

**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**

October 10, 2008

Mary Nichols, Chair
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Re: Joint NGO statement on forest sector climate policy and AB 32 implementation process

Dear Chairman Nichols,

The undersigned organizations commend the Air Resources Board (ARB) for acknowledging the valuable role of forests in climate change mitigation strategies in the draft Scoping Plan. We continue to support a key role for forests to help meet California's climate goals pursuant to the California's Global Warming Solutions Act (GWSA), as previously articulated in a set of common principles for a forest sector strategy.¹ As the ARB seeks to implement the Scoping Plan and forest-related climate policies, we urge ARB to maintain clear governance over the process and clarify this in the Scoping Plan to ensure a standardized and seamless greenhouse gas (GHG) accounting process across all sectors and measures to achieve real and permanent GHG reductions across the state.

Given the significant overlap of forest-related GHG reduction strategies with other sectors and initiatives identified in the draft Scoping Plan (DSP), the ARB should be the lead managing body to approve and facilitate the implementation of forest-related climate strategies. Forest-related measures intersect with local and regional government initiatives, market mechanisms, waste recycling, and energy, as identified in the DSP. In addition, in many instances the capacity of California's forests to achieve and sustain long-term forest-based GHG reductions will depend on adaptation measures and thus, adaptation considerations should be incorporated into the ARB Scoping Plan process. The Department of Fish and Game has key expertise to support ARB's efforts in this regard. To maintain the integrity of overall GHG accounting, prevent double counting across initiatives and reduce redundancy and inefficiencies, the ARB should clarify its role as the central managing body for forest-related climate initiatives. The ARB is in the best position to play this role given its GHG reduction responsibilities under the GWSA.

While ARB has broad authority under the GWSA, other agencies and entities also bring significant expertise to the discussion and should have a role in developing and implementing strategies for carbon sequestration and planning for ecosystem adaptation. However, ARB should manage the process and initially approve all proposed measures as viable GHG strategies with clear and appropriate GHG accounting to ensure reductions pursuant to the GWSA. As ARB approves measures and accounting standards and methodologies, it may then identify the appropriate

¹ Forest Climate Principles. Dated 2/27/2008.

governmental bodies or commission(s) to implement all or a part of a climate strategy. As part of this process, the ARB should establish and manage task groups, with ARB as Chair, that review and develop forest-related climate policies and initiatives. The task group should include representatives from the Resources Agency, the Department of Forestry and Fire Protection, the Department of Fish and Game, the California Environmental Protection Agency and local government representatives. The Board of Forestry should be an advisory body as part of the overarching process and can help implement certain measures related to forest practice regulations. The process should also provide for regular public input and feedback.

California is initiating a significant and complex effort to address global warming, which we support and applaud. The process requires not only new policies and thinking, but also new ways of working together. To promote clarity, efficiency and effectiveness of process and by extension, GHG reductions, we urge ARB to maintain the lead role to facilitate and approve forest-related climate policy strategies and GHG accounting methodologies. ARB is empowered to do so through the Global Warming Solutions Act and can do so while working collaboratively with other agencies, local governments and stakeholders.

Sincerely,

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