



United States  
Department of  
Agriculture

Forest  
Service

Pacific Southwest Region  
1323 Club Drive  
Vallejo, CA 94592  
(707) 562-8737 Voice  
(707) 562-9130 Text (TDD)

Pacific Southwest Research Station  
P.O. Box 245  
Berkeley, CA 94701  
(510) 559-6300 Voice  
(510) 559-6307 Text (TDD)

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Date: December 5, 2007

Ms. Mary Nichols  
Chair  
California Air Resources Board  
California Environmental Protection Agency  
1001 I Street  
Sacramento, CA 95814

Dear Chair Nichols:

Thank you for the opportunity to comment on the Statewide GHG inventory process. We strongly support the recommendations of your staff to partner “with land management agencies and the research community to investigate the feasibility of using products from the USDA-FS Forest Inventory and Analysis (FIA) program to better estimate biomass and carbon stocks and stock changes on forested lands” (Staff Report, p. 25). We are committed to working with ARB and related state agencies to improve both the data and methodologies that will underpin future forest-sector GHG inventory work.

As you know from our previous comments (see letter of October 12, 2007, *attached*), we have already been working intensively with your staff, the Energy Commission and Cal Fire to help hone the forest-sector GHG inventory for 1990. Pursuant to that end, scientists and analysts from our Forest Inventory and Analysis (FIA) division produced a report entitled “Forest inventory-based estimation of carbon stocks and flux in California forests in 1990,” dated November 14, 2007. We have attached a copy for the public record.

In our October comment letter, we noted several difficulties with the data sources and methods used to develop the forest GHG inventory for 1990, currently in the staff report submitted for Board approval. These difficulties are nearly unavoidable. They are inherent in the experimental approaches used by the California Energy Commission and Winrock International, intended to explore “hybrid” ways to improve forest and agriculture GHG inventories. The methods used in those earlier reports were not intended to support a full statewide inventory pursuant to the purposes of AB 32, and the data were not field tested nor were they ground-truthed in a manner commonly accepted by forest professionals.

Our attached FIA report found that very little *directly-measured* inventory data exist – even from the most comprehensive historical datasets available – to support an alternative inventory number for 1990 with any real confidence (as compared to the staff report’s findings). However, it is clear that *calculated* values can be improved with further analysis of existing data, using what the report calls a “convergence of evidence” approach.

We are firmly committed to working with the Air Resources Board staff, other state agencies and other public stakeholders over the next year to improve the forest-sector GHG inventory. We appreciate the diligent staff work that has already been dedicated to the recommended inventory, and look forward to advancing their work with further investments from our FIA inventory efforts.

Sincerely,

/s/ Randy Moore  
Randy Moore  
Regional Forester

/s/ James R. Sedell  
JAMES R. SEDELL  
Station Director

