



April 6, 2016

Chief Ken Pimlott
CAL FIRE Director

Assistant Secretary Russ Henly
California Natural Resources Agency

Deputy Secretary Ashley Conrad-Saydah
California Environmental Protection Agency

RE: RECOMMENDATIONS ON THE CALIFORNIA FOREST CARBON PLAN CONCEPT PAPER

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

On behalf of the Mendocino County Resource Conservation District (District), I am pleased to submit the following recommendations to the Forest Climate Action Team on the draft *California Forest Carbon Plan Concept Paper* published on March 9th, 2016. The Forest Carbon Plan has the opportunity to help conserve and sustainably manage natural and working forestlands to reduce potent greenhouse gas (GHG) emissions, enhance carbon sequestration improving our carbon sinks, and deliver economic, social, and environmental co-benefits.

The District is a non-regulatory, local agency supporting voluntary stewardship of natural resources on wild and working landscapes in Mendocino County and its mission is closely aligned with the successful outcomes of the Forest Carbon Plan. We are one of 99 Resource Conservation Districts (RCDs) in the state that were formed to facilitate coordinated resource management efforts with the purpose of local, state, and federal resource conservation planning. RCDs are in the position to collaborate and share program expertise across the state while tailoring their services to the needs of local landowners and ecosystems. The District sees our current role of conservation organization, public agency, and private landowner coordination as a way to fulfill FCAT's goals of engaging private and public landowners with local, state, and federal agencies.

To date, participating agencies in the Forest Climate Action Team have identified the following broad concepts to organize more specific goals and strategies around within the Concept Paper:

- Protect – Increase protections on forested lands to reduce the rate of fragmentation and conversion to non-forest uses and preserve forestland carbon sequestration potential

- Enhance – Increase forest carbon storage pools and minimize GHG and black carbon emissions in a sustainable manner
- Innovate – Optimize net carbon storage and GHG emission reduction while sustaining working lands and rural economies

The District’s comments are relevant to all three of these broad concepts. Recommendations are intended to meet the needs of forest landowners of all sizes and management capabilities to keep their lands sequestering carbon in perpetuity.

Recommendations on Planning and Implementation

Federal, state, and large industrial landowners inherently have more technical and economic support to implement management activities. Generally, it is more of a financial burden for smaller landowners to hire technical assistance, such as an RPF, to evaluate and develop management prescriptions. It is recommended that FCAT ensure clear direction for the implementation of carbon sequestering and GHG emission reducing activities through the following guiding principles:

- **Outreach:** FCAT should work with local county partners to develop an outreach program that targets landowners by utilizing RCDs, University of California Cooperative Extension (UCCE) advisors, and technical service providers, ensuring widespread awareness and buy-in for the Forest Carbon Plan. Future outreach should include recognition of forest landowner and manager participants for their work to address climate change and provide multiple benefits for their communities.
- **Practice Standards:** Develop standard carbon sequestration and emission reduction practices similar in format to the Natural Resource Conservation Service’s (NRCS) Conservation Practices. These practice standards should define the activity and where it applies, allowing a landowner to get a sense of what management activities may be appropriate for their parcels. Furthermore, practice standards should be refined by region and forest type, reflecting California’s great ecosystem diversity.
- **Regional Scale:** County level planning is recommended as the basis for regional delineation, with the intent that regional efforts be coordinated with one another when watershed boundaries span jurisdictional lines. Statewide priorities can be fine-tuned through local stakeholders, such as RCDs, local non-governmental organizations, fire safe councils, and landowners.
- **Regional Production Potential:** When setting regional goals, it is recommended that targets reflect the potential of the forest type to sequester carbon. For example, the redwood region is one of the most productive sites in the world, and has great potential to sequester carbon.
- **Focus Groups:** To determine the success and interest among forest landowners and management organizations to participate in such planning and implementation efforts, it is recommended FCAT develop regional focus groups of community leaders, local agencies, and land managers to discuss how best to roll-out new carbon driven programs to accommodate a variety of landowners and managers

Recommendations on Incentives and Landowner Participation

Land managers and landowners implement management practices for a variety of purposes, which may include economic, environmental, regulatory, and personal reasons. To achieve the widespread engagement and implementation of carbon sequestration and GHG emission reduction management activities, well-designed incentives must remove barriers to their adoption. Current barriers include economic limitations and lack of technical assistance for smaller landowners, among others.

