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17 August 2022

Harold Green  
Global Emissionary, LLC  
162 Lafayette Avenue  
Laurel, MD 20707

Dear Harold Green,

**Project 3094: Response to the exemption submitted on 15 August 022.**

Verra grants the exemption from Section 3.7.1 of the *VCS Standard, v4.2*, to Project ID 3094 as unforeseeable circumstances outside the project's control and a miscommunication on the project start date and validation deadline delayed project validation.

**Next steps:**

Project 3094 must complete validation before 21 April 2023 failing which the project will not be eligible for registration.

Exemptions are granted by Verra on a case-by-case basis and do not form the basis of or set a precedent for future exemption request approvals or denials. This letter will be uploaded to the Verra Registry as a public document.

**Background to the exemption request:**

Global Emissionary, LLC (the project proponent) is requesting an exemption from Section 3.7.1 of the *VCS Standard, v4.2* for the "Foam Stabilized Base and Emulsion Asphalt Mixture Pavement Projects" (No ID 3094). Below is a list of relevant project dates and deadlines:

- Project Start Date: April 21, 2018 (the date that asphalt installation began)
- Validation Deadline: 21 April 2022
  - Project 3094 applied the new methodology VM0039, which was approved within two years of the project start date. Per *VCS Section 3.7.1, v4.2*, validation thus must be completed within 4 years of the project start date.
- Validation Date: Not yet validated.

Based on the information provided to Verra, it is understood that Projects ID 3094 is unable to meet the requirement to complete validation within four years of the project start due to unexpected delays caused by COVID-19 pandemic. Additionally, confusion about the correct project start date and thus the validation deadline, lead the project proponent to believe they had till 21 April 2023 to complete validation. This was clarified and corrected by Verra in August 2022 when the project requested listing on the VCS pipeline.

Sincerely,

Tanushree Bagh Mukherjee  
Director, VCS Program Management  
Verra