



February 23, 2021

Mr. Gavin McCabe, Chair  
Compliance Offset Protocol Task Force  
1101 I Street, California Air Resources Board  
Sacramento, CA 95814

Subject: Comments on Compliance Offset Protocol Task Force Draft Final Recommendations

Dear Mr. Chairman and Members of the Offset Protocol Task Force:

On behalf of the Alaska Native People which we represent, we are writing to thank you for your work on the Task Force and to support recommendations to improve efficiency of the offset program while maintaining its rigor. We strongly support the offset program and the Forest Offset Protocol because of the dual benefits of generating significant GHG reductions while promoting environmental, social and economic co-benefits for Native Americans.

In particular, we would like to comment specifically on the following Task Force recommendations:

**Forestry Subgroup:**

Geographic eligibility: Alaska: We support the inclusion of additional regions of Alaska into the program. Currently only one region, the south central and south eastern coastal region, is included in the program due to prior limited availability of US Forest Service data. Additional data is now available so that more regions of Alaska may be included. Adding additional regions of Alaska to the program will further encourage the development of forest offset projects, a key to achieving significant GHG reductions.

New Methods for Inventory and Modeling: We support recommendations for a clear and efficient process whereby CARB can approve the use of new technologies and methodologies for inventory and modeling of forest carbon projects. Methods such as remotely sensed data (e.g. LiDAR, satellite and drone-collected data), data aggregation, cloud-based processing and machine learning have the potential to reduce project development costs while increasing the precision and accuracy of forest carbon estimates.

## Overarching/Programmatic Issues

Regularly Publish CARB Guidance: We support the recommendation that CARB regularly publish guidance, directives or decisions to ensure broad and timely access to information. We appreciate recent verbal guidance by CARB to clarify that lands owned by Alaska Native Corporations (ANCs) are treated the same as public and tribal lands with regard to financial risk ratings and contributions to the buffer account. We look forward to confirming the status of ANC lands in written guidance as well as subsequent revisions to the Forest Protocol.

Recognize that compliance grade offsets can help achieve other state and federal climate policy initiatives: We support the recognition that CARB has developed the leading compliance offset program in the country, if not the world. With the dual benefits of generating GHG reductions in uncapped sectors and promoting environmental, social and economic co-benefits, we agree the offset program has been a success. We support the suggestion that the state explore other avenues for these high quality offsets, including for example the mandate for the state to be “Carbon Neutral” or in international aviation efforts.

Thank you for the opportunity to comment on these important recommendations.

Sincerely,



Sheri Buretta, Board Chair  
Chugach Alaska Corporation



Michelle Anderson, President  
Ahtna, Inc.



Anthony Mallott, President and CEO  
Sealaska Corporation