



LINDA S. ADAMS  
SECRETARY FOR ENVIRONMENTAL  
PROTECTION

# CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD



ARNOLD SCHWARZENEGGER  
GOVERNOR

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812-4025  
(916) 341-6000 • WWW.CIWMB.CA.GOV

MARGO REID BROWN  
CHAIR  
MBROWN@CIWMB.CA.GOV  
(916) 341-6051

SHEILA JAMES KUEHL  
SKUEHL@CIWMB.CA.GOV  
(916) 341-6039

JOHN LAIRD  
JLAIRD@CIWMB.CA.GOV  
(916) 341-6010

ROSALIE MULÉ  
RMULE@CIWMB.CA.GOV  
(916) 341-6016

GARY PETERSEN  
GPETERSEN@CIWMB.CA.GOV  
(916) 341-6035

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California Climate Action Registry  
523 W. Sixth Street, Suite 428  
Los Angeles, CA 90014  
213-891-1444

Attn: CCAR Forest Project Protocol 3.0 Working Group

**Subject:** Revised Forest Project Protocol

California Integrated Waste Management Board (CIWMB) staff have not been involved in the development of revisions to the Forest Project Protocol, but recently became aware that the revised protocol might incentivize the landfilling of wood products over alternative options, such as composting or recycling.

Without commenting substantively at this time, CIWMB believes that if landfill sequestration of wood products is being discussed as part of this protocol, then the relative greenhouse gas emissions from alternative uses of such material should also be evaluated. As such, CIWMB suggests that meetings need to be set up during the 45-day comment period with a range of stakeholders who would have differing perspectives on this particular issue. These stakeholders would include compost and mulch facilities, landfill operators, biomass to energy facilities, and recycling entities.

CIWMB staff believes this input is critical and looks forward to working with CCAR, the Forest Project Protocol 3.0 Working Group, and stakeholders in the development of this protocol before it is finalized.

Sincerely,

Brenda K. Smyth, Division Chief  
Statewide Technical & Analytical Resources California

cc: Derik Broekhoff, CCAR Policy Director

