Comment 1 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Scott
Last Name: Miller
Email Address: millercs@roadrunner.com
Affiliation: BioEnergy BlogRing

Subject: Tackle Forest Wildfire Greenhouse Gas Impacts
Comment:

NOTE: an illustrated and source-linked version of this comment is available at http://biostock.blogspot.com/2008/07/ca-draft-scoping-plan-comment.html .

The ill health of our forests is a statewide catastrophe. We are witnessing unprecedented wildfires, bug infestation, and decay that consumes our forests without adequate reforestation efforts. It is estimated by the California Forest Foundation that we are losing over 30,000 acres of timberlands (an area the size of San Francisco) each year to brushlands.

Nationally, six of the seven worst fire seasons on record have occurred within the last eight years with some fires lasting months and covering hundreds of thousands of acres. Just four wildfires that were recently studied were found to emit the GHG equivalent of adding 7 million cars to our streets for one year.

The smoke and emissions from wildfires are greenhouse gases that we can see, smell, and touch as ash and particulate matter is strewn across the landscape. But this is only the start of the GHG problem. Decay contributes 3 times as much greenhouse gas as the fire itself.

The goal of reducing 5 MMTC02E by 2020 seems woefully inadequate considering the GHG from the combustion of just one wiidfire (2007 Moonlight Fire in Plumas National Forest) which burned 65,000 acres has been documented to have generated 4.9 MMT GHG. Unmanaged treatment would add an additional 15 MMT GHG according to a study by the California Forest Foundation. If wildfire trends continue on their current trajectory, we will have to see much greater reductions to maintain the forest managed GHG sequestration defined in the Scoping Plan.

There are forest management practices that can and should be implemented that would mitigate the greenhouse gas impact of these fires while reducing the ferocity of future fires. These practices are not mentioned in the Scoping Plan and I'll list them here:

1 - We need to thin our most vulnerable forests.

Recent reports of a thousand fires in California spotlight the urgency of the problem - which is neither the lightning that sparks the fires nor the lack of firefighting resources to fight

the blazes. The real problem is the density of the number of trees - estimated to be 4-10 times their historic profile - and undergrowth on our largely unmanaged forests.

In 2003, the U.S. Congress passed the 2003 Healthy Forest Restoration Act (HFRA) allocating $750 million dollars in federal funds to thin approximately 20 million acres nationally. Thinned forests contain the spread of wildfires.

Resource allocation to fight forest fires (50% of the current USDA / Forest Service budget) and to answer environmentalist challenges (729 lawsuits between 1989-2003) has resulted in bureaucratic inertia - so only 77,000 acres have been thinned.

Thinning forests won't necessarily reduce the incidence of fires, but it would significantly reduce their size and GHG consequences.

2 - We need to salvage wood from impacted forests.

Reducing the biomass of dead and dying trees would go far to mitigating the GHG impacts of wildfires since decay contributes three times the GHG as the original fire itself. Large diameter wood could be converted into saw logs and building materials that sequester carbon in energy efficient home construction. Scrap wood could be used to cleanly generate green electricity and convert into carbon-neutral biofuels reducing our GHG from fossil fuels.

3 - We need to replant our devastated forests.

From 2001 to 2007, over 143,500 acres of forestland outside wilderness owned by the federal government has not been replanted and has been left to turn into brush.

Following the 1992 Cleveland Fire in the Eldorado National Forest, the U.S. Forest Service replanted some lands, and left some untouched in an experimental ecoplot. Today, trees stand more than 17 feet tall on replanted lands, but brush dominates the untreated ecoplot.

Unlike government-owned lands, private forest landowners quickly remove dead trees and other fuels for additional fires and then replant. It is a part of their enduring legacy for their children.

CARB needs to incorporate these common sense steps into the Scoping Plan otherwise the status quo will prevail. CARB needs to show leadership in fighting bureaucratic inertia caused by public resistance to necessary change in forest management. These problems will worsen in the midst of compounding global warming factors. As the Plan so clearly states "Future climate impacts will exacerate existing wildfire and pest problems in the Forest sector."

We can ill afford to lose the carbon sequestering forests of our state.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-04 09:57:46

No Duplicates.

Comment 2 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: scott
Last Name: miller
Email Address: millercs@roadrunner.com
Affiliation: BioEnergy BlogRing

Subject: Study of GHG from Wildfires
Comment:

```
Please review the following recent study regarding the emissions of
greenhouse gases from wildfires in California funded by The Forest
Foundation of Auburn, CA.

It provides compelling evidence of the need to engage aggressive
forest management practices of thinning to reduce the virulence of
wildfires as well as woody biomass salvaging and forest replanting
to reverse their net GHG emissions impact.
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/2-report_fcem.pdf

Original File Name: Report FCEM.pdf

Date and Time Comment Was Submitted: 2008-07-05 16:31:20

No Duplicates.

Comment 3 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Lynn
Last Name: Jungwirth
Email Address: lynnj@hayfork.net
Affiliation:

Subject: Forest Greenhouse Gases contribution wrong
Comment:

Sirs: Please address your decision to ascribe 0 emissions from forests. The forest fires of today and yesterday produce about 20% of the greenhouse gases of California. The ability of the forest to sequester carbon after some of these fires is very dimished due to ecosystem conversion. check with the NOr Cal air resources board for their estimates from 1999 and today.

If we don't address the wildfire issues we will not make a gain on ggh. Your tables do not reflect wildfire....look out the window. The studies have been done on the emissions and the carbon and the public health issues...please put them in this strategy. Contact Mark Necodem at USFS if you need to.

A wildfire strategy could reduce emission and provide non fossil fuel energy from the byproducts of forest thinnings...why isn't that squarely in your strategy? You talk of the snow pack in the Sierra's ...converting the forests to brushfields is not going to help, either. Please address this glaring hole in your strategy.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 09:58:16

No Duplicates.

Comment 4 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Charlotte
Last Name: Pirch
Email Address: dpirch@socal.rr.com
Affiliation: LWV of Orange Coast

Subject: AB 32 Workshop: Forest management
Comment:

```
OFFSETS FROM SINKS, SUCH AS PLANTING TREES OR AVOIDING TREE
CUT-DOWNS, SHOULD NOT BE ALLOWED, SINCE THEY ARE TOO DIFFICULT TO
MEASURE AND OFTEN UNDER-PERFORM.

