

**The Nature Conservancy, Pacific Forest Trust, Trust for Public Land,
The Conservation Fund, California Council of Land Trusts, California
Waterfowl Association, CalTrout, The Wilderness Land Trust, Rocky
Mountain Elk Foundation and Trout Unlimited**

February 6, 2007

**Catherine Witherspoon
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814**

RE: Proposed Early Action Measures for the Forest Sector and Natural Resources

Dear Ms. Witherspoon:

On behalf of the organizations listed above, we request the implementation of the following “early action” recommendations, so that the state can most effectively engage the forest sector and its other natural resources to attain its 2020 emissions reduction goal. We agree with the Governor and legislature that California must act immediately to address the global warming crisis. Climate change is, by definition global and complex, but we have the opportunity to minimize the most serious effects of climate change by acting now and using all available tools to reduce green house gas (GHG) emissions, including our forests and other natural resources.

Over the past several years, California has taken significant steps to recognize the role that forests can play to mitigate climate change. Most recently, the Climate Action Team (CAT) report estimates that the sector can contribute 35 million metric tons of CO₂ emission reductions by 2020 if actions are undertaken immediately. A series of state climate policy reports also recommend the engagement of the forest sector, among other sectors, as a tool to reduce GHG emissions, including the California Energy Commission’s (CEC) Integrated Energy Policy Report, and the CEC Climate Change Advisory Committee final report from August, 2005.

California has recognized the climate benefits of forests by establishing a greenhouse gas registry that includes a set of standardized GHG accounting protocols for the forest sector, based on the management, restoration and conservation of native forests. These protocols, developed through an extensive public process, promote greenhouse gas emission reductions from forests, while fostering multiple other public benefits such as clean water, wildlife and fish habitat, biodiversity and local timber economies.

Building on the strong leadership that the State has shown thus far, we recommend the following actions be undertaken by the CARB and other relevant agencies. Where the CARB may not have the full authority to implement all of our recommendations, we

strongly encourage coordination with the other relevant agencies to ensure that forests and other natural resources are included in early efforts to reduce greenhouse gas emissions.

Early Action GHG Reduction Recommendations for Forests and Natural Resources:

As a threshold action, The CARB should act expeditiously to adopt the California Climate Action Registry Forest Protocols (Project & Entity)

As the CARB is likely aware, a standardized accounting system is a fundamental component of GHG policies designed to reduce emissions. The existing California Climate Action Registry Forest Protocols have been developed over a 4-year extensive and open process. They provide the GHG accounting guidance that is critical to implement early action climate policies that include the forest sector, as described below.

The CARB should indicate a commitment to invest its best efforts to recognize the early actions undertaken by CCAR registrants

The CARB should indicate a commitment to invest its best efforts to recognize the early emission reduction actions undertaken by members of the CCAR in future policies. This action would provide a much-needed signal to CCAR registrants that their efforts to reduce GHG emission will be rewarded, and it will provide an incentive for registry members to continue reducing their greenhouse gas emissions as state policies are developed. Such action would also be consistent with the intent of the legislature and the Governor.

The CARB should coordinate with the Wildlife Conservation Board and other relevant agencies to assess the climate benefits of land (fee title) and easement acquisitions

The Wildlife Conservation Board (WCB) facilitates fee title and easement acquisitions that, in many cases, produce climate benefits. The WCB was recently given authority by the legislature to consider climate benefits, among other benefits, of forestland acquisitions suggesting the CCAR Forest Protocols as a mechanism to assess them. Given the CARB's responsibility to adopt GHG accounting protocols, the WCB's expertise and the significant opportunities to achieve reductions from the forest sector, we recommend that CARB communicate and coordinate with the WCB on these issues.

The CARB should coordinate with the Climate Action Team (CAT) and California Department of Forestry and Fire Protection to facilitate the expansion of the urban forestry program and set a goal of planting five million trees by 2020

The CARB should coordinate with CDF to give priority within the urban forestry program to projects that maximize climate benefits, in addition to other public benefits, using funds from Proposition 84. The CCAR in conjunction with CDF has recently initiated the process to develop GHG protocols for urban forestry, giving CARB the opportunity to adopt urban forestry protocols expeditiously.

The CARB should work with the Department of Water Resources to expand and accelerate investment in water conservation and water use efficiency measures

As suggested in the CAT Report, there are many water use efficiency measures that can be implemented to reduce GHG emissions, and many of these measures can be implemented as early action measures. These actions include increasing the energy efficiency of all water and wastewater treatment operations and improving price signals so that water-related energy use can be shifted off periods of peak energy demand.

Thank you for considering our early action recommendations. We appreciate the scale and complexity of work that the CARB faces, as it seeks to implement AB 32. As a group, our organizations represent a significant resource that is eager to help CARB and other state agencies work in concert to ensure that the forest sector and California's other natural assets are included in climate policies to achieve the State's GHG emission reduction goals, while also fostering the many other public benefits that they provide.

We would like to meet with you at your earliest convenience to discuss our recommendations and how they may be implemented. You may contact Louis Blumberg with The Nature Conservancy at (415) 281-0439 or Michelle Passero with Pacific Forest Trust at (415) 561-0700.

Sincerely,

cc:

Hon. Linda Adams
Hon. Jackalyne Pfannenstiel
Dan Skopec
Anne Baker
Eileen Tutt
Brian Prusnek
Chuck Schulock
Jeanne Panek
Doug Thompson
Whitney Leeman