

23 August 2019

California Air Resources Board
1001 I Street
Sacramento, CA - 95814

RE: Support for California's Tropical Forest Standard

Dear representatives of the California Air Resources Board:

We are a member based Californian nonprofit organization, focused exclusively on supporting and scaling the REDD+ mechanism, and we commend your staff's tremendous effort in developing the California Tropical Forest Standard.

From the Amazon Basin, to the African Savannah, to the Heart of Borneo, our members' voluntary REDD+ projects are supporting and scaling the REDD+ mechanism to realize its full potential to empower people, preserve forests, protect wildlife, and reduce emissions. Our members represent corporate buyers, market participants, and leading REDD+ project developers from around the world. With both for profit, and nonprofit, project proponents. In addition, all Code REDD member projects have been independently validated and verified to the leading voluntary certification standards known as the Verified Carbon Standard (VCS) and the Climate, Community & Biodiversity Standard (CCBS). Thus, our projects are aligned with your REDD Offset Working Group's recommendations and would be in a position to compliment the California Tropical Forest Standard.

Of note whilst we support the California Tropical Forest Standard as drafted, we would like to point out that we understand that whilst the crediting baseline for jurisdictions should be 10% below the historical ten year average, for eligible credits, this does not inhibit jurisdictions developing other baselines, such as a high forest low deforestation (HFLD) developing a BAU baseline, for UN purposes, and that simply California Tropical Forest Standard credits are eligible as to the elements specified by the standard.

We appreciate the California Tropical Forest Standard's leadership in providing for cross border compliance markets and for recognizing voluntary actions. Both of which are seminal to Reducing Emissions from Deforestation and Forest Degradation succeeding, and, we strongly encourage you to adopt the California Tropical Forest Standard for its consideration by other jurisdictions.

Thank you very much for your consideration.

Sincerely,



Michael Radomir,
Executive Director, Code REDD