REFORESTATION MUST BE DONE BUT IN A MANNER THAT MIMICS AS NEARLY
AS POSSIBLE THE ECO-SYSTEM OF THE FOREST. CLEAR CUTTING AND
REPLANTING IS NOT SUSTAINABLE. FORESTS MUST ME ALLOWED TO AGE
NATURALLY. WE NEED TO REUSE BUILDING MATERIALS OR USE MATERIALS
THAT DO NOT REQUIRE CUTTING OF TREES.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-07 16:46:38

No Duplicates.

Comment 5 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Rachael
Last Name: Katz
Email Address: rkatz@pacificforest.org
Affiliation: The Pacific Forest Trust

Subject: The Pacific Forest Trust comments on draft scoping plan
Comment:

```
Please find comments from The Pacific Forest Trust on the draft
scoping plan attached.

Thank you,
Rachael Katz
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/5-pft_scoping_plan_comments_7-25-08.pdf

Original File Name: PFT Scoping Plan Comments_7-25-08.pdf

Date and Time Comment Was Submitted: 2008-07-25 17:13:35

No Duplicates.

Comment 6 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Chris
Last Name: Fitz
Email Address: cfitz@mclw.org
Affiliation: LandWatch Monterey County

Subject: Forests
Comment:

```
Sustainable Forests

The Sustainable Forests measure shows a 5 MMTCO2E reduction.
Emissions reductions are to be achieved through such measures as
forest management and protecting forest land using the CEQA
process.   Regarding the latter, the Plan should require
amendments to CEQA Guidelines to require offsets when forest lands
are replaced by emission increasing activities, i.e., development.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 07:46:28

No Duplicates.

Comment 7 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Gordon
Last Name: Mann
Email Address: gordon@sactree.com
Affiliation:

Subject: urban forestry
Comment:

Thank you for including urban forestry in the scoping plan. There are additional measures that will move the state closer to the reduction goals.

Urban forest trees providing shade on individual structures will reduce the need for cooling energy.

The use of trees to enhance a neighborhood's appearance and cooling temperatures will encourage more walking or bike riding and less vehicle use.

The use of individual solar panel units on homes is in direct conflict with the use of trees to shade and reduce energy used for cooling. Instead of individual solar systems, group or farms could be set in strategic locations such as urban parking structures (where the shade will improve air quality), large or tall building roofs that are not easily shaded and would doubly benefit from the shade of the solar panels.

The sequestration of carbon will be increased.

There are great opportunities for urban wood utilization. The state could support this limited market by grouping or coordinating between smaller markets and regions.

There are many environmental co-benefits to trees such as improved air quality, reduced ambient air temperature and heat island effects, enhanced community appeal, increasing the tree canopy in underserved communities.

The state could set models for creating ordinances or laws to protect existing tree canopy and setting targets for new tree canopy. There should be a direct requirement to include urban trees with new development or re-development to offset the impacts of human activities.

There are great opportunities to include trees along most state routes to mitigate air quality and provide shade reducing the ambient air temperature and heat island effect.

Many of the tree planting opportunities can be performed by volunteers and nonprofits building community, civic pride, and support for the state goals. Following the tree planting, young tree maintenance can be performed by the same groups. This provides a large return on investment.

Another area the state could set parameters with is the leadership with landscape architects and tree growing nurseries to use the best tree species in designs and growing those trees. Nurseries continue to grow trees known to be high BVOC emitters and Landscape Architects continue to specify high BVOC emitters, infrastructure damaging species, and often don't provide the necessary space for the plant to thrive. With every landscape design, a maintenance plan should be required to support the design achieving the intended affect.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 15:40:30

No Duplicates.

Comment 8 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Evy
Last Name: Justesen
Email Address: evyjust@gmail.com
Affiliation:

Subject: Forrest
Comment:

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Mandate change from harvesting slow growing trees for wood based
products to faster growth plants such as bamboo and hemp.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-30 21:40:46

No Duplicates.

Comment 9 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: cory
Last Name: Brennan
Email Address: cory8570@yahoo.com
Affiliation: Green Leadership Consortium

