



## ASSOCIATED CALIFORNIA LOGGERS

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October 4, 2007

Ms. Mary Nichols, Chair  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

**SUBJECT: Endorsement of California Forestry Protocols – OPPOSE**

Dear Ms. Nichols:

Associated California Loggers represents the largely family-owned logging and log trucking companies in California. These companies provide the basic infrastructure for timber harvesting and for collection and transport of woody biomass materials, as well as contributing to both the prevention of forest fires and their clean-up when such fires occur. We strongly believe that loggers should be considered a vital component of the state's efforts on dealing with the global warming debate, including carbon sequestration.

In the few years since the initial release of the California Forestry Protocols developed by the California Climate Action Registry, our members have reviewed these protocols on their own merits, and in comparison to other protocols across the nation.

We are concerned about the efficacy of the California Forestry Protocols in providing the best possible approach to carbon sequestration, and we are greatly concerned that they are being given "fast track" consideration by the Air Board as part of the implementation of AB 32.

We are further concerned that the Air Board has elected to move so quickly on endorsing these protocols when they have not been fully reviewed in the proper venue: the State Board of Forestry.

It is our understanding that a planned symposium on forestry issues between the Air Resources Board and the Board of Forestry was cancelled by the Air Board, and moved to some time in early 2008, some months *after* the Air Board intends to adopt the Forestry Protocols before 2007 concludes.

In addition, we understand that large landowners have stated to the Governor that they will not be able to participate in programs based on the California Protocols, thus depriving the state of up to 10 million tons of CO<sub>2</sub> per year from California air.

ORIGINAL: Board Clerk  
Copies: Executive Officer  
Chair

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We are at a loss to understand the decision to expedite approval of the California Forestry Protocols as part of the important AB 32 implementation without first properly submitting it to review by the Board of Forestry, and to discussion and scientific review by forestry experts, particularly as a majority of California land owners cannot participate in programs using these protocols as they currently stand.

The idea that these protocols are “low hanging fruit” -- among the simplest, earliest, and easiest ways to start dealing with the global warming issue – strikes us as premature. The importance of timber and wood products as a “net carbon sink” is such that the AB 32 implementation of forestry protocols should not be dealt with quickly and without proper analysis of the math and science involved.

The argument that the Board of Forestry reviewed and endorsed these protocols several years ago and consequently should be considered in support of them now does not hold water. This is because as we understand it, the approval at that time for those protocols was not in the context of AB 32 (which didn't exist yet) and its implementation. The protocols were endorsed so as to see how they might work, and have barely been used in the field since that endorsement was given.

In addition, the idea that these protocols will simply be “voluntary measures” subject to future reworking and re-development begs the question: if they aren't useable or ready now, why lock them into the regulatory framework even as a “starting point”?

Moreover, we understand that the Governor is joining with other leaders of western states for a regional approach (“The Western Regional Climate Action Initiative”), and it is doubtful that other states would commit to the California protocols as they are currently written.

For these reasons, Associated California Loggers respectfully opposes the early adoption of the California Forestry Protocols in 2007. We instead urge the Air Resources Board to confer with the Board of Forestry and other knowledgeable forestry experts on the development of the best possible protocols for use in the implementation of AB 32. Conducting the symposium between the Air Board and the Board of Forestry would be a proper way to begin the process.

Sincerely



Eric Carleson

Executive Director

Associated California Loggers