

California Forest Carbon Plan Concept Paper

USFS Comments 4/8/2016

- Page 2, Purpose and Scope, 5th bullet: Consider adding “Provide framework.... to increase *the quantity of carbon sequestration and/or the quality and stability of the carbon sink* ...and reduce climate-warming emissions....” To reflect that the goal is not just to increase forest carbon sequestration, but also long term sustainable and healthy levels of forest carbon
- P6, second to last paragraph: 14m acres, 1-2m acres, 9m acres. Provide context to the 3 diverse numbers re # acres of overstocked or needing treatment – is it to illustrate uncertainty in methods, or different contexts or ?? Is confusing as it is currently written
- Page 12, Carbon storage bullet: Consider adding “Functioning as a *sustainable and healthy* net carbon sink over time.” To reflect quality of carbon stored
- Pages 13-15, Carbon Storage and Methods:
 - Consider adding the Canadian method that was presented to FCAT (model based)
 - Something that USFS is discussing right now is how to more accurately quantify forest carbon in the Southern CA forests, for which FIA plots and downscaled carbon estimates do not accurately reflect the ecosystem carbon of chaparral and some woodlands that are not conifer based. Pending where these carbon pools might be taken into account within a State-wide inventory, or how CALFIRE defines “Forests” and thus “Forest Carbon” would affect how this comment is considered.
- Page 18, table 4 & 5: consider adding acreage in CA as a reference
- Page 22, Enhance, Goals, first sentence: Consider adding “Increase *the quantity of carbon sequestered and/or the quality and stability of* all forest carbon storage pools....”
- Page 23, Enhance, Strategy: Consider adding a section that reflects the need to move towards harmonized and cleanly compatible carbon quantification tools between both various landscape/project scales and land ownership.
- Page 28, Level of Investment: Consider adding “to meet planning targets for carbon storage *and/or carbon sink enhancement* or emissions avoidance....”
 - Also how will investment levels be coordinated or calculated across ownerships? In Federal Forests, we are not currently receiving additional federal funds to achieve CA targets.
- Page 30, 2nd bullet: Consider adding “Use the analytical components.... to identify the most cost-effective investments for carbon storage, *carbon enhancement*, emissions reductions, and related co-benefits.”
- Page 31, Monitoring, Assessment and Reporting: Consider adding “forest health resiliency performance measures, carbon storage *and enhancement*, and GHG emission...”
 - See above note on harmonization and clean compatibility of monitoring tools across ownerships