October 29th, 2018

Clerk of the Board
Air Resources Board
1001 I Street, Sacramento
California 95814

Re: In opposition to the California Tropical Forest Standard
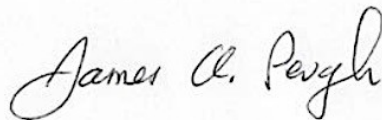
Dear Air Resources Board,

The San Diego Audubon Society is an environmental non-profit based in San Diego, California. As staunch advocates of natural resource stewardship and wise environmental planning for the conservation of wildlife and their natural habitats, we are writing to oppose the proposed California Tropical Forest Standard on behalf of our 1,500+ members.

Climate change is one of the most serious threats that our natural habitats, wildlife and communities face, and properly mitigating greenhouse gas emissions is an essential part of tackling this problem. Tropical forest carbon offsets are not an appropriate way to go about this. They are unreliable, largely impossible to track and enforce across transnational boundaries, and often tied directly to potential human rights violations for many indigenous peoples. By moving these carbon credits to other countries, large-scale fracking, drilling and refining can continue in California, with little to no accountability that any real mitigation measures will actually be taken.

No other government in the world has allowed tropical forest carbon offsets into their compliance network. California should lead the way in creating a more stable, accountable carbon credit system. If California does enact this bogus standard, we may be setting precedents for other states and countries. This could result in the weakening of legitimate compliance markets. We must maintain our position as leaders and innovators, and say no to tropical forest carbon credits.

We thank you for the opportunity to comment on this important matter, and please notify us of future events, milestones, information, and opportunities to comment related to this decision-making process.

Sincerely,

James A. Peugh, Conservation Chair San Diego
Audubon Society
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