



June 27, 2014

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

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

On behalf of the Chugach Alaska Corporation, this is 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.

Removing the Alaska exclusion will give Chugach and other 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 Southcentral 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, predominately owned by Alaska Native Corporations. 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.

Many of Alaska's largest private landowners are interested in participating. Chugach alone has resources that could sustain a project that range from an estimated 1 million to 2.2 million tons of carbon capture in the first year.

Thank you for your efforts to remove the Alaska exclusion and allow Alaska landowners to participate in California's carbon market.

Sincerely,

Sheri D. Buretta
Chairman of the Board

bcc: Jim Boyd
Linda Adams
Pat Leathers