November 5, 2020

This paper addresses California Air Resources Board’s request for ideas and thoughts about how to increase forest carbon offsets on the California exchange.

Firstly, the baseline for Tribal carbon should not be this somewhat arbitrary number conjured up by the white power structure based on the short time frame of white settlement, forest management or lack thereof. Native peoples have been on this continent actively managing the vegetation for, as they claim 35,000 years. The Yurok Tribe alone has seen 2,000-year-old (old growth) redwood forests burn and regenerate, grow to biological maturity and burn and regenerate- time after time. Given their long term commitment to managing the human environment, the baseline for Indian carbon should be bare ground.

Secondly, out-of-state projects should be encouraged and promoted to the full extent possible. The carbon offsets from these projects should be designated for the international market only. This would not diminish the value and market potential for in-state projects.

Thirdly, additionality is a non-issue. To claim forest management treatments are going to be done anyway- with or without carbon revenues is not accurate. Recent wildfire years have made it evident just how depleted we really are in terms of funding for treatments, training in prescribed fire, equipment and staffing and actually getting positive management (i.e. prescribed fire) done on the appropriate landscapes. More carbon funds need to be made available for forest treatments, staffing, training and equipment. There needs to be an enhanced and improved cooperative effort between CalFire, landowners and Tribal governments.

Fourthly, leakage is not an issue in California. State laws require all commercial forest lands be managed on a ‘sustained yield’ basis. The leakage issue comes from out-of-state sources for logs. Promoting out-of-state carbon projects would be a good first step (short of a national cap-and-trade system) to address this issue of leakage.

Thank you for your time.

 Edward L. Mann Forestry Director (ret.) Yurok Tribe 10/5/2020

 509-710-8975 (cell) sequoia1910@gmail.com (email)