



YSS

YOSEMITE STANISLAUS SOLUTIONS

American Forest Resource Council

American Motorcyclist Association, District 36

Blue Mountain Minerals

California Forestry Association

Central Sierra Audubon Society

Central Sierra Environmental Resource Center

CT Bioenergy Consulting

Friends of Berkeley Tuolumne Camp

Jim Dambacher Construction

Merced Dirt Riders, 4x4 in Motion

Mule Deer Foundation

Sierra Pacific Industries

Stanislaus Bike Trail

Tuolumne County

*Tuolumne County Alliance for
Resources and the Environment*

Tuolumne County Farm Bureau

Tuolumne County Resource Conservation District

Tuolumne County Sportsmen, Inc.

Tuolumne Me-Wuk Tribal Council

Tuolumne River Trust

Yosemite Deer Herd Advisory Council

Liaison Members

*Bureau of Land Management
CA Fish & Wildlife*

National Park Service, Yosemite National Park

Sierra Nevada Conservancy

South West Interface Team

United States Forest Service

August 21, 2015

From: Yosemite-Stanislaus Solutions

RE: Cap-and-Trade Auction Proceeds, Second Investment Plan

Located in Tuolumne County, California, Yosemite Stanislaus Solutions (YSS) is a collaborative group of diverse interests ranging from timber companies to environmental organizations to local government representatives working together to assist public and private land managers in achieving healthy forests and watersheds. YSS is currently focused on developing recovery and restoration plans for the Rim Fire and other areas on the Stanislaus National Forest in need of rehabilitation.

YSS is committed to restoring and preserving healthy forestlands in California as an essential element of achieving California's greenhouse gas reduction goals. We applaud the Governor, ARB and partner agencies for your vision and leadership on this issue.

Overall, YSS believes this first draft represents a promising start on outlining the broad issues and approaches that should guide the legislature in making future budget allocations. However, YSS recommends greater specificity on both the essential role that restoring forest health must contribute and the means to do it in order to meet AB 32's GHG reduction goals.

YSS will not reiterate all the facts and known relationship between forest health, or lack thereof, and GHG emissions. While YSS is confident that you are generally familiar with them, we are providing a link to the Joint Presentation by the Sierra Nevada Conservancy and the US Forest Service at the ARB's August 5th Public Forum on Natural Land Management, and ask that it be incorporated as part of our comments. (SNC-USFS Presentation

<http://www.arb.ca.gov/cc/pillars/natworklands/nwl-slides-8-5-15.pdf>.

In the remainder of these comments, it will be referred to as SNC-USFS)

Strongly endorsed recommendations in this initial draft and their relevance to restoring forest health.

A. Beyond 2020 (p.4) The proposal highlights that projects supported in the three budget years beginning in 2016-17 "...should be focused on helping deliver successes in meeting the state's mid- and long-term climate targets and goals."

This is particularly relevant to the critical task of restoring the health and fire resiliency of our forested wildlands. The magnitude of this task is reflected in the USFS Region 5's estimate "that 6 to 9 million acres of

the land they are responsible for managing in California **are in need of restoration**" (Emphasis from source document, SNC-USFS). Unless we promptly and boldly launch this needed restoration, there is increasing risk that mega-fires will severely undermine investments and progress in other sectors.

C. Innovative Technologies (p.5) The plan emphasizes "pursuing innovative approaches that are either in early stages of implementation or have yet to begin." Ecological thinning, also known as ecological forestry, is a recently emerging science-based approach that yields multiple benefits, including increasing fire resiliency and consequently reducing probability of high-severity mega-fires, such as the recent Rim and King fires, which generate the highest magnitude of GHG emissions.

