



August 29, 2019

Chair Mary Nichols  
California Air Resources Board  
1001 I Street  
Sacramento, California

Electronic submittal: <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: Updated California Tropical Forest Standard

Dear California Air Resource Board:

Greenpeace USA would like to formally express our strongest opposition to the Updated California Tropical Forest Standard (Updated Standard) and the specific criteria California Air Resources Board (CARB) has set forth for linking a jurisdictional sector-based crediting program to reduce emissions from tropical deforestation with an emissions trading scheme.

Greenpeace USA employs scientists and issue experts in our quest to protect forests, oceans, our climate and our democracy. Millions of people around the world have taken action with Greenpeace offices in a shared quest for a green and peaceful world. Greenpeace's evaluation of the Updated Standard is grounded in both impacts we are observing in California, as well as what Greenpeace offices have documented *in situ* in tropical forest regions where tropical forest carbon offset projects have been attempted.

We submitted a comment letter during the public comment period of the Draft California Tropical Forest Standard in Fall 2018. Much of our detailed opposition is still relevant as the updates to the standard have been cosmetic at best, providing no structural changes, providing no additional assurances and in no way addressing our previous concerns. We submit this detailed opposition for the record yet again, as an addendum to this letter.

We urge CARB to abandon the Updated Standard and once and for all halt development of any elements of a future international, sector-based forestry offset program, especially for linkage with California's or any other cap and trade program. Instead, attention should be devoted to urgently and dramatically reduce emissions at the source and transition California to a clean energy economy.

In November of 2018, CARB delayed a vote on this issue given substantial opposition displayed before and during the public hearing in Sacramento. This letter outlines some of the developments that have occurred in the last nine months and how none of them provide any amount of certainty or credibility to the Updated Standard. The sooner CARB realizes that devoting more hours and days and years to this idea of international forest offsets is doomed to fail, the sooner real progress can be made on legitimate climate protection.

One of the largest environmental moments of the last nine months is undoubtedly the fires that are currently burning in the Amazon. These fires not only highlight the lack of assurances that the Updated Standard can make around permanence, but it also highlights how fragile the government programs are that the Updated Standard relies. Fires in the Brazilian Amazon are up more than 80% from last year.<sup>1</sup> This has been linked to the anti-environmental policies of the new Jair Bolsonaro administration, including undermining longstanding environmental enforcement institutions and threatening transparent monitoring of deforestation. His administration's radical shift pulls into question whether or not we can count on any tropical forest offset project to remain standing.

If one election can usher in such radical substantial changes to the transparency and political process, then no carbon credits can promise any reasonable amount of permanence and no government can be reasonably expected to run effective jurisdictional programs under the Updated Standard for any sustainable length of time. We need tangible reductions in greenhouse gas emissions and not vulnerable wishful thinking.

Proponents of the Updated Standard and REDD in general will argue that the situation in the Amazon provides evidence for the passage of the Tropical Forest Standard. Recently, Norway and Germany had to freeze funds to Brazil intended for Amazon forest conservation.<sup>2</sup> These funds were not only unable to prevent the dismantling of forest protection underway in Brazil, but this move begs the question what would happen in the offset context when the offset carbon has already been emitted?

In May 2019, academic researchers found that California's own forestry offset protocol had inflated the amount of emissions reductions that had occurred. While experts on both sides are still debating the extent of inaccurate assumptions around baselines and leakage rates, the outcome is still the same -- if this type of uncertainty at best, and error at worst, can take place in California, what assurances can CARB reasonably rely on that they won't happen with projects in other jurisdictions? We know that polluters who will buy these credits will absolutely be polluting more, but we have nowhere near the same assurance that the emissions reductions under the Updated Standard will be present or permanent.

The Green Finance Observatory also published a report about unresolvable issues with carbon markets that highlights their vulnerability and thus inability to ever meet their environmental objectives.<sup>3</sup> Scientific uncertainty, high regulatory risk and poor environmental integrity in many areas of these markets translate into a high risk of rule changes and abrupt repricing, while seriously drawing questions about their ability to meet their objectives.

