

December 1, 2015

Board of Forestry and Fire Protection
Attn: Thembi Borrás
Regulations Coordinator
P.O. Box 944246
Sacramento, CA. 94244-2460

RE: TRA 2

Dear Members of the Board,

The California Forestry Association (Calforests) would like to offer the following comments related to the Forest Practice Committee's discussion related to Technical Rule Addendum Number 2.

Our comments specifically pertain to the new section G, Greenhouse Gas (GHG) Impacts. On page 25, there is a listing containing necessary elements to be evaluated in assessing net sequestration or emissions. We believe this assessment needs to evaluate the impact of wood product utilization explicitly. On line 23, we recommend adding at the end of the sentence:

"related emissions and substitution benefits of using wood products rather than common fossil-fuel intensive substitutes"

It is well known that wood products have numerous environmental advantages over non-wood products. This includes less reliance on fossil fuels during manufacture than non-wood building materials, and wood products ability to sequester carbon for the long term. It is important to recognize these favorable qualities of substitution and sequestration.

Thank you for considering our comments.

Sincerely,



Dave Bischel
President