



April 8, 2016

Chief Ken Pimlott  
CAL FIRE Director

Assistant Secretary Russ Henly  
California Natural Resources Agency

Deputy Secretary Ashley Conrad-Saydah  
California Environmental Protection Agency

**RE: RECOMMENDATIONS ON THE CALIFORNIA FOREST CARBON PLAN CONCEPT PAPER**

Dear Chief Pimlott, Assistant Secretary Henly, and Deputy Secretary Conrad-Saydah,

On behalf of the Climate Action Reserve, we would like to express our appreciation for the opportunity to submit comments following the *Recommendations on the California Forest Carbon Plan Concept Paper* released March 9, 2016. We appreciate the general direction of the FCAT team and are pleased to see the various agencies working in concert through this process.

Conservation and wise management of natural and working landscapes reduces GHG emissions, enhances carbon sequestration and delivers economic, social, and environmental benefits. In consideration of improving net climate benefits from natural and working landscapes, sustaining carbon stocks will require that natural and working landscapes remain intact and managed not only for appropriately high carbon stocking rates, but stocking rates that are appropriately resilient so that they can be sustained for long periods of time.

The Reserve recommends the following considerations as the FCAT team moves forward with the California Forest Carbon Plan:

**Develop a rigorous GHG accounting framework to ensure reductions and emissions from the forest sector are accurately quantified.**

- The accounting framework should describe how baselines, additionality, longevity of climate benefit, monitoring, and verification are addressed. It is important for the agencies to be clear with regards to expectations of non-offset activities in terms of the endurance of the reductions and removals.
- Establish metrics for assessing removals and reductions at a broad scale (counties for example) to enable management activities (reforestation, fuels treatments, avoided conversion etc.) to occur at a reduced cost and to improve overall certainty of GHG reductions accounting.

**Improve the economic viability of California’s forests through management.**

- We encourage the use of incentive programs to improve forest management for increased carbon stocks and resiliency. Incentive programs should be as simple as possible to ensure a high level of participation. Streamlining programs and compliance standards to encourage active management that improves forest resiliency and rural economics is an important consideration. Local wood production means transportation costs and emissions are reduced as well.
- We encourage programs to support biomass energy that recognize the full set of benefits associated with renewable energy, including increased resiliency in forests, job production, and climate impacts. Such a program needs to be well thought out in terms of accounting for forest carbon stocks as well.

**Engage local planning efforts.**

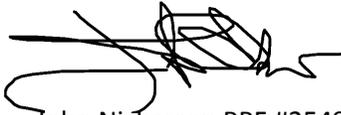
- Statewide priorities can be fine-tuned through local stakeholders, such as RCDs, local NGOs, landowners, and fire safe councils. The engagement of local stakeholders will help to improve targeting the location of management and policy actions that meet local priorities.
- We recommend county level planning be a base with regional efforts to address watershed issues.

**Integrate social and environmental benefits.**

- Managing forests for long-term increased (where possible) and resilient carbon stocks offers a number of social and environmental co-benefits beyond increased carbon stocks, such as improving forest resiliency, job creation, water filtration, preventing erosion and increasing soil stabilization, improved habitat for endangered or high value species, renewable energy and biodiversity.
- Planning and implementation of incentive programs should be strategic with a goal of leveraging the expenditure to achieve the greatest amount of combined social and environmental benefits.

Thank you again for this opportunity to provide comments to the *Recommendations on the California Forest Carbon Plan Concept Paper*. We again applaud FCAT’s work in developing comprehensive goals in an inclusive and participatory manner. We would be happy to continue to support with any further clarification or discussion.

Sincerely,



John Nickerson RPF #2549  
Director of Forestry  
Climate Action Reserve