



THE PACIFIC FOREST TRUST

Working Forests Work Wonders For Us All.

March 17, 2009

Mr. Tony Brunello
Deputy Secretary for Climate Change and Energy
California Natural Resources Agency
1416 Ninth Street
Sacramento, CA 95814

Mr. David Nawi
Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94224-2460

Re: Comments on the Inter-agency Forest Working Group 2009 Charter

Dear Mr. Brunello and Mr. Nawi:

The Pacific Forest Trust (PFT) greatly appreciates the opportunity to provide comments on the draft 2009 charter for the Inter-agency Forest Working Group (IFWG). We support the effort to involve a broad spectrum of agencies with responsibilities and jurisdiction on matters related to forests and climate change.

The IFWG's charter should be based on the final adopted AB32 Scoping Plan¹ from the California Air Resources Board (ARB). As the charter is currently drafted, direct reference to the Scoping Plan and acknowledgement of its main substantive guidance is missing. This includes the paramount "no net loss" goal, and also foundational mechanisms of inventory and accounting for working to achieve that goal. The charter should directly reference the Scoping Plan document for use by the IFWG in developing further policy recommendations aimed at reaching the Scoping Plan goals.

Further, we recommend that the IFWG start with the development of these key foundational mechanisms for achieving no net loss as its top priority. Specifically, this includes improving our forest inventory and data systems, establishing a comprehensive monitoring program for forest carbon changes, developing an accounting framework for forest carbon (which also serves to track forest carbon across sectors), and developing concrete measures for addressing the conversion of forestland to non-forest use.

In addition, the IFWG should focus its efforts on identifying key next steps for its members to expeditiously carry out in order to achieve the goals identified in the adopted Scoping Plan. We hope that clear and direct actions will be developed for implementation, aimed at maintaining the forestland base and both maintaining and substantially increasing its long-term carbon storage capacity. This should be the central purpose and desired outcome for the IFWG process.

¹ Reference includes all appendices and modifications approved at the December 2008 ARB meeting.

Finally, we would suggest that the IFWG charter more explicitly include a section on stakeholder involvement and elaborate on public access opportunities. Broader publicizing of the California Climate Change Portal website for the IFWG would be very beneficial, as well as the ability to sign up for a listserv through that website. The website and listserv should facilitate the timely dissemination of information, and ensure the public is aware of important announcements, materials, staff contacts, timelines, and other relevant background. It would also be helpful to post deadlines for submitting comments, and a brief explanation of what comments are being solicited on at various steps in the process. We support and appreciate the effort to make IFWG meetings accessible via webcast.

We look forward to working with you and the IFWG during the coming year to help establish a truly groundbreaking approach to forests and climate change. There is significant opportunity to increase the climate benefits of our forests, while also protecting sustainable supplies of other invaluable public benefits such as clean water, fish and wildlife habitat, biodiversity, and wood products.

Thank you very much for your consideration, and please do not hesitate to contact us with any questions.

Sincerely,



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Cc: Inter-agency Forest Working Group