

THE  
PACIFIC  
FOREST  
TRUST



Private Forests.  
Public Treasures.

October 8, 2007

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812  
Fax: (916) 445-5025

**Re: Support for Endorsement of the California Climate Action Registry  
Forest Protocols**

Dear Chair Nichols and members of the Air Resources Board:

The Pacific Forest Trust (PFT) strongly supports the California Air Resources Board's endorsement of the California Climate Action Registry's Forest Protocols as a voluntary early action measure, as proposed on its October 25<sup>th</sup> docket. We commend the Board for its decision to include the Forest Protocols as the first early action in the forest sector, and the first set of project protocols to be endorsed by the state for voluntary greenhouse gas emission reductions. This timely action will maintain the leadership that ARB has shown to date and establish a strong framework and precedent for including forests in AB 32 implementation.

PFT is a California-based nonprofit organization dedicated to working with diverse partners to sustain the public benefits of private forests. We have extensive expertise in forest and climate issues and have led the development of forest-based certified emission reduction (CER) projects, transactions for the CER market, and policies that achieve substantial climate benefits through forest conservation and stewardship. For almost 15 years we have actively participated in the development of a number of greenhouse gas accounting standards, including the World Resources Institute GHG Protocol for LULUCF, the Regional Greenhouse Gas Initiative (RGGI) and the California Climate Action Registry's Forest Protocols. Working with a forest landowner in northern California we registered the first voluntary greenhouse gas reduction project with the California Climate Action Registry.

The Registry's Forest Protocols are groundbreaking, since they are the first set of greenhouse gas protocols in the world to recognize a suite of forest activities that can help address global warming. The Protocols are based on broadly accepted greenhouse gas reduction principles equivalent to other sectors and contained within the Kyoto Protocol, RGGI and other climate programs. The California Registry's Forest Protocols provide comprehensive reporting, monitoring and verification guidance for projects in conservation, enhanced forest management and reforestation, directly addressing the two main causes of carbon dioxide emissions from forests—conversion and depletion.

Pursuant to the statutory principles enacted by Senate Bill 812 (Sher, 2002), the Forest Protocols were developed over an extensive four-year multi-stakeholder process, including a public workshop and comment period sponsored by the California Energy Commission. They also received

**Main Office**

The Presidio  
1001-A O'Reilly Avenue  
San Francisco, CA 94129  
phone 415.561.0700  
fax 415.561.9559

**Oregon**

2380 NW Kings Blvd.  
Suite 103  
Corvallis, OR 97330  
phone 541.754.6868  
fax 541.754.0014

**Washington**

P.O. Box 4035  
Seattle, WA 98194  
phone 206.292.4747  
fax 206.292.4742

[www.PacificForest.org](http://www.PacificForest.org)  
[pft@pacificforest.org](mailto:pft@pacificforest.org)

substantial scientific peer review and wide input from diverse stakeholders reflecting private and public sectors, and state, federal and international interests, as well as climate, forestry and policy expertise. The Registry Board unanimously adopted the Forest Protocols in June 2005, reflecting broad support by these parties and interests.

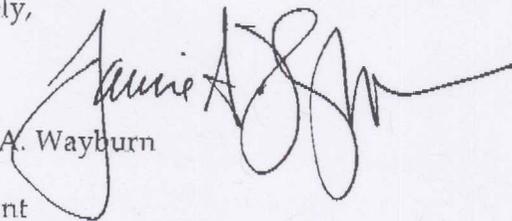
While we recognize that the Forest Protocols, like all greenhouse gas protocols, will evolve over time as the state further defines its plan for AB 32 implementation, we believe that the existing Protocols are a critical foundation and sound starting point for future policy development. Endorsement of the Forest Protocols will send a strong and much-needed signal to forest landowners, project developers and investors that the state supports greenhouse gas reduction projects from the forest sector. This will, in turn, encourage broader participation and greater investment into achieving immediate and lasting greenhouse gas reductions.

In closing, the Pacific Forest Trust strongly encourages the Air Resources Board to endorse the Forest Protocols as a voluntary early action measure for the forest sector. It is a positive step forward and an enormous opportunity for forests to contribute in a meaningful way towards achieving the goals of AB 32. We look forward to working with CARB and others to continually improve the Forest Protocols and ensure their ongoing effectiveness.

