

June 4, 2015

Ms. Mary Nichols
Board Chairman
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814
[Submitted via website](#)

Re: Rulemaking to Consider the Adoption of a Proposed California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation, Including Compliance Offset Protocols

Dear Chair Nichols and Board Members:

The California Forestry Association (Calforests) is concerned that the proposed amendments to the U.S. Forest Protocol fell short of simply adding clarity to the existing Protocol. Calforests have joined many other organizations in a letter requesting removal from consideration three portions of the proposed U.S. Forest Offset Protocol update and associated definitions. In addition, there are other technical issues with the proposed amendments.

Examples of technical issues are:

- As increased improved forest-management projects are undertaken, they will influence the Forest Inventory and Analysis (FIA) information. That should not change the "Common Practice." The increase in stocking is not Common Practice but rather the result of increased stocking levels due to registered projects that come with 100-year permanence commitments to maintain Common Practice stocking levels plus committed carbon offset volumes.
- When market conditions are such that less harvest occurs, standing inventory will rise; hence, Common Practice should incorporate "averaging."
- The Local Management Unit changes are inappropriate; there should be no new equation. A project that has higher than Common Practice and a verifier determines that Common Practice and lower carbon stocking is feasible; that should not generate a new equation.
- As currently proposed, the new section on stocking status when even-aged regeneration harvest is utilized has two missing requirements from the California Forest Practices Act implementing regulations that will cause

unnecessary delay, added cost and would not be able to complete a full verification.

We believe the California Air Resources Board (Board) should direct staff to convene a stakeholder workgroup to better address the complex technical issues involved.

We urge the Board to remove the three sections and associated definitions identified in the joint letter and urge the staff to conduct additional workshops to address all of the technical issues above, plus those that will be raised in comment letters by other stakeholders.

Sincerely,

A handwritten signature in black ink that reads "Steven A. Brink". The signature is written in a cursive style with a large, prominent "S" and "B".

STEVEN A. BRINK
Vice President, Public Resources