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September 22, 2009

Mary Nichols, Chairperson California Air Resources Board 1001 I Street Sacramento, CA 95814

Dear Chairperson Nichols and Members of the Air Resources Board:

The Climate Action Reserve and its Forest Workgroup are pleased to present to you a comprehensive update of the Forest Project Protocol for your consideration and adoption. This Forest Project Protocol, Version 3.0 is a pioneering effort that represents a significant advancement in promoting the role of forests to address the challenge of climate change. This update improves the scientific and technical foundations of the protocol, strengthens the greenhouse gas accounting framework, and significantly expands the applicability of the protocol to include public lands and working forests in California and throughout the United States.

There is one issue in the protocol that we would like to clarify for your Board. In seeking to make the protocol's requirements clearer and more broadly applicable across the U.S., the Forest Workgroup and the Climate Action Reserve included language in Section 3.9.2 that established minimum standards for projects that include timber harvest.

The intent of this provision is to ensure that projects meet explicit minimum standards for harvesting to promote environmental integrity. Neither the Reserve nor the workgroup, through this provision, sought to endorse a particular approach to harvesting practices, but instead intended to place limits on certain types of management practices. This provision does not override a landowner's obligation to abide with all applicable laws and regulations, including any governing forest management practices that may be more stringent, nor does it absolve landowners from their commitment under the protocol to maintain and increase the sequestration of forest carbon.







The Climate Action Reserve is very proud of the collaboration that resulted in the Forest Project Protocol, Version 3.0 and is grateful to the Air Resources Board for their support and assistance in this process.

Sincerely,

Gary Gero, President Climate Action Reserve

On behalf of:

Bob Rynearson W.M. Beaty & Associates, Inc.

Connie Best Pacific Forest Trust

Dave Bischel California Forestry Association

Ed Murphy Sierra Pacific Industries

Eric Holst Environmental Defense Fund Gary C. Rynearson Green Diamond Resource Company

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