



ENVIRONMENTAL DEFENSE FUND

finding the ways that work

August 11, 2008

Mary D. Nichols, Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95812
(916) 445-5025 (Fax)

RE: Draft Scoping Plan Comments – Forests

Dear Chairman Nichols,

Environmental Defense Fund (EDF) applauds the California Air Resources Board (CARB) on the release of the *Climate Change Draft Scoping Plan: A Framework for Change*. The draft Scoping Plan represents an important milestone in California's implementation of the landmark Global Warming Solutions Act of 2006 (AB 32), the first state-level cap on the greenhouse gas pollution that causes global warming.

EDF respectfully submits the following comments in response to the draft Scoping Plan, and looks forward to collaborating with CARB and other stakeholders in the coming months as further materials, including the evaluation supplements, are made available.

Sincerely,

Derek Walker
Director, California Climate Initiative
Environmental Defense Fund

Forest Sector

We applaud CARB for highlighting in the draft Scoping Plan the important contribution forests make to mitigating climate change and the critical role of forests in meeting our 2020 and 2050 goals. EDF will continue to be an active participant in deliberations with CARB, the Board of Forestry, and other agencies about the specifics of that role.

Forest Carbon Sequestration Target

EDF supports the establishment of an industry or company-wide baseline for assessing additionality of sequestration in the forest sector. We recognize that setting an appropriate target is a difficult task given uncertainties associated with inventory of existing forest carbon stocking and forest emission sources, and carbon reductions may be vulnerable to manipulation.

That said, we suspect that the sequestration target could be set at a substantially higher level for the following reasons:

- Many California forests are actively growing or many others could experience greater growth through application of widely accepted silvicultural techniques and modest public investment.
- Many of these same silvicultural techniques will result in an increase in resilience to catastrophic forest fire and insect damage thus reducing direct emissions from the forest sector.
- Trends that indicate that California forests may be sequestering carbon at a declining rate can and should be reversed, and techniques to do so can be easily implemented.

We recommend that CARB, working with its agency partners, commit to a process of augmenting inventory information and adjusting its net emissions target for the forest sector as this information improves. This target should balance climate mitigation goals with longstanding goals of restoring ecological health and resilience of California's forest ecosystems.

Development of 2020 Strategies

EDF looks forward to working with the Board of Forestry, the Resources Agency, Department of Forestry and Fire Protection, and other stakeholders to develop specific strategies that will help the state meet its 2020 target for the forest sector. We recommend that CARB and its partner agencies consider the following broad policies:

- Offsets – EDF supports the inclusion of high-quality offsets as a compliance option in a California cap-and-trade program. We believe there are numerous opportunities for high-quality offsets in the forest sector and that great vigilance is needed to ensure reductions meet rigorous criteria.
- Other forest stewardship incentives – Providing financial incentives and management advice to non-industrial private forest (NIPF) landowners, restoring forest ecological

integrity, increasing forest growth, and increasing resilience to catastrophic fire are cost-effective strategies for reducing net GHG emissions. The state should fully fund the California Forest Improvement Program (CFIP), allow cost share funds to be used to pay for services of a registered professional forester, and explore opportunities for reducing compliance costs for NIPF landowners.

- Federal forests – Half of California’s forested land is federally-owned. Strategies to increase sequestration and build resilience to catastrophic fire and climate change on federal forestland must be a part of any strategy adopted by the state. Every effort should be made to cooperate with federal land management agencies, coordinate forest management and project funding strategies, and to inform Congress about the resources and authorities required to optimize federal forestland management.

Emission Reduction Co-Benefits

Application of these strategies in pursuit of a more aggressive net emission reduction target for the forest sector will not only provide substantial cost-effective climate benefits but will also provide a host of co-benefits. These include a suite of ecosystem services such as enhanced wildlife habitat, improved water quality, and attenuation of flows derived from snowmelt. Improving resilience to catastrophic wildfire in California forests will reduce public expenditure related to firefighting, save lives and property, and reduce air pollution during the wildfire season. In addition, these approaches will generate social and economic benefits, particularly associated with renewal of local economies in forested communities in California.