

Mary Nichols, Chair
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Proposed Revisions to U.S. Forest Management Protocol

Dear Chair Nichols:

Green Diamond Resource Company owns and manages 400,000 acres of redwood and Douglas-fir timberlands in Humboldt and Del Norte Counties. We use a variety of silvicultural systems, including thinning, selection and even-aged management, with even-aged being the most common. We also implement protection measures through our state/federal agreements and Forest Stewardship Council standards that are well above the standard rules resulting in over 25% of our land base in a very lightly or un-harvested condition. We were active participants in the development of the U.S. Forest Protocol and support the offset program.

We have been investigating opportunities for carbon projects; however, the proposed changes to Section 3.1(a)(4)(A and B) would preclude our participation in any future projects. This change would require buffers around all harvested units that fall below a certain stocking level (50 sq ft per acre). These buffers would then have to be maintained until the harvested area meets this stocking requirement. Depending on the timber type and site quality, this could be 15- 25 years.

As an example, a 20 acre harvest unit would have an 800 foot buffer resulting in 106 acres of buffer. This buffer proposal far exceeds the California Forest Practice Rules that require a "logical yarding unit", but no less than 300 feet, and 3 to 5 year reentry period.

The U.S. Forest Protocol we carefully crafted to ensure high environmental standards were achieved under the definition of "natural forest management". The program requires long-term commitments from timberland owners (100 years) to maintain a level of timber inventory that meets or exceeds the regional average. The proposed very significant change to these standards within 5 years of adoption does not send a positive signal to the potential participants.

We respectfully request you reject this proposed modification to the protocol.

Sincerely,



Gary C. Rynearson, RPF 2117

Manager, Forest Policy and Communications