



October 19, 2011

Submitted electronically to <http://www.arb.ca.gov/lispub/comm/bclist.php>

California Air Resources Board  
Stationary Source Division  
Edie Chang, Assistant Division Chief  
1001 I Street  
Sacramento, CA 95812

Dear Ms. Chang:

The undersigned organizations commend the California Air Resources Board (CARB) for your ongoing commitment to develop and adopt an adaptive management plan to monitor environmental impacts of the U.S. Forest Protocols for the cap and trade regulation. Implementation of the adaptive management plan will prove valuable not only for the forest protocols, but also for forest biomass that is used for energy and fuels as part of the overall AB32 program. Given the nexus between these issues and the state's forest resources, we recommend that CARB staff pursue an integrated approach that considers impacts from both offset projects and energy and fuels, given the broad overlap in data needs and impact monitoring.

We recognize that the October 10, 2011 proposal is just a first step toward the development of a more detailed and integrated adaptive management plan to be developed by CARB with the assistance of a contractor. With this in mind, we urge CARB to continue to solicit and accommodate the active involvement of stakeholders in this process. Our organizations remain committed to working with CARB staff to ensure a successful effort going forward.

Sincerely,

Michelle Passero  
The Nature Conservancy

Paul Mason  
The Pacific Forest Trust

Peter Miller  
Natural Resources Defense Council

Timothy O'Connor  
Environmental Defense Fund