

August 29, 2019

Jason Gray
California Air Resources Board
1001 I Street
Sacramento, CA 95812

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

Dear Mr. Gray:

The Nature Conservancy (TNC, Conservancy) appreciates the opportunity to submit comments to the California Air Resources Board (CARB) in response to the revised California Tropical Forest Standard: *Criteria for Assessing Jurisdictional-Scale Programs that Reduce Emissions from Tropical Deforestation* (Standard). TNC recognizes the broad support for the Standard and the work CARB has undertaken to develop it, we offer our 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, 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, as well as prospective markets around the world. The IPCC report *Global Warming of 1.5 °C¹* highlights that we are not on track to meet the goals outlined in the Paris Agreement, which California is committed to achieving. 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 necessary.

This global problem needs a global solution, in addition to making deep cuts to global emissions, we need to increase efforts to remove carbon from the atmosphere. 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, a 30 percent increase from previous estimations.² Natural climate solutions are conservation, restoration and improved land management actions that increase carbon storage or avoid greenhouse gas emissions in landscapes and wetlands across the globe. 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 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. As a result of the

¹ 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/>

² 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.

robust stakeholder process led by CARB that solicited input to ensure the effectiveness of the Standard, there is a high bar for environmental integrity, social and environmental safeguards, transparency, and participatory processes to engage local communities. Additionally, the updates to the standard strengthen the process and application of social and environmental safeguards to help ensure that the rights of indigenous and local communities are protected, and the conservation of native forest species is prioritized. The Standard provides a strong signal to value the preservation of tropical forests over continued destructive activities such as oil exploration and extraction.

Further, the Standard will build upon and enforce existing commitments to social safeguards and participatory processes³, as well as the Principles of Collaboration and Partnerships between Subnational Governments, Indigenous Peoples, and Local Communities⁴ endorsed by California and 34 additional GCF Task Force jurisdictions.

California is at the forefront of addressing climate impacts, greenhouse gas reductions from tropical forests can provide significant benefits both within the state and beyond. 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. We urge the Board to endorse this Standard and look forward to continued engagement.

Sincerely,



Michelle Passero
Director, California Climate Change Program
The Nature Conservancy

³ For example, the Paris Agreement, UNDRIP, REDD+SES Version 2, World Bank's Social and Environmental Framework