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October 29, 2018

Honorable Members of the California Air Resources Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**Re: Comments on the California Tropical Forest Standard: Criteria for Assessing Jurisdictional-Scale Programs that Reduce Emissions from Tropical Deforestation**

Dear Chair Nichols and Members of the Board:

The undersigned groups appreciate the opportunity to submit comments to the California Air Resources Board (CARB) in response to the draft California Tropical Forest Standard: Criteria for Assessing Jurisdictional-Scale Programs that Reduce Emissions from Tropical Deforestation (hereinafter the “Standard”). While many of our groups will be submitting formal comments from their individual organizations with more detailed input, the undersigned groups wanted to emphasize broad support for the Standard and the work CARB has undertaken to develop it, as well as strong encouragement for CARB to move forward on this path.

As the state considers the role its own forests can play in achieving our emission reduction goals, it has an opportunity to leverage action globally by endorsing this Standard. Just as California has sought to address transportation and energy emissions globally through MOUs, it has a chance to also do so with forests. By endorsing the Standard, the Board will be endorsing a framework for incentivizing sustainable forests globally, which can support multiple climate policies, such as supply chain regulations and the low-carbon fuel standard. This robust framework will provide a significant precedent for other compliance markets, both those being launched imminently, like the one created by the International Civil Aviation Organization through the Carbon Offsetting and Reduction Scheme (CORSIA), as well as prospective markets around the world (such as in Mexico, Colombia, Chile, China, and others).

The recently released IPCC report, *Global Warming of 1.5 °C*<sup>1</sup>, is a sobering reminder that we’re still not on track to meet the goals outlined in the Paris Agreement, which California is committed to achieving.

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<sup>1</sup> Global Warming of 1.5 °C, an IPCC special report on the impacts of global warming of 1.5 °C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty  
<http://www.ipcc.ch/report/sr15/>

In order to keep global warming well below 2 degrees Celsius and to strive for no more than 1.5 degrees, more aggressive action is needed.

This global problem needs a global solution and in addition to making deep cuts to global emissions, we need to increase efforts to remove carbon from the atmosphere. Recent research demonstrates that nature-based solutions can provide up to 37 percent of the emission reductions needed by 2030 to keep global temperature increases under 2 degrees celsius--30 percent more than previously estimated.<sup>2</sup> Not only do tropical forests have the potential to be a significant carbon sink, but many local and indigenous communities rely on these forests for their traditional way of life, livelihood, and wellbeing.

A California Tropical Forest Standard would be a key tool to ensure high-quality programs for reducing emissions from deforestation and forest degradation in tropical forest jurisdictions. CARB staff have engaged with stakeholders and experts over a ten-year period to solicit input through stakeholder meetings and other public outreach efforts to ensure the stringency of this Standard. Experts and representatives from tropical forest jurisdictions, through the REDD Offset Working Group<sup>3</sup> and the Governors' Climate and Forests Task Force<sup>4</sup> (GCF) have contributed to the development of this standard for years, engaging a large cross-section of stakeholders and scientists. As a result, this standard sets a high bar for environmental integrity, social and environmental safeguards, transparency, and participatory processes to engage local communities. Further, the Standard will build upon and enforce existing commitments to social safeguards and participatory processes referenced in the Standard<sup>5</sup>, as well as the Principles of Collaboration and Partnerships between Subnational Governments, Indigenous Peoples, and Local Communities<sup>6</sup> recently endorsed by California and 34 additional GCF Task Force jurisdictions.

California is at the forefront of climate impacts, and greenhouse gas reductions from tropical forests can provide significant benefits to Californians. One recent study found that deforestation in South America affects rainfall and snowpack across the western United States.<sup>7</sup>

We commend CARB for its ongoing leadership to address climate change and recognition of the vital role natural and working lands must play in any climate change solution, both in California and abroad. We urge the Board to endorse this Standard and look forward to working with you to support this effort. If you have any questions, please contact any of signatories of this letter.

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<sup>2</sup> Natural climate solutions Proceedings of the National Academy of Sciences, Vol. 114, No. 44. (31 October 2017), pp. 11645-11650, doi:10.1073/pnas.1710465114 by Bronson W. Griscom, Justin Adams, Peter W. Ellis, et al.

<sup>3</sup> REDD Offset Working Group Recommendations: <https://www.arb.ca.gov/cc/capandtrade/sectorbasedoffsets/row-final-recommendations.pdf>

<sup>4</sup> Governors' Climate and Forests Task Force: <https://gcftf.org/>

<sup>5</sup> For example, the Paris Agreement, UNDRIP, REDD+SES Version 2, World Bank's Social and Environmental Framework

<sup>6</sup> GCF Task Force: Guiding Principles for Collaboration and Partnership Between Subnational Governments, Indigenous Peoples and Local Communities  
[https://static1.squarespace.com/static/5896200f414fb57d26f3d600/t/5b915dc2f950b735d57ee294/1536253379182/Principles\\_ENGL\\_V8.pdf](https://static1.squarespace.com/static/5896200f414fb57d26f3d600/t/5b915dc2f950b735d57ee294/1536253379182/Principles_ENGL_V8.pdf)

<sup>7</sup> If a tree falls in Brazil...? Amazon deforestation could mean droughts for western U.S.

<https://www.princeton.edu/news/2013/11/07/if-tree-falls-brazil-amazon-deforestation-could-mean-droughts-western-us>

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