

Written Record Only  
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**California Council for Environmental and Economic Balance**

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September 19, 2019

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Public Meeting to Consider Endorsement of an Updated California Tropical Forest Standard

Dear Members of the California Air Resources Board:

On behalf of the members of the California Council for Environmental and Economic Balance ("CCEEB"), appreciates the opportunity to offer comments and support the California Air Resources Board ("ARB") endorsement of an updated Tropical Forest Standard, which values preserving tropical forests over destructive activities. CCEEB is a non-profit and non-partisan coalition of business, labor, and public leaders that advances balanced policies for a strong economy and a healthy environment.

CCEEB supports California's leadership and ability to export ideas and policies that will help reduce the impacts of climate change. As such, we believe the Tropical Forest Standard is an important piece of California's policy that demonstrate international leadership with a robust standard that contains appropriate protections to address the concerns presented at the November 2018 Board Hearing.

While CCEEB recognizes the concerns from several academics regarding a potential for over accounting of emissions reductions, this skepticism is based on previous experiences such as the Clean Development Mechanism of the Kyoto Protocol ("CDM"). Unlike the proposed Tropical Forest Standard, CDM's project-based approach failed to standardize the GHG emission reductions from different regions of the world. The standard-based approach proposed in the ARB Tropical Forest Standard, has learned from those experiences and demonstrates the potential to lead the world on tropical forests protection.

Climate change is a global issue that requires global solutions. Forests are an important part of climate mitigation and provide efficient sequestration opportunities through reduction of the deforestation of critical carbon sinks.

Thank you for your consideration of our comments. Please contact me or Jackson R. Gualco, Kendra Daijogo or Mikhael Skvarla, CCEEB's governmental relations representatives at The Gualco Group, Inc. at (916) 441-1392 should you have any questions or comments.

Sincerely,

WILLIAM J. QUINN  
President & CEO

cc: Mr. Richard Corey  
Ms. Janet Whittick  
The Gualco Group, Inc.