



WESTERN FORESTRY LEADERSHIP COALITION

August 13, 2008

Western Climate Initiative

Subject: Western Forestry Leadership Coalition Response to the Western Climate Initiative Draft Design of the Regional Cap-and-Trade Program (July 23, 2008;

<http://www.westernclimateinitiative.org/ewebeditpro/items/O104F18808.PDF>)

Once again the Western Forestry Leadership Coalition (WFLC) appreciates the opportunity to comment on the Western Climate Initiative (WCI) "Draft Design of a Regional Cap-and-Trade Program." 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.

Currently, it is estimated that U.S. forests sequester approximately 10 percent of the nation's industrial emissions of greenhouse gases which amounts to over 200 million metric tons of CO₂ equivalents per year¹. Forests are the second largest carbon sink on the planet (second to oceans). We have an opportunity to greatly influence how forests function as carbon sinks (both positively and negatively). WFLC has provided previous comments (April 16, 2008; <http://www.westernclimateinitiative.org/ewebeditpro/items/O104F16918.pdf>) to WCI regarding the role of forests in mitigating carbon emissions.

Our comments below focus on the offset section of the current WCI recommendations and build upon similar themes. WFLC believes that a properly structured forest carbon offset program can provide significant ecological, social, and economic benefits in addition to offsetting carbon emissions, and we have previously submitted comments to the WCI supporting the inclusion of forestry as a potential offset type. We are pleased to see that the July 23, 2008 WCI draft design (section 9.3) recognizes forest projects for priority consideration as offsets. We recognize that many challenging technical and policy issues remain to be resolved in order to design and implement an effective forest offsets program and we look forward to engaging and contributing to the development of that program.

WFLC supports WCI's draft design approach to use and adapt (if needed) existing protocols and encourages the development of a simple and flexible system for forestry offsets. There are several types of approaches to defining baseline for forestry offset protocols and each has differing strengths and weaknesses. And obviously additional work is needed to evaluate these approaches to develop a forestry offset program for WCI that promotes clear carbon accounting so that any offset action taken makes a difference for the environment, is cost effective, and simple and flexible enough to encourage participation.

WFLC and its membership offer their assistance to WCI to design and implement an effective forest offsets program. Please contact Jay Jensen, Executive Director, at 303-445-4366; jay.jensen@colostate.edu with questions or for follow-on discussions. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Jensen".

Jay Jensen, Executive Director

¹ Helm, John A. 2007. Testimony before House of Representatives Select Committee on Energy Dependence and Global Warming, April 26, 2007.