

Herring, Alisha@CALFIRE

From: Bruce Campbell <madroneweb@aol.com>
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To: CALFIRE Forest Climate Advisory Team
Subject: comments on Draft Forest Carbon Plan (part two)

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Bruce Campbell
3520 Overland Ave. # A 149
Los Angeles, CA 90034

CalFire
Sacramento, California

To whom it may concern at CalFire, at other agencies, and beyond,

I'd like to quote some very helpful sentences in the document:

“Large trees store and sequester more carbon than small trees. (139) One large, old sugar pine tree, approximately 300 years old, stores as much carbon as 175 younger, 30-year old white fir (Figure 8).”

“California’s forests currently have higher densities of small trees and fewer large trees on the landscape overall compared to historic forest conditions. (133, 134, 135) These conditions have detrimental implications for both the resilience of the forest and quality of the forest as a carbon sink.”

“Reducing carbon losses from forests is essential to meeting the state’s GHG reduction targets.”

And now I want to quote a sentence and then comment on a key word within it. *“The carbon benefits from treatments that promote growth and retention of larger trees include increased sequestration rates, more stable carbon storage, and decreased risk from the growing threats of climate change.”* I simply wish to point out the obvious fact that the easiest way to “retain” larger trees is to: 1. Do not log larger trees; and 2. Do actual fuel treatments which outfits such as the California Conservation Corps may do, rather than use fuel treatment as an excuse for timber workers to fragment a forest to get at its largest trees).

Under “4.1 Regional Prioritization and Implementation”, it says that *“The overall goal to secure forestlands as a resilient net sink of carbon and minimize the GHG and black carbon emissions is a statewide objective, but one that is best pursued at the ecoregional (see Section 6.2), or finer, scale.”* I contend that construction / land management equipment that spews diesel and other exhaust is “a finer” scale in which to consider damaging so-called short-term atmospheric pollutant. Where is the analysis of state regulations on black carbon, or the analysis of anything regarding black carbon (for instance emissions due to land management activities under the Forest Carbon Plan) except that a lot is emitted during wildfires?

Another thing I wish to mention pertaining to the Draft Forest Carbon Plan is in reference to “stocking” / “re-planting”. Seeing that a range of species and ages of trees will help bolster climate resiliency of forests, is the wording of regulations regarding stocking / replanting going to shift toward achieving a greater diversity on its forestland? Or is this an acceleration of the mistakes of forest practices for decades – emphasizing logging old conifers, considering hardwoods to be trash trees, and then nearly always replanting monoculture conifer seedlings following logging is bad for forest health, bad for species diversity, and bad for carbon sequestration?

Thus, # 6 under “A. Significantly increase the pace and scale of forest and watershed improvements on nonfederal forest lands: 6. Ensure that timber operations conducted under the Forest Practice Act and Rules contribute to the achievement of healthy and resilient forests that are net sinks of carbon.” This is a fine theory, but since CalFire (like CDF before it) is the agency that has (like CDF before it) rubber-stamped at least 99% of Timber Harvest Plans submitted to it – despite most of them involving poor forest practices with negative impacts on species habitat, carbon storage, and watershed hydrology.

Toward the end of my comments submitted earlier today, I said “It is dangerous to consider stands with large existing trees and those with high habitat values – as top priorities since that would be timber industry greed rather than common sense guiding those misguided managers.” It is quite obvious to those with an understanding of forest management and about true forest resiliency that conifer plantations and other mostly younger overgrown forests are the primary problem with California forestland these days. These areas should be targeted for CCC-type management activities, but not be used as an excuse for timber companies, hey while they happen to be in the area, might as well take out those larger merchantable trees to make it worth their while!

There must be strict maximum diameter limits regarding how big a tree can be removed. One cannot achieve the desired state of “denser larger trees” by removing some of these larger trees. Keep the larger trees, and then proceed in balance to remove some underbrush and help to create increased growth and carbon storage rates.

After a fire, land managers should be reminded that often an area is naturally reforested – while at other times “active management” has really thrashed the soil to the point that landslides and mud/debris flows are possible, and also compact and disturb the soil so sometimes reforestation efforts are unsuccessful. Seek to plant more than a monoculture species or two – more species and more range within the species likely means better adaptation to climate change.

Lastly I wish to remind some land managers to be careful not to spread Sudden Oak Death syndrome when transporting equipment and personnel to land management work areas. Oh, and please also consider removing old forest roads in certain areas to reduce sedimentation to nearby watercourses.

Thanks for your consideration of these comments, and best wishes for an improved final product!

Sincerely yours,

Bruce Campbell