



JOHN DEERE

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23 October 2007

Honorable Mary D. Nichols
Chair
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Re: Climate Action Registry Forestry Protocols as AB 32 Early Action Items

Dear Chairwoman Nichols:

Deere & Company appreciates the opportunity to comment on the Air Resources Board's (Board) proposed California Climate Action Registry (CCAR) protocols. Although the Board is not considering regulatory action at this time its endorsement of the protocols marks an important step in the development of carbon accounting in forest projects.

As the world's leading manufacturer of agricultural and forestry equipment John Deere is keenly aware of the role that sustainable forestry practices and advanced harvesting technology will play in helping California and others meet their greenhouse gas (GHG) emission reduction goals. John Deere has five major business operations in California, including NavCom Technology, which provides the latest information technology tools, such as global positioning systems and wireless communications that can also be used to help grow healthier and more productive forests.

Deere supports the staff's proposal for the creation of a stakeholder working group to address working forests and other issues necessary to broaden the forestry sector participation and would like to participate in this group. The proposed protocols do not address active forest management which will provide net carbon sequestration benefits additional to that of an unmanaged forest. A working forest protocol addressing disease, pest, and fire management is essential to maximize the benefits of carbon storage and the use of carbon neutral fuels from woody biomass. It is important that an active management protocol be aligned with other national protocols, such as the Chicago Climate Exchange. This alignment will encourage California's forest land owners participation in the broader carbon market, thereby benefiting the environment through increased measures to sequester and/or reduce GHG emissions.

Undoubtedly, California's forest resources will play a critical role in helping the state meet its GHG emission reduction targets. Developing active forest management protocols aligned with the Chicago Climate Exchange will help to encourage greater landowner participation, thereby helping the state achieve its GHG emission reduction goals. We appreciate the opportunity to comment on the voluntary protocols and look forward to working with the Board and other California stakeholders on the development of additional protocols.

Best regards,