
Central Valley Regional Water Quality Control Board

16 March 2017

DRAFT CALIFORNIA FOREST CARBON PLAN COMMENTS

Thank you for providing the opportunity to comment on the draft California Forest Carbon Plan: Managing our Forest Landscapes in a Changing Climate. The mission of California's Water Boards is to preserve, enhance, and restore the quality of California's water resources for the benefits of present and future generations. The Central Valley Regional Water Quality Control Board (Central Valley Water Board) supports the goals of Assembly Bill 32 in reducing greenhouse gas emission dramatically by 2020. The draft Forest Carbon Plan goes a long way towards achieving that goal by recognizing the important role that forests play through improving carbon sequestration and encouraging the use of forest biomass for energy generation. The Central Valley Water Board has a keen interest in supporting any state-wide healthy forest initiative to improve resilience to fire and disease; as unhealthy forests can lead to severe wildfire, subsequent erosion, and contamination of surface waters with sediment.

The Central Valley Water Board submits the following comments:

1. The Draft California Forest Carbon Plan does not address silviculture as related to carbon sequestration per se, and definitely not in relation to flammability and re-burn potential of conifer plantations (firebombs as documented in the literature). The increase in flammability/re-burn potential of conifer plantations is related to water quality in that post-fire erosion is our agencies biggest issue. For more information, please see these references: Kobziar et al. (2009); Stephens and Moghaddas (2005); Thompson et al. (2007); McGinnis et al. (2010); Stephens (2005); Odion et al. (2004); Key (2000); Weatherspoon and Skinner (1995); Bradley et al. (2016); DellaSala (2006); Peterson et al. (2015); Coppoletta et al. (2016); Monsanto and Agee (2008); Johnson et. al. (2013); McIver and Ottman (2007); Donato et al. (2006); and Brown et al. (2003).
2. The elevation band of these high flammability/re-burn plantations carry fires up into Federal lands which are actually trying to thin and maintain spaced large trees – helping to defeat the purpose.
3. Page 93 – WQ: The Draft California Forest Carbon Plan indicates that post-fire reforestation improves watershed health and water resources, completely avoiding the prolonged erosion from post-fire herbicides, along with poor management by industry on the Fountain Fire (page 27), and attempts to state that post-fire reforestation is better for WQ (and other resources) than natural regeneration. None of the 'papers' referenced on the Fountain Fire piece is peer-reviewed and are 'industry' papers.

4. Page 116 – 11.2 Forest Restoration and Protection: Need research on post-fire erosion and herbicide use.
5. By not addressing silviculture and its associated flammability/re-burn potential and post-fire reforestation activities (herbicides) the Draft California Forest Carbon Plan is deficient as related to WQ.

If you have any questions or need further explanation related to our comments, please contact me at (530) 224-4129 or by email at ben.letton@waterboards.ca.gov.

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