



SB 27 CALIFORNIA CARBON SEQUESTRATION AND CLIMATE RESILIENCY PROJECT REGISTRY

FREQUENTLY ASKED QUESTIONS (FAQ)

This FAQ will be updated overtime to reflect the current status of the SB 27 California Carbon Sequestration and Climate Resiliency Project Registry.

WHAT IS SB 27?

Senate Bill 27 (Skinner, 2021) requires the California Natural Resources Agency (CNRA) to develop a registry of natural and working lands projects that drive climate action in California and are seeking funding.

WHAT IS THE REGISTRY AND HOW CAN IT BE HELPFUL TO ME?

A key component of the Registry will be a website that catalogs project information. While this component is still under development, we do not expect that the Registry will just be a list of projects. Rather, we anticipate it will be an interactive, spatially explicit tool that allows users to sort according to project location, project type, project duration, project benefits, project proponent (ex. California Native American tribe) and estimated amount of carbon removal benefits the project will achieve, for example. Users should then be able to click on a project link to see more detailed information describing, for example, the methods used to estimate the project's activities, carbon removal benefits, and project cost, among others. The Registry aims in part to connect project proponents with potential funders.

WHAT PROJECTS ARE ELIGIBLE FOR LISTING ON THE REGISTRY?

Natural and working lands projects and direct air capture projects are eligible for listing on the Registry. Natural and working lands projects include actions

such as those contained in the [Natural and Working Lands Climate Smart Strategy](#), [California's Climate Change Scoping Plan](#), and the [California Climate Adaptation Strategy](#).

WHY ARE NATURAL AND WORKING LANDS PROJECTS IMPORTANT?

Reducing emissions in transportation, industry and buildings are not enough to help avert catastrophic climate change – lands must be part of the climate solution. Our lands are a critical yet undervalued sector in California's urgent effort to achieve carbon neutrality and build resilience to the impacts of climate change. Healthy landscapes can sequester and store carbon, limit future greenhouse gas emissions into the atmosphere, protect people and nature from the impacts of climate change, and build resilience to future impacts of climate change.

HOW CAN A PROJECT BE LISTED ON THE REGISTRY?

SB 27 provides two paths by which projects can be listed on the Registry.

- The first path (Pathway A) allows projects to be listed if they applied for, and met all requirements for, programs funded from the Greenhouse Gas Reduction Fund (GGRF) or other funding sources, but were not funded due to a lack of sufficient funding. Projects that sought state funds will be subject to further minimum requirements set by CARB.
- The second path (Pathway B) allows proponents of projects in California to apply to CNRA to have a project listed on the Registry. SB 27 includes several minimum criteria for projects to be listed under this path, including quantification of expected carbon removal benefits and monitoring and reporting.

WILL MONITORING AND TRACKING INFORMATION BE REQUIRED FOR PROJECTS FUNDED THROUGH THE REGISTRY?

Yes. To be listed on the Registry, project proponents must indicate they will monitor and report carbon removal benefits once a project is funded.

CAN PROJECTS ON THE REGISTRY BE USED FOR CEQA MITIGATION?

The California Environmental Quality Act, or CEQA, requires that all public agencies consider the potential adverse environmental impacts of proposed projects, and to mitigate those impacts if they are significant. The CEQA Guidelines specifically require analysis and mitigation of project-related greenhouse gas emissions. They further state that measures to mitigate such impacts may include “[m]easures that sequester greenhouse gases.” CNRA cannot deem whether projects listed on the Registry serve as appropriate mitigation pursuant to CEQA. Rather, lead agencies must determine what is appropriate CEQA mitigation. The information required for projects to be listed on the Registry may provide evidence that a lead agency might use to assess which projects would serve as appropriate CEQA mitigation.

CAN PROSPECTIVE PROJECTS BE FUNDED BY MULTIPLE FUNDERS?

Yes, SB 27 states that CNRA may assign project value proportionally across multiple project funders.

IS CNRA CREATING OR CERTIFYING “CREDITS” FOR FUNDED PROJECTS?

No, projects listed on the Registry will have successfully met all requirements called for in SB 27. The information provided would allow funders to conduct their own due diligence and evaluate project opportunities according to any additional criteria/requirements they may have.

CAN PROJECTS LISTED ON THE REGISTRY BE USED TO CREATE CREDITS FOR CALIFORNIA'S CAP-AND-TRADE MARKET?

SB 27 prohibits projects listed on the Registry from creating credits for market-based compliance mechanisms developed or administered by CARB pursuant to the California Global Warming Solutions Act of 2006. Projects listed on the Registry also cannot be used by any state or private entity to offset a statutory or regulatory obligation to reduce emissions under that Act.

HOW CAN I GET INVOLVED AND WHO CAN I CONTACT WITH ANY QUESTIONS?

CNRA released a pre-rulemaking document, a [Concept Discussion Draft](#) regarding SB 27 (Skinner, 2021) implementation for public review. Comments can be submitted electronically to naturebasedsolutions@resources.ca.gov with the subject line "SB 27 Concept Discussion Draft Public Comment" by May 30, 2023. The Concept Discussion Draft contains two appendices, [Appendix A: Draft Regulation](#) and [Appendix B: Illustrative Eligible Projects](#). CNRA will be hosting a public workshop on the Concept Discussion Draft on May 9, 2023, at 5:30pm. Public workshop registration information can be found [here](#). Please contact naturebasedsolutions@resources.ca.gov with any further questions.