



WASHINGTON FOREST PROTECTION ASSOCIATION

724 Columbia St NW, Suite 250  
Olympia, WA 98501  
Phone: 360-352-1500  
Fax: 360-352-4621

December 15, 2014

California Environmental Protection Agency  
Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

*Submitted Electronically*

RE: Notice of Public Hearing to Consider Amendments to the California Cap on Greenhouse Gas Emissions and Market Based Compliance Mechanisms

Dear Chairman Nichols:

The Washington Forest Protection Association (WFPA) is a trade association representing private forest landowners in Washington State. Our members are large and small companies, individuals and families who grow, harvest and re-grow trees on about 4 million acres in Washington State.

In 2006, the federal agencies approved a statewide 50-year Habitat Conservation Plan for Washington's forest practices program for aquatic species. WFPA members practice sustainable forestry.

We have examined the existing forestry offset protocols developed in California and the proposed changes to the protocols and recommend that the ARB remove limitations on landowner silvicultural choices that do not influence carbon stored as part of an offset project. Specifically, the proposed revised protocols require significant buffers around even age management units. Even aged management is a common, lawful practice for our members, and these restrictions are not necessary to ensure that landowners are maintaining the carbon stocks they commit to when enrolling in the program.

The proposed revisions further increase our concern with the Compliance Offset Protocol for U.S. Forest Projects developed in California and would effectively preclude most of our members from participating as an offset provider in California's Cap and Trade Program.

Sincerely,

Mark Doumit  
Executive Director

cc: Governor Jay Inslee  
Matt Steuerwalt  
Chris Davis  
Joby Shimomura