



Sustainable Forest Action Coalition

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Participating Representation from the following:

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March 14, 2017

CAL FIRE Carbon Plan Comments:

The Sustainable Forest Action Coalition (SFAC) supports 22 counties in rural California. We also support a large cross section of elected officials, Chambers of Commerce, Farm Bureaus, Fire Safe Councils, Timber Industry, Water Agencies, Education and individuals who have voiced an interest in our efforts.

The SFAC wishes to provide comments on the proposed California Forest Carbon Plan. There is good research that went into the overall Plan, but there are still areas of concern that should be addressed. First and foremost, it is really not a Plan, as there is not a defined purpose, direction, or vision. Given that the State of California and its Forests are a complex make up of various ownerships, the document does not go into any discussion of how to better combine efforts to address the very unhealthy state of the public lands and private non-industrial forest lands, which make up over 76 percent of the available timberland acres within the state.

Key areas where the document does not go into any solutions or planning effort to resolve issues addressed:

1. Treatment of unhealthy forests. The document addresses the state of much of our public land forests in relation to fire, insects and disease as they relate to the carbon issue. However, there are no defined solutions, proposals or strategies to address the fact that over 76 percent of California's forested lands are in unhealthy condition. This Plan should go further to address how the State and Governor's office can work with all of California's Congressional delegation and the Board of Forestry to propose meaningful legislation and reduce complexity and cost of regulations that would increase the pace and scale of treating unhealthy public and private non-industrial forest land. There are plenty of examples of how other states Federal Representatives have proposed and carried special legislation to address various issues within their states. Our Governor and California's Federal representatives have for years put support into addressing one area to the detriment of all of our public lands, that being the Lake Tahoe Basin.

This Plan should outline State legislation and regulatory relief that would address our carbon issue on public and private non-industrial land and its unhealthy condition. Public and Non-industrial private landowners in California simply cannot economically manage their forest due to the arduous and expensive regulatory process currently in-place.

We recommend that this Plan also outline a federal legislative proposal that would allow all federal timber lands within the State to use the same exemption process that the State of California has in-place, that would allow for the rapid treatment and restoration of forests destroyed by wildfire or insect and disease outbreaks.

2. Importance of rapid post catastrophic event response and restoration. The Plan discusses the issues around the loss of the forest resource and its replacement by shrubs. This is not only important in relation to the carbon loss but also the additional loss of our water resource through the fact that forest retain as well as transpire less than brush land. Currently the US Forest Service has 623,000 acres of backlog reforestation that is comprised of brushfields due to past fires. In addition, there are approximately 526,000 acres of productive forest land that is dead from insect and disease just on the Sierra National Forest alone. There is 2 million acres dead from insect and disease on the Eldorado, Stanislaus, Sierra and Sequoia National Forests. This issue is addressed on page 30 of the Forest Carbon Plan. This ecosystem restoration need will not go away given the current budget constraints relative to wildfire funding and loss of revenue due to lack of rapid response to post fire salvage.

This is another area within the Forest Carbon Plan where direction and support could be emphasized by the State to our State and Federal Congressional delegations. The Plan should develop a specific legislative ask to address the budget needs that would provide additional funding to reforest many of these backlog acres of forest land now dominated by brush.

3. 4.2.2 Increase Use of Prescribed and Managed Fire.

The biggest issue relative to this item is again the fact that 62 percent of all forested land in California is on public lands. As with the reforestation backlog, there is also a tremendous backlog of burn piles and post harvest prescribed fire acres on the National Forests. In addition, the vast majority of these public land forest acres are in such a unhealthy and crowded condition that prescribed fire is not an option. Even if some acres were prescribe burned through several entries, the budget issue is again a barrier to accomplish such objectives. The ever accumulating backlog is due mostly to the limited burn days that are available through the various air sheds and the acceptable burn days. There must be a discussion in this Plan about this issue and how the State may be able to modify or provide more burn days to address this backlog issue.

4. Bioenergy. Both Section 8 and 9 address many of the issues and benefits associated with being able to bring forests back into a healthy state through the use of bioenergy infrastructure. The real problem with no solution or plan is how to provide finance and PUC support to modernizing and reusing many of the old biomass co-generation sites that now sit idle in the state (namely Delano, Mendota, Dinuba, Madera, Tracy, Loyalton, Westwood, Oroville and Blue Lake power plants). These 9 power plants can provide 192 megawatts of power and annually consume 1.5 million bone dry tons of wood waste. The only real solution or discussion still centers around the 50 MW of small, less than 3 MW, as outlined in Senate Bill 1122. There is no discussion that these small facilities will not address the real forest health, fuels and carbon issue because they cannot handle the extreme tonnage of biomass that must be treated on all forested lands within the State. This Plan should address how to work with the public and PUC to provide energy incentives as

they do with many of the States' other renewable energy sources such as wind and solar. The transportation issue discussed in 9.3.1 and other areas within the report would be addressed by providing incentives for the updating and re-firing of many old sites.

5. Watershed health. The Plan touches on the issues relative to our States watersheds and the benefits associated with bringing our forest back into a healthy state. What is lacking, like most areas, is the overall plan on how to accomplish this work. Within our State, water is always a critical need and issue and more should be done within this plan to address how to increase the amount of water that can come from our forested lands.

The SFAC thanks you for the opportunity to address just a few of the many critical issues outlined within this Plan. It is our hope that it will be taken further to provide more direction and outcome passed solution to accomplish the work that is needed to bring the carbon issue to fruition.

Sincerely,

Handwritten signature of Bill Wickman in black ink.Handwritten signature of Laurel Brent Bumb in black ink.

Bill Wickman and Laurel Brent Bumb
Co-Spokespersons for SFAC