Sincerely,

Laurie A. Wayburn

President



cc:

Daniel Sperling, Air Resources Board  
Jerry Hill, Air Resources Board  
Dorene D'Adamo, Air Resources Board  
Barbara Riordan, Air Resources Board  
Lydia Kennard, Air Resources Board  
Sandra Berg, Air Resources Board  
Ron Roberts, Air Resources Board  
Judy Case, Air Resources Board  
Ronald Loveridge, Air Resources Board  
Secretary Linda Adams, California Environmental Protection Agency  
Secretary Mike Chrisman, California Resources Agency  
Jackalyne Pfannenstiel, California Energy Commission  
Crawford Tuttle, California Department of Forestry and Fire Protection  
Tony Brunello, California Resources Agency  
Jim Boyd, California Energy Commission  
Lynn Terry, California Air Resources Board  
Dale Shimp, California Air Resources Board  
Jeanne Panek, California Air Resources Board  
Eileen Tutt, California Environmental Protection Agency  
Susan Kennedy, Office of the Governor

October 9, 2007

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812  
Fax: (916) 445-5025

**Re: Support for Endorsing the California Registry's Forest Protocols**

Dear Chair Nichols and members of the California Air Resources Board:

The California Global Warming Solutions Act, also known as Assembly Bill 32, represents a pivotal moment in California's history and creates an enormous opportunity for California's forest community to engage in voluntary, incentive-based efforts to enhance the forestland base and reduce greenhouse gas emissions. As landowners, managers and stewards of California's forests, we encourage the California Air Resources Board (CARB) to adopt the California Climate Action Registry's Forest Protocols as a first step to engaging forests in this landmark effort.

Forests provide significant climate benefits by naturally absorbing and storing carbon dioxide from the atmosphere. They also provide a wealth of other critical public benefits such as improved water quality, wildlife habitat, biodiversity, forest products, recreation and healthy local economies. However, every year California's forests face competitive pressures from conversion and development. As a result, California loses approximately 35,000 acres annually to non-forest uses, which further depletes the forestland base and emits greenhouse gases into the atmosphere.

There are a number of ways that California's forests can help the state meet its climate goals. Voluntary programs and incentives to encourage forest management and conservation would allow landowners and foresters to keep forests in active production, avoid greenhouse gas emissions and absorb more carbon from the atmosphere. They would also allow forests to remain in private ownership, benefiting local economies and communities.

To start developing incentives and market-based programs for forests, CARB must first adopt a strong accounting framework for measuring forest-based emissions reductions. Based on broadly accepted greenhouse gas reduction principles reflected in regional, national and international climate programs, the Forest Protocols help ensure that forest-based reductions are real, additional, verifiable, permanent, and do not degrade the forestland base. Thus, the existing Forest Protocols provide a credible and rigorous basis for developing a suite of programs and policies for forests.

If we are going to succeed in reaching the state's ambitious targets under AB 32, we are going to need the willing participation of all sectors. Adopting the Forest Protocols is an important first step because it shows that CARB is committed to pursuing opportunities to engage the forest sector in the California's groundbreaking climate policy. As members of the forest community, we respectfully urge CARB to endorse the California Climate Action Registry's Forest Protocols at the next Board Meeting.

Sincerely,

Baldwin, Blomstrom, Wilkinson & Associates

Mark Andre, Associate, Registered Professional Forester (RPF)

Kenneth Baldwin, Associate, RPF

Greg Blomstrom, Associate, RPF

Jared Gerstein, Associate, RPF

Paul Harper, Associate, RPF

Mark Lancaster, Associate, RPF

Bill Wilkinson, Associate, RPF

Thembi Borrás, RPF

Borrás Forestland and Road Management

Tom Gaman, RPF

President, East-West Forestry Associates

Robert Haas

Landowner, Siskiyou County

Robert Heald, RPF

Former Member of the Board of Forestry

Gary Hendrix

Forest Manager, Phillips Brothers Mill est. 1897

John C. Hooper

OZ Farm Landowner, Mendocino County

Robert J. Hrubes, Ph.D.

Senior Vice President, Scientific Certification Systems

Robert Kirkwood

Landowner, Alpine County

Richard Klein

Landowner, Humboldt and Trinity Counties

Marilyn Renaker

Landowner, Trinity County

Sherry Skillwoman

Former Certified Timber Cruiser

Peter Stent

Landowner, Shasta County

Berry Stewart

Northwest California Resource Conservation and Development Council

cc:

Daniel Sperling, Air Resources Board  
Jerry Hill, Air Resources Board  
Dorene D'Adamo, Air Resources Board  
Barbara Riordan, Air Resources Board  
Lydia Kennard, Air Resources Board  
Sandra Berg, Air Resources Board  
Ron Roberts, Air Resources Board  
Judy Case, Air Resources Board  
Ronald Loveridge, Air Resources Board  
Secretary Linda Adams, California Environmental Protection Agency  
Secretary Mike Chrisman, California Resources Agency  
Jackalyne Pfannenstiel, California Energy Commission  
Crawford Tuttle, California Department of Forestry and Fire Protection  
Tony Brunello, California Resources Agency  
Jim Boyd, California Energy Commission  
Lynn Terry, California Air Resources Board  
Dale Shimp, California Air Resources Board  
Jeanne Panek, California Air Resources Board  
Eileen Tutt, California Environmental Protection Agency  
Susan Kennedy, Office of the Governor

Pacific Forest Trust • The Nature Conservancy • Sierra Club California  
California Council of Land Trusts • Environmental Defense • California Trout  
Trust for Public Land • The Conservation Fund • The Wilderness Society  
Trout Unlimited • Defenders of Wildlife • Save the Redwoods League • Sierra Forest  
Legacy • Greenbelt Alliance • California Oak Foundation • Californians Against Waste

