



May 4, 2026

Ms. Rajinder Sahota
Deputy Executive Office
California Air Resources Board

Electronic Submittal: [First 15-day Regulatory Docket](#)

The Verified Emission Reduction Association (VERA) is appreciative of the opportunity to comment on the initial 15-day amendment package to the Cap-and-Invest Program (Program).¹ CARB's continued support and efforts to improve the Compliance Offset Program are also recognized. Compliance offsets have always been additive to the regulatory components of the broader market-based program by providing additional, real, enforceable, permanent, and quantifiable GHG reductions through a transparent price on carbon. These AB 32 mandated criteria have always been seen as the standard with which all creditable compliance-grade emission reductions have been judged.

VERA is a coalition of individual companies with vast experience in achieving GHG reductions for cost-effective use as compliance offsets in California's Cap-and-Invest Program. Our members have been developing projects that meet AB 32's stringent standards from the Program's inception.²

We strongly support California's efforts to reduce statewide GHG emissions through a market-based program, including the use of high-quality compliance carbon offsets. VERA also supports the staff effort to update the offset program rules in the name of efficiency and integrity using a robust stakeholder process where public engagement is valued and encouraged. Compliance offset development is a detailed task requiring teamwork, trust, and fortitude, by both developers and CARB, to get a project across the finish line and secure creditable reductions.

The 15-day package released on April 14, 2026 reflects several of the updates requested by VERA in our ISOR comment letter.³ These changes were taken after discussions and stakeholder input, and include:

- Effective date clarity as it relates to various offset provisions;
- Correctable Errors definition and text consistency;
- Clarification on DEBs designation through the verification process, rather than uncertain revocation timing which potentially included already verified and issued offsets; and
- Notice of offset verification services for offset projects timing adjustment;

¹ <https://ww2.arb.ca.gov/rulemaking/2026/cap-and-invest2026>

² VERA members include: Anew Climate, ClimeCo, New Forests, The Climate Trust, A-Gas, 3Degrees, and NextERA

³ https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid377/did200184/oid_213315/assets/attachments/83043/110ci17fk3w_document.pdf?v=37381

VERA supports these changes, and is appreciative of the time staff spent understanding our feedback

There was, however, a broader topic area where the 15-day package diverged from VERA recommendations. We believe that staff's attempt to improve aspects of the rule with respect to forest projects has fallen short, both in terms of outcomes and public process. It has been almost two years since CARB asked for developer (public) input on these issues. The last workshop was in April of 2024 where only high-level "initial concepts" were presented without sufficient details to see their actual impacts.⁴ Presenting a set of detailed, significant, and wide-ranging changes for the first time in a 45-day package is problematic. This timing does not allow a venue to work through the minutiae of something as complex as a compliance offset protocol, forestry or otherwise. Public comments within a 45-day, or 15-day, package are constrained at best, and too late at worst to be effective.

As an organization, VERA's main objective is to promote and protect the broader policy framework associated with implementation of all CARB's offset protocols. Our 45-day ISOR comments discussed this issue of process, focusing on the need for rulemaking over ad-hoc guidance documents to change policy. An important corollary is at play here—that the rulemakings, and protocol updates, need to be robust and of sufficient time to allow for meaningful dialogue *prior* to entering into formal rulemaking documents, where even necessary changes are difficult to achieve.

In terms of details, VERA supports and defers to our individual forestry developer comment letters regarding the actual details and proposed changes impacting the Forest Offset protocol. VERA strongly disagrees with any assertion that sufficient process was conducted for changes of this significance, and therefore recommends an additional opportunity for impacted stakeholders to address their concerns before this portion of the rulemaking is finalized.

Conclusion

We would like to thank you for your consideration of these comments and look forward to working together to finish this rulemaking and to start on the next phase of the Program, including SB 840 required protocol updates. VERA can be reached through Jon Costantino at Tradesman Advisors, via email at jon@tradesmanadvisors.com.

Sincerely,

/s/

Jon Costantino
on behalf of VERA

⁴ https://ww2.arb.ca.gov/sites/default/files/2024-04/nc-CapTradeWorkshop_Apr232024_1.pdf