

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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October 24, 2007

Ms. Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

The California Department of Forestry and Fire Protection (CAL FIRE) supports the endorsement by Air Resources Board (ARB) of the California Climate Action Registry (CCAR) Forestry Greenhouse Gas Protocols for Voluntary Purposes. CAL FIRE believes that forestry has a significant role to play in the reduction and avoidance of greenhouse gas emissions. Endorsement of the protocols is an important first step in recognizing and measuring forest contributions to Greenhouse Gas (GHG) reduction and in promoting the use of forest projects to mitigate and offset emissions by other sectors.

CAL FIRE agrees with the importance of providing accounting methodologies that are complete, consistent, transparent, accurate, and conservative. CAL FIRE also recognizes international precedents for standards that require that GHG reductions are permanent, real, additional, independently verified and not double-counted.

As a participant in the four year, multi-stakeholder process described in the ARB staff report, CAL FIRE understands that the proposed protocols include the best information that was available at the time and that the drafting process included steps to address many comments raised by stakeholders and the public. CAL FIRE recommends that the State, in concert with CCAR, continue to consider these issues, including but not limited to permanence, establishment of baselines, accounting of wood products, sampling methodology, use of default equations, use of look-up tables, classification of required and optional pools, and the handling of leakage.

The process for developing additional protocols or amendments should be inclusive and open. It should enhance opportunities for public and private forest landowners to use the forestry protocols. It must also maintain the highest protocol standards. Finally, it should identify and consider feedback from entities that are using and demonstrating the protocols, including CAL FIRE, the private sector, and the US Forest Service.

CAL FIRE looks forward to working with the Resources Agency, Cal/EPA, ARB, CCAR, the Board of Forestry and Fire Protection, the US Forest Service, other state foresters, forest landowners, forest industry, academia, conservation groups, and other stakeholders to improve the forestry protocols.

CONSERVATION IS WISE—KEEP CALIFORNIA GREEN AND GOLDEN

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We believe these improvements will increase the participation of forest landowners in addressing the challenges of climate change, and will help California successfully participate in state, national and international carbon markets for voluntary and regulatory GHG emission offsets.

Sincerely,

A handwritten signature in black ink, appearing to read 'Crawford Tuttle', with a long horizontal line extending to the right.

CRAWFORD TUTTLE
Chief Deputy Director

cc: Tony Brunello, Deputy Secretary, Climate Change and Energy, Resources Agency
George Gentry, Executive Officer, Board of Forestry and Fire Protection
Bill Snyder, Deputy Director, CAL FIRE Resource Management
Doug Wickizer, CAL FIRE, Environmental Protection Program Manager
Cathy Bleier, CAL FIRE, Climate Action Coordinator
Mark Nechodom, USFS Pacific Southwest Research Station
Lynn Terry, Deputy Executive Officer, ARB
Linda Murchison, Division Chief, ARB, Planning and Technical Services
Jeanne Panek, Air Pollution Specialist, ARB, Planning and Technical Services