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Jason Gray
Branch Chief, Climate Change Program Evaluation Branch
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Pacific Gas and Electric Letter of Support on Draft California Tropical Forest Standard

Dear Mr. Gray,

Pacific Gas and Electric Company (PG&E) would like to thank the California Air Resources Board (ARB) for its leadership role in addressing climate change as a global problem. As the recent Intergovernmental Panel on Climate Change (IPCC) Report on Climate Change Mitigation¹ finds, forests are a critical part of limiting climate change and they provide one of the only readily available, cost-effective means of carbon sequestration at scale. Establishing the Tropical Forest Standard (TFS) is an important step to reducing global GHG emissions from deforestation. This is a critical time for our tropical forests, in particular the Amazon, and endorsement of the TFS can help mitigate some of the economic drivers behind deforestation (including clearing by fire) by sending a strong signal that there is value in standing forests. PG&E strongly supports ARB's efforts to set this standard and recommends Board adoption.

Nearly a decade of work from both the Governor's Climate and Forests Task Force and Reducing Emissions from Deforestation and Degradation (REDD) Offset Working Group has gone into developing this robust standard, which sets a high bar for safeguards and stringency. PG&E has been, and remains, a strong proponent of high-quality offsets as real GHG emission reductions and believes this standard supports the development of large-scale rainforest credit programs while maintaining rigorous environmental and social standards. We support the simple and clear mechanisms included to mitigate risk and ensure that the reductions are robust and permanent, which is critical to the sustainability of the global rainforest credits market. PG&E also appreciates the updates that add clarity, accountability, and strength to the proposed standard made by ARB staff based on meaningful feedback from stakeholders, including environmental justice and tribal organizations.

¹ Intergovernmental Panel on Climate Change Report: Climate Change 2014: Mitigation of Climate Change available at: https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_wg3_ar5_summary-for-policymakers.pdf

In a letter from the California Legislature June 2019², Assembly Members [which?] Eduardo Garcia, Richard Bloom, Ash Kalra, and Eloise Gomez Reyes recommended that ARB endorse the TFS to complement other existing State policies for emission reductions. PG&E supports the signal this letter provides as we believe the ARB plays an important role in climate leadership and its actions to accelerate innovative policies and strategies will only aid in achieving our ambitious climate resilience goals.

PG&E continues to support the programs and standards that will help the State meet its aggressive environmental goals while maintaining a healthy, thriving economy. Thank you for the opportunity to engage on this important issue.

Sincerely,

/s/

Jessica M Melton

² California Legislature letter to Chair Nichols regarding Tropical Forest Standard: <http://ed.pr-optout.com/ViewAttachment.aspx?EID=QgRBF3g80yLm1qY3hMRNI83oCfQ5PIUhGbs62Hb3Kyw%3d>