Subject: Forests
Comment:

```
Stop subsidizing logging, and instead provide incentives for
alternative solutions such as treeless wood and paper products and
recycling.
Ensure that forest management methods being used comply with state
of the art understanding of how natural systems work and eliminate
unworkable fire suppression methodologies, etc.
Focus on remediating erosion and water availability (via water
catchment methods such as gabions) so that forests can better
recover from unsustainable logging and ranching practices, fire,
disease, pollution and other man made stressors.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-07-31 08:32:38

No Duplicates.

Comment 10 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: William
Last Name: Stewart
Email Address: stewart@nature.berkeley.edu
Affiliation:

Subject: Count all climate benefits of forests and forest products
Comment:

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The attached letter identifies the opportunities for forests to
provide even more climate benefits if all benefits are accounted
for. Counting only forest sequestration could have unintended
negative consequences
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/11-stewart_ab_32_scoping_comments.pdf

Original File Name: Stewart AB 32 Scoping comments.pdf

Date and Time Comment Was Submitted: 2008-08-01 08:56:32

No Duplicates.

Comment 11 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Zheng
Last Name: Liang
Email Address: lawrence.liang@verizon.net
Affiliation: 909-931-1267

Subject: Subject: Livestock is a marjor reason of global warming
Comment:

Comment:

It is great to know that you as a govenment officials take the iniate to act on this issue of global warming, I was encouraged by
you and appreciated your great effort. That's the government that we people need.

After went through your plan, I have found out a big loop hole in the whole act, that is you missed the big picture of the whole issue: the main reason to cause the global warming. If you check all the publication from Nasa Website, Many sicientist have already prooved that the most contribution of the global warming is from live stock industry, meat eating of us is the real reason behind it. Only if we know about the truth, then we can find the right way to solve the problems. Vegetarianism is the best way to stop the global warming.

According to Senior UN Food and Agriculture Organization (FAO) official Henning Steinfeld, livestock are one of the most significant contributors to today's most serious environmental problems and urgent action is required to remedy the situation.? The reasons include:

1. The livestock sector generates more greenhouse gas emissions as measured in CO2 equivalent to 18 percent than transport. It is also a major source of land and water degradation.

2.Livestock generates 65 percent of human-related nitrous oxide, which has 296 times the Global Warming Potential (GWP) of CO2. Most of this comes from manure. And it accounts for respectively 37 percent of all human-induced methane (23 times as warming as CO2), which is largely produced by the digestive system of ruminants, and 64 percent of ammonia, which contributes significantly to acid rain.

3. livestock now use 30 percent of the earth entire land surface, mostly permanent pasture but also including 33 percent of
the global arable land used to producing feed for livestock, the report notes. As forests are cleared to create new pastures, it is
a major driver of deforestation, especially in Latin America where,for example, some 70 percent of former forests in the

Amazon
have been turned over to grazing.

4. The livestock business is among the most damaging sectors to the earth increasingly scarce water resources, contributing among other things to water pollution, euthropication and the degeneration of coral reefs. The major polluting agents are animal
wastes, antibiotics and hormones, chemicals from tanneries,fertilizers and the pesticides used to spray feed crops.Widespread overgrazing disturbs water cycles, reducing replenishment of above and below ground water resources. Significant amounts of water are withdrawn for the production of feed.

For more detail information about livestock, please click the below link: www.fao.org/newsroom/en/news/2006/1000448.

Livestock sector is a major greenhouse gas source. Please do not ignore it. Only vegetarianism can solve the Crysis. Otherwise, by 2012, the world is going to the point of no return. Human specise is going to vanish from the earth including all other living beings. So please add this most important part into your sector or
as a general background of this act.

Thanks for your understanding and acceptance of our suggestions

Zheng Liang

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 12:38:15

No Duplicates.

Comment 12 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Brian
Last Name: Morris
Email Address: brianmorris@countyofplumas.com
Affiliation: Plumas County

Subject: Address Public Health Impacts of Wildfires
Comment:

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Please see attached comments.
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/13-scoping_plan_comments_20080731.pdf

Original File Name: Scoping Plan Comments 20080731.pdf

Date and Time Comment Was Submitted: 2008-08-01 15:31:16

No Duplicates.

Comment 13 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Greg
Last Name: McPherson
Email Address: egmcpherson@ucdavis.edu
Affiliation: US Forest Service

Subject: Comments re Urban forestry in Scoping Plan
Comment:

```
Attached please find comments from the Center for Urban Forest
Research regarding the inclusion of urban forestry in the Scoping
Plan.
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/14-cufr_comments_ab32_scoping_plan.pdf

Original File Name: CUFR_Comments_AB32_Scoping_Plan.pdf

Date and Time Comment Was Submitted: 2008-08-01 15:34:39

No Duplicates.

Comment 14 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: William
Last Name: Keye
Email Address: bkeye@surewest.net
Affiliation: California Licensed Foresters Associatio

Subject: CLFA comments on Draft Forest Sector Scoping Plan
Comment:

California Licensed Foresters Association (CLFA) comments on AB 32 Draft Forest Sector Scoping

Printed copies of the following letter, including citations of data sources, were delivered to the ARB on 8/1/08.

August 1, 2008

Ms. Mary D. Nichols, Chairman
California Air Resources Board
1001 I Street PO Box 2815
Sacramento, CA 95812

Reference: AB 32 Draft Scoping Plan: Sustainable Forests

Dear Chairman Nichols,

CLFA appreciates the opportunity to comment on the above referenced planning document. We note, with pride, that forestry is the only sector under AB 32 that is identified as a net carbon sink. California's forested ecosystems, properly managed, offer the potential to both mitigate and adapt to potential climate change. The purpose of this letter is to identify possible shortcomings in the Draft and to suggest ways to meet and exceed forest sector targets.

We commend you for your decision to turn to the Board of Forestry and Fire Protection (BOF) for assistance in meeting your AB 32 responsibilities. The BOF is uniquely suited to this task. Fortunately, forestry's unique suite of ecosystem services – including carbon sequestration – can be expected to help attract financing in an increasingly carbon constrained economy.

CLFA agrees with the Draft that catastrophic wildfire and forest conversion are two risks to AB 32 targets that need to be addressed. California foresters welcome the discussion.

Catastrophic Wildfire and Increasing Deforestation. California's forests are estimated to store 1 Billion Tons of carbon. The importance of managing these lands to minimize uncontrolled emissions of greenhouse gases is just beginning to be recognized.

Unfortunately, the current trend line is poor. Wildfires in California and other western states are on the increase. Already in 2008, an unprecedented 1.1 million acres of forest and wildlands have burned in the Golden State. Hundreds of thousands of these acres are on national forest lands.

