

Organization: California Oak Foundation
Date Received: September 14, 2009

Subject: CEQA Forest Amendments Query

Mr. Calfee:

The California Oaks Foundation would appreciate clarification of Resource's initial statement of reasons regarding the proposed Appendix G forest amendments.

“As a practical matter, where a mitigation program or measure is consistent with protocols adopted or approved by an agency with regulatory authority to develop such a program, a lead agency will more easily be able to demonstrate that off-site mitigation will actually result in emissions reductions. Examples of such protocols include the forestry protocols described above. Where a mitigation proposal cannot be verified with an existing protocol, a greater evidentiary showing may be required.”

Question: Will the Department of Forestry and Fire Protection be the agency that determines if “a greater evidentiary showing” has been made regarding CEQA alternatives to the CARB forest protocols methodology?

Respectfully,
COF Technical Staff

California Oak Foundation