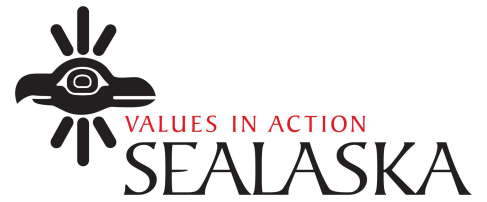




Ahtna



December 15, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814

On behalf of the Alaska Native people which we represent, we thank CARB for the opportunity to participate and comment on the November 30, 2022, Public Workshop: Discussion of US Forest Projects Compliance Offset Protocol.

The UN Intergovernmental Panel on Climate Change has highlighted the importance of forest management as a critical climate change mitigation effort. Forests are key to limiting average global temperature rise, as they provide one of the only readily available, cost-effective means of directly removing and storing GHG emissions at scale, while also providing a host of additional benefits such as shading and cooling, water filtration and storage capacity, and wildlife habitat.

We write to express our strong support for the Cap-and-Trade Program and the use of compliance offset credits as a way to bring uncapped sectors into the program, thereby benefiting many historically disadvantaged communities, including rural and tribal communities. In particular, the Forest Protocol and use of forest offset credits has provided dual benefits of generating significant GHG reductions while promoting environmental, social, cultural, and economic co-benefits for Native Americans. We greatly appreciate CARB's efforts to promote the importance of well-managed forests, and we are proud to have developed and submitted significant forest management projects to CARB.

With the dual benefits of generating GHG reductions in sectors of the economy not regulated by Cap-and-Trade, and promoting environmental, social, cultural, and economic co-benefits, we agree the offset program has been a success. Maintaining the effectiveness and improving the efficiency of the Program while retaining its rigor, including the use of new technologies and methodologies for inventory and modeling of forest carbon projects, is an important recommendation that we support. We also encourage CARB to include additional regions of Alaska into the Program. We further thank CARB for your acknowledgement of the protected status of Alaska Native tribal lands.

We appreciate your commitment to this important program, and we urge California to continue its leadership nationally and internationally in addressing climate change. We support the suggestion that California 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 again for the opportunity to comment on this important program.

Sincerely,



Sheri Buretta, Board Chair
Chugach Alaska Corporation



Michelle Anderson, President
Ahtna, Inc.



Anthony Mallott, President and CEO
Sealaska Corporation