



Ahtna



July 10, 2019

Climate Action Reserve
818 West 7th Street, Suite 710
Los Angeles, CA 90017

Re: Comments on CAR draft U.S. Forest Project Protocol Version 5.0

Dear Climate Action Reserve,

On behalf of the Alaska Native People which we represent, we appreciate the opportunity to comment on this new Forest Protocol. The undersigned Alaska Native Corporations (ANCs) strongly support your draft U.S. Forest Project Protocol (FPP) Version 5.0, released June 6, 2019. The draft FPP v5.0 makes many meaningful improvements to the protocol that will reduce barriers and costs and enhance usability.

One particular provision which rightfully clarifies that tribal lands, including land owned by Alaska Native Corporations and Hawaiian homelands, are treated the same as public lands in terms of required contribution to the Buffer Pool is a welcome and overdue acknowledgement. This broader definition of “tribal lands” recognizes that ANC lands have land bank protections similar to that of public and tribal lands already acknowledged in previous protocols. Our land is held by ANCs for the benefit of tribal members and is protected against alienation. This fundamental protection against alienation is very similar to tribal land in this regard.

A feature that distinguishes ANCs from non-tribal corporations is our overriding commitment to improving the social and economic well-being of our tribal member shareholder communities through the provision of shareholder benefits. Those shareholder benefits include such programs as dividends; elder care; scholarships; job training, placement, apprenticeships and internships; hiring preferences; death benefits; and extensive cultural programs. These benefits are made possible through the careful management and protection of our forest lands. Having a workable carbon forest protocol is a key feature to help our communities and protect our Native lands. We therefore strongly

support the clarification that lands owned by ANCs should be treated the same as public and tribal lands in relation to the Buffer Pool contribution.

The two largest forests in the National Forest System are the Tongass National Forest in Southeast Alaska and the Chugach National Forest in South-Central Alaska, which total approximately 22

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million acres of coastal temperate rainforests. Making consistent the Buffer Pool contributions will encourage the development of forest offset projects, a key to achieving significant GHG reductions in furtherance of California's emission reduction goals. In addition, these projects provide an important alternative to timber harvest and protect important old growth forests while allowing those lands to remain available for traditional uses of Alaska Natives, alongside multiple environmental benefits.

Thank you for your efforts to update and improve the U.S. Forest Project Protocol.

Sincerely,



Sheri Buretta, Board Chair
Chugach Alaska Corporation



Michelle Anderson, President
Ahtna, Inc.



Anthony Mallott, President and CEO
Sealaska Corporation

cc: John Nickerson, Climate Action Reserve
Philipp LA Haela Walter, Hawaii State Resource & Survey Forester