Forest Carbon Plan comments

Provided by Coreen Francis, BLM CA State Forester, on 3/16/17

pg. 3 – A. 1. The goal of 500,000 acres treated annually has no scale or context to it. Is this goal specific to non-federal lands or all lands? The specific acre targets that follow action item 1. are much lower than 500,000 acres (e.g. 60,000 acres annually by 2030) so I'm wondering why the conflict and discrepancy.

p. 4 item D. – provides no quantification of wood volume that would need to be utilized by the wood and biomass industry to achieve restoration and forest management goals for carbon sequestration. Past efforts such as the Sierra Nevada Framework quantified how much wood volume is growing, thus allowing the readers to understand growing stock compared to what is being harvested.

p. 6 item 4. e. export of sawlogs from federal and public lands would actually cost more carbon to transport/export than utilizing this wood in the US. Limiting imports of wood would have more carbon benefit than proposing more exporting.

p. 12 figure 2 – shrub vegetation that has burned is a major category in this figure so why is there no discussion on strategies in this vegetation type to limit acres burned? Such as a network of strategic fuels breaks and strategies of fire suppression in advance of a shrub fire?

p. 13 paragraph 1 – states that from 2013 to 2014 there were 885,000 to 3.3 million dead trees which conflicts with the next sentence about 102 million trees. Not sure where the first estimate is derived from since there is no citations in this whole paragraph. Last sentence refers to "Field" as if this was a study with again no citation.

p. 21 Fountain fire case study – salvage after fire is an opportunity to sequester carbon yet salvage is not part of the goals of the carbon plan. Reforestation after fire is a widely accepted strategy for the burned area to recover the ability to sequester carbon into the future, yet we need a funding strategy to insure reforestation occurs. Salvage of timber provides that funding and is key in managing the burned area into the future. Planting under fire killed trees is hazardous to forest workers and becomes more hazardous as the snags decay, which prevents follow up maintenance treatments that are key to insuring seedling/sapling survival and growth into the future.

p. 29 paragraph 1 bullet #1: Change to make it clear that the 20,000 acres target is specific to 2030 goals. Please note that our 1.2 million acres comes from GIS analysis of CalVeg mapping rather than FIA estimates.

Increase forest and woodland resilience through national landscape conservation networks, landscape mitigation strategies, native seed rehabilitation and restoration, and vegetation treatments including fuels reduction, managed and prescribed fire, and weeds management. The goal will result in resource benefits to approximately 1.2 million acres of forests and woodlands on BLM public lands in California ~~by 2030~~ and include forestry and fuels reduction targets expanding from the current annual average of 9,000 acres to 20,000 acres by 2030.

p. 31 paragraph 1 – 102 million dead trees across 7.7 million affected acres is only 13 trees/acre in need of reforestation. Rather than 7.7 million affected acres it would be more useful to analyze reforestation needs on mortality areas that have >50% mortality rates. That would be more accurate in showing the reforestation need.

p. 31 paragraph 2 first bullet – confusing way to portray the goal of reforestation on the backlog acres, especially to the public who would not connect the "reforestation need" language to the 500,000 acrea, 270,000 acres and the acres of mortality areas in need of reforestation. Recommend having a goal of 1 million acres by 2020… or if this is too aggressive, 500,000 acres by 2020 and another 500,000 acres by 2025. Then there could be a goal of planting every acre of deforestation from 2025 to 2030. Just a thought on how to ramp up reforestation efforts.

p. 35 regional prioritization criteria (comments in red):

- Forests at greatest risk to high-severity events (e.g., fire, insect outbreak)
- Stands with existing large trees these seem to be in a desired condition as described by research that shows stands with large trees effectively sequester carbon. Recommend deleting or redefining based on the original intent of this bullet (i.e. if stands with large trees need to be protected from disturbance)
- Forests at high risk of type-conversion this bullet can be interpreted as the same as the first bullet – seems redundant
- Overly dense forests with large growth potential
- Forests critical to state and local water quality and supply are there any forests that are not critical to water supply?
- Areas with high habitat values at risk, such as owl Protected Activity Centers
- Need to reforest areas after high mortality events
- Forests at risk to conversion to other uses, including development and agriculture the scale of this threat is minor so I'm wondering if this should be a priority or just another action
- Previously treated areas that are in need of "maintenance" treatments, which are generally less costly and may be able to be accomplished via prescribed fire

My general comment to this prioritization list is whether it is too exhaustive to where everything becomes a priority. Also how do you reconcile competing priorities across the landscapes? Is there a numerical value assigned to determine which regions are in need of restoration more than others? Also, why not prioritize restoration in forests that show potential for high carbon density (p. 68 figure 13)?

p. 37 funding sources – left out the U.S. Department of Interior's Wildland Fire Resilient Landscapes Program which is discussed on pg. 28

Move box 2 closer to the reference of it on pg. 37. But also consider the value of Box 2 – not many acres are treated by these crews in relation to the amount of restoration needed. They are essentially one of

the smaller entities in implementation of restoration. Maybe the SNC Prop 8 program would be a better case study??? Or even the FS CFLR program?

p. 43 4.2.4 wouldn't relaxing this restriction be contrary to the goal of increasing capacity to process wood and utilize biomass domestically? As previously mentioned, imports seem like another place to address the need to sequester carbon locally and not transport carbon into this country from other sources?

p. 51 figure 6 – consider giving National Park Service their own category of Forestland since there are some donut holes that appear weird as portrayed currently (e.g. Yosemite, Kings Canyon, and Sequoia NP's).

p. 52 box 4 – these seems to fit better with the previous section of Working Collaboratively at Landscapes Scales (p. 36 section 4.1.1)

Starting on p. 225 1.1.6 Eastside Ecoregion – the discussion of treatments in this ecoregion does not talk about woodland removals for sage-grouse habitat and the effect these have on carbon in this ecoregion. Wondering why?