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FORESTS AS PART OF THE SOLUTION TO CLIMATE CHANGE

State Foresters hold that domestic forests need to be part of the solution to reducing atmospheric greenhouse gases. The National Association of State Foresters (NASF) offers the following recommendations for inclusion in current and yet-to-be-introduced climate related proposals.

FORESTS CARBON OFFSET PROJECTS

Forest carbon projects have many co-benefits (e.g., providing clean air and water, wildlife habitat) making them more attractive than other types of offsets or technologies that may be used to reduce atmospheric greenhouse gases. To be credible, however, forest offset projects must guarantee reductions in atmospheric greenhouse gases and be verifiable (through periodic third-party review), enforceable and permanent.

NASF strongly recommends that legislation include the following forest carbon offset related provisions:

- Eligible offset project types should include afforestation, reforestation, improved forest management, and others such as avoided deforestation to be added at a later date. These projects offer significant opportunities to reduce GHGs by enhancing carbon stocks.
- The U.S. Department of Agriculture should have a strong role in the establishment and oversight of an offsets program given the agency's expertise in forestry.
- Markets must be structured to facilitate broad landowner participation by limiting transaction and compliance costs. Landowners and project developers should be allowed to establish contracts of different duration so long as the environmental integrity of emissions reductions is maintained.
- Early actors participating in existing regulatory and voluntary carbon markets should be rewarded in order to maintain their current and future interest in supplying emissions reductions.
- Addressing environmental considerations in forest offset projects should be accomplished through existing mechanisms such as forest management plans or third-party forest certification.

Any comprehensive federal climate program should also specify who is eligible to claim credit for carbon sequestered in products and for the substitution benefits from wood products and biomass energy. Such credits could be claimed by landowners interested in carbon friendly forest management on their forest lands.

THE ROLE OF FORESTS BEYOND OFFSET PROJECTS

Forestry projects offering quantifiable emission reductions—but that cannot meet higher standards for offset markets—should be eligible for incentives beyond offsets. Although they may not be able to qualify for offset payments, support for these incentives or other programmatic efforts could come from the sale of allowances for carbon emissions as well as from other sources. We recommend that legislation offer these kinds of incentives to reward forest project types with quantifiable climate benefits—including avoided deforestation—and perhaps designate an existing USDA program as a ready delivery system.

FOREST ADAPTATION

NASF supports legislation that includes new and expanded funding for adaptation activities across the nation's federal and non-federal forests. Healthy forests are a key part of the solution to reducing atmospheric greenhouse gas levels. Their capacity to sequester carbon hinges on their ability to adapt to changes in temperature, precipitation and disturbance regimes (e.g., fire, wind and insect outbreaks) and migrate to regions with more suitable climates. Climate legislation should take advantage of existing programs (e.g., Forest Stewardship Program, Forest Legacy, National Fire Plan) and planning tools (e.g., State Forest Resource Assessments and Strategies, FIA data) as part of a forest adaptation response.

July 2009