



CALIFORNIA  
LICENSED  
FORESTERS  
ASSOCIATION

P.O. Box 1516 Pioneer, CA 95666

phone· 209.293.7323 fax· 209.293.7544  
email· clfa@volcano.net web· www.clfa.org

September 24, 2007

Ms. Mary D. Nichols, Chairman  
California Air Resources Board  
1001 I Street - PO Box 2815  
Sacramento, CA 95812

*Reference: CCAR Forestry Protocols*

Dear Chairman Nichols,

CLFA has attended the ARB forest protocols workshop held September 6<sup>th</sup>, as well as the last two meetings of the California State Board of Forestry and Fire Protection (BOF). Both ARB and BOF meetings provided helpful forums for public discussion of the fledgling issue of accounting for, and properly crediting, the climate benefits that may accrue from forest management activities.

Unfortunately, ARB staff entered the public discussions with an already fixed "game plan" of recommending to your Board that it adopt the existing forest protocols developed under the auspices of the California Climate Action Registry as a first step in what is presented as a multi-step process of ARB adoption of forest protocols. CLFA believes that staff's approach to date has been to inure itself to this course of action rather than being responsive to the significant adverse testimony that it has received.

While it is true, for example, that the BOF passed a resolution supporting the forest protocols in August of 2004, fairness requires that the action be placed in a proper historical perspective. In 2004, the explosion of interest that has developed on this topic still lay in the future. The BOF action came in response to a request and presentation by the Pacific Forest Trust, which spoke of the voluntary protocols as being a potential tool in deterring forestland conversion and loss. The resolution was adopted unanimously and with minimal discussion.

Now that the climate change issue has captured a massive amount of public attention and concern (as evidenced by the passage of AB 32) it might be instructive for the ARB to inquire of the current BOF what its views are of the issue today, and whether it supports its earlier action without any changes based upon new information and the changed circumstances.

CLFA is encouraged that seemingly everybody interested in this issue – agency staffers, forest industry and environmental representatives – all recognize the tremendous potential that California forests (and forest management) offer in sequestering atmospheric CO<sub>2</sub>. We simply ask the ARB to take more time with the issue of forest accounting protocols, so that the benefits we are striving for are maximized; rather than inhibited because of a flawed start.

We note that the provisions of SB 812 expire at the end of this year. Therefore, the ARB need not be constrained in developing and implementing a new set of voluntary protocols that will be real, verifiable and potentially applicable on millions of acres in our state.

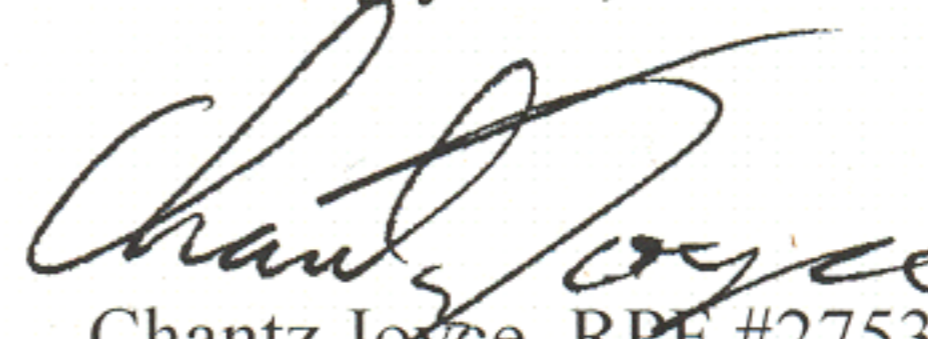
1

Specific areas of concern that we would like to see addressed in a workable forestry protocol are:

- Baseline. California forestry should be able to compete on a level playing field in the global economy. At minimum, our forest protocols need to integrate with emerging regional and national standards. It makes no sense to reward states that have lower regulatory baselines with higher levels of tradable carbon credits.
- Permanence. The requirements of SB 812, as carried into the current protocols, require CCAR forestry participants to secure a permanent conservation easement. CLFA believes this requirement is unrealistic and a huge deterrent to willing landowner participation. The issue can be handled in a number of fiscally sound, legally binding ways. An example would be a long-term agreement between a forest landowner and credit purchaser.
- Forest Products. In the current protocols, when a tree is cut it is treated as an emission. We know this not to be the case in the real world. Products and end uses of wood fiber need to be properly accounted. Wood is the most climate friendly building commodity, comparing extremely favorably in total product life cycle with non-renewables such as steel and concrete. Forest protocols which discourage the use of wood products actually encourage product substitutes carrying larger carbon footprints.
- Inventory Expense. Foresters are highly qualified to make measurements necessary to estimate forest carbon. Statistical sampling schemes should be rigorous and verifiable, but cost-effectiveness is always a consideration. If sampling expenses are too high in relation to expected landowner benefits, the work will not be done and opportunities lost.
- National Forests. National forests contain approximately half of the high quality timberland in the state, representing a huge potential carbon sink – if properly managed. Fuel treatment efforts are lagging, contributing to the increasing occurrence of catastrophic forest fires (and greenhouse gas emissions). Many areas also lack adequate reforestation after wildfires, leading to brush fields and long term forest loss.

Thank you for the opportunity to provide comment to the ARB on this important and emerging issue. Now that the stakes have clearly been raised for all parties interested in California forestry, we hope that you will give the issue the deliberation and due process that it deserves.

Sincerely yours,

  
Chantz Joyce, RPF #2753  
President

Cc: Mr. George Gentry, Executive Officer, BOF.  
Mr. Crawford Tuttle, CDF Chief Deputy Director.  
Mr. Anthony Brunello, Deputy Secretary, Resources.  
CLFA Board of Directors.  
Ms. Hazel Jackson, Executive Director.

*The California Licensed Foresters Association, with a membership responsible for the sustained management of millions of acres of California forestland, represents the common interests of California Registered Professional Foresters. The Association provides opportunities for continuing education and public outreach to its membership, which includes professionals affiliated with government agencies, private timber companies, consultants, the public, and the academic community. Governed by an elected Board of Directors, CLFA was established in 1980 after the passage of the landmark California Professional Foresters Law.*