



**SOCIETY FOR CONSERVATION BIOLOGY
COMMENTS ON THE PROPOSED
CALIFORNIA CAP ON GREENHOUSE GAS EMISSIONS
AND MARKET-BASED COMPLIANCE MECHANISMS**

December 15, 2010

The Society for Conservation Biology is a global network of nearly 10,000 conservation professionals with policy leaders drawn from all continents on the globe and numerous disciplines relevant to conservation science and practice. Over half of our members are from the United States, however, and a large portion of our policy work is focused on the conservation of the American West.

Our top priority issue since early 2007 has been climate change and we have submitted testimony, comments and other papers in Federal and international proceedings.

Our North America Section President, Dominick DellaSala, joined by several other senior members and staff of SCB and others coauthored a groundbreaking book demonstrating the heretofore under-appreciated carbon storage services of temperate rainforests such as exist from northern California to Alaska. Our letter to Cancun cites this research and related studies. We also cite Dr. DellaSala's testimony to the U.S. House Committee on Natural Resources on the management of public lands with regard to climate change.

Our Policy Director participated this September in workshop of scientists and policy makers, including senior officials of California, at the University of California at Davis' John Muir Institute of the Environment, which is headed by a former board member of SCB, Professor Mark Schwartz. The workshop focused on greenhouse gas sequestration effects of different ecosystems in California and in areas that may be included in your cap and trade system. The scientists issued a succinct statement noting the very substantial and in some cases, surprising, capacity of grasslands, marine marshes and kelp forests, and forests of different sorts to sequester greenhouse gases if managed properly and protected from excessive anthropogenic stresses.

We are submitting these comments and attachments today by way of your web-based formⁱ as our comments on your proposed cap and trade regulations as we believe you will find these submissions useful in your consideration of the California draft rules - Subchapter 10 Climate Change, Article 5, Sections 95800 to 96022, Title 17, California Code of Regulations, (--: Article 5: CALIFORNIA CAP ON GREENHOUSE GAS EMISSIONS AND MARKET-BASED COMPLIANCE MECHANISMS).



We are submitting our letter to the conveners and delegates of the UNFCCC Conference of the Parties in Cancun, which references our letter to the COP in Copenhagen, both of which cited recent research that should directly help to shape your regulations. These are available also at www.conbio.org/resources/policy.

A fundamental point of our letters and testimony is that governments have an obligation to require the most rapid reduction possible in human-caused greenhouse gases and other forcing agents, such as black carbon or soot, and to combine that with bio-diverse ecosystem conservation and restoration. Nothing short of the combination will be likely to avoid highly dangerous climate change and accelerating losses in biodiversity and ecosystem service.

The second point is that these mitigating steps should not be undercut by reliance upon offsets when any other approach is available. Otherwise, the heat and drought and other climate driven stresses threaten to repeat the experience of the Amazon which in the drought of 2005 tipped for one year to not only fail to sequester its usual 2-3 billion tons of CO₂, but to become a source of carbon nearly as large, with a net loss in planter sequestration as large as the European Union and Japanese emissions combined. US forests are also stressed and the California system must take that into account dynamically in its approach.

In the US system, states have the greatest array of tools available under our Constitution – from common law to legislation to protect public health using all of the powers not preempted by the Federal government, and in fact, California is the prime example of a state that uses its freedom to lead and help other states join in the process, even when the Federal government is far behind in controlling air pollution. We hope that you will protect and exercise those powers and stand ready to help you do that in the future as we are today with the attached submissions.

Thank you.

John M. Fitzgerald
Policy Director

i

http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=capandtrade10&comm_period=A