

Northern California Society of American Foresters
1851 Hartnell Avenue
Redding, CA 96002



www.norcalsaf.org

January 19, 2009

Mr. John Nickerson
California Climate Action Registry
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014

RE: Comments on the Draft Revised Forest Project Protocol

Dear Mr. Nickerson:

The Northern California Society of American Foresters appreciates the opportunity to comment on the Draft Revised Forest Project Protocol dated December 2008. We believe that the Draft Revised Forest Project Protocol is a significant improvement over the previous version, but feel that with a small amount of modification the protocol could provide an incentive for forest landowners to continue to responsibly manage their property into the future. The standards being developed by the California Climate Action Registry (CCAR), as well as by other governmental and non-governmental groups such as CCAR, have the potential to significantly improve the accounting of benefits from sustainable forest management in the state of California. Forests in California produce wood and store carbon at rates that are among the best in the world. The products they produce, such as long-lived wood products used in the building sector and biomass used to generate carbon-neutral energy, also provide considerable climate benefits. The management of these lands needs to be encouraged to offset increased carbon emissions that primarily come from the combustion of fossil fuels. California imports over $\frac{2}{3}$ of its wood product needs (The Changing California: Forest and Range Assessment, 2003). If both private and public timberlands in California were managed for sustainable supplies of wood products there would be a high potential to offset greenhouse gas (GHG) emissions in all sectors of the California. Active management of public forest lands could also help to generate badly needed funds to restore timberlands damaged by severe wildfires (many acres of which are now dominated by shrubs), and sustainable management could even lead to a reduction in the risk of damage caused by catastrophic wild fires.

We are therefore submitting the following comments on the Draft Revised Forest Project Protocol:

2.1.2 Improved Forest Management, p. 3

In describing improved forest management, the protocol uses the term “natural forest management practices” and defines this term as “forest management practices that promote and maintain native forests comprised of multiple ages and mixed native species at multiple scales...” If this definition is taken to require a minimum level of both age and species diversity on every acre, this term is both misleading and inaccurate. There are numerous examples, both within and outside of California, where there are significant native forest stands comprised of a single species. On Mount Shasta the forests at higher elevations are pure California Red Fir. This forest is the result of natural evolutionary processes. The Ponderosa pine forests of Northern Arizona are considered one of the largest single species forests in the world. And when Yellowstone National Park burned in 1988, both the burned forest and the naturally regenerated forest were largely pure Lodgepole pine. The last example also demonstrates natural forces that result in single-aged stands and forests. Other natural events that could result in a single-aged stand include wind and ice storms. Attempting to limit eligible forests based on definitions that do not match the actual forests in California will diminish the scientific accuracy of these voluntary guidelines.

The issue of labeling uneven-aged, multi-species management as “improved forest management” produces a false dichotomy within silviculture methods with the result that any other type of management is inappropriate or incorrect and needs to be “improved”. This gives uneven-aged, multi-species management a status that may not be valid. Foresters use existing stand conditions, among other factors, in determining the best management approach and treatment for each stand. There are natural conditions that make even-age treatments the best option for forest health. These conditions might include insect outbreaks where removing most or all trees in a stand is the only way to slow the infestation. Also, you might have a naturally occurring disease affecting a stand. Removing all trees and planting another species that is not affected by that disease can be the most appropriate treatment option.

If CCAR is going to require uneven-aged, multi-species management, it should state so in the protocols using the correct terminology. Also, clarification on whether small even-aged clumps simulating natural clearings, such as group-selection silviculture are allowed would be beneficial. Calling any particular management strategy improved or natural places an artificial break between appropriate site-specific silviculture methods in a way that is not necessarily honest.

3.1 Additionality, p.4

The issue of additionality needs to be applied in a manner that promotes use of the protocols and the program, and provides incentives for forest landowners to participate. An appropriate way to provide those incentives would be to make, in the case of California, the minimum standards in the California Forest Practices Act and the Forest Practice Rules (FPRs) the baseline level for timberlands in the state. The FPRs already include the use of best management practices, public review, consideration of cumulative impacts, and protection measures for sensitive species and special resources.

