



March 17, 2017

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Members of the Forest Climate Action Team:

RE: FOREST CARBON PLAN – COMMENTS

As you know, the Sierra Nevada Conservancy (SNC) staff have been active participants in the Forest Climate Action Team (FCAT) and in the drafting of the Forest Carbon Plan (FCP). We have worked to ensure that science and policy considerations were addressed in a way that went beyond simply answering the question of “what is the status of California’s forest carbon” to the true heart of the issue: “what actions can be taken in the forest sector to assist in meeting California’s carbon goals and protecting California’s future?” While we will continue to participate as a member of the FCAT, we are taking this opportunity to provide comment through the public comment process.

As a small, non-regulatory agency, the SNC plays a unique role in the state’s forest and carbon discussions. Our Region represents 25 percent of California’s land mass, is the source of more than 60 percent of the state’s developed water supply, and has millions of acres of forested landscape that store nearly 50 percent of the state’s total forest carbon – more than any other bioregion in California. This carbon is at risk because of the millions of acres of forest lands in our Region that are in poor health and lack resilience: from 2014 through 2016 we estimate that more than 110 million trees have died as a result of wildfire and insects in the Sierra Nevada. This indicates a clear trend of our forests moving from net sequesters of carbon to net emitters. This disturbing trend in forest carbon will have significant implications on California’s climate change goals, but there is hope – the mortality described above is almost exclusively occurring on unhealthy lands – the small areas of healthy forest in our Region have been more resilient in the face of the recent stresses.

To put it simply, the conditions in too many of our forests in the Sierra Nevada have gone from bad to worse. The need for significant action is obvious and urgent, and demands that the FCP serve more clearly as an urgent call to action. It must offer a stronger and more strategic plan for identifying policy and funding gaps, implementation priorities, and identifying steps the state can take in addressing those issues. The FCP must better communicate the dire conditions we face and the consequences of failing to act at the appropriate pace and scale.

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We will be offering additional detailed suggested edits as a part of the FCAT process, but are providing our most substantive overarching comments below:

- The current draft appears to be more of a “report” than a “plan.” It lacks a sense of prioritization of actions – what actions will have the greatest effect on reducing greenhouse gas emissions (GHG) and enhancing long-term, stable storage of carbon? It is clear that uncharacteristically high-severity wildfires and widespread tree mortality represent the greatest threats to the forest sector’s contributions to achieving AB 32 objectives, but this point seems buried in the FCP. While all of the recommended actions have merit, clearly those activities aimed at restoring forest health and resilience provide the greatest benefit, and are the best protection against significant emissions. These activities include ecologically sound forest thinning and the use of prescribed and managed fire.
- The recommendation of “regional implementation” is vague and suggests a future disengagement of the agencies involved in drafting the FCP. This description might include the development of regional “Forest Carbon Action Plans,” but this tool is only mentioned in the Executive Summary and in the Conclusions, but nowhere else in the document. It should also be clearly stated that without increased state, federal and private investment, success will not be possible at the regional level. While it is unclear what implementation means in the context of the FCP, the SNC has already developed a Region-wide collaborative program (Sierra Nevada Watershed Improvement Program) that provides a seamless implementation opportunity.

It is also important to note that this does not appear to be the case in much of the remainder of the state. We recommend that implementation be more clearly defined, developed as a goal in Chapter 3, and that, for each bioregion, a lead agency be identified for implementation. We further recommend that an agency or group of agencies be responsible for tracking progress at the statewide level and providing ongoing policy and funding recommendations for state leaders.

- Some of the targets in the FCP seem to lack justification and offer conflicting numbers, e.g., needed restoration on non-federal lands is identified as 500,000 acres a year, with an annual goal of 35,000 acres. How were these numbers determined, and why is there such a significant discrepancy?
- The urban forestry section seems to offer similar metrics of sequestration and storage that are described for the wildland forests. More perspective should be added to describe the degree to which the numbers are comparable across those sectors, and if not it should be clearly indicated. For example, is the sequestration number for urban



forests a net or gross value, and how are dead urban tree emissions accounted for as they are in wildland forests? Urban forestry is an important part of livable communities and their co-benefits are very important. When calculating carbon sequestration and storage potential, however, it is important to have accurate numbers to compare across forest types to inform actions.

- There are many impediments to achieving the identified actions, but the FCP provides very little guidance on which of these should be addressed in order to achieve the objectives. Without identifying and addressing impediments, it will be impossible to achieve the targets identified in the FCP and therefore impossible to achieve the state's overall climate goals.
- While it is understandable that much of the available data is relatively old (2010-14), is it critical that inclusion of such information is qualified with a clear indication that it does not reflect the dramatic changes that have occurred in recent years (with tree mortality, etc.) As written, including the old data is at best confusing, and actually is likely misleading as it relates to current carbon stocks, the condition of our forests, and reasonable projections of future contributions from this sector. This highlights a critical gap in data timeliness that the FCP needs to identify as a priority, especially as yearly weather patterns fluctuate more wildly with climate change. As newer data becomes available, it should be incorporated into statewide quantification and monitoring methodology so that we have a better understanding of overall emissions and to track the progress of investments to identify ways to improve. Newer data will allow the state to better understand sequestration potential, especially in light of disturbance events such as drought and pests.
- A target for forest carbon sequestration is essential in order to develop priority actions and effective monitoring. While it is possible that this could be developed on a regional scale through the Forest Carbon Action Plans, it is imperative to have a concrete, statewide goal. If it is determined that existing data is inadequate for developing a current, accurate baseline and targets, this should be identified as critical future next step.
- The FCP fails to adequately explore and explain the consequences of not achieving the goals identified. Natural landscapes like forests not only offer the opportunity for reduced GHG emissions, but also provide the adverse opportunity for dramatic increases in GHG emissions. Failure to act in a proactive manner will not only prevent us from achieving the benefits, but will also likely result in ongoing net emissions that are very detrimental to the State of California's overall climate goals.



By clearly identifying goals, necessary actions, and a plan to achieve the goals, as well as the consequences of failing to act adequately, the FCP will achieve the purpose of informing policy makers, agency leaders, and the public as to what is at stake in this sector. As such, it can provide the foundation to direct investment, address needed policy changes, and implement actions at the Regional level by a variety of state, federal and local agencies, and a wide range of stakeholders.

Thank you for the opportunity to comment on the Forest Carbon Plan draft.

Respectfully,



Jim Branham
Executive Officer

