



March 17, 2017

Chief Ken Pimlott  
CAL FIRE Director

Assistant Secretary Russ Henly  
California Natural Resources Agency

Deputy Secretary Ashley Conrad-Saydah  
California Environmental Protection Agency

**RE: Comments on California Forest Carbon Plan January 2017 Draft for Public Review**

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

The Mendocino County Resource Conservation District (District), appreciates the opportunity to submit comments on the January 20, 2017 Draft California Forest Carbon Plan. The District strongly supports Assembly Bill 32's requirements to sharply reduce greenhouse gas emissions and the State's leadership in transitioning to a sustainable, low-carbon future. California's forests are one of the State's greatest assets and is an imperative piece to reducing our overall greenhouse gas emissions while providing a diverse array of co-benefits. In addition to the ability to be a substantial carbon sink, California's complex forest ecosystems provide a suite of critical ecosystem services.

The District agrees and appreciates the background and science review presented in the Plan establishing California's forests as a more reliable long-term carbon sink, as opposed to a carbon source. Additionally, we applaud FCAT's commitment to working collaboratively at the watershed or landscape-level scale. The following are the District's recommendations to further promote the goals and key findings outlined in the Plan.

*Support for Regional and Local Planning Efforts*

Local, professional leadership is essential to the success of the Plan, but this cannot take place if there is not adequate funding for planning efforts. It is a great challenge to implement projects on a landscape-scale while working with small, private landowners. Much staff time is needed to organize projects on a neighborhood, watershed, or landscape scale. Grant funding has increasingly been favoring on the ground projects and has put little investment into large-scale planning projects that would provide the benefits necessary to keep pace with the State's climate goals. The District would like to see a commitment to funding planning efforts to implement the Plan's recommendations.

*Methodologies for Project Development and Tracking*

To achieve the Forest Carbon Action Plan's goal of landscape-level forest health, non-industrial forest landowners will need a way of accounting for their climate beneficial practices to be eligible for funding tied to GHG reductions or carbon sequestration potential. It is suggested that the Plan emphasizes the need for simple, easy-to-use guidelines for calculating project-level net GHG benefits. Too often, low income, small non-industrial landowners are excluded from participating in incentive-based or grant programs that require complex, capital intensive accounting. It is suggested that an approved accounting sheet with pre-calculated net GHG benefits of treatment activities for a suite of forest stand types be developed. This would allow small landowners to easily assess their eligibility to pursue funding sources requiring an explanation of GHG benefits for the proposed treatments.

As identified in the Plan, the need for an information management system to track implementation activities at multiple scales is needed to assess the impact and success of management. The District, along with 11 other Resource Conservation Districts throughout the state, are in the process of developing an online integrated data management network software system to track project implementation and resulting measurable benefits by all parties enrolled in the system. The District invites FCAT to partner on the development of this project to develop a system that meets both the Resource Conservation Districts' and State's needs. The system will be modeled after and in partnership with the developers of the Tahoe Regional Planning Agency's Project Tracker found at: <https://eip.laketahoeinfo.org/>.

### Education and Outreach

Investment must be made by the State to educate the public regarding healthy forest management. This should include educational workshops to teach non-foresters to recognize treatment opportunities and connect landowners with organizations or consultants to implement projects. Funding should be made available for the formation of sustained regional working groups to host workshops, create outreach material, and ensure a clear, standardized message.

In conclusion, implementation of recommended strategies presented in the Plan must be done collaboratively between agencies, Resource Conservation Districts, land trusts, consultants, watershed councils, and other organizations, to leverage resources and promote success. Leadership at both the State and regional level is necessary to ensure all parties are working in concert to achieve California's ambitious climate goals. The District would appreciate a commitment to organizing initial regional planning meetings as a first step to facilitate implementation of the Plan.

Sincerely,



Patricia Hickey  
Executive Director