



August 30, 2018

Rajinder Sahota
Assistant Division Chief, Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95812-2828

Re: Comments on the June 2018 Preliminary Discussion Draft

Dear Ms. Sahota,

The California Forest Carbon Coalition (CFCC) represents a diverse array of California based stakeholders—including conservation groups, Native American Tribes and industrial timberland managers—representing a large portion of California’s forestland that have come together to support a continued role for sustainable forest management and forest-based offsets in achieving the ambitious emission reduction goals set forth in the Global Warming Solutions Act.

To that end, the CFCC agrees with CARB’s June 2018 “Preliminary Discussion Draft” which proposes to adhere to the clear intent of Assembly Bill (AB) 398 and adopt regulatory language that ensures that no more than one-half of the offsets surrendered for compliance come from projects that do not result in “the reduction or avoidance of emissions of any air pollutant *in the state* or the reduction or avoidance of any pollutant that could have an adverse impact on *waters of the state*” (Section 38562c2(E)(ii), emphasis added. In addition, CARB has proposed, and the CFCC agrees, that out of state forestry offsets located in watersheds flowing into California clearly meet this requirement since they contribute to the health of waters of the state and the environmental and economic benefits they sustain. We also encourage CARB to streamline the review process for determining direct environmental benefits (DEBS) by publishing project-specific criteria that would automatically qualify projects for the DEBS designation, such as forestry projects located in the state or in watersheds flowing into the state.

As you know, California forest-based offset projects have substantially enhanced the conservation and sustainable management of California’s forests, while providing cost-effective GHG reductions and many other environmental, cultural and economic benefits to the state. The direct environmental benefit requirement set forth in AB 398 is a clear expression of the Legislature’s intent that forest offset projects continue to provide *direct* environmental benefits in California. We urge CARB to adopt regulatory language that furthers that objective.

Finally, our May 10th comments to CARB requesting a change to how certain types of environmental, health and safety (EHS) violations impact forest carbon offset projects still remains a high priority for the Coalition.

We look forward to working with CARB to expand and improve the offset program going forward. Thank you again for the opportunity to provide you with our recommendations on this vitally important issue.



Sincerely,

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Chairman
Yurok Tribe

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