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## WESTERN FORESTRY LEADERSHIP COALITION

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To: Western Climate Initiative

Date: November 30, 2007

Subject: WFLC Response to the Western Climate Initiative work plan

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The Western Forestry Leadership Coalition (WFLC) appreciates the opportunity to comment on the Western Climate Initiative (WCI) work plan. The WFLC stands ready to assist the WCI as they move through this process, specifically as it relates to forestry offsets and the possibility of required reporting for forestry practices.

Currently, it is estimated that U.S. forests sequester about 10 percent of the nation's industrial emissions of greenhouse gases. This amounts to over 200 million metric tons of CO<sub>2</sub> equivalents per year.<sup>1</sup> There is little controversy in the idea that forests store carbon in all parts of the system and that the climate sequestration services provided by forests are substantial.

WFLC recognizes the benefits of forest management as a way to not only sequester carbon, but to also build healthy forests that avoid carbon losses due to fire and other sources of mortality. Preventing conversion to non-forest uses not only helps to mitigate impacts of change, but can also help support the provision of other goods and services needed by the public for their health and well-being (e.g., wildlife habitat, clean water, recreation areas, etc). Because of this, WFLC supports the use of forestry, forest products, and woody biomass/biofuels to help sequester carbon emissions and mitigate climate change impacts, and to consider otherwise we believe would be a missed opportunity. Mitigation options, in conjunction with appropriate adaptation responses, will help us optimize carbon sequestration and have healthy forests into the future.

### Specific Responses to Subcommittee Work Plans

- Program Design and Scope—Forests are a large sink of carbon, and while natural disturbance and some management activities result in short-term carbon emissions, trees grow back or are used in forest products that will continue to sequester carbon. If forests do become a required reporter, we encourage the WCI to develop simple systems. Our goal is to encourage as much participation from forest landowners as possible, and so that landowners can continue to sustainably manage their forests, we suggest developing reporting systems that have proportional costs to the value of the credits. Our experiences in the forestry arena lead us to conclude this can be a make or break factor, particularly for smaller landowners, which own the bulk of the nation's forestlands (~500 million acres). We have found that complex and time consuming reporting requirements may result in some land being sold or converted to non-forest uses, an unintended, but real, externality. We believe a balance can be struck, and to this end, the WFLC supports a reporting system proportionate to the cost of the landowner and to the value of the credit. Further, we support the use of forestry offsets as a viable mitigation option.

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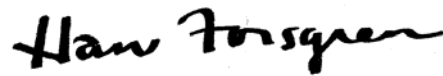
<sup>1</sup> Helms, John A. 2007. Testimony before the House of Representatives Select Committee on Energy Independence and Global Warming, April 26, 2007.

- Offsets—WFLC supports the use of forest offsets under a cap and trade system and recognizes that the markets created by a forestry offset program can provide valuable incentives to landowners to sustainably manage their land, rather than converting their forests (losing not only current carbon inventories, but future carbon sequestration potential), to other more emission intensive uses. WFLC suggests that the WCI consider a full range of alternatives to address permanence and certainty for participation in carbon markets; and would like to offer our assistance in helping develop viable alternatives to the requirement of permanent conservation easements (as required in the California Climate Action Registry).

Once again, thank you for this opportunity to comment. Should you have any questions, please contact WFLC Executive Director, Jay Jensen, at 303-445-4366; [jay.jensen@colostate.edu](mailto:jay.jensen@colostate.edu). [www.wflcweb.org](http://www.wflcweb.org)



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