



February 25, 2021

Gavin McCabe
Chair
Compliance Offset Task Force
California Air Resources Board (CARB)
OffsetTaskForce@arb.ca.gov

Re: Comments regarding Compliance Offset Task Force Final Report

Dear Chair McCabe and Compliance Offset Task Force Members,

The California Forest Carbon Coalition (CFCC) appreciates the opportunity to submit comments regarding the Compliance Offset Task Force's final recommendations. As stated in our May and November 2020 comments to the Task Force, we very much applaud the work of all Task Force Members and appreciate the countless volunteer hours involved focused on improving California's carbon offset program.

The Task Force's Final recommendations are thoughtful and thorough and show the balanced approach in weighing the benefits of adding new offset protocol types, improving existing offset protocols and working to ensure frontline community needs are prominent in all recommendations. CFCC represents a diverse array of California forest landowners, including Native American tribes, conservation groups and industrial timberland managers working to educate policy-makers on California forest's unique space in climate policy and to advocate for progressive forest carbon issues. Together, the coalition's organizations have committed thousands of working hours developing and managing projects representing nearly 20 MMT of sequestered CO_{2e} over more than 1 million acres of California and California-adjacent land.

We appreciate the Task Force considering our May and November recommendations. Now, our main suggestion for the final report is to use the report to educate California policy-makers on the opportunities to expand the use of California-based compliance offsets in California (especially forestry offsets), and to begin updating protocols like the forest offset protocol that has not been updated for over 5 years.

Again, thank you all for your work on the Task Force.

Sincereley,

Joe James
Chairman
Yurok Tribe

Gary C. Ryneerson
RPF 2117
Manager, Forest Policy and Communications
Green Diamond Resource Company

Brian Shillinglaw
Director, US Investments & Operations
New Forests Inc.

Mark Wether
President & CEO
Redwood Forest Foundation, Inc.
Usal Redwood Forest Company, LLC

Lauren Fety
Forest & Climate Project Manager
The Conservation Fund

Richard Gordon
President/CEO
California Forestry Association

John Anderson
Director of Forest Policy
Mendocino Redwood Co/Humboldt Redwood Co

Rich Padula
President
Coastal Forestlands, Ltd.

Bob Ryneerson
Manager, Land Department
W.M. Beaty and Associates

Cedric Twight
California Regulatory Affairs Manager
Sierra Pacific Industries

James Russ
President
Round Valley Indian Tribes

CC:

Paul Cheng, Compliance Offset Task Force Lead (Paul.Cheng@arb.ca.gov)

Jason Gray, Chief, Cap-and-Trade Program (Jason.Gray@arb.ca.gov)