



November 5, 2013

Mary Nichols
Air Resources Board
1001 I Street
Sacramento, CA. 95814

RE: Comments on the October 2013 Discussion Draft of the Scoping Plan

Green Assets would like to thank the Air Resources Board (ARB) for the opportunity to comment on the Discussion Draft of the 2013 Scoping Plan update. As a forest carbon offset developer in the Southeastern US we appreciate your recognition of “forests and other natural working lands” as an important component of the Plan, and applaud the ARB for recognizing the countless ways in which forestlands help to optimize emission reduction and sequestration opportunities.

The recent Cap-and-Trade system implemented by the State of California is readily recognized as one of the most ambitious and comprehensive greenhouse gas emission reduction programs in the world. As creators of carbon offsets for that system, we are obligated to uphold the rigorous objectives set forth by the program and, thus, continually strive to design and maintain the most effective forest carbon offset projects possible.

In our review of the Discussion Draft, the goals and objectives for forestlands/working lands *within the state of California* are clearly outlined. However, we find no mention of the “global” impacts of forest carbon projects located outside of the state. Since offsets for the Cap-and-Trade system have been, and will continue to be, generated outside of the state, we feel it would be appropriate for the scoping language to include forestlands outside of the state, which will contribute much needed offsets into the system.

According to the Southeastern Lumber Manufacturer’s Association (SLMA), America’s forests cover 747 million acres (33 percent of the land base) and the forests of the Southern U.S. (from eastern Texas to northern Florida) have the highest biodiversity of any forests in North America. As urban areas of the South expand and the demand for commercial crops continues to rise, thousands of acres of forestland will face a clear threat for conversion to housing developments, tillable acres, etc. Thus, in the various sections of the Draft which speak to forestland (particularly Sections III -8 and V E.6), we believe it would be appropriate to provide inclusionary language for carbon offsets generated from forestlands that are preserved by projects like those designed by Green Assets, which provide high-quality offsets for the California system. Moreover, it is stated within the Scoping Plan that “coordinating and promoting climate action at the interstate, federal, and international levels benefits the State by helping to protect the climate system, and consequently California’s people and resources.” Therefore, it would seem fitting to encompass the broader implications and overall scope of the system into this current updated version.

Lastly, the Scoping Plan states that the Cap-and-Trade program is “a vital component in achieving both California’s near- and long-term GHG emissions targets.” It is also widely recognized that offsets created by forestry projects will bring the most long-term value to the Cap-and-Trade system. Unlike the other ARB-approved offset protocols, forest projects actually sequester carbon while continuing to provide direct, long-term co-benefits to people, regional ecosystems, and, indeed, the planet as a whole.

California has taken the lead in creating a Scoping Plan that creates economic and environmental advantages far beyond its borders, thus we feel that the language within the Scoping Plan should be expanded to take into account all active participants and the benefits/value that they bring into the system. While Green Assets’ projects are designed for use in the California Cap-and-trade Market, the benefits extend to the whole planet. This is one of the overarching reasons that Green Assets got involved in the carbon market in the first place.

Again, we appreciate the opportunity to provide these comments and look forward to continuing our relationship with the ARB to achieve emission reductions, protect natural lands, and reach the long-term goals set forth in AB-32. Please feel free to reach out to me at any time.

Respectfully,

Hunter Parks, President