National forests in California hold greater than 50% of all live tree carbon in the state. Deforestation is increasing on these lands due to destructive wildfires converting extensive stands of trees into fields of brush. Last year alone, over 100,000 acres of California national forests were burned into a deforested condition. This year that figure seems likely to be exceeded. Deforestation is a grave threat to forest sector targets, and not adequately represented in ARB estimates. When forests burn, there are the immediate (and potentially massive) emissions of pollutants and greenhouse gases that we see – and breathe – in smoke. But that's just the beginning: timber stands that are burned, neglected and allowed to convert to brush fields slowly decay over a period of decades, resulting in releases of methane, a very potent greenhouse gas. Because of the buildup of dead fuels and brush, these areas often times reburn, again releasing CO2 and other greenhouse gases. Although more research needs to be done, it appears probable that the emissions related to national forest wildfires in California have not been properly quantified in the Draft.

Prompt reforestation following a wildfire is an established practice on private lands, but sadly has become a rarity on national forests. Dead trees removed and utilized for forest products also contain carbon that is sequestered for long time periods or utilized as biomass energy, reducing fossil fuel combustion.

Deforestation of national forest lands resulting from wildfire must be stopped, and the trend reversed. To do this will require greater public awareness and support for active management by qualified resource professionals. We request the BOF and ARB convey to the Forest Service that the status quo is not acceptable and to enlist the cooperation of your federal partners in helping the state meet its AB 32 targets.

Clearly, the 2050 emission reduction goal can be greatly facilitated by aggressive reforestation/afforestation efforts between now and 2020. These efforts include urban tree planting, which CLFA strongly supports.

Besides reversing deforestation, there is the need to prevent the occurrence of catastrophic, stand replacing wildfires in the first place. Reducing high levels of flammable woody fuels in the forest does not completely prevent wildfires, but lessens their size and severity.

Professional foresters can help California convert today's brush fields to tomorrow's forests and transform unnaturally overstocked forests from a fire-prone to fire adapted condition. Required will be new funding mechanisms and an investment in 21st century infrastructure, discussed below.

Forest Loss Through Conversion to Other Uses. CLFA recognizes the legitimate role of permitting and mitigation when it comes to proposals to convert privately owned forestland to other uses such as development or intensive agriculture. Conversion decisions, however, are often a consequence of a landowner's inability to make a reasonable profit on his or her timberland property. Forest management requires long term investments in land tenancy, cultural improvements, and stewardship. Faced with California's costly and duplicative forest practice regulations and declining market conditions, many landowners feel driven to pursue other options.

The Draft suggests a need for more stringent forest conversion permitting requirements as a means of conserving carbon sinks. CLFA agrees that this should be explored. However, we feel that the Draft does not go far enough in recognizing the role that

innovative public policy could play in encouraging stabilization and new investment in the forest sector, promoting economic incentives and sustainable forest management.

California Forestry in 2050 and Beyond: Infrastructure for Sustainability. What kind of forests will we leave for our grandchildren in 2050, or theirs in 2100? CLFA believes that the answer to this question must be, “Healthy, diverse, ecologically resilient, fully stocked and growing.”
We believe that our profession, allied with related natural resource disciplines, can get us there. Given predictions that climate change will impact our forests, CLFA believes that science-based management is all the more essential to conserve resources while facilitating ecosystem adaptation.
But we need help in terms of public understanding and support. Doing nothing needs to be understood as the most devastating course of action.
Investment will also be needed in new technology and processing facilities. Although traditional sawmilling and lumber products will remain part of the industrial mix, the potential exists for a rural network of bioenergy facilities designed to convert woody wastes from forest fuel treatments into carbon-neutral energy products such as electricity, syngas and liquid transportation fuels.
The potential for this type of development is large and increasing with advancing technology. California currently produces 1,000 MW (2%) of our electricity from biomass. Estimates are that this level can be sustainably raised to 4,700 MW, as part of a larger strategy to meet the state’s Renewable Portfolio Standard goals.

Removing barriers to the development of biomass and other forms of bioenergy will be critical to improving the health of our forests and their ability to store atmospheric carbon. There is hope that revenue from capped sectors will play an important role in the future, stimulating new investment and increasing opportunities for forest stewardship on both public and private lands.
CLFA is committed to helping the ARB and BOF in achieving – and exceeding – AB 32 targets for the forest sector. We hope this correspondence will be helpful as you revise the Scoping Draft, enlisting the carbon sequestration potential of the Golden State’s vast forests and wildlands to the fullest possible extent.

Sincerely yours,

Charll K. Stoneman, RPF #2375
President

Cc: Mr. Stan Dixon, Chairman, and Members, California Board of Forestry and Fire Protection (BOF).
Mr. Tony Brunello, Deputy Secretary, Resources Agency.
Mr. Richard Bode, Air Resources Board (ARB).
Ms. Linda Murchison, ARB.
Ms. Jeanne Panek, ARB.
Mr. Randy Moore, Regional Forester, Pacific Southwest Region, USDA Forest Service.
CLFA Board of Directors.

The California Licensed Foresters Association, with a membership responsible for the sustained management of millions of acres of California forestland, represents the common interests of California Registered Professional Foresters. The Association

provides opportunities for continuing education and public outreach to its membership, which includes professionals affiliated with government agencies, private timber companies, consultants, the public, and the academic community. Governed by an elected Board of Directors, CLFA was established in 1980 after the passage of the landmark California Professional Foresters Law.

Attachment: www.arb.ca.gov/lists/sp-forests-ws/15-letter_to_arb_on_forest_sector_scoping_8-01-08_final.doc

Original File Name: Letter to ARB on Forest Sector Scoping 8-01-08 FINAL.doc

Date and Time Comment Was Submitted: 2008-08-01 16:16:37

No Duplicates.

