

March 17, 2017

Ken Pimlott, Chair  
Forest Carbon Action Team  
1416 9th Street  
Sacramento, CA 94244-2460

**RE: DRAFT California Forest Carbon Plan - Managing our Forest Landscapes in a Changing Climate**

Dear Chair Pimlott and Team:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Forest Carbon Plan (Plan).

ARCCA is a network of existing regional collaboratives from across California. Our members are coordinating and supporting climate adaptation efforts in their own regions to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives come together to amplify and solidify their individual efforts, as well as to give a stronger voice to regionalism at the state and federal levels. ARCCA members share information on best practices and lessons learned; identify each region's most innovative and successful strategies; and determine how these strategies could be adapted to another region's particular needs. As a result, ARCCA bolsters the efforts of member collaboratives and empowers those interested in forging new regional partnerships.

We offer the following comments and recommendations for consideration to improve the Plan to better achieve the state's GHG and SLCP reduction goals and the goals of the Plan for achieving healthier forest conditions in the face of climate and other impacts.

We appreciate the wealth of comprehensive background on forest conditions and the information on the nexus between forest health and water quality and quantity that this plan brings together in one place. To strengthen Plan implementation, we offer the following additional thoughts and suggestions:

1. **Nonfederal Forest Health and Resiliency Needs (pg. 29):** California's forests are facing an unprecedented threat from drought, insect infestation, and wildfire. Restoration activities are crucial to ensure California's forests remain healthy and continue to store carbon. While the recommended 500,000 acres of restoration per year may not be feasible for CalFIRE and other agencies under current circumstances, we recommend refining the Plan to more proactively address obstacles and identify ways in which we can meet that commitment to restoring California's forests. We encourage CalFIRE to use this plan to enumerate the obstacles to increasing the pace and scale of restoration efforts, and identify potential strategies to overcome these obstacles in order to secure the resources necessary to meet the recommended target.

2. **Focusing on Landscape-level Collaborations (pg. 3, paragraph 6; pg. 35):** We applaud the attention the Plan gives to collaborating at the landscape level. We agree that it is imperative to bring together all stakeholders to make meaningful change. Groups and organizations such as Sierra Nevada Conservancy's Watershed Improvement Program, and the Prescribed Fire MOU to increase controlled burning in forests demonstrate the effectiveness of such collaboration. The Plan should include more direction on how the state should interact with and support these regional efforts, including providing funding for development and implementation of regional priorities and strategies for improving forest resilience and the ability to store carbon.
3. **Implementation and Leadership through Conservancies (pg. 5, paragraph 13):** We support implementing the Plan regionally through conservancies, where they exist. This approach will make management at the landscape level a greater possibility, and will allow areas to implement the Plan in ways that are the most effective and feasible. However, several areas of the state are unrepresented by California conservancies; therefore, we recommend developing alternatives for these areas of the state to ensure consistency.
4. **Strengthening the Commitment to Biomass (pg. 108, paragraph 3; pg. 3, paragraphs 2, 9, 10-11):** In order to strengthen California's commitment to biomass, the Plan must seriously address short-, medium- and long-term policy barriers to biomass utilization. In the short-term, as a means to address tree mortality and other immediate issues, this could include providing a subsidy to offset transportation costs for moving excess biomass from the forest to local facilities that can use it for power or products, as well as working with CPUC to ensure that utilities are completing Power Purchase Agreements with biomass energy facilities. This could help build the feasibility for treating more acres of California's unhealthy forest land.
5. **Adopting Data and Modeling Standards (pg. 5, paragraph 4):** While we appreciate the proposed move toward adopting data and modeling standards for information between state and federal agencies, the Plan should be more specific on which standards should be adopted and expedite the timeline for adoption. Until California has an agreed-upon set of parameters, we recommend using existing protocols developed under other programs, such as the IPCC protocols or those developed for the [Governors' Climate & Forests \(GCF\) Task Force](#), of which California is a founding member. The Task Force conducted a [study of different forest-related protocols](#) and developed an extensive set of project criteria and standards (Appendix A) that could be applied to forest projects in the meantime.
6. **Length of Time for GHG Inventory of Natural & Working Lands (g. 45, paragraph 2):** California has lost carbon storage in over a million trees since 2010 from the tree mortality epidemic in our forested watersheds, and we must do everything we can to stop this epidemic to keep the state's forests from becoming more of a net carbon emitter than a carbon sink, negating the GHG reduction gains we have achieved in other sectors. We recommend expediting the process to measure the reality of GHG emissions in California's natural and working lands to be

completed as soon as possible.

- 7. Account for Co-Benefits of Biomass & Other Restoration Activities (pg. 87):** We understand the challenges of accounting for the co-benefits of restoration activities in the overall value of restoration. However, we urge ARB and the State of California to work toward establishing interim standardized metrics for measuring these benefits in the short-term. Standardizing methods for measuring these benefits reflects the true value of restoration, and the cost of inaction.

We thank you for your all of your important work on California’s Forest Carbon Plan, and look forward to continued engagement as the process unfolds.

Sincerely,



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