



**WESTERN  
FORESTRY  
LEADERSHIP  
COALITION**

www.wflcweb.org

To: Western Climate Initiative

Date: April 16, 2008

Subject: Western Forestry Leadership Coalition Response to the Western Climate Initiative Offsets Subcommittee Recommendations

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The Western Forestry Leadership Coalition (WFLC) appreciates the opportunity to comment on the Western Climate Initiative (WCI) offset subcommittee recommendations. The WFLC membership includes the State, Territorial, and Commonwealth Foresters of the western United States and the western Regional Foresters, western Research Station Directors, and Forest Products Lab Director of the US Forest Service. The mission of the WFLC is to promote science-based forest management that serves the values of society and ensures the health and sustainability of western forests.

The WFLC has provided previous comments to the WCI regarding the role of forests in mitigating carbon emissions, which emphasizes that forests store carbon in all parts of the system and that the climate sequestration services provided by forests are substantial.

The WFLC recognizes the benefits of forest management as a way to not only sequester carbon, but to also build healthy forests that avoid carbon losses due to fire, land conversion, and other sources of mortality. Preventing conversion to non-forest uses not only helps to mitigate impacts of change but can also help support the provision of other goods and services (co-benefits) needed by the public for their health and well-being (e.g., wildlife habitat, clean water, recreation areas, etc).

With regards to the Offsets Subcommittee recommendations, the WFLC commends the WCI for their willingness to explore a wide range of opportunities and options to reduce greenhouse gas emissions. The WFLC fully supports the use of offsets in this system to meet the articulated goals of the WCI. The WFLC supports the identified evaluation criteria for the offset program design. There are challenges associated with almost any type of offset project/program management. The forestry community is aware and is responsive to the concerns regarding the use of forest-based offsets (e.g., additionality, permanence, leakage, etc). Several organizations have shown that while there are complexities in dealing with natural systems, there are effective ways to utilize them in an administratively simple and cost effective way (e.g., Chicago Climate Exchange). The WFLC applauds the WCI for recognizing the value of co-benefits and also the desire to stimulate innovation (there are great opportunities for woody biomass utilization and improving the durability of the wood products industry).

The WFLC appeals to the WCI to continue considering forestry in the discussion around offset project types and protocols. While arguments are put forward about the uncertainty of quantifying forest offsets, it is our stance that the costs of not including forestry offsets in a cap & trade solution to climate change will be more detrimental than the costs associated from any learning curve in forest carbon offset projects. We believe there is already enough rigor in existing systems, or in improvements soon to reach the market and that it would be a missed opportunity to stifle forest contributions. While indeed we may see disagreeable site-specific impacts with an offset project from time to time, it is our belief that the lessons learned at-large and the innovation and entrepreneurial gains will significantly out-weigh a “go slow” approach.

The WFLC commends and affirms the WCI’s current approach to involve the broad forestry community in the development of set of acceptable project types. WFLC supports the use of existing standards as a starting point for discussions and encourages the WCI to look closely at those developed by the groups such as the Chicago Climate Exchange as one solid source of credible, functioning standards for forestry.

The WFLC and its membership stand ready to assist the WCI as they move through this process. Please contact Jay Jensen, Executive Director, at 303-445-4366; [jay.jensen@colostate.edu](mailto:jay.jensen@colostate.edu). Thank you.

Sincerely, Jay Jensen

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