In April 2019, EU lawmakers also urged CARB to reject the Updated Standard. They argued that "the TFS would water down climate ambition in California..." and that it would "replace real emissions reductions with the purchase of credits that at best do little to address climate change and at worst lead to increased emissions and human rights violations on the ground."<sup>4</sup> This

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<sup>1</sup> <https://abcnews.go.com/International/experts-explain-brazilian-wildfires-devastating-save-rain-forest/story?id=65194500>

<sup>2</sup> <https://www.reuters.com/article/us-brazil-environment-norway/norway-stops-amazon-fund-contribution-in-dispute-with-brazil-idUSKCN1V52C9>

<sup>3</sup> <https://greenfinanceobservatory.org/wp-content/uploads/2019/03/50-shades-carbon-final.pdf>

<sup>4</sup> <http://carbon-pulse.com/73673/>

dramatic and clear language from these lawmakers should cause CARB the utmost caution and further cast doubt on the Updated Standard.

Investigative journalists also looked at forest carbon offset projects going back two decades around the world, using on the ground visits, academic articles, government reports, technical documents, and satellite imagery. “In case after case, [they] found that carbon credits hadn’t offset the amount of pollution they were supposed to, or they had brought gains that were quickly reversed or that couldn’t be accurately measured to begin with. Ultimately, the polluters got a guilt-free pass to keep emitting CO<sub>2</sub>, but the forest preservation that was supposed to balance the ledger either never came or didn’t last.”<sup>5</sup> This is real historical data and CARB has not done enough to ensure the Updated Standard will not follow the same failed path.

More than 100 groups sent a clear message of opposition to oil giants Shell and Eni’s plans to use forest credits to offset some of their carbon emissions.<sup>6</sup> This clear market signal that huge polluters will jump on the chance to use these forest offset credits means that the harm to local California communities where pollution will continue and grow is not hypothetical. This harm to human health is real while the credits these polluters will buy are shrouded in uncertainty and opposition.

These academic, journalistic and civil society contributions to the debate around the Updated Standard have filled the last nine months, since the last CARB hearing on the Draft Standard, with more and more evidence that CARB should abandon the Tropical Forest Standard all together. However, the flawed stakeholder process in the California Legislature and its outcomes are an even more powerful signal that the Updated Standard must be rejected. During the November CARB hearing, a clear signal was sent that CARB would like a public hearing of California’s Joint Legislative Committee on Climate Change Policies to take place in order to address this issue. However instead of that process, essentially one Assemblymember organized a deeply flawed, exclusive and shallow stakeholder process. The failure of this more formal process, means that the deep divisions, scientific debate, uncertainty and emotions that were on full display during the November 2018 CARB hearing, have only grown over the last nine months.

Additionally, while the outcome of the stakeholder process was essentially a greenlight to CARB to move forward, there was deep caution in that approval, along with clear guidance that CARB would need to exercise “vigorous and proactive monitoring” of the implementation of the Updated Standard, in order to provide even the minimal assurances that the offsets are valid. Is California ready and willing to engage in such monitoring of all jurisdictions and trading schemes that use the Tropical Forest Standard outside of California? If the answer is not a firm yes, then the Updated Standard must be rejected. Additionally, the letter that Senator Wieckowski sent to CARB in opposition of the Updated Standard also provides clear evidence

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<sup>5</sup> <https://features.propublica.org/brazil-carbon-offsets/inconvenient-truth-carbon-credits-dont-work-deforestation-redd-acre-cambodia/>

<sup>6</sup> <https://redd-monitor.org/2019/05/14/ngos-oppose-the-oil-industrys-natural-climate-solutions-and-demand-that-eni-and-shell-keep-fossil-fuels-in-the-ground/>

that the California legislature is split on this issue – much like the scientific and environmental communities.<sup>7</sup>

The last nine months, along with the updates made to the Draft Standard, have done nothing to validate CARB moving forward with the Tropical Forest Standard nor address fundamental efficacy concerns outline below. For this and all of the reasons in the addendum to this letter, we urge CARB to abandon the Updated Standard and once and for all halt development of any elements of a future international, sector-based forestry offset program, especially for linkage with California’s cap and trade program or any other emissions trading system including CORSIA. And to be clear, Greenpeace fully supports other global efforts to reduce deforestation and forest degradation, as well as calls for reforestation. If protection of the forest is a goal, there are real tested concepts that are working today that do not involve unproven offsets.

