

Dear California Air Resources Board Members,

Earth Innovation Institute (EII) would like to first congratulate the California Air Resources Board (ARB) and its staff on continuing the regulatory process to bring offsets from reduced emissions in deforestation and forest degradation into California's Cap and Trade Program. EII works actively in many of the jurisdictions that are members of the Governors' Climate and Forests task force (GCF), where deforestation is the largest source of emissions. These states and provinces are developing some of the most ambitious climate change programs in the world, and their joint commitment through the Rio Branco Declaration could represent a total of 4.4 Gt of avoided CO₂ emissions by 2030. Many of the states have already achieved enormous reductions in deforestation, but have so far received very little recognition or financial support. The program proposed by California sends a critical signal to these regions that their efforts to reduce deforestation are recognized and valued, as a necessary component of the global effort to mitigate climate change.

Our staff participated in the workshop on October 28th and has reviewed the associated whitepaper, and we are impressed with ARB's rigorous consideration of technical structures necessary to implement this program. I participated in the REDD+ Offset Working Group, and EII is supportive of ARB's review of the ROW Recommendations and intention to build on these frameworks to deliver high-quality, compliance-grade offsets into the Cap and Trade Program. We believe that the process laid out by ARB in the workshop and White Paper will ensure the atmospheric integrity of California's program, provide critical social and environmental safeguards, and support continued development of low-emission rural development strategies in the tropics. California is a global standard-setter in environmental regulation and climate action, and this program is yet another example of that leadership.

We agree that there is great value in moving this process forward in time of the third compliance period of the Cap and Trade Program. We look forward to continuing to participate in the public process to finalize these regulatory frameworks, and would like to offer our support.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan C. Nepstad". The signature is fluid and cursive, with the first name "Dan" and last name "Nepstad" clearly distinguishable.

Dr. Daniel Nepstad

Executive Director, Earth Innovation Institute