



From: Mike Smith, Managing Partner, RenewWest

To: Gavin McCabe, Chairman, AB 398 Compliance Offsets Protocol Task Force

Subject: Comment on Initial Draft Recommendations of the Task Force

Mr. McCabe:

RenewWest welcomes the opportunity to submit comments on the initial draft recommendations (“Recommendations”) produced by the Compliance Offsets Protocol Task Force. As the developer of the largest single-site reforestation project in U.S. history – our 10,000 acre, two million trees project in Modoc County – we have a unique understanding of the challenges of using the U.S. Forest Project Protocol. The Recommendations address numerous issues that we at RenewWest have run into during project development. However, there were a few items that I would like to bring to your attention.

Federally owned forest lands: I encourage the Task Force to re-examine engaging federal forest lands in California carbon markets. Federal lands serve critical ecosystem functions for the State of California, including water, habitat, recreation, and climate outcomes. Regardless of the whether inclusion of federal lands for Improved Forest Management (IFM) projects is appropriate, there is a *critical* need for federal land reforestation. Allowing reforestation projects on federal lands to be recognized under the California Cap and Trade would provide crucial private-sector funding for reforestation projects.

RenewWest has [an MoU in place blah – describe why you are a partner]. As the U.S. Forest Service partner for carbon and reforestation, we are well aware of limitations for working with the federal government, but the environmental benefit to the people of California for expanded federal public lands reforestation would more than make that effort worthwhile.

Invalidation Period Reduction: RenewWest fully supports the reduction of the invalidation period for IFM projects to three years. We believe lowering the invalidation period for all forest project types, including afforestation/reforestation (A/R) projects. We believe doing so is congruent with the Task Force’s recommendation to lower the invalidation period for all project types to three years. Further, although there is less of a track record for A/R projects, there is less likelihood for invalidation based on the two most-likely invalidation scenarios: material misstatement and violation of environmental, health and safety laws. Calculation and verification of A/R projects are technically simpler. Having a single age class for many years post-planting with planned survey plots prior to reforestation make for a highly repeatable process with less chance of error. This means the possibility of material misstatement in an A/R project is comparable to or less than in other forest project types. During the first ten to fifteen years of an A/R project, land is minimally managed (if at all).



This means that for the first period of an A/R project, there is minimal potential for the occurrence of an environmental, health or safety violation. Once active management begins, we see no reason that the risk of violation would be different from any other type of forestry project. Finally, there is critical need for reforestation, especially for in-state projects. Removing disincentives to reforestation projects is in the best interest of the people of California.

Reforestation Baseline Streamlining: RenewWest is strongly in favor of a simplified baseline and finds the committee’s recommendations compelling. The committee’s reasoning is sound and supported by RenewWest’s experience in developing California reforestation projects. We would welcome the opportunity to help in the development of these baselines.

Avoided Wildfire Protocol: RenewWest was part of the development team for a proposed avoided wildfire methodology in the voluntary market. We believe that the process has significant merit but would likely need some significant changes to overarching ARB forest standards, specifically to consider the fire effects beyond project boundaries and modeling baselines, especially on federal lands. While these are a tall order, THE primary environmental threat to the health and safety of Californians, besides climate change, is through high-intensity wildfire. I would encourage the committee to consider the transformative nature that an avoided wildfire protocol.

Planned Reversals: This is a critical concern for AR projects, as the best management practice for reforestation projects are to overplant and then execute a pre-commercial thinning (PCT). A PCT is in the interest of fire risk reduction and increased long-term carbon uptake, so allowing for mechanisms that do not penalize landowners and developers for doing so are highly advisable. We find CAR Version 5.0 to be the best choice for accounting for planned reversals.

Again, thank you for the opportunity to comment on the draft Recommendations.

Warm regards,

Mike Smith

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