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From: Bruce Campbell <madroneweb@aol.com>
Sent: Friday, March 17, 2017 5:12 PM
To: CALFIRE Forest Climate Advisory Team
Subject: 3rd attempt at sending Comments on Draft Forest Carbon Plan

March 17, 2017

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

I am very disappointed in the Forest Carbon Plan. While the Forest Carbon Plan's analysis of some of the problems facing us is pretty good, but when they get around to proposals, there are very disturbing terms being used which have been abused for decades – terms like “forest health”, “fuels treatment”, “overstory removal”, “regeneration harvest” and even “modified select cut” are often just public relations terms for variations of clearcut logging. The Forest Carbon Plan should have admitted that is standard commercial forest practices (along with fire suppression) that have resulted in the many unhealthy conditions in California forests, and the so-called “solutions” proposed in the document can easily become convenient excuses for the timber industry and agency land managers to continue logging the biggest trees, but at an accelerated pace!

Let's pretend we are in a Logic 101 class – it could be at an elementary to college level. The Forest Carbon Plan admits that especially old conifer trees are great at sequestering carbon, yet calls for the export of logs from California. Thinner or dead trees won't be the trees exported since it isn't economical. So what they want to export are larger trees (what many view as commercial timber) in the general region of the areas ravaged by drought and bark beetles. Yet the very trees that would be worth enough to bother with exporting are the comparatively resilient ones which should continue to be living trees sequestering the most carbon that they can here on California forestland.

This document proposes that more large trees be in our forests partly to sequester carbon. It also proposes lifting the log export ban, or else will claim insufficient domestic timber facilities as an excuse to obtain approval for the export of California logs. And the document also calls for the increase in the use of wood / products from larger trees to be used in buildings.

Excuse me, there are insufficient restraints on timber managers (who are out to liquidate the most valuable conifers) to make the preposterous claim that there will be more large standing trees in California. And to propose that there be a mandate to use more wood products from older California trees in California buildings is going about it the exact wrong way! The mandate should be something like was proposed back in the 1990 Forests Forever initiative – which was to mandate that many trees (including on commercial timberlands) be allowed to grow to the highest annual mean growth (which for coast range conifers means to the 80 to 110 year-old age range) -- including on most corporate timberland territory.

Throughout much of this document, there is inadequate consideration of the impact of fragmentation on forests – including fragmentation due to land management activities! The only large trees that should be considered for removal are those in a clump with a more dominant tree nearby – and only then if the removal of designated tree will not result in sunlight striking the forest floor.

The document's discussion of Black Carbon was quite inadequate – since it refused to even consider black carbon emissions from construction / land management equipment.

There are many disturbing “factors” mentioned which are to guide regional prioritization regarding this forest carbon plan. Forests at greatest risk of catastrophic events is a good focus, yet timber managers will be eyeing areas with larger trees despite it being the plantations which are the tinder box fire danger.

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.

I will send additional comments in a little while. We need a Supplemental (a real) Forest Carbon Plan for California – not one focused on helping biomass facilities and log exporters.

Sincerely,

Bruce Campbell