Sincerely,



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<sup>7</sup> <https://carbon-pulse.com/80536/>

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# Addendum

October 29, 2018

Chair Mary Nichols  
California Air Resources Board  
1001 I Street  
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Electronic submittal: <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: Draft California Tropical Forest Standard

Dear California Air Resource Board:

Greenpeace USA would like to formally express our opposition to the Draft California Tropical Forest Standard (Draft Standard) and the specific criteria California Air Resources Board (CARB) has set forth for linking a jurisdictional sector-based crediting program to reduce emissions from tropical deforestation with an emissions trading scheme. Greenpeace USA employs scientists and issue experts in our quest to protect forests, oceans, our climate and our democracy. Millions of people around the world have taken action with Greenpeace offices in a shared quest for a green and peaceful world. Greenpeace's evaluation of the proposal is grounded in both impacts we are observing in state as well as what Greenpeace offices have documented *in situ* in tropical forest regions where tropical forest carbon offset projects have been attempted.

We urge CARB to abandon the Draft Standard and finally halt development of any elements of a future international, sector-based forestry offset program, especially for linkage with California's cap and trade program. Instead attention should be devoted to urgently and dramatically reduce emissions at the source and transition California to a clean energy economy. This letter outlines the numerous reasons why the Draft Standard must not be allowed to move forward.

## **Offsets of any kind are counterproductive to the urgent action needed on climate change**

The IPCC Special Report on Global Warming of 1.5°C, released on October 8, 2018, establishes that urgent, dramatic and unprecedented changes to all aspects of our society is needed now, if the planet has any hope of avoiding the catastrophic impacts of climate change.<sup>8</sup> This level of urgency is fundamentally noncompliant with the concept of carbon emission offsets of any kind, but especially to jurisdictional international forest offsets. The best scientists in the world are

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<sup>8</sup> Intergovernmental Panel on Climate Change. (2018). Climate Change of 1.5 Degree Celsius. <http://www.ipcc.ch/report/sr15/>

telling us in no uncertain terms that we need to dramatically curb greenhouse gas emissions AND immediately bring down deforestation rates around the world. We do not have the luxury to choose between the two. We cannot simply allow polluters to keep on polluting and hope that forests in a far away place will make that ok. The numbers just do not add up. They don't add up for California and they don't add up globally.

### **Jurisdictional forestry offset projects are unlikely to ever actually secure lasting climate benefits**

While offsets as a whole are inherently problematic to the goal of avoiding catastrophic climate change, jurisdictional forestry offset projects have a number of unique, significant and yet unsolved issues. CARB staff has been working on developing this standard for nearly a decade, but there is a reason it has taken so long and why no one else in the world has done it yet. It is complex, including elements related to sector-based crediting program scope, reference levels, crediting baselines, reporting requirements, reversals, leakage risk, credit tracking, verification, and social and environmental safeguards. Many of these issues are tackled in the Draft Standard, but not adequately addressed. Many of the the alleged 'solutions' to these issues, as proposed in the Draft Standard, have been tried and to date have done very little to actually resolve the fundamental and inherent problems with forestry offset projects. And even if real solutions were found to these complexities, forestry offset projects do nothing to address the real drivers of deforestation and do nothing to combat natural forest disturbances, such as fires, droughts and pests, that can overwhelm and invalidate any human-induced emission reduction actions.

There has yet to be one forestry offset project proven to reduce greenhouse gas emissions with permanence, additionality and no leakage, while CARB seems to ignore the countless examples of the inadequacies of forest offset projects to date. Even the project previously heralded as exemplary by CARB in your 2015 white paper,<sup>9</sup> the Uddar Meanchey project in Cambodia, has since been extensively documented to have failed to meet objectives, to the point that private company partners no longer will buy its credits.<sup>10</sup>

Ultimately, end-of-pipe greenhouse gas emissions are certainties with permanent harm, while forest carbon credits are uncertain, often temporary, and rife with other intractable problems. No jurisdiction in the world accepts forestry credits into its compliance market, and there is a very real reason for this. In the end, the aggregation of projects that have failed to deliver real climate benefits deems further development of these projects to simply be unsound public policy.

