

**From:** Chris Lish <lishchris@yahoo.com>  
**Sent:** Thursday, March 16, 2017 8:16 PM  
**To:** CALFIRE Forest Climate Advisory Team  
**Subject:** Please revise the Forest Carbon Plan to protect mature trees and diverse ecosystems

Thursday, March 16, 2017

Sacramento Headquarters  
1416 9th Street  
Sacramento, CA 94244-2460

Subject: Please revise the Forest Carbon Plan to protect mature trees and diverse ecosystems

Dear CAL FIRE Director Ken Pimlott,

The Forest Carbon Plan's vision is to "secure California's forests as a healthy, resilient net sink of carbon, while conferring a range of ecosystem and societal benefits, and minimizing the GHG [greenhouse gas] and black carbon emissions associated with management activities, conversion, wildfire events and other disturbances." The plan concludes California forests are unhealthy due to decades of fire suppression and poor forest management practices.

*"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."*  
-- Theodore Roosevelt

To resolve these health problems, the plan emphasizes more logging through thinning, and recommends up to 500,000 acres/year of thinning on both federal and state lands. This would be in addition to regular logging projects, and amounts to an increase in logging for over many years.

*"Our government is like a rich and foolish spendthrift who has inherited a magnificent estate in perfect order, and then has left his fields and meadows, forests and parks to be sold and plundered and wasted."*  
-- John Muir

However, to effectively deal with climate change, California forests must be healthy, include a substantial population of mature trees, and serve multiple purposes for wildlife and the ecosystem. California forests must be managed now to protect its greatest carbon sequestration assets: larger, mature trees and vegetation variety. The plan must ensure that forest harvesting and thinning combined do not turn our forests into a carbon source. Concrete carbon sequestration targets are missing from the plan, as is a clear delineation of goals and timeline. Although the plan lays out specific targets for thinning, it sets no specific targets for controlled burns. Controlled burns are essential for fuels reduction and forest health. Targets for controlled burns and allowing some involuntary fires to burn should be added to the plan.

*"Then I say the Earth belongs to each generation during its course, fully and in its own right, no generation can contract debts greater than may be paid during the course of its own existence."*  
-- Thomas Jefferson

In order to manage forests so that they are resilient enough to survive climate change, periodic drought, and insects, as well as sequester as much carbon as possible, the plan must require these changes to the way forests are managed:

**1. Significantly reduce clearcutting** and replace it with selective logging. Clearcutting creates the forest conditions that the plan now seeks to correct with thinning. A clearcut site is a net emitter of carbon dioxide for 20 to 30 years even if a plantation is installed. In addition, plantations, with their dense young trees of the same age and species, increase fire risk. The clearcut operation reduces the ability of the soil to retain water, carbon, and nutrients. The removal of so much non-commercial biomass from a site creates a disposal problem. Disposal is less of a problem with selective logging because the amount of material to remove is less in relation to the size of the area logged so leaves and small branches can be chopped up and left on the site to rebuild the soil.

*“As we peer into society’s future, we—you and I, and our government—must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow.”*

-- Dwight D. Eisenhower

**2. Prioritize and safeguard large trees.** Large trees sequester more carbon faster than smaller trees. The plan acknowledges that a “300-plus-year-old sugar pine contains more carbon than one hundred 30-year old white firs”, but sets no targets or incentives to encourage forest managers to allow trees to grow longer before harvesting them. Additionally, large trees are more fire resistant than small trees.

*“It is our task in our time and in our generation, to hand down undiminished to those who come after us, as was handed down to us by those who went before, the natural wealth and beauty which is ours.”*

-- John F. Kennedy

**3. Prioritize and increase forest diversity** as it is well-established that more diversity leads to greater resilience. A diverse forest has many types and ages of trees as well as other vegetation.

*“Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish—indeed, all the living creatures of prairie and woodland and seashore—from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement.”*

-- Theodore Roosevelt

**4. Value and retain non-hazardous dead trees as they store carbon and provide other benefits.** The plan assumes that dead trees release carbon immediately and are a huge fire and safety hazard. However, dead trees retain carbon for as many as 100 years and are good wildlife habitat and replenishing the soil. Once the needles have fallen of a dead tree, they are not especially fire prone. Of course, dead trees can be a hazard if they are located near a structure or a highway.

*“A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.”*

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA