

The undersigned organizations are writing to express our concern regarding efforts to include the replacement of existing forests with intensively-managed, monoculture plantations as a climate change mitigation strategy. Available evidence clearly demonstrates that this strategy fails to provide significant climate benefits while it threatens other environmental values.

A recent study by Sierra Pacific Industries (SPI)¹ asserts that large increases in total sequestration will result from replacing existing forests in two watersheds in California with intensively-managed plantations. However, a careful review of the SPI study has found significant flaws in the SPI analysis that, when corrected, would negate the report's conclusions.² In general, SPI's findings do not provide a sound basis for developing effective climate policy.

We urge State policymakers instead to focus their forest sector planning on measures that increase sequestration in forests and protect other environmental values, because these are the most credible and verifiable means of providing climate benefits at this time. Abundant opportunities exist in forest conservation, urban forestry, conservation forest management, and afforestation/reforestation that have broad scientific and political support and can produce significant and lasting greenhouse gas reductions while also protecting critical ecosystem services. In contrast, SPI's proposed strategy would not provide reliable climate benefits and conflicts with the forest climate principles adopted by nine environmental organizations.³

We strongly support the ARB's efforts to develop an effective and ambitious forest sector strategy in the AB32 Scoping Plan including adoption of the forest protocols in October 2007. We are confident that review of the available evidence will show that replacement of existing forests with forest plantations does not make climate sense.

CalTrout

ForestEthics

Sierra Forest Legacy

The Natural Resources Defense Council

The Pacific Forest Trust

The Wilderness Society

May 8, 2008

¹ James, C. et. al. "Carbon Sequestration in Californian Forests; Two Case Studies in Managed Watersheds" Dec. 12, 2007

² Miller, P. "A Review of SPI's Study: "Carbon Sequestration in Californian Forests; Two Case Studies in Managed Watersheds" May 5, 2008

³ Forest Climate Principles. Dated 2/27/08