



California Timberlands Division

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June 4, 2015

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

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

Re: Rulemaking to Consider the Adoption of Compliance Offset Protocols, Including Modifications to U.S. Forest Projects Protocol

Dear Chair Nichols and Board Members:

Green Diamond Resource Company actively participated in the development of the U.S. Forest Offset Protocol and is in the process of reviewing opportunities for the development of forest offset projects. We believe the standards contained in the current protocol (which are modeled after the California Forest Practice Rules (CFPR)) promote sound forest management while maintaining timber inventory levels that are higher than "business as usual". Timberland owners are required to make long-term commitments to participate in this program. It is therefore disconcerting that technical aspects of the protocol are being modified so soon after its adoption.

It is our understanding that ARB staff intended to add language to the protocol that mirrored the CFPR to provide regulatory guidance to out of state project proponents and verifiers. Unfortunately, some of the proposed changes do not exactly match the CFPR and will have unintended consequences on California forest projects.

Green Diamond Resource Company has co-signed a letter with several other organizations and landowners requesting removal from consideration three portions of the proposed US Forest Offset Protocol update, and associated definitions. We respectfully request that a technical working group be formed to allow further refinement of the language to better address the complex technical issues involved.

Thank you for your consideration of our request. We would appreciate the opportunity to participate in any protocol technical working group that may be organized.

Sincerely,

Gary C. Rynearson, RPF 2117
Manager, Forest Policy and Communications