



Gavin McCabe, Chair  
Compliance Offset Task Force  
California Air Resources Board (CARB)  
[OffsetTaskForce@arb.ca.gov](mailto:OffsetTaskForce@arb.ca.gov)

**RE: Comments regarding suggested changes to CARB's Compliance Offset Protocols for U.S. Forest Projects**

Dear Chair McCabe and Compliance Offset Task Force Members,

The California Society of American Foresters (CalSAF) appreciates the opportunity to provide comments and recommendations for CARB's U.S. Forest Projects Protocol (Forest Protocol). We support and applaud efforts to improve the existing Forest Protocol as well as consideration of new project types to expand California's carbon offset program.

In reviewing the Final Draft document, the protocol that was of highest interest was Non-Consensus Item 3, New Protocol Type: Avoided Wildfire. What caught our attention was the discussion of reasons for which the protocol was not supported by some subgroup members, which did not occur in the two other items with non-consensus. Also, the stated reasons for non-consensus were almost the exact opposite of the stated goals in *California's Wildfire and Forest Resilience Action Plan (2021)* and *California Forest Carbon Plan (2018)*, among other policy documents.

The claim that fuels reductions do not provide carbon benefits is countered by peer reviewed research (Liu, et al 2017, Loudermilk, et al 2014, North and Hurteau 2011, and Winford and Gaither 2012). The statement that fuel reduction activities are better funded through other means including cap and trade revenues ignores the recent trends regarding allocation of revenues generated through that mechanism, grant funds availability, and costs to complete such work. The mention of immediate and short-term carbon loss due to fuels treatments ignores the increased growth and carbon sequestration rates in the thinned stands (Stephenson et al 2014, Van Kooten, Binkley and Delcourt 1995), which often recover all of the carbon removed in less than a decade (Hurteau and North 2010). The statement on issuance of credits ex-ante prior to their accrual sidesteps the fact that projects are required to remeasure 5 to 10 years after credit issuance to ensure that projects are accurate and on track. Finally, the complaint about incentivizing cutting trees or prescribed burning gets to the heart of the issue. Research and public policy have both been pointing to the need for forest thinning and reintroduction of prescribed fire. To oppose this protocol because it could promote the very activities that are needed to reduce GHG emissions, improve forest resilience, and increase the rates of carbon sequestration is at best questionable, given California's current rather dire forest health catastrophe. Clearly, California's forests are now a significant carbon source (as demonstrated by the 2020 fire season) that need to be addressed expeditiously using a variety of tools, including carbon offset credits.

As demonstrated in the recently enacted Shared Stewardship Agreement, there is strong consensus and support for increasing the pace and scale of forest management activities, particularly thinning and prescribed burning.

CalSAF strongly recommends that CARB approve the development of an Avoided Wildfire Emissions protocol.

By encouraging investment in California's rural landscapes and working forests, this offset program provides unique opportunities for landowners to deliver environmental and climate benefits. Expansion of the program, including developing an Avoided Wildfire Emissions protocol, will continue and grow the state's influence around the country and the world.

Chartered in 1916, the California Society of American Foresters, a state section of the Society of American Foresters, represents professional foresters in academia, government, not for profit organizations, and private industry.

Thank you again for the opportunity to provide comments and suggestions to this document. CalSAF looks forward to working with CARB to achieve our climate goals. If you have any questions, please contact past chair John Todd at [education.chair@californiasaf.org](mailto:education.chair@californiasaf.org).

Sincerely,



Timothy Robards, Chair  
California Society of American Foresters

#### References

Hurteau, M.D. and North, M., 2010. Carbon recovery rates following different wildfire risk mitigation treatments. *Forest Ecology and Management*, 260(5), pp.930-937.

Liu X, et al (2017) Airborne measurements of western U.S. wildfire emissions: Comparison with prescribed burning and air quality implications. *J. Geophys. Res. Atmos.*, 122, 6108-6129, doi:10.1002/2016JD026315

Loudermilk EL, A Stanton, RM Scheller, TE Dilts, PJ Weisberg, C Skinner, J Yang (2014) Effectiveness of fuel treatments for mitigating wildfire risk and sequestering forest carbon: A case study in the Lake Tahoe Basin. *Forest Ecology and Management* 323:114-125

North MP and MD Hurteau (2011) High-severity wildfire effects on carbon stocks and emission in fuels treated and untreated forest. *Forest Ecology and Management* 261:1115-1120

Stephenson, N.L., Das, A.J., Condit, R., Russo, S.E., Baker, P.J., Beckman, N.G., Coomes, D.A., Lines, E.R., Morris, W.K., Rüger, N. & Alvarez, E. 2014. Rate of tree carbon accumulation increases continuously with tree size. *Nature*, 507(7490), 90-93.

Winford EM, JC Gaither (2012) Carbon outcomes from fuels treatment and bioenergy production in a Sierra Nevada forest. *Forest Ecology and Management* 282:1-9

Van Kooten, G.C., Binkley, C.S. and Delcourt, G. 1995. Effect of carbon taxes and subsidies on optimal forest rotation age and supply of carbon services. *American Journal of Agricultural Economics*, 77(2), pp.365-374.