

THE
CONSERVATION FUND

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Industrial Strategies Division

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ws&comm_period=1](https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=ct-4-26-18-wkshp-
ws&comm_period=1)

Comments on the April 26, 2018 Workshop on Possible Revisions to the Cap-and-Trade Regulation

Dear Ms. Sahota,

Thank you for ARB's continued leadership in implementing California's cap-and-trade program. The Conservation Fund owns and manages forest offset projects covering 75,000 acres on California's North Coast. Participating in the cap and trade program has significantly enhanced our ability to conserve and sustainably manage these forests for the environmental, economic and climate benefits they provide in the state.

We are pleased to see ARB considering amendments to the offset program to ensure it remains a vital part of California's efforts to reduce GHG emissions. Increasing enrollment of California forestlands in the offset program is one of the most powerful ways to reduce emissions and compliance costs and increase direct environmental benefits in the state.

We therefore support the California Forest Carbon Coalition's (www.caforestcarbon.com) proposal for clarifying when certain environmental, health or safety violations may result in the invalidation of forest offsets. Providing such clarity will encourage more forest landowners to develop projects in California that will provide co-benefits for fish and wildlife, create and maintain good jobs in rural North Coast communities, and help reach the state's GHG emission reduction goals while maintaining the program's high standards and reputation for environmental integrity.

We look forward to working with ARB to expand and improve the offset program that has become a model for the rest of the country and the world. Thank you for the opportunity to comment.

Sincerely,

s/Chris Kelly
California Program Director

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