

# Memorandum on Forest Carbon Plan

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To: FCAT Members

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Thank you for your hard work on the California Forest Carbon Plan. I am commenting as an RPF with many years field experience in California forests and woodlands, including all 19 National Forests here. I am also an ARB Forest Carbon Lead Verifier.

I suggest that some other term be used to describe the “Forest Carbon Plan”, as unfortunately it contains no plan. The document presents the need, goals, technical and institutional background information, and even project funding ideas, but it does not present any plan. Without a plan, how will California’s forest carbon needs ever be met? For instance, the Forest Carbon Plan indicates that half a million acres of forest need restorative and fuels reduction treatments each year, but it does not present any way to do it. The State of California has Forest Carbon Protocols for wild land forests and urban forests, but they are so complex and expensive to administer that no entity has signed up for urban forest projects, and few small landowners, who collectively own 6 million acres of forestland and millions more of rangelands, can afford to participate in Cap and Trade. Meanwhile California forest fires, insects and disease epidemics have become so frequent and numerous that California is a net emitter of carbon. The ARB Forest Protocols should be simpler and encourage carbon sequestration on all our forests, and these needs should be addressed in the plan.

The plan seems to address primarily mixed conifer forests in the Sierra Nevada. While restoration and fuels reduction are essential for the future of those forests, there are many other forest types that should be part of a Forest Carbon Plan. Meanwhile, virtually all of our federal forestlands are essentially unmanaged and the threat of catastrophic fire is constant. California’s diverse ecosystems are being wiped out, one fire, one flood at a time.

Another example, using FIA data I determined that there are over a billion oak trees on California’s 10+ million acres of oak woodlands, and, taken together, they account for hundreds of millions of tons of sequestered forest carbon. There are possibilities, using range management, oak regenerative science, and soil carbon enhancement methods, to restore these lands’ productivity and also to regenerate our sorely depleted oak woodlands, but California oak woodlands are dying, tree by tree. Although 10% of the state, California oak woodlands are scarcely mentioned in the Forest Carbon Plan.

Southern California and Sierra forests are particularly vulnerable right now. There should be a focus on maintenance and restoration of the national forest lands and other stressed forest lands in Southern California. There should be plans for regeneration of burned forests, for habitat restoration and protection of the few remaining old growth forests.

The question becomes, what is this plan for? Is there real policy or funding that will be directed to specific projects as a result of this plan? If so, it needs extensive work as presented by the many speakers at the forest Carbon Plan hearing in February 2017.