October 9, 2007

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812  
Fax: (916) 445-5025

**Re: Support for Adoption of the California Climate Action Registry Forest Protocols**

Dear Chair Nichols and members of the California Air Resources Board:

The organizations listed above support the California Air Resources Board's timely adoption of the California Climate Action Registry Forest Protocols. Authorized by statute and developed through extensive public review, the Registry's Forest Protocols (Forest Protocols) provide a strong greenhouse gas accounting platform to engage the forest sector in voluntary early action measures to help mitigate global warming and meet the state's greenhouse gas reduction goals pursuant to Assembly Bill 32.

The Registry's Forest Protocols are the first set of greenhouse gas protocols in the world to recognize a suite of forest activities that can help address global warming. Based on broadly accepted greenhouse gas reduction principles reflected in AB 32, the Kyoto Protocol, the Regional Greenhouse Gas Initiative and many other climate programs, the Forest Protocols provide guidance on reporting, monitoring and verification for three types of forest projects: conservation (avoided conversion), conservation-based forest management, and reforestation. They were developed through an extensive four-year multi-stakeholder process, including a public workshop and comment period sponsored by the California Energy Commission and substantial public and scientific review from the private and public sectors, state, federal and international interests, and climate, forestry and policy experts.

In addition to climate benefits, the Forest Protocols promote other valuable and much-needed public benefits for California. These co-benefits include the protection and enhancement of water quality, wildlife habitat, biodiversity, and local timber economies. The Protocols are designed to promote and maintain native tree species and natural forest conditions, so forest projects that create climate benefits also lead to other co-benefits, and are not carried out at their expense.

The Board's adoption of the Forest Protocols will maintain California's leadership in forest and climate policy. It will provide critical momentum for greenhouse gas reductions from the forest sector and help the state meet the AB 32 mandated emissions level. The Forest Protocols are a significant first step, and will only improve with time and implementation by the Board. We therefore urge the Board to take advantage of this opportunity and commend the Board and staff for its initiative on this issue.

Sincerely,

Californians Against Waste

1

10/09/2007 06:59 4155619559 PFT 02/04 PAGE

10/09/2007 06:59 4155619559 PFT 03/04 PAGE

October 9, 2007

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812  
Fax: (916) 445-5025

**Re: Carbon Market Community Supports Adoption of the California Registry's Forest Protocols**

Dear Chair Nichols and members of the California Air Resources Board:

Global warming is the largest environmental and, ultimately, economic crisis of our time, requiring immediate and lasting action. The California Global Warming Solutions Act, also known as Assembly Bill 32, represents a pivotal moment in U.S. climate policy and creates a tremendous opportunity for the business community to concurrently protect forests from further depletion and reduce greenhouse gas emissions. As investors and advisors in the carbon market, we strongly encourage the California Air Resources Board (CARB) to adopt the California Climate Action Registry's Forest Protocols for voluntary early actions as a key step to supporting the marketplace for highly credible forest-based emissions reductions.

In anticipation of further state action on climate change in fulfillment of AB32, the market is already responding with significant demand for California's emissions reductions, including from the forest sector. When conserved and managed well, forests provide major climate benefits by naturally absorbing and storing carbon dioxide from the atmosphere. They also provide a wealth of other critical public benefits such as improved water quality, wildlife habitat, biodiversity, forest products, recreation and healthy local economies. These are the kind of co-benefits that make the forest sector so attractive. However, while an obvious choice for their potential benefits, forests have not yet been widely embraced by the market due to uncertainties. These uncertainties are now being addressed in California by the CCAR Forest Protocols.

To ensure that forests are working towards, and not against, state climate goals, CARB must first adopt a strong accounting framework for measuring forest-based emissions reductions. Based on broadly accepted greenhouse gas reduction principles reflected in regional, national and international climate programs, the Forest Protocols help ensure that forest-based reductions are real, additional, verifiable, and permanent. These principles are absolutely necessary for making emissions reductions from forests an effective and sound climate investment, and are a basic requirement for the global market. Because the Forest Protocols are consistent and compatible with regional, national and international standards, they will allow forest-based emission reductions to be tradable in the overall carbon marketplace, which will stimulate investment and innovation.

We believe the existing CCAR Forest Protocols provide a credible and rigorous basis for utilizing forest emissions reductions to help meet California's cap and mitigate global warming. California has an incredible opportunity to lead at the cutting edge of climate policy, to choose now to continue the CCAR's innovative work and increase certainty for the market. Adopting the Forest Protocols for voluntary early actions under AB32 is an important first step as it shows that CARB is committed to pursuing opportunities to credibly engage the forest sector in the state's pioneering climate policy. As participants in the growing carbon market, we respectfully urge CARB to adopt the California Climate Action Registry's Forest Protocols at the next Board Meeting.