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STAKEHOLDER COMMENT: CA. FOREST CARBON PLAN CONCEPT PAPER

VITA: *Rondal Snodgrass was a founder of Sanctuary Forest, and the Executive Director from 1987-2000. He is a co-founder of Northcoast Regional Land Trust, serving Humboldt, Trinity, and Del Norte counties since 2000 in Northern California. He has been a primary consultant for numerous Northcoast California conservation projects from 2000 to 2016. Working with private landowners, non-profits and public agencies, his leadership and involvement has helped create over 150,000 acres of protected and conserved forestlands, farmlands, streams, and rivers with investments of multiple millions of dollars by public and private funds. BS in Economics, University of Oregon, Masters of Arts in Teaching, Reed College, and Certified Land Counselor by California Coastal Conservancy and Trust for Public Land*

I offer thanks, respect and congratulations to the Forest Climate Action Team (FCAT) that produced this comprehensive document. They have garnered valuable information and data with links; provided scientific references; and, established worthy goals and strategies.

COMMENTS:

These comments are in response to the request for *“input from stakeholders to define the regional delineation and/or regional considerations that should be incorporated into applicable protection, enhancement, and innovation strategies.*

My expertise and experience is derived from 30 years of professional, forestland conservation in the California Northcoast’s temperate rain forest.

1) I do not see a specific description and evaluation of the temperate rain forest, ranging from Santa Cruz to the Oregon border. Those forestlands are unique in many ways as the Redwood/Douglas fir ecosystem benefit from rain, fog, and soil conditions unlike the rest of California. Vigorous growth of these forestlands allow for economic use of the working forest, with growth way ahead of fire or conversion and perfect for positive net carbon sequestration. The wide spread fire regime and bark beetle attack of the Sierra and particular attention to Urban Forest are highlighted within the report. I recommend that the Northcoast temperate, rain forest bioregion be established and the report expanded to include specific recommendations: goals and strategies for this region.

2) The paper does not have a section devoted to how State programs have contributed to saving, maintaining and enhancing the internationally recognized

Carbon Sink of California's forestlands. Why we have such a vast resource is largely because of such investments and improved forest practices. California voters approved a number of Bond Acts established to protect natural lands, and their co-benefits.

For example:

Prop 70 passed in 1998 for 776M for Parks and Wildlife Conservation

Prop 12 passed in March 2000 for 2.1B Water, Forests and Open Space

Prop 13 passed in March 2000 for 1.97B Water Bond

Prop 40 passed in March 2002 for 2.6 B Resources Bond

Prop 50 passed in Nov 2002 for 3.4 B Bay Delta and River Parkways

Prop 84 passed in 2006 for 5.38 B Protection of Rivers, Lakes and Streams, Forest and Wildlife Conservation, Protections of Beaches, Bays, Coastal Waters, State Parks and Natural Education Facilities, Sustainable Communities/Climate Change

Now, when much of the money from those bond acts is greatly reduced or expended the auction proceeds from AB 32 Cap and Trade are the next step to fund conservation to reduce Green House Gas Emission. Carbon sequestration has ascended even beyond state priorities to now include worldwide needs. There is a pathway established and evaluation can be made as to how these past efforts worked, what methods were successful, timely, efficient, and effective. What state agencies and methodologies were best able to deliver these expenditures needs to be a consideration and precedent for Cap and Trade budget expenditures.

3) Strategies listed for Wildland Forests in the FCAT paper are clear and consistent with historical purposes of successful bond acts. *“Provide funding for working forest and other conservation easements, delivering funding through the CA Forest Legacy Program, Wildlife Conservation Board, and other forest conservation granting programs, and working in collaboration with land trusts and other related nongovernmental organizations.* The Cap and Trade auction proceeds are at a level to match previous bond act totals. A 2017 allocation in that budget for 1 Billion would be entirely consistent with the present need for carbon sequestering and the agencies are in place as a result of the previous bond act appropriations.

4) In response to the request: *FCAT will work internally and with external stakeholders throughout 2016 to improve goals and strategies.*

I suggest that a section be developed that would have a goal of refining and prioritizing a cost-benefit analysis for implementing any specific programs. The Dept of Finance has produced data that can be utilized for this approach. Priorities based on proven methodologies that can easily be utilized are smart and can be stated in this paper. Measurement and estimates of tree growth, therefore increase in sequestration, is finite, clear, and assessable, and can be matched with Cap and Trade mitigation and investments benefits.

5) In response to: *“Strategies to achieve goals for forest carbon and health must be flexible and nimble enough to address the varying biophysical conditions or landowner goals and capacities for forest management throughout California. Goals and strategies must recognize bioregional and landowner class differences.*

There is a need for new and innovative instruments to incentivize forest landowners to participate in processes that would guarantee positive carbon sequestration on their properties. A primary and successful tool has been conservation easements purchased with public funds that have restrictions and prohibition on land use. Now new terms need to be developed with specific legalities directed at insuring carbon storage protection and increase. Thousands of non-industrial forest landowners want to join in this effort but do not qualify, nor can afford present costs for cumbersome certification. Many larger landowners now faced with choices of selling parcels and converting ownership are ready to commit to conservation easements. Acquiring carbon sequestration via conservation easements has been reported as cost effective with respect to dollars invested per metric ton of CO₂e reduced.

THANK YOU FOR YOUR CONSIDERATION