### **International offsets exacerbate environmental harms on the most disadvantaged communities in California.**

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<sup>9</sup>California Air Resources Board. (2015). Staff White Paper: Scoping next steps for evaluating the potential role of sector-based offset credits under the California Cap-and-trade Program, including from jurisdictional 'reducing emissions from deforestation and degradation' programs.

<https://www.arb.ca.gov/cc/capandtrade/sectorbasedoffsets/ARB%20Staff%20White%20Paper%20Sector-Based%20Offset%20Credits.pdf>

<sup>10</sup> Fern. (2017). Unearned Credit: why aviation industry forest offsets are doomed to fail.

[https://fern.org/sites/default/files/news-pdf/Unearned%20Credit\\_0.pdf](https://fern.org/sites/default/files/news-pdf/Unearned%20Credit_0.pdf)

Even if CARB will not immediately be able to link its jurisdiction-scale forestry programs to California's cap and trade, that is clearly the ultimate intent. The first sentence of the Draft Standard admits the goal is to link sector based projects with "an emissions trading system (ETS), such as California's Cap-and-Trade Program."<sup>11</sup>

Allowing an international offset program will by definition increase emissions in California by allowing big polluters to release more greenhouse gases and other pollutants. A July 2018 peer reviewed, scientific journal article evaluated the impacts of California's Cap and Trade Program and it found that after it was implemented, most regulated local facilities, not only increased their greenhouse gas emissions, but a majority also increased their particulate matter, volatile organic compounds and air toxic emissions during this time period.<sup>12</sup>

In regular evaluations of air quality in the US, cities in California overwhelmingly are found at the tops of the lists for different pollutants.<sup>13</sup> International offsets linked to California's Cap and Trade Program will only make many of these communities' bad air quality even worse. Local residents will pay the highest price as human health impacts from air quality are well documented.<sup>14</sup>

These impacts however are not shared equally. The same peer reviewed scientific article evaluating California's Cap and Trade, also found that the neighborhoods closest to the facilities that increased their greenhouse gas and co-pollutant emissions after Cap and Trade was implemented, had higher proportions of people of color, and higher proportions of poorer, less educated, and linguistically isolated residents, as compared to neighborhoods further away from these facilities.<sup>15</sup>

The result is clear. The Draft Standard when linked to any emissions trading system, including California's Cap and Trade Program, will disproportionately impact disadvantaged communities. In Richmond for example, an incredible majority of the people living within a kilometre of Chevron's refinery are people of color. Thus the vast majority of the people that Chevron's increased pollution will impact, will be people of color. And that's exactly what environmental racism looks like.

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<sup>11</sup> California Air Resources Board. (2018) California Tropical Forest Standard. Page 3.

[https://www.arb.ca.gov/cc/ghgsectors/tropicalforests/draft\\_ca\\_tropical\\_forest\\_standard.pdf](https://www.arb.ca.gov/cc/ghgsectors/tropicalforests/draft_ca_tropical_forest_standard.pdf)

<sup>12</sup> L. Cushing, et. al. (2018). *Carbon Trading, Co-Pollutants, and Environmental Equity: Evidence from California's Cap-and-Trade Program (2011-2015)*. PLoS Med 15(7).

<http://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1002604#sec016>

<sup>13</sup> American Lung Association. (2018). State of the Air 2018. [http://www.lung.org/local-content/california/documents/state-of-the-air/2018/sota-2018\\_ca\\_\\_most-polluted.pdf](http://www.lung.org/local-content/california/documents/state-of-the-air/2018/sota-2018_ca__most-polluted.pdf)

<sup>14</sup> Environmental Protection Agency. (n.d.). Managing Air Quality - Human Health, Environmental and Economic Assessments.

<https://www.epa.gov/air-quality-management-process/managing-air-quality-human-health-environmental-and-economic>

<sup>15</sup> L. Cushing, et. al. (2018). *Carbon Trading, Co-Pollutants, and Environmental Equity: Evidence from California's Cap-and-Trade Program (2011-2015)*. PLoS Med 15(7).

