

August 11, 2014

Ms. Mary Nichols
Board Chairman
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Submitted via web <http://www.arb.ca.gov/cc/capandtrade/meetings/meetings.htm>

Re: Guidance for the Newly Adopted U.S. Forest Projects Compliance Offset Protocol

Dear Ms. Nichols:

The Nature Conservancy (TNC) appreciates the opportunity to provide additional comments on the California Air Resources Board's (ARB) newly adopted U.S. Forest Projects Compliance Offset Protocol. With over fifteen years of experience developing offset projects, protocols, and policy internationally and domestically, TNC strongly supports AB 32 and the inclusion of forest-based offsets in California's greenhouse gas (GHG) cap and trade program and shares ARB's goal of designing robust, defensive protocols in which GHG reductions are accounted for in a complete, consistent, transparent, accurate, and conservative manner.

We commend the work of ARB staff in convening a stakeholder workshop to address the outstanding technical issues in the updated protocol. This stakeholder process provides an excellent model moving forward to ensure concerns are addressed proactively and the updates to the protocol are clear to impacted parties.

To address the outstanding issues related to even aged management and the logical management unit, we are attaching the letter from the Climate Action Reserve, et al., to which we are a signatory. We strongly urge the inclusion of these proposed technical adjustments in the future guidance issued by ARB.

We look forward to working with ARB and other stakeholders in the finalization of this guidance and the drafting of future protocol updates.

Please feel free to contact us with any questions or comments.

Contact: Alex Leumer, Climate Change Policy Associate, The Nature Conservancy, aleumer@tnc.org