



THE PACIFIC FOREST TRUST

Working Forests Work Wonders For Us All.

August 11th, 2008

Re: Appendix C to the Climate Change Draft Scoping Plan

Submitted online at <http://www.arb.ca.gov/cc/scopingplan/spcomment.htm>

The Pacific Forest Trust (PFT) appreciates the opportunity to submit comments on the Appendices to the California Air Resources Board (CARB) Draft Scoping Plan, specifically on Appendix C: Sector Overviews and Emission Reduction Strategies. These comments expand upon our previous submission dated July 25th, 2008 on the Draft Scoping Plan (Forests).

PFT commends CARB for addressing both the significant emissions from the forest sector as well as the great capacity for restoring carbon stocks across the California landscape. We particularly would like to thank CARB for the very helpful clarification in the appendix that the intent of the plan is to focus on achieving climate gains on forestlands within the state's jurisdiction, working with the Board of Forestry on strategies that use regulatory mechanisms within its or other state authority: Forest Practice Rules, timberland conversion regulations, fire safety requirements, forest improvement assistance programs, and the California Environmental Quality Act (CEQA).

As further indicated by the appendix, PFT anticipates that this collaborative effort will establish annual forest inventory reporting at fine and larger scales, incorporate climate considerations into the forest sector regulatory framework, and establish a statewide forest carbon monitoring and assessment program. We also look forward to the completion of the CEQA guideline revision process, which PFT has participated in, that the appendix notes will enable a robust requirement for mitigating the loss of carbon stocks from the conversion of forests to other uses. The CEQA mechanism provides an important nexus between forests and land use, helping ensure climate benefits on all natural and working lands are appropriately assessed, valued, and mitigated for.

The appendix affirms that the Draft Scoping Plan represents very important progress towards addressing forests and climate with a comprehensive approach. PFT respectfully suggests the following additional points for consideration as the Scoping Plan continues its refinement:

1. Engage the Department of Fish and Game to work with CARB and specifically be represented in the Board of Forestry process to ensure adaptation concerns, including resilience and durability of ecosystem carbon, are fully addressed.
2. Clarify the connection between the forest sector target and the estimated benefits of implementation strategies. This requires clarifying and linking carbon stocks, annual emissions, and overall carbon dioxide (CO₂) flux numbers.

3. Clarify that that the assessment by the Board of Forestry is of appropriate source and level of data to ensure effective regulatory implementation in areas of state jurisdiction and authority.
4. Clarify the distinction between regulatory implementing strategies to achieve the sustainable forests target and voluntary actions and implementing strategies to achieve additional reductions.

1. Engage the Department of Fish and Game to work with CARB and specifically be represented in the Board of Forestry process to ensure adaptation concerns, including resilience and durability of ecosystem carbon, are fully addressed.

As is becoming increasingly understood and documented, California's forests are already facing increasing stress from climate change. Stressors such as fire, drought, pests and disease are expected to continue and grow in their intensity. In addition, climate change models project plant and wildlife geographical shifts as their preferred habitat moves northward and upward.

It makes both climate and economic sense to ensure that the carbon gains we seek to achieve in the forest sector are as adaptive and resilient as possible, enduring for the long term. Climate mitigation strategies in the forest sector need to take adaptation into account and incorporate actions that increase forest resiliency. To do this, PFT urges CARB to engage the Department of Fish and Game (DFG) to assist with the development of strategies and actions in the forest sector. It is their mission to manage California's fish, wildlife and plant resources and their habitats. This is inherently inclusive of forests overall and key for adaptation. DFG can provide valuable expertise and resources, making connections between mitigation and adaptation needs that could otherwise be missed.

2. Clarify the connection between the forest sector target and the estimated benefits of implementation strategies. This requires clarifying and linking carbon stocks, annual emissions, and overall carbon dioxide (CO₂) flux numbers.

Forest carbon *stocks* are the sequestered carbon contained and stored in forest carbon pools. As trees and other vegetation grow and sequester CO₂, carbon stocks increase. CO₂ *flux* is the uptake and release of CO₂ to the atmosphere. Net CO₂ flux for the forest sector is the net sequestration in a given time period—growth in carbon stocks minus CO₂ emissions from carbon stock loss and decay (e.g. fire, conversion, wood processing, landfills). To maintain and increase the climate benefits of California's forests, strategies will be developed and actions taken that monitor carbon stocks, prevent and mitigate significant carbon stock loss (emissions), and increase net *stocks* across the landscape.

