertise into the development of the recommendations. The end product would be a set of recommendations addressing a number of the most important technical issues facing WCI in the design of a robust and workable offset program.

The work of the Committee would take place in advance of the WCI program implementation over the next 12 to 18 months, and would involve a cross-section of government, non-profit and for-profit businesses active in the existing offset markets. A proposed Committee composition is presented in Table 1.

Table 1. Proposed Offset Experts Committee Representatives

- Government
- Non-Profit/Academic Organizations
- Offset Project Developers/Purchasers/Sellers
- Regulated Entities
- Financial Sector
- Protocol Specific Experts (as necessary)



The Climate Trust believes the proposed committee would be well-suited to provide valuable input to the WCI members by:

- Recommending how to best structure a WCI compliance offset system and regional administration process, including providing analysis and recommendations regarding the integration of various member jurisdiction regulatory frameworks and requirements into the regional system.
- Evaluating the advisability of, and if appropriate, recommending mechanisms for offset system linkage and harmonization between existing regulatory offset programs such as the Clean Development Mechanism and Joint Implementation under the Kyoto Protocol, as well as the Regional Greenhouse Gas Initiative, the Midwestern Climate Accord and other state and province-established offset programs including California's AB 32, and the Oregon and Washington carbon dioxide standards.
- Recommending an initial list of offset project types and protocols for inclusion in the WCI offset program, as well as a process that allows new project types and protocols to be added to the WCI offset system.
- Providing guidance on the selection and synthesis of protocols, particularly in areas where more than one protocol exists for a specific offset project type or sector and on the integration of different standards across offset systems.
- Recommending a process for regularly scheduled, periodic review and evaluation of the overall WCI offset program, as well as its protocols and methodologies, to ensure that they are as accurate and up to date as practicable.
- Recommending a process for establishing certification requirements and monitoring and third party verification procedures.

Capitalizing on the extensive experience and knowledge of the existing GHG offset market will assist the WCI in developing a robust, comprehensive, and adaptable compliance offset system. This in turn could play an important role in shaping a national regulatory GHG offset program.

We appreciate your consideration of this proposal, as well as your dedication to make the Western Climate Initiative a successful platform for reducing greenhouse gas emissions in the West. Please do not hesitate to contact me or Alexia Kelly, policy program manager at The Climate Trust (akelly@climatetrust.org) for additional information.



Cc: All members of the WCI Offset Subcommittee

Sincerely,

A handwritten signature in black ink that reads "Mike Burnett".

Mike Burnett, Executive Director
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