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California Air Resources Board
1001 I Street
Sacramento, CA 95812-2828

Re: June 20 ARB workshop on revision of protocols, including forest projects protocol

I am writing on behalf of the Alaska Chapter of The Nature Conservancy to express our strong support for an amendment to the Compliance Offset Protocol U.S. Forest Projects to remove the Alaska exclusion so that Alaskan corporations and other eligible landowners may participate in the carbon market by developing compliance forest offset projects.

Alaska's coastal forests support among the highest standing carbon biomass of any terrestrial ecosystem. Removing the Alaska exclusion will give landowners an alternative to timber harvest and will reward sustainable forest management and protect important old growth forests. Allowing Alaska forest projects into California's carbon market will contribute to the success of the offset program. Alaska forest carbon offset projects could generate millions of compliance offsets, while achieving social, environmental, and economic benefit to Alaska Native and resident populations.

The two largest forests in the National Forest system are located in Alaska. The Tongass National Forest in Southeast Alaska encompasses nearly 17 million acres and the Chugach National Forest in South-central Alaska more than 5 million acres. Adjacent to, or within the boundaries of these two large national forests, there exists nearly 1.5 million acres of private lands. According to the USDA's Forestry Sciences Lab, the baseline inventory for these southern Alaska forests average between 22 to 30 tons of carbon captured per acre.

When the ARB originally adopted the forest protocol, forest projects in Alaska were made ineligible "due to lack of region-specific data". Subsequently, region-specific data for the South-central and Southeast portions of Alaska was formally transmitted to the ARB in 2012; however, the exclusion of forest projects in Alaska has not yet been corrected.

In summary, the Alaska Chapter of The Nature Conservancy strongly supports removal of the Alaska exemption. This action, if taken, will enhance long-term carbon storage while protecting some of the world's finest forest ecosystems.

Sincerely,

Randall H. Hagenstein
Alaska State Director