The referenced requirements in Section 6 describe in detail a methodology for determining the baseline carbon stocks from which additional carbon stocks may be calculated. The FIA average stocks are a good general level that may be appropriate for some landowners. But the minimum standards of the FPRs are easily measured and provide a sound base from which to build stocks.

CCAR can provide a level playing field for timberland owners in order to create a program that encourages participation. Forests are one of the few areas that can sequester carbon over long periods while providing both consumer goods and ecosystem services, and participation by forest landowners is a critical component in reducing greenhouse gases. CCAR needs to develop a program that those landowners will want to join.

3.5.1 Promotion and Maintenance of Native Species, p5

The definition of native forests as “those occurring naturally in an area, as neither a direct nor indirect consequence of human activity” is misleading. Dr. Thomas Bonnicksen discusses the development of North American forests in his book *America's Ancient Forests*. Humans have been interacting with and modifying forests in American for about 10,000 years, so a baseline uninfluenced by human activities does not exist. The protocols could easily do without the second sentence in the first paragraph of this section.

5.1 Accounting for Significant Secondary Effects, pp.10, 16

Any discussion of leakage should consider the effect of forest regulations and public demands on forest management practices, at state, regional, and global levels. In surveys, the public states that it wants sustainably produced wood products and are willing to pay for those products. Yet, when the public goes to the lumber yard, the choice of wood product appears to be largely based on economics – the less expensive wood products are chosen over those labeled as sustainably grown. The issue of

harvesting levels and practices seem to be more a function of “not in my back yard”. People want the sustainable products, but want them to come from somewhere else. This results in a shift of the environmental footprint of forest management to states and countries that have fewer costs and restrictions. Another impact of exporting the environmental footprint of local management is the increase in transportation time and distance needed to import those products into the state, with the accompanying increase in GHGs. While difficult to calculate using the methodology included in the protocols (see section 6.2.2 of the protocols), these emissions are every bit as significant, if not more on a global level, as the emissions from equipment operating on-site.

CCAR could develop protocols that encourage forest landowner participation that might have a significant effect on both worldwide GHG emissions and on unsustainable harvest activities in developing countries where deforestation is occurring.

6.2 Improved Forest Management Projects, pp.13, 15 ,16

The protocols state that with above average stocking levels cannot reduce stocking levels below the baseline high levels (6.2.1.1-2, p.14). The protocols require a 100 year agreement from the landowner and their heirs and assignees to continue practices that maintain and possibly increase stand stocking in order to increase carbon storage. The worksheet for the Leakage Risk Assessment for Improved Forest Management Projects (IFMPs) assumes that a harvest rate of 2% is the sustainable harvest that would lead to a high level of carbon storage. However, since much of the higher quality timberland in the state is growing at 3% - 5% or more per year, the assumed harvest rate would be significantly below a potential sustainable level. This means that the forest lands covered under an “improved forest management project” could quickly exceed healthy stocking levels. For nearly all forest types, there is a limit to the amount of biomass that can be grown on a parcel of land and once that limit is reached, tree and stand mortality may ensue. A mechanism for modifying the Leakage Risk Assessment worksheet would allow for the appropriate calculation of leakage risk.

Summary

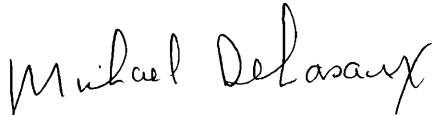
The protocol guidelines will be more useful if they do not try to be prescriptive in the details of how forests across the state should be managed for the full range of benefits to the environment and the forest landowners. The best way to develop the protocols is to ensure that incentives exist that bring forest landowners willingly to the table. Full, active participation in the Registry is the optimal outcome of CCAR’s program and the protocols need to acknowledge the positive role that forests have played, and will continue to play.

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A review of the way in which the European Commission, the United Nations Framework Convention on Climate Change, and the UN Food and Agriculture Organization, among others, could be beneficial in giving proper consideration to the benefits of forest management in responding to the problem of global climate change.

We thank the California Climate Action Registry for the opportunity to comment on the protocols and look forward to working with the Registry on issues relating to forest management and sustainability.

Respectfully,

A handwritten signature in black ink that reads "Michael De Lasaux". The signature is written in a cursive style with a large, prominent 'M' and 'D'.

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