



December 10, 2014

Clerk
Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted via <http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: U.S. Forest Projects Compliance Offset Protocol

Please accept these comments on behalf of the American Forest Resource Council (AFRC) and its members.

AFRC is a nonprofit corporation that represents the forest products industry throughout Washington, Oregon, Idaho, Montana, and California. AFRC represents over 60 forest product businesses and forest landowners, including forest landowners, wood products manufacturers, energy facilities and loggers in the State of California. AFRC's mission is to create a favorable operating climate for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving state and federal laws, regulations, policies and decisions regarding access to and management of forest lands.

Not only AFRC's California members, but others who depend on California forest lands for a source of supply, are greatly concerned about revisions currently being proposed to the Compliance Offset Protocol for U.S. Forest Projects. As we understand these revisions, we believe they would severely limit the ability of forest landowners who utilize even-age silviculture to participate as offset providers in California's Cap and Trade Program.

As you know, even-age silviculture is regulated under California's forest practices rules as a lawful use. Those rules require reforestation, limit the size of even-age units and prescribe adjacency and green-up requirements. Private forest landowners, including among them AFRC members, calculate the sustained yield of their forest lands based on these established regulations as part of their long-range business planning. A change to the cap-and-trade rules that is at substantial variance with the forest practices rules stands to disadvantage these environmentally responsible companies and limit their ability to participate in the carbon market.

Specifically, we read Section 3.1(a)(4) of the revised Offset Protocol for U.S Forest Projects to require adjacency requirements that would result in 15 -20 years between harvests, in contrast to the California forest practice rules which require between 3-5 years between harvests of adjacent stands. We are very concerned with the width of the buffers that far exceed the adjacency

5100 S.W. Macadam Avenue, Suite 350
Portland, Oregon 97239
Tel. (503) 222-9505 • Fax (503) 222-3255

requirements of the forest practices rules. We are unable to find any justification based on beneficial impacts on carbon stores for the restrictions contained in the proposed protocol.

We ask that Section 3.1(a)(4) be omitted from the proposed revisions to the protocols.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Tom Partin". The signature is written in dark ink and has a fluid, connected style.

Tom Partin
President