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To the California Natural Resources Agency,

Thank you for the opportunity to comment on the 2017 Safeguarding California Plan. California has been and continues to build with wood – from the flumes used in the gold rush to new multi-story transit friendly apartments next to metro stops – and we are all better off for it. With current management practices, wood is renewable and sustainable, but the vital role of providing California consumers with renewable wood products from our forests and other sustainably managed forests in North America is buried in a laundry list of 52 items in the 'forests' section of the 2017 Safeguarding California Plan. A clearer articulation that forests AND forest products (often simply referred to as 'forest biomass' in the plan) need to be considered as a linked system would benefit the Plan.

The current ability of California's forests, especially those under private management, to generate considerable climate benefits in the forest as well as through wood products that replace cement and steel products is well documented in the 'California's Forest Resources' (2016) report as well as the 'California Forest Products Industry and Timber Harvest' (2015) report. It is well known that steel girders and bags of cement do not grow on trees, and that their production involves major emissions of greenhouse gases. The important role that managed forests have in reducing consumption of these GHG intensive building products could be better articulated in the plan. State Demonstration Forests could be interesting incubators for new approaches to demonstrate the important climate mitigation potential of California's forests.

While it is magnanimous for the state in first step (F1.1) to highlight the need for the federal forests to take greater responsibility to come closer to their potential to generate climate benefits and provide other public benefits, achieving better results may require California to exercise the 'Good Neighbor Authority' to take greater control in terms of designing AND implementing innovative projects. Other states such as Wisconsin, Michigan, Oregon, and Idaho have shown what is possible with the 'Good Neighbor Authority'. Setting clear goals in the plan for new and innovative projects that will be judged on outcomes, rather than simply on collaborations, could spur action.

References

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Sincerely,

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