

[Solve Climate](#) has posted a letter from five state Attorneys General expressing concerns about several provisions of Waxman-Markey (a/k/a ACES). One suggestion they made, in particular, struck me as very persuasive:

[T]he House bill does not require public disclosure of all offset project documentation, including project eligibility applications, monitoring and verification reports for agricultural or forestry offset projects, or disclosure of USDA's determination of the quantity of GHGs that have been offset by such projects, even though this is required for other types of offsets. In the absence of such disclosure, it is impossible for members of the public, states, and other interested parties to know how credible the offset claims are. The lack of certainty about the integrity of these offsets is also likely to lead them to be valued lower by the market.

Indeed, I would go further and mandate that the relevant documents be available on-line in a central repository and linked to a GIS (Geographic Information System) so it would be easy to find individual offset projects and track where those projects are taking place. Without this kind of transparency, it's hard to see how the system can maintain credibility.