



Bringing
Water
Together

VIA EMAIL: fcats@fire.ca.gov

March 17, 2017

Mr. Russ Henly
Assistant Secretary of Forest Resources Management
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

SUBJECT: California Forest Carbon Plan: Managing our Forest Landscapes in a Changing Climate, Public Review Draft, January 20, 2017

Dear Mr. Henly:

The Association of California Water Agencies (ACWA) appreciates this opportunity to provide comments on the *California Forest Carbon Plan: Managing our Forest Landscapes in a Changing Climate, Public Review Draft, January 20, 2017* (Forest Carbon Plan).

ACWA represents over 430 public water agencies responsible for delivery of over 90% of the water used for residential, commercial and agricultural purposes in California. Water managers, and an increasing number of water users, recognize that much of California's water supply comes from headwaters watersheds statewide, and that healthy headwaters ecosystems ensure the quality and supply of these water resources. Water agencies are also keenly aware of the many resource management challenges which are evident in our headwaters and that we must act decisively to better manage the land and waters upon which depends our quality of life. It is clear that our water supply is increasingly threatened by past decades of fire exclusion, resulting in unhealthy forests and larger and more intense wildfires, and that the recent drought and growing impacts of climate change are making matters worse.

ACWA appreciates the commitment and leadership of state's Forest Climate Action Team (FCAT), including the personal involvement of its executive level members from CAL FIRE, CalEPA, and The Natural Resources Agency, in producing this significant document.

ACWA supports the Forest Carbon Plan and its intent to more effectively manage California's forests to increase carbon sequestration, reduce black carbon and other greenhouse gas (GHG) emissions, and do so in a targeted way that significantly increases the pace and scale of headwaters restoration by 2030. ACWA supports the ambitious forest restoration goals set forth in the Forest Carbon Plan and its recognition that implementing actions must be accomplished in collaboration with federal, regional, local governments and public and private stakeholders. ACWA also believes that the Forest Carbon Plan properly identifies the need for increased monitoring and standardized metrics, and that implementing actions must be accomplished at the watershed or landscape scale to restore resilience to forestlands.

Many of the forest restoration and management issues and described in the Forest Carbon Plan are also identified in ACWA's policy document entitled [Improving the Resiliency of California's Headwaters – A Framework \(February 2015\)](#) (Headwaters Framework). Implementation of the Forest Carbon Plan will address a number of elements identified in ACWA's Headwaters Framework, including recommendations to:

- Establish headwaters monitoring programs that help quantify GHG benefits and other performance metrics of proactive headwaters management;
- Provide carbon credits for investments in lands management programs and biomass energy projects that balance or create gains in carbon sequestration benefits and air quality concerns;
- Promote biomass management, an important component of forestry management, as a potential source of revenue for headwaters protection while ensuring other renewable energy sources remain economically viable; and
- Facilitate innovative research that can develop new markets for forest products and create financial support for restoration activities.

Suggested Addition to “Regulatory Opportunities” section of the Forest Carbon Plan

The ACWA Headwaters Framework proposes the following recommendation, which we believe could also strengthen the Forest Carbon Plan:

- Review regulatory obstacles to carrying out activities to GHG emissions and maintain or enhance carbon storage associated with forests and headwaters lands.

Specifically, ACWA recommends that the Forest Carbon Plan be amended to include under the “Regulatory Opportunities” header in section 4.2.1 “Flexible Elements of Major Regulatory Laws” (p. 40) a discussion of air quality attainment standards that are enforced by the California Air Resources Board, Air Pollution Control Districts, and Air



Quality Management Districts, and the need to evaluate and remove possible barriers to implementing actions in the Forest Carbon Plan.

ACWA appreciates the opportunity to offer the above comments. ACWA and public water agencies statewide are ready to work collaboratively with the state and with other federal, regional and local governments and other stakeholders to help successfully implement the Forest Carbon Plan. I am available to discuss these comments at daveb@acwa.com or (916) 441-4545.

Sincerely,

A handwritten signature in black ink that reads "David E. Bolland". The signature is written in a cursive, slightly slanted style.

David Bolland
Director of State Regulatory Relations