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California Department of Forestry and Fire Protection
Forest Carbon Action Team
1416 Ninth Street
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Re: Comments on California Forest Carbon Plan (January 20, 2017 Draft)

Dear Members of the Forest Carbon Action Team,

Thank you for the opportunity to respond to the California Forest Carbon Plan.

When I read that federal and state agencies would work together to create a [plan](#) to “secure California’s forests as a healthy, resilient net sink of carbon”, I hoped that climate change might be the impetus to make long-needed changes in the way we manage our forests.

Unfortunately, my hopes were dashed.

The proposed plan’s main recommendation is to drastically increase thinning of densely growing trees and allow the timber industry’s usual logging projects. This plan guarantees that California forests will be net emitters of carbon for 30-40 years even though scientists assert that emissions must drop precipitously in the next five years if we are to avoid the worst effects of climate change.

Let’s look at what the plan proposes, and what changes need to be made to the plan.

BACKGROUND

In 2006, the California enacted Assembly Bill 32, the “California Global Warming Solutions Act”, which requires California to reduce greenhouse gas emission to 1990 levels by 2020. It has long been recognized that California forests will play a very important role in achieving AB 32 goals.

In 2014, an interagency working group came together with the main purpose of developing a Forest Carbon Plan. The working group, which became known as the Forest Climate Action Team (FCAT), is made up of executive level members of , many of the State’s natural resources agencies, state and federal forest land managers, and other key partners directly or indirectly involved in California forestry. The director of CalFire, an agency inexperienced in climate issues and very experienced in advancing logging, chairs FCAT.

PROPOSED PLAN

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 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.

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.

RECOMMENDED CHANGES TO THE PLAN

To effectively deal with climate change, 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 guidelines for when to allow wildfires to burn should be added to the plan.

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 20-30 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.
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. The plan needs to include specific penalties for timber harvest plans with trees that are harvested before 50 years of age and reduce

the cost of harvesting trees greater than 100 years of age. Additional specific incentives need to be provided for land owners who retain trees older than 100 years.

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.

4. **Value carbon in dead trees.** 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 from 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.

Sincerely,

Karen Maki