



March 19, 2009

George (YG) Gentry
Executive Officer
California State Board of Forestry and Fire Protection

Re: Comments in response to the draft 2009 charter of the Interagency Forestry Working Group

Dear Mr. Gentry and members of the Interagency Forestry Working Group,

These comments are submitted on behalf of the Center for Biological Diversity in regard to the draft 2009 charter of the Interagency Forestry Working Group (IFWG). The Center for Biological Diversity is a non-profit, public-interest conservation organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. Thank you for this opportunity to comment on the charter. We look forward to working with the IFWG as you develop these critical policy tools.

The following comments are intended to be as concise as possible, and organized in order of appearance in the draft charter.

1) Item A in the “Necessity” section on page 1 states that the IFWG was established to “utilize the Board’s October 2008 “REPORT TO ARB ON MEETING AB32 TARGETS...to achieve and surpass the 5 million metric ton goal outlined in the forestry sector by 2020 ARB’s Scoping Plan.” However, this list does not address the necessity to develop the measures specifically laid out in the Scoping Plan.

The charter should include the charge to directly address and develop the measures and strategies laid out in the AB32 Scoping Plan for the Forest Sector. This includes the Sustainable Forests Target of Section 16 of the Scoping Plan, which mandates the reduction of 5 MMTCO₂E by 2020, as well as reduction strategies listed in Chapter 10 of Appendix C.

2) At the February 27 meeting, the IFWG committed to a public process. This commitment should be included in the “Values” section on page 2 of the charter. In addition, the commitment to public process must go beyond a commitment to “assuring that documents are posted and or distributed well in advance...” to include meaningful consideration of comments and input from the public and other agencies.

3) The work plan on page 3 of the charter identifies 5 principles to guide the work of the IFWG. These are: protection and conservation; resilience; restoration; utilization; and mitigation. However, it is unclear how these five categories might relate to the reduction strategies identified in the scoping plan: forest conservation; forest management; afforestation/reforestation; urban forestry; and fuels management. More importantly, it is not

clear that development of the 5 principles identified in the charter would necessarily facilitate development of the reduction strategies adopted in the scoping plan.

Whether through restructuring the principles section of the charter, or by adding a separate section, the charter should directly connect the principles and charge to the specific reduction strategies identified in the scoping plan.

4) The “Protection and Conservation” section on page 3 states that “for wildfire, protection takes the form of active fire suppression and related programs...” While current fire suppression programs and policies are expected to continue to be a part of forest management, the IFWG should be able to assess and revise those policies in response to the changing scientific understanding and the physical impacts of climate change. Rather than a reference to the status quo, the charter should set forth a commitment to incorporating changing conditions and evolving scientific understanding into California’s response to forest fires.

Thank you very much for your consideration. Please do not hesitate to contact me if you have any questions.

Sincerely,



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