



November 5, 2020

Mr. Gavin McCabe, Chair
Compliance Offset Protocol Task Force
1101 I Street, California Air Resources Board
Sacramento, CA 95814

Subject: Comments on Compliance Offset Protocol Task Force draft report

Dear Mr. Chairman and Members of the Offset Task Force:

On behalf of the Alaska Native People which we represent, we are writing to support the 20 Consensus Recommendations of Subgroup B on Forestry to improve the current Forest Offset Protocol adopted in June 2015. We strongly support the offsets program and the Forest Offset Protocol because of the dual benefits of generating significant GHG reductions in the forestry sector while promoting environmental, social and economic co-benefits for Native Americans.

The 20 Consensus Recommendations of the Forestry Subgroup will improve efficiency, reduce participation risk, and reduce cost of project development, verification, and monitoring, while maintaining the rigor of the current Forest Protocol. These changes will benefit the program by attracting more participation from forest landowners, including Native American or tribal landowners. In particular, we would like to comment specifically on the following Consensus Recommendations:

Geographic eligibility: We support the inclusion of additional regions of Alaska into the program. Currently only one region of Alaska, the south central and south eastern coastal region, is included in the program due to prior limited availability of US Forest Service data. Additional data is now available so that more regions of Alaska may be included in the program. Adding additional regions of Alaska to the program will further encourage the development of forest offset projects, a key to achieving significant GHG reductions toward California's climate policy goals. In addition, these projects will provide an additional option to Alaska Native landowners for managing forest resources for both economic and traditional, cultural uses.

ARB Guidance: We appreciate recent verbal guidance by the California Air Resources Board (CARB) to clarify that lands owned by Alaska Native Corporations (ANCs) are treated the same as public and tribal lands with regard to financial risk ratings and contributions to the buffer account. We therefore support the recommendation that CARB regularly publish such guidance, directives or decisions from

CARB communicated to project developers, verifiers, or registries, and we look forward to confirming the status of ANC lands in written guidance as well as subsequent revisions to the Forest Protocol.

New Method for Inventory and Modeling: We support recommendations for a process whereby CARB can approve the use of new and alternative methodologies for inventory and modeling of forest carbon projects. Methods such as remotely sensed data (e.g. LiDAR, satellite and drone-collected data), data aggregation, cloud-based processing and machine learning have the potential to reduce project development costs while increasing the precision and accuracy of forest carbon estimates.

We also support the recognition by Subgroup F that CARB has developed the leading compliance offset program in the country, if not the world. With the dual benefits of generating GHG reductions in uncapped sectors and promoting environmental, social and economic co-benefits, we agree the offset program has been a success. In order to ensure the continuation of a robust market for offsets, we support the suggestion that the state explore other avenues for these high quality offsets, including for example the mandate for the state to be “Carbon Neutral” or in international aviation efforts.

The importance of the Forest Protocol and the offsets program cannot be overstated. We are greatly appreciative of CARB’s historical efforts to promote the importance of well-managed forests. The UN Intergovernmental Panel on Climate Change has highlighted the importance of forest management as a critical climate change mitigation effort. Forests are key to limiting average global temperature rise, as they provide one of the only readily available, cost-effective means of directly removing and storing GHG emissions at scale, while also providing a host of additional benefits such as shading and cooling, water filtration and storage capacity, and the provision of wildlife habitat.

Thank you for the opportunity to comment on these important recommendations.

Sincerely,



Sheri Buretta, Board Chair
Chugach Alaska Corporation



Michelle Anderson, President
Ahtna, Inc.



Anthony Mallott, President and CEO
Sealaska Corporation