

BOARD OF FORESTRY AND FIRE PROTECTION

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October 19, 2007

Ms. Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

Dear Chairman Nichols,

Please consider this letter as our Board's input to the Air Resources Board in regards to your consideration of Forestry Protocols. As you are aware, the Board of Forestry and Fire Protection passed a resolution endorsing the Climate Action Registry Forest Protocols on August 4, 2004. That endorsement was for the protocols as they existed within the framework of SB 812. The Board, and all of those involved, recognized that these protocols were an attempt to encourage early voluntary actions for forestry activities in conservation, reforestation, and conservation-based forest management. It was well recognized that additional work would be necessary to develop protocols for public and industrial lands, neither of which were suited to the sideboards of SB 812.

As we have observed the evolution of the issue through 2007, via presentations and testimony from interested parties, we note that support for the current Registry protocols from forest landowners has varied greatly. Due to limited testing and application of the protocol, some uncertainty exists on how it will apply to differing ownership types.

The voluntary nature of the protocol and non-governmental status of the Registry made the protocols a useful device for voluntary carbon accounting on individual, small scale ownerships and projects, but not necessarily for the mandatory, statewide nature of the current AB 32 process. The current protocols will need modification in order to apply to a larger segment of the overall forestland acreage in California. In order to capture this larger acreage, it will be necessary to address different types of ownerships, such as public lands, industrial lands, and lands owned by non-industrial owners. These landowners may wish to utilize a contractual agreement rather than an easement, or combinations thereof.

Because of the scientific and technical complexity of the issues that can be raised by protocol development, we offer you our assistance in this area. We look forward to our joint symposium with the Air Resources Board in early 2008 in order to gain a better understanding of the inventory and tracking methods for forest sector carbon and other atmospheric gases. The forest sector is one of the significant sectors for carbon sequestration. We are committed to assisting you in the development and refinement of measurement and tracking protocols to allow California to take full advantage of this sector in meeting its 2020 goals for Carbon emissions.

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We anticipate working with you in developing protocols appropriate for a wide range of forestry landowners. We pledge to support you in this important issue, particularly in bringing together experts and interested stakeholders in developing protocols to address the goals of AB 32.

Sincerely,

A handwritten signature in blue ink, appearing to read "George Gentry". The signature is written in a cursive, flowing style.

For:
Pam Giacomini, Vice Chair