



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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Sent via e-mail: fcf.cat.calfire@fire.ca.gov

RE: Forest Carbon Plan Comments

Forest Climate Action Team:

The California Farm Bureau Federation (Farm Bureau) is writing to provide input on the draft Forest Carbon Plan (the Plan). Farm Bureau represents more than 48,000 members as it strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources. Farm Bureau appreciates the opportunity to provide comments on this important document, which recognizes the need to improve the management of many forests in our state.

Farm Bureau supports the efforts to address the opportunities California's forests provide for carbon sequestration and promote management actions that prevent catastrophic wildfires that allow the release of significant stores of carbon. Farm Bureau provides these comments to help improve upon the Plan by incorporating changes to provide a clear roadmap to implementing policies at the state and national level that will improve forest management and increase carbon storage, both in our forests and in wood products harvested from our forests.

The Plan currently is limited in its discussion on how recommendations included within will be implemented. It is important that the Plan be implemented to create real improvements in forest and forest product storage of carbon. Without specific mention of how objectives will be implemented and who will implement them, it is likely that many recommendations included in the plan will be left undone. The proposed actions need more specificity. We cannot continue to allow wildfire to be the largest source of black carbon in California and put our focus instead on anthropogenic black carbon emissions that have been reduced by over 90 percent since the 1960's. This puts an unfair burden on sources that have already made significant progress.

Farm Bureau recommends that there be further consideration given to specifically referencing the role that the U.S. Forest Service should play in implementing many of the recommendations in the Plan. Further, there appears to be limited recognition of the role the Board of Forestry (BOF) plays in the development and oversight of forest policy in California. BOF has significant expertise in forest management and should be relied upon as a valuable partner in the implementation of the Plan.

California forests are diverse not only in their ecosystem type, but in their ownership patterns as well. Each landowner type faces different challenges to meeting forest management goals and the Plan should recognize this and promote policies to address the challenges. For example, small forest landowners in California face many barriers to actively managing their forests. This is primarily driven by the numerous regulations governing timber harvest in California. Meeting those standards is very expensive and for many small landowners the up-front costs of meeting

the regulatory requirements is more than they can afford, so they forego harvest altogether. Reducing regulatory burdens and the associated costs for small forest landowners would help promote active management and improve carbon sequestration.

Actively managed forests where timber harvest is occurring should be recognized within the Plan. Currently there is limited mention of timber harvest and the role it plays in carbon sequestration and reduction of the incidence of catastrophic wildfires. Privately owned forests play a significant role in the sequestration of carbon in California. The harvest of timber off those lands should be recognized within the Plan as contributing towards the state's carbon storage goals. The Plan recognizes that nonfederal lands sequester carbon at a rate 1.9 times that of forests on federal lands (see page 72), however the Plan continues by stating that nonfederal forest lands make up a much smaller portion of the state's total forested area. This statement appears to discount the value private lands play in carbon sequestration as well as discounting the active management on private forests. Rather than stating how much larger the acreage of national forests is as compared to private forests, the Plan should promote improved management on national forests.

The Plan should expand upon opportunities to promote demand for forest products as well as promoting a reliable supply of timber to allow for investment in expanded milling and manufacturing of forest products. For example, expanding the value of wood products within the LEED standard would help increase demand for wood. The plan does recognize that current state and local building codes limit the structural use of timber (see page 104), but that point should be expanded upon to identify specific changes that could be made to those codes to increase demand for wood products.

However, since California imports a significant amount of wood to meet current demand, even more focus should be paid to increasing the reliability of wood supply off our public lands to allow for investment in expanded milling and manufacturing. Investment in increased milling capacity is greatly hampered by the unreliability of timber products being harvested from national forests. Without these investments, actively managing California forests to improve their resilience will be difficult.

Farm Bureau appreciates the Plan's recognition of the important role biomass plays in reducing carbon emissions from our forests. However, this topic should be expanded upon within the Plan as significant barriers to biomass utilization remain in place. The Plan should include specific recommendations for the state to incentivize biomass power plants in recognition of the substantial environmental benefits they provide.

Proposed Actions

Farm Bureau questions the goal of increasing the amount of forest land under a conservation easement (see page 25). No data is provided to show that simply placing conservation easements on forested properties will improve their ability to act as carbon sinks. Instead more investment should be made towards increasing active forest management and reducing burdens that lead to forest land conversions.

California's forest landowners operate under extremely restrictive forest practice rules. While Farm Bureau does not disagree that these rules should contribute to resilient forests (see page 3 item A.6.), the statement gives the impression that the rules are not currently leading to resilient forests that are net sinks of carbon. California's actively managed forests are much more resilient than our national forests and this should be recognized in the Plan.

Farm Bureau agrees that the restoration of mountain meadows on national forests is a valuable goal. However, this activity, if done incorrectly can have negative consequences for downstream water rights holders. This goal (see page 4 item B.5. and page 31) should mention this consideration and promote restoration that does not create short term impacts for downstream water users.

As California is placing many regulations on its businesses to reduce carbon emissions, it is important that the savings generated by those regulations not be lost in one or two catastrophic wildfires. It is for this reason that the Plan is so important. Farm Bureau appreciates the opportunity to comment and respectfully requests that these comments be incorporated into the Plan to improve the likelihood that real improvements will be made to increase the role of California's forests to act as carbon sinks.

Sincerely,

A handwritten signature in cursive script, appearing to read "Noelle Cremers".

Noelle G. Cremers
Director, Natural Resources and Commodities