



October 26, 2017

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

Re: Comments on the October 12, 2017 Workshop on Next Steps for the Post-2020 Cap-and-Trade Regulation

Dear Ms. Sajota,

Thank you for ARB's continued leadership in implementing California's cap-and-trade program. We represent a diverse array of California forest stakeholders—including conservation groups, Native American Tribes and industrial timberland managers—representing a large portion of California's forestland that have come together with a unified voice to support California's offset program.

We are pleased and encouraged to see that with the passage of SB 398, ARB will continue to administer a robust offset policy as part of California's efforts to reduce GHG emissions through 2030. In particular, we note that California's inclusion of forest based offsets has substantially enhanced the conservation and sustainable management of California's forests, while providing cost-effective GHG reductions and a host of other environmental benefits to the state.

The offset projects our groups have developed, among other things, have allowed tribes to reacquire ancestral territory, conserved forested watersheds that provide drinking water and critical salmon habitat, increased fire resiliency in rural communities, and created jobs in economically disadvantaged areas.

We look forward to working with ARB to expand and improve the offset program going forward. In particular, we applaud the creation of a Compliance Offsets Protocol Task Force to increase offset projects in the state. In addition to adopting additional protocols, we encourage ARB to look for ways to streamline and improve implementation of the existing forest offset protocol to increase participation and deliver more benefits to the state. We recommend that ARB include forestry experts with direct experience in offset project development on the Task Force. We also encourage ARB and the Task Force to draw on the expertise of the larger California forestry community for input throughout the process.

California's offset program is the only one of its kind that is encouraging investment in rural and working landscapes at scale. It has the potential to deliver even greater environmental benefits through expansion and improvement going forward. We look forward to working with ARB to build on this groundbreaking program that is a model for the rest of the country and the world.

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Again, thank you again for the opportunity to provide you with our recommendations on this vitally important issue.

Sincerely,

Thomas P. O'Rourke, Sr.  
Chairman  
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