

March 13, 2017

Comments on the Forest Carbon Plan

Dear Forest Climate Action Team,

Thank you for the opportunity to comment on the Draft Forest Carbon Plan. It is clear much effort was put into the plan by a variety of authors to ensure California's forests continue to sequester carbon and remain a carbon sink. As discussed at recent meetings, this plan is not intended to get into minute details but to provide high level goals to meet sequestration targets. We have a few comments after reviewing the plan with this in mind.

Throughout the plan, statements are made about reaching carbon sequestration goals. It does not appear there is an actual figure for the amount of carbon aimed to be sequestered in the forests of California. AB 1504 requires the BOF to ensure forest practice regulations support a sequestration goal of 5 million metric tons annually. Is this the goal for private forestlands? Is there a goal for federal lands?

Page 19 of the plan states "A primary goal of the Forest Carbon Plan is to transfer carbon stocks from many small, fire-vulnerable trees into resilient large trees.". There is no doubt a significant portion of CA's forestland base is overstocked due to lack of forest management and fire suppression. But this statement suggests forest management, regardless of ownership type, should move towards creating large scattered trees. The statement also suggests a static forest, unchanging over time. Further detail should be included discussing the benefits of unevenaged forest management in managing for all age classes so large trees can be replaced over time. Similarly, it should be noted evenage management maintains trees of varying tree sizes, including large trees, across the landscape as well.

Section 3.1 of the plan, Increase Protection of Forested Lands and Reduce Conversion to Non-Forest Uses, discusses a goal of increasing the acreage subject to conservation easements by 10% by 2030. Using public funds for conservation easements should be viewed carefully for their benefit to forest resources. If legitimate pressure for development pressure exists, they may be warranted. Otherwise, these funds are better used for activities on the ground that improve or restore forest resources. Stronger language is needed in this section to ensure public funds for conservation easements focuses on those lands where legitimate development pressures exist.

The plan could benefit from a discussion on incentives for small and large forestland owners alike to participate in activities that further the goals of the plan. Prescribed fire is discussed as a needed tool to achieve the goals but many landowners are leery of participating in prescribed fire operations due to liability. In areas where prescribed fire is not an option, timber harvesting to create resilient forests from overstocked forests should be encouraged. Page 99 of the plan states:

"Activities aimed at improving resilience in these forests are often center around reduction of hazardous fuels and modification of degraded stand structure. Forest management policies on various scales have highlighted the importance of these activities, but, as discussed earlier, the pace and scale of implementation has lagged far behind need, owing to societal and organizational barriers and disincentives."

A goal of the plan should be to investigate options to lessen or remove the liability for landowners using prescribed fire and streamlined permitting to encourage timber harvest operations that further other goals of the plan.

Section 9.3, Biomass Energy, could benefit from additional discussion of the public benefits biomass power provides, benefits not associated with other renewable sources of energy. In addition to being a baseload source



of renewable energy, biomass provides landfill diversions for woody waste material from forest, urban, and agricultural sources. Typically, forest residues are piled and burned in the woods resulting in significantly increased emissions of methane, carbon monoxide, and particulate matter. Additionally, the state is on the cusp of witnessing significant emissions from drought-killed trees in the Sierras when wildfire events return in the summer or as they decay in the forest. Biomass is the answer to avoiding these emissions and should be stressed in this section.

Lastly, there is a question as to what happens after the Forest Carbon Plan is finalized. Will the Forest Carbon Action Team or other entity propose additional regulation if these targets cannot be met in the short or long term? Any new regulations should be considered carefully to encourage landowners to participate in activities that further the goals of this plan. More restrictive regulations in a state currently with the most stringent forest practices regulations in the nation will only discourage participation.

We support many of the comments submitted by the Board of Forestry and Fire Protection to the Forest Carbon Action Team regarding this plan. We have not repeated them here but hope they are reviewed in great detail.

Thank you for the opportunity to submit comments on the Forest Carbon Plan. We look forward to working with state and federal agencies as we seek a sound approach to ensuring California's forests remain resilient to the many factors affecting them.

If you have any questions or comments regarding this letter, I can be reached at jandersen@mendoco.com or 707-962-2820.

Sincerely,

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