Comment 15 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Steven
Last Name: Goetz
Email Address: sgoet@cd.cccounty.us
Affiliation: Contra Costa County

Subject: Forests
Comment:

```
Appendix C refers to urban forestry strategies to help achieve the
5 Million Metric Tons of Carbon Dioxide Equivalents by 2020 from
the Forests sector.  This strategy discusses “agency planting”.
As an urban land owner, the State should look at its standards for
landscaping on its property and the ability to support urban
forestry through the planting of suitable species of trees in
strategic locations.
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Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 16:25:09

No Duplicates.

Comment 16 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: S
Last Name: Robinson
Email Address: srmw@comcast.net
Affiliation:

Subject: Comments on Forest Scoping
Comment:

Re: Draft Scoping Plan Preliminary Recommendation on Sustainable Forests
Submitted online at
http://www.arb.ca.gov/cc/scopingplan/spcomment.htm

Dramatic reduction in CO2 emissions and additional carbon sequestration are urgently needed. The California legislature and the Governor have boldly stepped forward and we understand that all businesses, governmental agencies and citizens must make sacrifices and changes in order to address this world-wide crisis. All industry sectors will undoubtedly lobby against change and promote their own “science” view. In the end CARB must ensure that good unbiased science is used and that no one industry sector is allowed to escape “transparency.” If one sector gets away without reducing emissions then another sector will have to take up the slack. CARB must continue to hold high standards and be vigilant and ensure that any delegation of work on AB 32 issues to agencies or Boards is not biased by political or industry pressure.

The current forest sector scoping document is a first step but it needs to be significantly strengthened to embrace the bold challenge of AB 32. As currently written it requires little over the status quo for the forest industry. Forests are critical to climate change and forests can either be managed in a way that emits more CO2 than they sequester for decades. The issue of CO2 emissions from forest and forest soils disturbance is one that is not adequately addressed.

--Clearcutting practices produce more CO2 and immediately eliminate more carbon sequestration than other logging methods for a variety of reasons that are clearly documented. Companies like Collins Pines and The Mendocino Redwood Company have embraced sustainable harvest methods that reduce CO2 emissions and sequester more carbon in the short term and long term. This approach needs to be addressed and alternative timber harvest methods that produce less CO2 than clearcutting need to be rquired by Cal Fire Resources.
--Climate change conditions such as higher temperature and less rainfall will severely stress forests. Scientific analyses and reviews show that forestry practices that build diverse unevenaged will increase the chances for healthy forests and wildlife habitat. Plantation forests are more susceptible to climate change impacts and should not be replacing biodiverse properly thinned and maintained forests.
--In one Sierra Nevada County nearly ½ of the entire forest is

privately owned by a company that is converting that forest area to tree plantations following clearcutting type timber harvest. As climate change worsens the impact of that plantation conversion is likely to be disastrous.
--Timber harvest methods need to be those methods that do not degrade watersheds or snowmelt runoff rates for California's critical water supplies. Clearcutting is has the most negative impacts on water.
--CAL FIRE Resources and Board of Forestry need to ensure that all science views on climate change related forestry issues are proactively brought forward and fully evaluated – not just those that support industry views. All calculations and assumptions used in climate change and forestry work need to be readily available for peer and public review. This transparency needs to be strengthened in the foresty arena.

Thank you for the opportunity to comment.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-01 17:19:11

No Duplicates.

Comment 17 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Addie
Last Name: Jacobson
Email Address: Addie Jacobson [addiej@gmail.com]
Affiliation:

Subject:
Comment:

```
this attachement should go with my earlier comment -it would not
attach previously
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/19-epfw_draft_scoping_comments.doc

Original File Name: EPFW draft scoping comments.doc

Date and Time Comment Was Submitted: 2008-08-01 18:02:20

No Duplicates.

Comment 18 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Sue
Last Name: Lynn
Email Address: suelynn403@yahoo.com
Affiliation: Sierra Club

Subject: CARB's Draft Scoping Plan
Comment:

These comments are a response to the Appendix on Forests.

The discussion of forestry in these appendices fails to mention key debates that currently rage between the timber industry and the majority of forestry scientists. The practice of clearcutting has expanded exponentially in the last decade. It’s very surprising that there is no mention of this practice in the forestry section. To assume that it makes no difference what type of harvesting methods are used, as this section seems to do, flies in the face of current research by forestry scientists. I have outlined below some of the major points made by forestry science on this issue, and included footnotes to some major studies.

It is obvious that healthy forests can serve as a source of carbon sequestration. But how those forests are managed has a huge impact on whether they sequester carbon, and if so, in what quantity, or whether in fact carbon emissions caused by certain forest management processes outweigh carbon absorption. The timber industry currently argues that their standard procedures of clearcutting, which involve cutting down older forests and replacing them with plantations of young trees, will help combat global warming. They argue that since young trees absorb more carbon than older ones, the net result will be a reduction in greenhouse gases.

This argument is based on a misunderstanding of what happens to mature forests if they are clearcut. Mature forests continue to store carbon in ever greater quantities for many decades as they age, and cutting them down releases much of that carbon into the atmosphere, thus contributing to global warming. Young trees do absorb carbon quickly, and when a forest is logged, some of its carbon may be stored for years or decades in wood products. But when forests are clearcut, large quantities of CO2 are also released to the atmosphere - immediately through the disturbance of forest soils, and over time through the decomposition of leaves, branches, and other detritus of timber production. One study found that even when storage of carbon in timber products is considered, the conversion of 5 million hectares of mature forest to plantations in the Pacific Northwest over the last 100 years resulted in a net increase of over 1.5 billion tons of carbon to the atmosphere. (Harmon, M.E., W.K. Ferrell and J.K. Franklin, 1990. “Effects on carbon storage of conversion of old-growth forests to young forests.” Science (9 February 1990), 247, 699.) Clear-cutting followed by replanting thus clearly contributes to global warming.

