



Forest Landowners OF CALIFORNIA

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October 24, 2007

Mrs. Mary D. Nichols, Chairman
California Air Resources Board
100 I Street – P.O. Box 2815
Sacramento, CA 95812

SUBJECT: CCAR Forestry Protocols

Dear Chairman Nichols:

Forest Landowners of California was formed in 1975 to represent the interests of the non-industrial private timberland owners in California. We represent the interests of California's family forests, tree farms and ranches across the entire state and account for approximately twenty percent of California's timberland. Our members have a proud history of responsible management of their California timberlands for the sustained production of timber and other forest products. As an organization, we work to educate our members in responsible management, care and stewardship of their working forests.

Our membership is always interested in new markets for sustainable forest resources, as well as socially and environmentally responsible timberland stewardship practices. Managed California forests have a great potential for sequestering atmospheric CO₂. Our members have monitored the emerging carbon sequestration market with interest, but to date have found little in it of practical financial value to forestland owners who wish to maintain the viability of their working forests for themselves and their children.

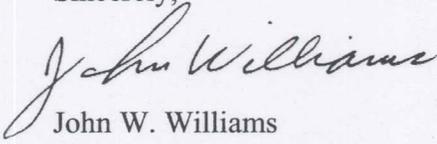
Your October 17 staff report states several times: "The current CCAR protocols represent the work of leading experts in the field of forestry and protocol development, and the input of stakeholders and the public over a four-year process." These and similar statements are highly misleading. The fact is the protocols were developed without input from major forest landowner stakeholders who were simply not interested in the process. At the time it was considered an elitist exercise of little value to those who manage their forest lands to produce forest products. Mainstream forest landowner interest has only developed this year, in the aftermath of AB 32.

The protocols recommended by your staff offer no incentive for real-world forest landowners. The only ones who stand to gain from the protocols are those few wealthy enough to purchase valuable timberland and remove it from its intended use. Forest Landowners would welcome the opportunity to work with your staff to develop forest protocols which represent the needs of those who own and work the land.

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We ask you to include Forest Landowners of California as a member of the proposed Forest Sector Workgroup. If California's forest protocols are to be voluntarily applied in the real world, a way must be found to involve the real-world stakeholders who own and manage California's forestlands. The protocols must offer benefits to private family forestland owners or those protocols will not be utilized.

Sincerely,

A handwritten signature in cursive script that reads "John W. Williams". The signature is written in dark ink and is positioned above the printed name and title.

John W. Williams
President