



YUROK TRIBE

190 Klamath Boulevard • Post Office Box 1027 • Klamath, CA 95548



Via online submission

July 17, 2012

Climate Action Reserve
523 W Sixth St, Ste 428
Los Angeles, CA 90014
(213) 891-1444

RE: Comments on Federal Lands White Paper

Aiy-yu-kwee':

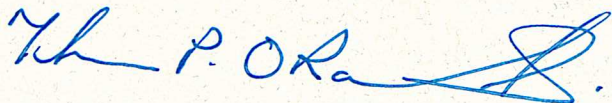
The Yurok Tribe is a natural resources tribe with extensive forest lands held in fee by the Tribe and in trust by the United States for the benefit of the Tribe. Yurok is currently developing a 21,240 acre carbon project under Climate Action Reserve (Reserve) Forest Project Protocol v.3.1 on Tribal fee lands that lie both within and outside the Yurok Reservation. The Tribe, at a point in the future, may seek to have these project lands taken into trust by the United States for the benefit of the Tribe. To ensure appropriate standards are applied to this and other tribal projects, Yurok is providing comments on the Forest Offset Projects on Federal Lands White Paper (White Paper).

The White Paper provides a general overview of federally owned and managed lands and lists the Bureau of Indian Affairs (BIA) as an agency administering a portion of such lands. The BIA has primary responsibility for administration and management of lands held in trust for the benefit of Indians and tribes. While title to these trust lands are held by the United States, Indians and tribes are the beneficial owners. For this reason, trust lands are unique and distinguishable from other federal lands.

It is our understanding, which is based on conversations with Reserve staff and the specific concerns identified in the White Paper regarding the conformance of projects on federally owned or managed lands to fundamental principles of quality offsets, that both tribal fee lands and lands held by the federal government in trust for the benefit of Indians and tribes are beyond the scope of the White Paper. While tribal forest projects may present certain concerns peculiar to tribes, tribal projects are not considered a part of the offset projects on federal lands as discussed in the White Paper.

The Tribe appreciates the willingness the Reserve has shown to work with the Tribe to address tribal concerns. Yurok plans to continue to work with the Reserve to ensure tribal carbon projects provide real, additional, permanent, and verified emission mitigation offsets. Should you have any questions, please contact Staff Attorney Nathan Voegeli at (707) 482-1350 ext. 1408 or nvoegeli@yuroktribe.nsn.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Th P. O'Rourke, Sr.", with a stylized flourish at the end.

Thomas O'Rourke, Sr.
Chairperson, Yurok Tribe