



November 30, 2018

Rajinder Sahota  
Assistant Division Chief, Industrial Strategies Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812-2828

Re: Comments from the California Forest Carbon Coalition on the November 15<sup>th</sup> 2018 Modified Text of the Proposed Amendments to the California Cap On Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation

Dear Ms. Sahota,

The California Forest Carbon Coalition is writing to request an explanation for how the November 15<sup>th</sup> amendments to the proposed California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation (“Cap-and-Trade Program”) will clarify the criteria as to when a violation of a local, state or national environmental, health or safety (EHS) regulation results in the ineligibility or invalidation of forest based carbon offsets.

The CFCC submitted two sets of comments<sup>1,2</sup> to the “Preliminary Discussion Draft” with suggestions for clarifying the current Regulation and reducing uncertainty as to how and when an EHS violation would result in the ineligibility or invalidation of forest offsets. Unfortunately, we did not see significant changes in the November 15<sup>th</sup> draft that we believe would reduce this uncertainty and encourage the development and enrollment of more California forestlands in the California Cap and Trade Program.

We appreciate any guidance you can provide on this question.

Sincerely,

<sup>1</sup> [https://www.arb.ca.gov/lispub/comm/bccomdisp.php?listname=ct2018&comment\\_num=52&virt\\_num=48](https://www.arb.ca.gov/lispub/comm/bccomdisp.php?listname=ct2018&comment_num=52&virt_num=48)

<sup>2</sup> <https://www.arb.ca.gov/lispub/comm/bccommlog.php?listname=ct2018>

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