



Forest Landowners and Forest Product Producers are a Key Part of a Workable Climate Change Strategy

Given the extensive amount of forested land in the Western United States, it is critical that any organization developing protocols for a market based approach to regulating carbon dioxide emissions recognize the full contribution that forests make to improving air quality.

Any market based mechanism must contain protocols that allow forest landowners and forest product producers to voluntarily opt in to mitigate emissions from other sectors. To ensure that forest landowners and forest product producers have incentives to participate in such a program, our organizations have developed the attached guidelines to help policy makers build programs that encourage forestry as a preferred land use while providing real atmospheric carbon reductions.

Our organizations represent large and small private forest landowners who are committed to practicing sustainable forestry. More information can be found at our individual websites:

Washington Forest
Protection Association
www.wfpa.org

Oregon Forest Industries
Council
www.ofic.com

California Forestry
Association
www.foresthealth.org

Washington Farm Forestry
Association
www.wafarmforestry.com

Oregon Small Woodlands
Association
www.oswa.org

Forest Landowners of
California
www.forestlandowners.org

Intermountain Forest
Association
www.ifia.com

American Forest Resource
Council
www.amforest.org

Montana Wood Products
Association
www.montanaforests.com

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In response to climate change concerns, policy makers at state, regional, and national levels are embarking on efforts to reduce anthropogenic greenhouse gas emissions. Science has demonstrated that forests provide environmental values, including carbon sequestration that non-forested landscapes cannot. Therefore, policies should encourage keeping forests in long-term forest use and provide forest landowners with market-based incentive programs to reduce Greenhouse gases. Given that forestlands managed for sustainable wood production over time are carbon neutral, any participation by forest landowners should be voluntary.

Elements of appropriate Forestry Sector Protocols for carbon markets must include:

- **Incentives to forest landowners to keep forestlands in forest uses.** Develop ways to reward forest landowners for providing ecosystem services and provide incentives for them to continue to invest in their holdings. Forest landowners should not be expected to incur additional regulatory burdens or other required encumbrances such as permanent easements or treating timber harvest as a net emission.
- **Full credit for carbon sequestered and stored in forests and forest products and from forgone carbon emissions from product or energy substitution.** This includes carbon stored in forests and carbon stored in forest products. Additionally, carbon not emitted as a result of utilizing forest products in lieu of other more energy-intensive building materials and from substituting forest biomass energy (electricity & fuels) for fossil fuel energy is a critical component.
- **Credit for carbon sequestration, storage and offsetting carbon emissions must accrue to forest landowners, forest products producers, and forest bioenergy producers.** To be meaningful, carbon credits must initially accrue to those providing these services, not to those purchasing outputs, such as utilities.
- **Accounting standards that create an equitable trading system across administrative boundaries.** Regulatory baselines differ between states and nations. Multiple standards among current registries and voluntary markets create high transaction costs and barriers to participation. Rules for accessing markets should be standardized and equitable. A baseline should be defined as the carbon stocks in place at the point of landowner registration. Additionality can then be described as the annual increases in all carbon stocks resulting from the management activities implemented pursuant to an approved carbon project.
- **Methods for inventory and accounting of carbon emissions, sequestrations, storage, and substitution offsets need to be accurate and feasible utilizing accepted forestry inventory and forest product assessment protocols.** There are many valid sampling techniques that can be utilized to accurately and cost effectively estimate forest and wood product carbon stocks and carbon offsets.
- **Carbon reporting, tracking, compliance, and administrative systems should complement existing systems.** The forest products industry is highly regulated. As such, there are many existing systems in both the private and public sector that could be utilized to establish a carbon accounting system. However, any monitoring and inventory system must protect private forest landowners' proprietary interests.
- **Standards should be developed utilizing a recognized and transparent consensus process.** Protocols should be developed utilizing the American National Standards Institute (ANSI) process for development of voluntary consensus.