Forests and agricultural lands in the United States have been slowly diminishing in their role of sequestering carbon since 1960. (Executive Summary, “Global Warming in Depth,” The PEW Center on Global Climate Change,” cited on the web at http://www.pewclimate.org/global-warming-indepth/all_reports/carbon_sequestration/exe.)
The major causes of this shift are the increasing practice of clearcutting coupled with clearing forests for development. From 1990 to 2001, as forests on private lands have been increasingly clearcut, managed unsustainably, or cleared for development, carbon sequestration decreased by approximately 20 percent. (“Forest Carbon Sequestration: How It Works,” Catalyst: The Magazine of the Union of Concerned Scientists 3:2 (Fall 2004), cited on the web at http://www.ucusa.org/publications/catlyst/fa04-catalyst-forest-carbon-sequestration.html)
According to Olga Krankina, Professor of Forestry at Oregon State University, it takes approximately 100 years of growth for a new forest to regain the amount of carbon storage that older forests maintain. National Forests currently store three times as much carbon as those on private land, because they are managed differently and clearcutting is no longer permitted on National Forest land. (Olga Krankina, “Forest Management and Mitigation of Climate Change,” lecture at “Clearcutting the Climate Conference,” Eugene Oregon, January 256, 2008). If this pattern of increased clearcutting continues, forests will shift from net sources of carbon sequestration to net sources of carbon emissions.

To conclude, the CARB needs to do a thorough analysis of the issue of the role of forestry in carbon sequestration. It looks like the information contained in these appendices is drawn from the arguments of the timber industry and the Board of Forestry. By not including the competing narrative presented by the leading forest scientists in this country and abroad the results are not science-based. This smacks of the practices we have seen in the Bush administration over the last eight years- ignoring or misrepresenting scientific information in favor of serving the needs of industry. California, a leader in the fight against global warming, deserves better.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-05 20:56:17

No Duplicates.

Comment 19 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Peter
Last Name: Miller
Email Address: p.miller@earthlink.net
Affiliation: NRDC

Subject: Comments on forest sector of Draft Scoping Plan
Comment:

```
NRDC forest sector comments on Draft Scoping Plan plus 2
attachments.
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/21-nrdc_forest_comments.zip

Original File Name: NRDC forest comments.zip

Date and Time Comment Was Submitted: 2008-08-08 11:52:20

No Duplicates.

Comment 20 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Bob
Last Name: Williams
Email Address: jsisneros@tehamacountyadmin.org
Affiliation: Tehama County Board of Supervisors

Subject: Catastrophic wildfire impact on air quality
Comment:

August 5, 2008

Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Climate Change Scoping Plan, June 2008 Discussion Draft

Dear Chairperson Nichols:

Tehama County welcomes the opportunity to comment on the June 2008 Discussion Draft of the Climate Change Scoping Plan. We do have a concern that the document does not adequately address the serious issue of catastrophic wildfire, and believe that wildfire mitigation and prevention are vital to meeting the goals set forth in AB 32.

As you are aware, in May 2008, Governor Schwarzenegger issued Executive Order S-03-08, which specifically directed CalEPA and the California Resources Agency to oversee the Climate Action Team's development of measures for wildfire fuels reduction and biomass utilization. In light of the Executive Order, the current rampant wildfires around the state, and the Governor’s recent emergency declarations, we are troubled that no such measures have been outlined in the Scoping Plan.

Recent wildfires have had major impacts on air quality, contributing significantly to California’s carbon and particulate emissions. Catastrophic wildfires, typically located on United States Forest Service (USFS) lands, could be prevented if these lands were more efficiently managed. The Draft Scoping Plan makes only a vague mention of fuels reduction and fails to address emissions from fires on USFS lands.

Tehama County strongly urges ARB to include a firm commitment by the state in the Final Draft Scoping Plan to join with local governments to advocate at the federal level for enhanced management on USFS lands, as well as an extensive program to quantify wildfire emissions that could be avoided through better forest management practices. This is vital not only in meeting the goals of AB 32, but more importantly to improving the quality of

the air and public health. We thank you for your consideration of our comments.

Sincerely,

Bob Williams, Chairman
Tehama County Board of Supervisors

CC: Governor Arnold Schwarzenegger
Members, California Air Resources Board
RCRC
CSAC

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-08-08 15:16:48

No Duplicates.

Comment 21 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Stan
Last Name: Van Velsor
Email Address: stan_vanvelsor@tws.org
Affiliation: The Wilderness Society

Subject: Comments on Sustainable Forest Sector Scoping
Comment:

```
The Wilderness Society's comments on the Draft Scoping Plan for the
Forest Sector -- 1 attachment
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/23-comments_on_sustainable_forests.doc

Original File Name: Comments on Sustainable Forests.doc

Date and Time Comment Was Submitted: 2008-08-11 12:56:49

No Duplicates.

Comment 22 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Rachael
Last Name: Katz
Email Address: rkatz@pacificforest.org
Affiliation: The Pacific Forest Trust

Subject: The Pacific Forest Trust comments on draft scoping plan appendix
Comment:

```
In addition to PFT's first set of comments on the Draft Scoping
Plan dated July 25th 2008, we respectfully submit the attached
comments on Appendix C. Thank you for your consideration.
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/24-pft_comments_on_scoping_plan_appendix_c.pdf

Original File Name: PFT Comments on Scoping Plan Appendix C.pdf

Date and Time Comment Was Submitted: 2008-08-11 13:32:13

No Duplicates.

Comment 23 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Rusty
Last Name: Dupray
Email Address: cseghers@arb.ca.gov
Affiliation: County of El Dorado

Subject: Climate Change Scoping Plan
Comment:

```
Please see attached letter
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/25-7_29_08_countyofeldorado.pdf

Original File Name: 7_29_08_countyofeldorado.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:10:02

No Duplicates.

Comment 24 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Ed
Last Name: Robey
Email Address: cseghers@arb.ca.gov
Affiliation: County of Lake

Subject: Climate Change Scoping Plan
Comment:

```
Please see attached letter
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/26-7_22_08_countyoflake.pdf

Original File Name: 7_22_08_countyoflake.pdf

Date and Time Comment Was Submitted: 2008-08-11 15:13:02

No Duplicates.

Comment 25 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Derek
Last Name: Walker
Email Address: dbwalker@edf.org
Affiliation: Environmental Defense Fund

Subject: EDF - Forest comments
Comment:

```
Please accept the attached forest comments from Environmental
Defense Fund on the AB 32 draft Scoping Plan.
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/27-edf_-_forest_comments.pdf

Original File Name: EDF - Forest comments.pdf

Date and Time Comment Was Submitted: 2008-08-12 15:27:02

No Duplicates.

