



CHANGE THE FORECAST FOR WILDLIFE
SOLUTIONS TO GLOBAL WARMING

January 11th, 2010

Mary Nichols
Chairman
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Nichols,

The National Wildlife Federation appreciates the opportunity to comment on the Preliminary Draft Regulation for a California Cap-and-Trade Program published on November 24th, 2009. National Wildlife Federation has over 4 million members, partners and supporters nation-wide, and is among the primary environmental organizations in the United States addressing the critical need for instituting domestic and international forest protection policies for an effective climate change solution. The loss of our planet's tropical forests contributes approximately 15 percent of annual global greenhouse gas emissions. As an organization with 111,918 active members and supporters in California, we recognize that we cannot win the fight against climate change without addressing emissions from global deforestation.

National Wildlife Federation commends the California Air Resources Board (ARB) for its continued leadership in advancing California's landmark climate legislation. Our organization applauds California's exceptional efforts to create the Governors' Climate and Forests Task Force and work with other states in the U.S., Brazil and Indonesia to tackle greenhouse gas emissions from tropical forest loss. Our organization supports California's efforts to include international forestry efforts, including Reducing Emissions from Deforestation and Degradation in Developing Countries (REDD), into the overall framework of the proposed Cap-and-Trade Program.

National Wildlife Federation urges the ARB to ensure that effective environmental and social safeguards are included in the REDD language of the California Cap-and-Trade Program, along the lines of the provisions included in the U.S. House of Representatives H.R. 2454 American Clean Energy and Security Act, and the Senate Clean Energy Jobs and American Power Act S. 1733. Our organization recommends consideration of the Climate, Community & Biodiversity Standards (CCBS) to validate and verify the social and environmental benefits of forest carbon projects, and to guarantee that



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responsible safeguards are included in California's planning of carbon credits generated by REDD programs abroad.

Our organization would like to simultaneously urge the ARB to ensure that the quantity of offset allowances potentially included in the California Cap-and-Trade Program does not significantly reduce incentives for large-scale emissions reductions from regulated sectors in California. The international offset provisions in the preliminary Draft Regulation for a Cap-and-Trade Program could achieve dramatic gains in the reduction of global warming pollution, however this must be appropriately balanced to maintain a reasonable price for carbon that will ensure a transition to low-carbon energy development in future market incentives for California. Our organization also encourages the ARB, as it structures the proposed climate Program, to ensure that any provisions for offsets specifically include measures to benefit air quality in communities suffering from disproportionate levels of pollution within California.

National Wildlife Federation commends California for its pioneering efforts to initiate state action to stop global deforestation and address climate change by including tropical forests under the international offset provisions of its Cap-and-Trade Program. Such a program could help protect California jobs by reducing illegal logging and other forms of forest conversion overseas that result in producing goods that compete in the global market with Californian foresters, farmers, and ranchers. At the same time, it could set an essential example for the rest of the country in pursuing equitable and effective solutions to global climate change.

Respectfully,

Barbara Bramble
Senior Advisor for International Affairs
National Wildlife Federation