

September 26, 2007

Mary Nichols, Chair
Members of the Board
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Re: California Climate Action Registry Forestry Protocols

Dear Chair Nichols

The Nature Conservancy unequivocally supports the recommendation to the Air Resources Board by its staff to endorse the California Climate Action Registry (CCAR) Forest Protocols at your October meeting. This action is an important and essential next step in the effort to produce real, verifiable emissions reductions, in this case from voluntary early actions from the forest sector. In addition, by endorsing the forest protocols in October, you will be able to report emissions reductions to the Governor and Legislature demonstrating quantifiable, early progress towards meeting the emissions level mandated by AB 32.

The CCAR Forest Protocols are the most rigorous set of standards for greenhouse gas reduction projects in the world. They were developed through a robust multi-stakeholder process that included scientific peer review and multiple public meetings. They incorporate commonly accepted principles for high-quality greenhouse gas reduction projects including the principles of permanence, baseline, additionality, verifiability, independent certification and environmental integrity all required by AB 32 and recommended by the Market Advisory Committee in its final report to your Board. You can be confident that projects consistent with the CCAR Forest Protocols will produce real emissions reductions with high value and unimpeachable credibility.

The Nature Conservancy commends the ARB staff for proposing a reasonable and prudent two step process in adopting protocols for the forest sector. The first step, before you in October, is to endorse the good work that has already been completed by CCAR and its working group. The second and next step is to use the existing protocols as the foundation for refinements, new methods, or potentially additional protocols as appropriate.

Several forest projects are currently working their way through the CCAR process and The Nature Conservancy is a partner in one in Mendocino County. We are beginning to see the market respond; emissions reductions from the forest sector are the most sought after offsets and are attracting some of the highest prices on the voluntary market. Endorsing the protocols now will reinforce this trend, further reduce uncertainty and send a signal to land owners that emissions reductions from the forest sector are real, endorsed by the state, and of high value. This action will encourage other entrepreneurs to develop new projects producing emissions reductions quickly before the AB 32 regulatory program becomes effective in 2012.

Confidence in the Forest Protocols is further strengthened by the significant support they have drawn from a broad cross section of conservation, business, and government entities. The Forest Protocols have the backing of the state Legislature, the California Climate Action Registry and many state agencies and departments including the California Energy Commission, the Department of Forestry and Fire Protection, and the Board of Forestry.

The Forest Protocols also ensure that forest-activities that produce climate benefits will foster needed public co-benefits for wildlife habitat, biodiversity, water quality and local timber economies. The protocols were designed to ensure that forest-activities undertaken to produce climate benefits are not undertaken at the expense of all the other public benefits that forests provide.

Finally, by endorsing the forest protocols now, CARB will maintain momentum in AB 32 implementation while further reinforcing California's role as a leader in climate policy in the United States and in the world. Endorsement of the Forest Protocols by the Air Resources Board is an important next step. The Nature Conservancy urges you to take it.

Sincerely,

Louis Blumberg
Director of Forest Policy