D. System Approaches (p. 5) YSS applauds the recognition that an effective solution has to be commensurate with the scale of the problem. In regards to restoring forest health across millions of acres of public and private land, we cannot achieve the principal goals of fire resiliency and increased retention of forest sequestered GHG in a piecemeal manner. Landscape level forest restoration approaches offer the best hope to reverse the mega-fire trend that forest researchers believe will likely occur without a robust program to restore forest health. This point is emphatically made by the USFS: "Only an environmental restoration program of unprecedented scale can alter the direction of current trends." (SNC-USFS)

G. Short-Lived Climate Pollutants (p.6) As the draft highlights: "...short-lived climate pollutants may be responsible for as much as 40% of global warming experienced to date." Black carbon is one of these powerful short-lived climate pollutants, of which wildfires are the greatest contributor, at 66%. (SNC-USFS)

H. Rural Communities and Small Businesses (p. 7) YSS commends the recognition that "Providing more opportunities for small businesses and rural communities to help advance the state's climate mitigation efforts could bring economic and health benefits."

In reality, this understates the need and opportunity of doing so. For decades, California has under-invested in watershed and forest health, which is the very foundation of California's overall wealth and health. Achieving AB 32 goals requires reversing this trend.

Requested Additions and Refinements to Natural Resources Section **(pages 18 -23)**

Needs Assessment pages 19-20: You wisely note that "a comprehensive approach requiring strategies that take a landscape level approach" is needed. You then highlight that easements are needed targeting private landowners to reduce conversion to higher GHG-emitting land-uses.

While YSS concurs with this strategy, it needs to be complemented with a strategy that targets the tens of millions of acres of public forest lands through support for ecologically-based thinning combined with appropriate prescribed and managed wildfires. The largest and most severe wildfires have been occurring on public lands. Easements can only be effective tools on private forest lands, of which there are significantly fewer acres than on our public lands.

Figure 7. Draft Investment Concepts p 21: While indirectly referenced, YSS requests that you add an explicit investment concept under natural landscapes for investing in restoring wildland forest health. We suggest: **"A robust, landscape level program of ecological thinning complemented by on-going prescribed and managed wildfire to increase forest resiliency, reduce probability of mega-fires and over time reliably sequester more carbon."**

This is essential to increase fire resiliency, as well as necessary to reduce prospects for additional Rim Fire events, which demonstrated that significant amounts of reductions achieved elsewhere can be quickly offset by such mega-fires. (SNC-USFS)

Resources Secretary Laird emphasized in his opening comments at the Public Forum on Natural Lands on August 5, the Rim Fire released greenhouse gas emissions in a few weeks equal to what 2.3 million vehicles would release in a year. Amplifying the consequences of such mega-fires is what the SNC-USFS reported in their presentation: “High intensity fires such as Rim and King will continue to emit GHGs for decades, **resulting in emissions more than 4 times greater than those during the event.**” (Emphasis in original report)

4. Disadvantaged Communities, page 22: While recognizing that investments in disadvantaged communities “...helps direct the benefits of these ecosystem services to these communities,” there remains the fundamental flaw in the current screening to identify disadvantaged communities that currently excludes rural disadvantaged communities. This was explored at length at the August 5th Public Forum on Natural Lands. YSS strongly supports the judgment that while the current screening criteria may be adequate for identifying disadvantaged urban communities, it is fatally flawed when applied to rural communities. We request that this flaw be recognized and corrected in the final report to the legislature. Otherwise, rural California will not be equitably treated, and the benefits intended for them under existing law will be denied.

In closing, it is important to recognize the conditions that spawned the largest and most severe wildfire ever in the known history of the Sierra are increasingly prevalent throughout the over 8 million acres of forest land in the Sierras, as well as throughout much of the Klamath -Cascade Region. Forest Service researchers foresee the real possibility that we are entering an era of megafires, similar to the Rim Fire. (SNC-USFS) Without a robust program to make these forests more fire resilient, it is not an exaggeration that we could lose the Sierras as our generation inherited them, as well as severely undermine achievement of California’s globally important GHG reduction goals.

Within YSS, there is strong agreement with ecologically-based forest treatments that will reduce carbon loss/emissions resulting from wildfires. We invite you to join us in further discussion, ideally on a field trip, to help illustrate the value and the necessity of incorporating this approach into the natural landscape component of the AB 32 program.

If YSS can be of any assistance, or you have additional comments/concerns, please contact our Cap and Trade Program Coordinator, John Amodio, at jamodio@msn.com or 1-916-764-7575.

Sincerely,



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