

Alpine Biomass Committee

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Forest Climate Action Team

fcf.fire@fire.ca.gov

Re: Draft Forest Carbon Plan Comments

Dear Sir/Madam.

The Alpine Biomass Committee (ABC) is a collaborative group in Alpine County with the mission of “Unifying partners to promote forest and watershed health and local economic development”. Alpine County is approximately 95% federal land which is mostly managed by the US Forest Service (USFS) and to a much lesser extent by the Bureau of Land Management (BLM). The USFS is further broken down into four National Forests in two USFS regions. Typically California agencies only include USFS Region 5 in their considerations, but we respectfully remind you that USFS Region 4 also manages land in California, and needs to be part of the planning process.

ABC strongly supports restoring forest health. As pointed out in the draft Forest Carbon Plan, among other benefits, restoration of forest health will result in increased carbon sequestration, dramatic reductions in the emission of particulate matter, carbon monoxide and methane with lesser reductions of carbon dioxide and nitrogen oxides, and dramatic reductions in the emission of black carbon. This is due to the facts that a healthy forest contains a greater concentration of healthy large trees that are more efficient in sequestering carbon, and that healthy forests are less susceptible to catastrophic wildfires with their associated high emissions.

Specific measures that the ABC believes are missing from or not given sufficient emphasis in the draft Forest Carbon Plan are listed below. The majority of them relate to the lack of commitment to fund healthy forests.

1. **Funding for forest restoration.** The benefits of healthy forests are shared directly and indirectly by everyone, but the agencies that manage our forest do not have sufficient funding, and we believe the taxpayers are unlikely to award them sufficient funding. Perhaps some sort of a Public Goods Charge whereby those downstream that benefit from a healthy forest with consequent healthy watersheds would fund forest restoration may be possible.
2. **Some 62% of Alpine County is in Wilderness and Inventoried Roadless Areas.** While some of this is in a pristine condition, there is much of it that is seriously overstocked with excess biomass that cannot be removed due to restrictions on activity in these areas. Fire knows no boundaries and eventually these overstocked areas will have a catastrophic wildfire with the consequent

detrimental effects of reduced carbon sequestration and increased emissions. While it would take an act of Congress to change this, and such an action is beyond the power of FCAT, it is worthwhile highlighting the issue where our forests are largely designated as Wilderness or Inventoried Roadless Areas.

3. **The lack of support for improving forest health from certain state agencies.** For example biomass-to-bioenergy, with the biomass to come from excess biomass in the forest, could be a way to at least in part, pay for improving forest health, with additional benefits to local rural economies. But to date it has not progressed due to an overly burdensome regulatory regime at the California Public Utilities Commission, the lack of certainty about possible carbon credits from the California Air Resources Board, and lack of a sufficiently strong mandate from the legislature to require utilities to purchase electricity produced from excess biomass from the forests.
4. **Lack of economic development funding for rural areas where the forests are.** Projects to improve infrastructure to process excess biomass from the forests often do not qualify for economic development funding because the counties where they are located are unfairly disqualified for assistance by the Environmental Protection Agency's CalEnviroScreen tool. Allowing other measures of underdevelopment more appropriate to rural areas would help.
5. **Need for education in urban areas** about the importance of managing our forests for clean air, clean water, and carbon sequestration. The source of much of the water consumed in urban areas is the forests and watersheds of the headwaters of our rivers.

Thank you for your consideration and if you have any questions please feel free to contact the undersigned. More information about the ABC can be found on our blog/website at <https://alpinebiomasscommittee.wordpress.com>.

Respectfully submitted

Alpine Biomass Committee
per David Griffith

cc Sierra Nevada Conservancy, Jim Branham
Alpine County Board of Supervisors
Assemblyman Frank Bigelow
Senator Ted Gains
Stanislaus National Forest, Acting Supervisor Scott Tangenberg
Eldorado National Forest, Supervisor Laurence Crabtree
USFS Carson Ranger District, Ranger Irene Davidson
Lake Tahoe Basin Management Unit, Deputy Supervisor Teresa McClung
Rural County Representatives of California, Staci Heaton