Incentives proposed by the Forest Carbon Plan should facilitate participation from landowners of all size, from large industrial companies to local homeowners. Additionally, incentives should encourage and facilitate management activities on a long-term, sustained time scale while increasing economic viability and resilience. It is recommended that the following objectives be integrated into incentive programs:

- **Incentive Program Simplicity:** The incentive program should be designed to serve a diverse array of landowners across various regions, stand types, and scale. Both the application process for and selected compliance standards used in adopted incentive programs should be as simple as possible. Simplicity is needed to keep the costs of participation manageable for as many eligible landowners as possible, regardless of parcel size and capacity for forest management.
- **Technical Assistance:** Incentives should not be considered strictly financial, but should also encompass training and technical assistance benefits. The State should consider providing funding to local agencies, such as RCDs or UCCE, that may employ staff with the technical skills to evaluate and prescribe management action plans.
- **Streamline Compliance Standards:** Methodologies to assess carbon stocks and other greenhouse gas exchange between forests and the atmosphere are time and capital intensive and currently excludes small landowners from participating in greenhouse gas off-set programs. This should be kept in mind when a standard forest carbon accounting framework is in development. The framework should provide a simple and streamline inventory and application process to participate in state or federal programs.
- **Incentives for All Landownership Classes:** The goal of redistributing total carbon storage among fewer, larger, more fire resilient trees will have huge implications for much of the current management over the many ownership classes across the State. In addition to supporting non-industrial landowners, corporate or capital intensive lands will need economic incentives to carry larger trees over a longer rotation and must have the milling capacity to handle these when eventually harvested and replaced by other trees recruited for these characteristics.

Recommendations on Innovation and Sustaining Economies

The District applauds FCAT for specifically pointing out long-term economic benefits for landowners and workers, as well as committing to the production of wood products and biomass for energy as key factors in protecting and enhancing our forests. The need to make forest management economically viable cannot be understated. Incentive programs are a critical piece of the puzzle, but

the Forest Carbon Plan should look broadly at the forest products industry which sustains so many of California's rural and forested communities.

Successful implementation of FCAT's management recommendations depends on the following elements:

- **Regulatory Reform:** Support regulatory reform to reduce costs of legal compliance for active forest management.
- **Infrastructure:** State and private investment in infrastructure, such as saw mills and woody biomass energy facilities. Subsidies to the biomass energy sector are currently needed. The District recognizes that this may be beyond the scope of FCAT, however, the Forest Carbon Plan should recognize and acknowledge the full suite of benefits biomass extraction provides, including producing renewable energy, jobs, and increased forest stand resilience from a product that currently has little to no economic value.
- **Support and Elevate the Forest Products Industry:** Maintaining and elevating the forest products industry is key in keeping forestland under effective long-term management to enhance forest health and prevent the parcelization and conversion of potentially productive land.
- **Public Education on the Topic of Forest Management:** Outreach and education about forest management's role in carbon sequestration and GHG emission reductions should extend beyond timberland owners and into urban communities. Urban perceptions create rural realities. Thus, in order for forest landowners, both industrial and non-industrial, to manage in ways that support the goals of the Carbon Action Plan, urban communities must be supportive of the wood products industry.

The District would like to again emphasize the importance of engaging local partners in planning efforts. Community-based organizations are instrumental in motivating landowners to engage in the conservation and responsible management of forestland for the purpose of enhancing carbon sequestration and reducing greenhouse gas emissions. Collaboration between neighbors, facilitated by locally based organizations, will provide more landscape level treatments.

Thank you for the opportunity to provide input on this important and timely issue. The success of the Forest Carbon Plan and how it facilitates and dictates forest management for the purpose of carbon sequestration and GHG reduction is integrated into the Districts goals of watershed restoration and enhancement. Please contact me at 707-462-3664, or at patricia.hickey@mcrd.org if I can provide you with any additional information.

Sincerely,



Patricia Hickey
Executive Director