

Robert Callahan  
07-10-3



October 24, 2007

Mary D. Nichols  
Chair, California Air Resources Board  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812-2815

**RE: COMMENTS ON THE PROPOSED ADOPTION OF CALIFORNIA CLIMATE ACTION  
REGISTRY FORESTRY GREENHOUSE GAS PROTOCOLS**

Dear Ms. Nichols,

The California Chamber of Commerce, the state's largest business advocate and representing over 16,000 members, is an active voice in the implementation of AB 32. Since the signing of AB 32, the CalChamber has been committed to finding the best solutions to reduce our global greenhouse gas (GHG) emissions without hurting the state's economy or driving businesses and their emissions elsewhere. To be a true leader in the fight against global warming, we believe the state should promote its best practices and programs on a global scale.

The Global Warming Solutions Act of 2006 has given the Air Resources Board (ARB) the enormous task of regulating the state's GHG emissions. A large part of this effort includes the development of a list of early action measures aimed at helping the state reach its 2020 GHG reduction goals. Among the early actions is the proposed adoption of the California Climate Action Registry (CCAR) forestry protocols. The CalChamber has the following concerns and recommendations regarding the adoption of this early action.

We are concerned about the premature adoption of the proposed CCAR forestry protocols before the merits of alternative protocols have been fully examined. Forestry protocols designed in too strict a manner will act as a barrier to landowner participation and will jeopardize the benefits that could be gained by utilizing the natural forest processes of CO2 absorption and storage. We recommend that the ARB conduct a comprehensive review of alternative protocols and work with stakeholders to determine which proposals are best suited to encourage landowner participation while also ensuring careful carbon accounting.

The CalChamber believes that California's forests can serve as a powerful ally in our efforts to reduce our GHG emissions. We look forward to working with you on this topic in the future. If you have any questions, feel free to contact me at (916) 444-6670.

Sincerely,

**Amisha Patel**  
Policy Advocate

cc: Members of the California Air Resources Board  
John Moffat, Office of the Governor  
Chuck Shulock, Program Manager, ARB

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