Comment 26 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Michelle
Last Name: Passero
Email Address: MPassero@tnc.org
Affiliation:

Subject: TNC Draft Scoping Plan Comments
Comment:

```
Attached are The Nature Conservancy's comments on the Draft Scoping
plan.

Thank you,

Michelle
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/28-tnc_draft_scoping_plan_comments_final__8_13_08.pdf

Original File Name: TNC Draft Scoping Plan Comments Final 8 13 08.pdf

Date and Time Comment Was Submitted: 2008-08-13 13:50:17

No Duplicates.

Comment 27 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: David
Last Name: Fingian
Email Address: cseghers@arb.ca.gov
Affiliation: County of Del Norte

Subject: AB 32
Comment:

```
Please see attached letter
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/30-7_28_08_countyofdelnorte.pdf

Original File Name: 7_28_08_countyofdelnorte.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:29:28

No Duplicates.

Comment 28 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Kathleen
Last Name: Crookham
Email Address: cseghers@arb.ca.gov
Affiliation: Merced County

Subject: AB 32
Comment:

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please see attached letter
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/31-7_22_08_mercedcounty.pdf

Original File Name: 7_22_08_mercedcounty.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:34:27

No Duplicates.

Comment 29 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Rose
Last Name: Comstock
Email Address: cseghers@arb.ca.gov
Affiliation: Plumas County Board of Supervisors

Subject: AB 32
Comment:

please see attached letter

Attachment: www.arb.ca.gov/lists/sp-forests-ws/32-7_22_08_plumascountysupes.pdf

Original File Name: 7_22_08_plumascountysupes.pdf

Date and Time Comment Was Submitted: 2008-08-14 10:53:41

No Duplicates.

Comment 30 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Richard
Last Name: Pland
Email Address: cseghers@arb.ca.gov
Affiliation: County of Tuolumne

Subject: Climate Change Scoping Plan
Comment:

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please see attached letter
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/33-8_5_08_tuolumnecounty.pdf

Original File Name: 8_5_08_tuolumnecounty.pdf

Date and Time Comment Was Submitted: 2008-08-14 14:02:11

No Duplicates.

Comment 31 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Terry
Last Name: Woodrow
Email Address: cseghers@arb.ca.gov
Affiliation: Alpine County

Subject: Climate Change Scoping Plan
Comment:

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please see attached letter
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/34-8_05_08_alpinecounty.pdf

Original File Name: 8_05_08_alpinecounty.pdf

Date and Time Comment Was Submitted: 2008-08-14 14:11:01

No Duplicates.

Comment 32 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Peter
Last Name: Miller
Email Address: p.miller@earthlink.net
Affiliation: NRDC

Subject: NRDC comments on forest sector forecast of Draft Scoping Plan
Comment:

```
NRDC comments on forest sector forecast of Draft Scoping Plan
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/35-nrdc_comments_on_forest_sector_forecast_in_draft_scoping_plan.pdf

Original File Name: NRDC Comments on Forest Sector Forecast in Draft Scoping Plan.pdf

Date and Time Comment Was Submitted: 2008-08-16 20:15:32

No Duplicates.

Comment 33 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: David
Last Name: Bradshaw
Email Address: cseghers@arb.ca.gov
Affiliation: Modoc County Board of Supervisors

Subject: Climate Change Scoping Plan
Comment:

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please see attached letter
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/36-8_5_08_modoccounty.pdf

Original File Name: 8_5_08_Modoccounty.pdf

Date and Time Comment Was Submitted: 2008-08-20 16:02:00

No Duplicates.

Comment 34 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Jack
Last Name: Hanson
Email Address: cseghers@arb.ca.gov
Affiliation: County of Lassen Board of Supervisors

Subject: Climate Change Scoping Plan
Comment:

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please see attached letter
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/37-7_28_08_countyoflassen.pdf

Original File Name: 7_28_08_countyoflassen.pdf

Date and Time Comment Was Submitted: 2008-08-20 16:03:11

No Duplicates.

Comment 35 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Ralph
Last Name: Gaarde
Email Address: cseghers@arb.ca.gov
Affiliation: Forest Landowners of California

Subject: AB 32 Sustainable Forestry Scoping Plan
Comment:

```
Please see the attached letter
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/39-9_03_08_forestlandownersofcalif.pdf

Original File Name: 9_03_08_forestlandownersofcalif.pdf

Date and Time Comment Was Submitted: 2008-09-10 10:57:04

No Duplicates.

Comment 36 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Tom
Last Name: Mitchell
Email Address: cseghers@arb.ca.gov
Affiliation: County of Mendocino

Subject: Climate Change Scoping Plan
Comment:

```
Please see attached comment
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/40-8_28_2008_countyofmendocino.pdf

Original File Name: 8_28_2008_countyofmendocino.pdf

Date and Time Comment Was Submitted: 2008-09-10 14:49:05

No Duplicates.

Comment 37 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Patricia
Last Name: Gunsolley
Email Address: pgunsolley@inyocounty.us
Affiliation: County of Inyo Clerk of the Board

Subject: AB 32 Scoping Plan
Comment:

```
The Inyo County Board of Supervisors submits the attached letter
as comments to the AB 32 Scoping Plan.

Patricia Gunsolley
Assistant Clerk of the Board
Inyo County Board of Supervisors
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Attachment: www.arb.ca.gov/lists/sp-forests-ws/41-ab_32_scoping_plan_sample_letter_08.doc

Original File Name: AB 32 Scoping Plan Sample Letter 08.doc

Date and Time Comment Was Submitted: 2008-09-30 14:51:26

No Duplicates.