<http://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1002604#sec016>



It is time for California to become a real leader on climate and public health issues rather than one seeking to provide its most polluting industries with yet another loophole to continue to perpetuate very real harm on local disadvantaged communities and to our global climate.

**The Draft Standard means local communities and Indigenous People will face enormous impacts at best and human rights violations at worst.**

Real world implementation of projects aimed at reducing emissions from deforestation and degradation has been taking place around the world for almost a decade. The risks to local communities and Indigenous Peoples in the locations of these projects is not theoretical, it is proven. These projects have brought coercion, violence, lost livelihoods, reduced food security, restrictions from traditionally and culturally important lands and forced evictions.<sup>16</sup> The displacement these projects can bring to local and indigenous communities carries enormous human consequences.<sup>17</sup>

Now, CARB has attempted to include some social and environmental safeguards into the Draft Standard to mitigate these well documented impacts, however they are far too vague, weak and hard to enforce, rendering them unable to mitigate the very real risk of human rights abuses.

The vague requirement for consultation in the Draft Standard is nowhere near the fundamental and internationally recognized right that Indigenous People and local communities have to Free Prior and Informed Consent (FPIC). Briefing local people about the project, setting up a website and getting input on design is not the same thing as formally requiring that local people are not only informed, but are done so free of coercion and that they can give or withhold their consent to changes on their land. All of the criteria outlined in the Draft Standard are well intentioned, but are fundamentally flawed without the paramount status of consent.

However it is important to point out that even if CARB were to amend the social and environmental safeguards to include FPIC and other more clear and stringent requirements, there would still be unacceptable levels of risk of corruption, conflicts of interest and human rights abuses that California certainly cannot police. How will social safeguards of any strength be enforced and monitored by each jurisdiction? The remote forest locations for these projects at a very minimum will make monitoring, enforcement and verification nearly impossible. Not to mention that true local participation and empowerment could only come from ideal local governance processes and a history of fundamentally open and participatory land-use planning processes at the national level; not once have such conditions been in place during the implementation of a forest offset project and it is impossible to believe they will in the future.

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<sup>16</sup> World Rainforest Movement. (2015). REDD: A Collection of Conflicts, Contradictions and Lies. [https://wrm.org.uy/wp-content/uploads/2014/12/REDD-A-Collection-of-Conflict\\_Contradictions\\_Lies\\_expanded.pdf](https://wrm.org.uy/wp-content/uploads/2014/12/REDD-A-Collection-of-Conflict_Contradictions_Lies_expanded.pdf)

<sup>17</sup> Friends of the Earth. (2017). REDD+, The Carbon Market and California-Acre-Chiapas Cooperation: Legalizing Mechanisms of Dispossession. [https://www.foei.org/wp-content/uploads/2018/01/REDD\\_The-carbon-market-and-the-California-Acre-Chiapas-cooperation.pdf](https://www.foei.org/wp-content/uploads/2018/01/REDD_The-carbon-market-and-the-California-Acre-Chiapas-cooperation.pdf);

At the heart of it, the Draft Standard is really about altering human activity, which then must be monitored and enforced for decades – even generations – if the promised carbon storage is to be delivered. Even with the best safeguards, local, Indigenous and forest dwelling people will face disruption to their ways of life, cultural practices, and traditional livelihoods, all so that companies can keep polluting.

CARB and the State of California have not done enough to ensure that the Draft Standard will facilitate real and meaningful social and environmental safeguards. Instead, the Draft Standard tries to pass off vague language as substantive protections that are doomed to fail. CARB and the State of California has ignored inconvenient facts to continue to pursue international offsets. If ever human rights abuses are a reasonable risk stemming from a California policy, then we are doing something very wrong.

## Conclusion

For all of these reasons, we urge CARB to abandon the Draft Standard and once and for all halt development of any elements of a future international, sector-based forestry offset program, especially for linkage with California's cap and trade program or any other emissions trading system. CARB should immediately shift attention to urgently and dramatically reduce carbon emissions at the source and transition California to a clean energy economy. And to be clear, Greenpeace fully supports other global efforts to reduce deforestation and forest degradation, as well as calls for reforestation. If protection of the forest is a goal, there are real tested concepts that are working today.

Sincerely,



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