Since the forest sector target is expressed, however, as the current annual statewide net CO₂ *flux* (-5 million metric tons CO₂e), CARB should ensure that the difference between types of measures is clear when providing estimates of climate benefits. For example, numbers estimating afforestation/ reforestation or forest management benefits

are likely an increase in carbon stocks, avoided conversion/ forest conservation is avoided emissions, and both of those are distinct *pieces* of the equation for determining overall CO2 flux for the sector. It is important for stakeholders to be able to connect the dots between carbon stock-based actions and a carbon flux-based evaluation, but even more important for CARB, the Board of Forestry, DFG, CalFIRE, and the Resources Agency to be able to do so.

Further, since the statewide CO2 flux measure captures sequestration and emissions on federal lands, it will be critical to utilize spatial carbon stock and emissions data that can help target actions and evaluate progress on state and private forestlands that are the focus of AB 32 implementation.

3. Clarify that that the assessment by the Board of Forestry is of appropriate source and level of data to ensure effective regulatory implementation in areas of state jurisdiction and authority.

PFT appreciates the clarification in the appendix that the 5 million metric ton (mmt) sustainable forest target is a regulatory target and, in fact, just the starting point for achieving further climate benefits from our forests. An estimate is given of *at least* an additional 5 mmt of reductions from the forest sector through a variety of non-regulatory activities, bringing the total to at least 10 mmt. PFT continues to suggest that this total number could be even higher with the right programs and policies in place.

Furthermore, the importance of key regulatory and accounting actions that are part of the sustainable forest target cannot be overstated. In particular, a comprehensive accounting framework will help ensure the forest sector meets both its regulatory obligation *and* ensure that the additional activities undertaken voluntarily at the project scale are indeed achieving *additional* climate benefits. Implementation of a comprehensive monitoring program, prevention and mitigation of forestland conversion, and integrated GHG accounting between the forest and end-use biomass energy and fuel sectors is crucial for eliminating concerns around negative leakage—the simple transfer of emissions from one part of the state or economy to another.

Thus the assessment done by the Board of Forestry needs to rely on data at a finer grain than statewide average data, and from sources within state jurisdiction, to create and maintain an effective regulatory and accounting framework that forms the fundamental underpinning to achieving significant climate benefits from the sector. This is so central because many of the implementation strategies for the non-regulatory target are, while very helpful, quite voluntary, carried out on a project-by-project basis, and not underpinned by any state based guarantee. Without a broader programmatic framework, it would be very difficult to assess whether or not these actions are leading to overall gains in the forest sector.

4. Clarify the distinction between regulatory implementing strategies to achieve the sustainable forest target and voluntary actions and implementing strategies to achieve additional reductions.

We remain somewhat confused and would appreciate further clarity about the relationship between stated regulatory “mechanisms” and voluntary “implementing strategies” and the separate targets. For example, there are both regulatory and non-

regulatory or voluntary means of addressing avoided conversion/ forest conservation. For one specific example – if a developer is required to mitigate forest conversion, is the forest they conserve with a conservation easement part of the regulatory or voluntary target? There is similar potential overlap in areas of forest management and reforestation, and potentially others as well.

Also, reforestation and fuels management activities on federal lands are important, but, as we have previously mentioned, outside the control of state jurisdiction and thus not a part of the AB 32 targets. Since federal action is in relation to the state essentially voluntary, that only increases the need to “get it right” on state and private lands throughout California.

Conclusion

The Pacific Forest Trust greatly appreciates the effort that CARB and others have already and will continue to put into shaping the Scoping Plan to achieve California’s climate goals. We especially appreciate the ongoing work to craft a sound and robust role for the forest sector, utilizing our forests for their climate benefits while ensuring forests continue to provide wood, water, wildlife, and well being for generations to come.

If you have any questions or thoughts regarding these comments, please do not hesitate to contact us. We thank you for the additional detail that was given in the appendix, and look forward to working with you further to complete the Scoping Plan.

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