Comment 38 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Judy
Last Name: Rocchio
Email Address: judy_rocchio@nps.gov
Affiliation: National Park Service

Subject: NPS Comments on DRAFT AB32 Scoping Plan
Comment:

OFFICIAL ELECTRONIC MAIL SENT VIA EMAIL
NO HARD COPY TO FOLLOW

National Park Service
Pacific West Region
1111 Jackson Street, Suite 700
Oakland, California 94607-4807

N3615 (PWR-NR)

September 30, 2008

Memorandum

To: Mary Nichols, Chairwoman, California Air Resources Board

From: Jonathan B. Jarvis, Regional Director, Pacific West Region
Subject:NPS Draft AB 32 Scoping Plan Comments Downloaded to ARB Website

Dear Chairwoman Nichols:

The National Park Service (NPS) appreciates the opportunity to comment on the California Air Resources Board's (ARB) AB 32 Global Warming Solutions Act Draft Scoping Plan. AB 32 mandates the reduction of 169 million metric tons of carbon dioxide equivalent (MMT CO2e) by 2020, which will bring the state back to 1990 CO2 levels. The goal of the forestry sector is to maintain the current annual sequestration potential of approximately 5 MMT CO2e through 2020.

We commend CARB for its leadership in defining global warming solutions and for your attention to details in documenting the complex role forests play in sequestering and emitting greenhouse gases. NPS agrees healthy forests maximize carbon sequestration; however effective models are needed to quantify carbon fluxes and stocks on park lands.

We would note that, first and foremost, the NPS is committed to forest and fire management practices that maintain the integrity of our forested ecosystems. These practices, which include the reintroduction of natural fire cycles to forested landscapes,

increase resiliency to drought and fire disturbances that climate change will likely exacerbate. They also may have the co-benefit of reducing landscape emissions of greenhouse gases and criteria pollutants while increasing carbon sequestration. Although such co-benefits are not the primary NPS mission, we believe that it is in the mutual interest of both the NPS and ARB to investigate and quantify those benefits.

To that end, we would like to participate in an AB32 Forestry Protocol "Public Lands Work Group" whose objectives would include; developing carbon inventories on public lands, identifying forest and fire management research (or pilot) projects needed to increase our understanding of carbon sequestration on forested lands, and identifying national park projects eligible for funding from carbon offsets purchased by other parties.

Some other questions of interest to the NPS include (but are not limited to):

•What accounting procedures are being developed so that public land managers may participate in the growing carbon market?

•What are the trade-offs between managed fires vs. wildfires, in terms of greenhouse gases, criteria air pollutant emissions, and carbon/biomass stocks? Is there a way to allow more managed fires (instead of waiting for wildfires) to help increase overall carbon storage and reduce overall criteria air pollutant emissions?

We look forward to further exploring these mutual interests and welcome further collaboration with ARB in implementing AB 32 forestry objectives and facing the challenges of climate change impacts and sequestration potential on public lands. Please contact Judy Rocchio, Regional Air Quality Coordinator at 510-817-1431 if you have questions regarding our comments.

/s/ Patricia L. Neubacher for

Jonathan B. Jarvis

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2008-09-30 15:36:22

No Duplicates.

Comment 39 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Richard
Last Name: Forster
Email Address: cseghers@arb.ca.gov
Affiliation: Amador County Board of Supervisors

Subject: Climate Change Scoping Plan
Comment:

```
Please see attached comment
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/43-9_19_2008_amadorboardofsupervisors.pdf

Original File Name: 9_19_2008_amadorboardofsupervisors.pdf

Date and Time Comment Was Submitted: 2008-09-30 16:21:37

No Duplicates.

Comment 40 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Diane
Last Name: Dillon
Email Address: cseghers@arb.ca.gov
Affiliation: County of Napa Board of Supervisors

Subject: Climate Change Scoping Plan
Comment:

```
please see attached comment
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/44-10_1_08_countyofnapasup.pdf

Original File Name: 10_1_08_countyofnapasup.pdf

Date and Time Comment Was Submitted: 2008-10-08 15:41:27

No Duplicates.

Comment 41 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Ralph
Last Name: Gaarde
Email Address: cseghers@arb.ca.gov
Affiliation: Forest Landowners of California

Subject: AB 32 Sustainable Forestry Scoping Plan
Comment:

```
please see attached comment
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/45-10_07_08_forestlandowners.pdf

Original File Name: 10_07_08_forestlandowners.pdf

Date and Time Comment Was Submitted: 2008-10-08 16:16:29

No Duplicates.

Comment 42 for Forests Comments for the GHG Scoping Plan (sp-forests-ws) - 1st Workshop.

First Name: Joint NGO
Last Name: Letter
Email Address: rkatz@pacificforest.org
Affiliation:

Subject: Forest sector climate policy and AB 32 implementation process
Comment:

```
Thank you for the opportunity to comment. Attached is a joint
letter on the forest sector policy implementation process under
AB32, submitted for your consideration by Audubon California,
California Council of Land Trusts, California Trout, Defenders of
Wildlife, Ebbets Pass Forest Watch, Environmental Defense Fund,
ForestEthics, Sierra Club California, The Nature Conservancy,
California, The Pacific Forest Trust, The Wilderness Society
Transportation and Land Use Coalition, Trust for Public Land.
```

Attachment: www.arb.ca.gov/lists/sp-forests-ws/46-carb_joint_ngo_process_ltr_final.pdf

Original File Name: CARB Joint NGO Process LTR_final.pdf

Date and Time Comment Was Submitted: 2008-10-10 17:08:18

No Duplicates.

There are no comments posted to Forests Comments for the GHG Scoping Plan (sp-forests-ws) that were presented during the Workshop at this time.