

BOARD OF FORESTRY AND FIRE PROTECTION

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November 17, 2008

Ms. Mary D. Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

Dear Chair Nichols:

The Board of Forestry and Fire Protection would like to commend you and your staff on the October Draft AB32 scoping plan. For the area concerning the "Sustainable Forests" section, we offer no additional comment. For the appendices (F-1, Sustainable Forest Target) we offer some minor suggestions:

Page C-169, "Reduction Opportunity: Forest Management":

"Implementation approaches include:

- *Riparian Zone Extension. The voluntary extension of the existing riparian protection zones currently required by the Forest Practice Rules."*

We would suggest in its place:

"Increased intensity of forest management that improves forest health, stocking levels and forest growth rates all have the potential to increase carbon sequestration and reduce emissions in the short and long term. Existing rules that require Maximum Sustained Production will ensure the short and long term carbon sequestration benefits of increased forest inventory and wood product production. These activities may be incentivized by the carbon offset market."

Page C-169, "Reduction Opportunity: Forest Management":

- *"Timber Stand Improvement. These activities include 1) removing hardwoods and increasing conifer stocking, 2) thinning stands to increase the growth rate for remaining trees, 3) optimizing rotation age from a carbon life cycle perspective, 4) planting additional trees where the existing stocks are not fully utilizing the biological potential of the site. The additional value of the carbon will provide the incentive for the private landowners to make the additional investment in their lands to better utilize the growth potential."*

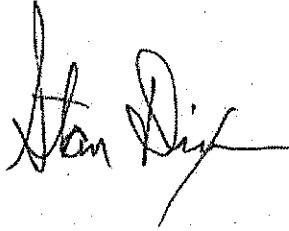
We feel there is a need to elaborate to the public that what is being contemplated above is not the removal of hardwoods from their naturally occurring areas, but the rehabilitation of coniferous areas. We would suggest in its place:

"Restore conifer areas to full productivity by reduction of undesirable species and restocking with native conifer"

Page C-167, "Appendix C: Forests Table 30":

The table lacks an explanation of "Net annualized cost". Previous versions included an explanation. We would suggest such an explanation might add clarity.

On behalf of the State Board of Forestry and Fire Protection (Board),

A handwritten signature in black ink, appearing to read "Stan Dixon". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Stan Dixon, Chair
California Board of Forestry and Fire Protection