

07-12-4



## DEPARTMENT OF FORESTRY AND FIRE PROTECTION

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December 5, 2007

Ms. Mary Nichols, Chair  
California Air Resources Board  
California Environmental Protection Agency  
1001 I Street  
Sacramento, California 95814

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To: Lori Anderson	From: Richard Kite	
Co. Board Clerk	Co. ARB	
Dept.	Phone # 916-322-5150	
Fax # 916-459-4310	Fax #	

**SUBJECT: 1990 FORESTRY SECTOR GREENHOUSE GAS INVENTORY (GGI)**

Dear Ms. Nichols:

The California Department of Forestry and Fire Protection (CAL FIRE) recognizes the important role that the forested landscapes of the State play in any Greenhouse Gas Inventory. These forests are an important carbon sink where substantial carbon is stored. These forests also sequester carbon and the rate of that sequestration will be an important element in accurately assessing GGIs.

CAL FIRE appreciates the collaborative approach that Air Resources Board (ARB) staff have taken regarding implementation of mandates under AB32. Establishing the 1990 GGI is an important first step and CAL FIRE has been actively engaged with ARB and the United States Forest Service (USFS) in an attempt to explain the variance in the GGI estimates for the forestry sector. Based on the white paper prepared by Jeremy Fried and Xiaoping Zhou of the USFS in response to the draft inventory, "Forest inventory-based estimation of carbon stocks and flux in California forests in 1990", CAL FIRE believes it is conceivable that the rate of carbon flux estimated by ARB staff may underestimate the carbon flux. However, as was indicated in the USFS white paper, significant uncertainty regarding data and information argue against trying to make further refinements of the 1990 ARB estimate at this time.

As we move into a scoping process to identify strategies to reduce projected 2020 GGIs to 1990 levels, continued collaboration will be needed. For the forestry sector it will be important to determine if the sequestration rate attributable to the forests of the state is increasing, decreasing, or remaining constant. CAL FIRE supports an approach based on the USFS Forest Inventory and Analysis Program (FIA) for quantifying both carbon stocks and flux. This top down approach will rely on observed data rather than models, and will support characterization of carbon pools consistent with accepted protocols and processes.

CAL FIRE looks forward to working with ARB and USFS staff to assist ARB in moving forward in a FIA framework with the objective of establishing a forest sector GGI estimate for 2020. CAL FIRE will also continue to work with the USFS to explore the options laid out in their whitepaper to pursue 1) refinement of carbon flux estimates for non-conifers and hardwood



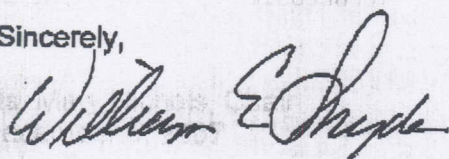
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rangelands, 2) analysis of National Information Management System (NIMS) data on National Forest System (NFS) lands, and 3) establishment of additional plots necessary to determine within desired accuracy limits carbon stocks, growth and flux. Hopefully, this process can help to clarify trends in forest related sequestration.

As part of this analysis, it will be crucial to characterize all potential carbon sinks associated with the forest sector including urban forestry, wood products, and substitution benefits attributable to the benefits of wood for other building products and woody biomass as an alternative energy source to fossil fuels.

We look forward to refining the understanding of the potential contributions of the forestry sector to the greenhouse gas reduction strategies.

Sincerely,



WILLIAM E. SNYDER  
Deputy Director  
Resource Management

cc: Tony Brunello, Resources Agency