

3/17/2017

Ken Pimlott, Chair
Forest Carbon Action Team
1416 9th Street
Sacramento, CA 94244-2460

RE: Forest Carbon Plan comments [submitted via email: fcac.fire@fire.ca.gov]

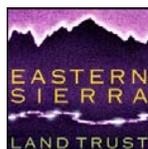
Dear Chief Pimlott:

The undersigned Sierra-based land conservation, utility and community sustainability organizations appreciate the opportunity to provide comment on the public review draft of the California Forest Carbon Plan [Plan], dated January 20, 2017. We are focusing our comments and recommendations on one key area: the need for more specific guidance relative to regional implementation strategies and funding.

We strongly agree with the Plan's assessment that the best way to achieve the statewide goal of stabilizing and ensuring forest carbon benefits is to develop and implement strategies at the regional scale (p. 35). We are all in this together; but level of climate impact, significance of statewide benefits provided, and opportunities for improvement differ by region. Therefore, we ask that the Plan go even farther in instituting a framework for regional planning, implementation and funding for forest and meadow restoration, protection and management projects in the rural forested parts of the state.

Many areas of the state already have such a vehicle in state conservancies, which were established for precisely this purpose – to manage statewide conservation, restoration and other goals at the local and regional scale. Conservancies have this as their mission, they have the on-the-ground relationships with agencies and landowners, and they have the staff and programmatic resources necessary to do the work. Therefore, in areas where they exist, state conservancies should be funded to manage the prioritization, implementation, monitoring and reporting for interventions within their region. In areas not covered by conservancies, existing climate, forest and/or watershed-based collaborative groups can play this role.

In addition to funding conservancies and other collaboratives to manage the processes, the state should create complementary region-specific project funding pots for distribution by the conservancies and other appropriate agencies within each region. Focused regional funding can roll up to achieve statewide GHG reduction and carbon storage goals while doing more to maximize economic, environmental and public health co-benefits at the local and regional scale, as called for in AB 32, Executive Order S-3-05, SB 375, SB 535, AB 1532, and other associated legislation.



Key benefits to a prioritized regional strategy include:

- Ensuring that all residents and businesses across California understand the need for and contribute to GHG reduction efforts to address climate impacts, reduce risk of extreme events and improve sustainability over time;
- Offering the opportunity for more equitable distribution of GHG reduction benefits and co-benefits across all regions of the state;
- Encouraging agencies, legislators and stakeholders to a.) look beyond just the urban-focused tactics for meeting climate goals, and b.) recognize the need for broader participation to reach 2020 and post-2020 climate and related goals.

We thank you for your important work on this document and look forward to continued engagement as the process unfolds.

Sincerely,



Steve Frisch
President,
Sierra Business Council



Marty Coleman-Hunt
Executive Director
Bear Yuba Land Trust



Kay Ogden
Executive Director
Eastern Sierra Land Trust



Jeff Darlington
Executive Director *Placer Land Trust*



Steve Frisch
Executive Director
Sierra Foothill Conservancy



Perry Norris
Executive Director
Truckee Donner Land Trust