April 8, 2016

Ken Pimlott, Director
California Department of Forestry and Fire Protection
Forest Climate Action Team
Sacramento Headquarters
1416 Ninth St.
Sacramento, CA 94244

Submitted via electronic mail to fcat.calfire@fire.ca.gov

Re: Comments on Draft Forest Carbon Plan Concept Paper

Dear Director Pimlott and other responsible officials:

These brief comments regarding the Draft Forest Carbon Plan Concept Paper: Managing our Forest Landscapes in a Changing Climate are respectfully submitted on behalf of Friends of the Earth – United States (FOE-US). Our organization is grateful for the opportunity to provide early comment on this process regarding California’s forests and the role of forests in responding to the environmental, economic, and social threats of local and global climate change.

As you must know, climate change is arising from the past and present mobilization of stable biocarbon and geocarbon reservoirs by human industrial activity. These stable biocarbon reservoirs that have been mobilized include the stocks once held in California’s ancient forests, which had evolved over millennia to include some of the most carbon dense forests on the planet before being subject to a massive deforestation event over the course of the past approximately 160 years, a mere blip of time compared to the time-scale relevant to understanding the evolution and ecology of old growth forests. It is this unprecedented rapid mobilization of stable stocks of carbon by past and present human industrial activity that is resulting in an ever-increasing concentration of greenhouse gases in our atmosphere and oceans. The increased concentrations of greenhouse gases in our atmosphere and oceans is forcing a global warming trend that the best available climate and carbon science demonstrates must be kept below a certain threshold to avert the worst impacts of global warming.

Considering the urgency of this situation we are eager to contribute to a process that will be integrated in the 2016 Scoping Plan Update. We take this opportunity to express our profound concern that there are a series of erroneous assumptions underpinning this draft concept paper that will undermine any serious effort for California to develop climate policy that will help avert the worst impacts of human induced climate change. These assumptions need to be addressed in a scientifically rigorous manner in order that development of policy for the protection
and conservation of California’s forest carbon functions as an important tool in responding to the threats of human induced climate change – and that it does not actually present a greater danger due to policy being based on erroneous assumptions that will aggravate the clearly delicate situation regarding forest carbon stocks and climate change.

The risk of ignoring the best contemporary science regarding the appropriate role of forests in mitigation and adaptation to global and local climate change is that precious time will be wasted with inadequate and even harmful polices. In this letter our organization must be emphatic and express our concerns that if this draft Forest Carbon Plan is not subject to substantial changes that include the integration of the best available science regarding carbon cycles and their relation with a changing climate that the resultant policy will not help California prepare for climate change - if it will make the situation substantially worse.

The following bullet points are intended to highlight a series of assumptions present in the draft concept paper that need to be subject to rigorous peer driven and globally contemporary scientific review as a part of a process that involves substantial revision of the draft:

• The role of past deforestation and land use change has to be taken into account in any forest carbon plan for California’s forests. It is an imperative that the baseline concerning carbon stocks in California’s forests be determined by an estimation of the sum of carbon held in the original old growth forest cover. To not do so is to simply ignore physical reality. To understand carbon sequestration in land-based ecosystems such as forests it is fundamental to understand the role of past deforestation and land-use change in creating a carbon depleted landscape.

• The assumption that we can “neutralize” the emissions from the burning of fossil fuels with carbon sequestration in forest ecosystems may be a commonly held belief, but it is not scientifically defensible. It is an imperative that this assumption regarding the efficacy of offsets as a climate change mitigation tool is subject to rigorous scientific review. Offsets are not a means to achieving a reduction in concentrations of greenhouse gases in our atmosphere and oceans, in many instances they are fully lacking in additionality and permanence, and they obfuscate the dangers of ongoing mobilization of the geocarbon reservoirs that human industry exploits as fossil fuels.

• A full decoupling of carbon “accounting” between forest carbon (biocarbon) and fossil fuel carbon (geocarbon) must take place in California climate policy as soon as possible, and California must develop a Carbon Budget. Failure to develop a carbon budget and base forest carbon management upon
that carbon budget would be a total failure to base policy development on the best available science.

• Biomass is mentioned repeatedly as a climate solution, when an increasing body of evidence demonstrates that biomass energy generation on a large scale is harmful to local environments and contributes significantly to greenhouse gas concentrations in the atmosphere and oceans. Also, for long-term carbon sequestration in forest ecosystems, including in soils, forest debris matters. Assumptions regarding biomass must be seriously addressed for a future Forests Carbon Plan to be based upon the best available science.

• Natural forest processes need to be accepted for what they are: natural forest processes. Disturbance regimes, whether they be fire or insects, are an essential part of the evolution and maintenance of the forests in California. The importance of standing dead trees for wildlife habitat and in forest succession needs to be re-examined and better understood, and the assumptions regarding tree mortality as expressed in the draft paper need to be subject to a rigorous scientific review. It is imperative that the biological and ecological importance of standing dead trees, of post-fire (including severe incidences) forest landscapes, and the diverse interrelations of wildlife and the mosaic of natural forest disturbance regimes be better understood and included in California policy related to forests and climate change.

• The detrimental and destructive role of salvage logging must be examined in full in order that California develop climate and forest carbon management policy that is based upon the best available science. There is nothing more destructive to a delicate post-fire forest ecosystem than salvage logging. The role of salvage logging in exacerbating complications around the natural role of fire in our forests must be taken seriously and policy regarding salvage logging in California, both on public and private lands, must be subject to rigorous scientific review. The draft Forest Carbon Plan does not even mention salvage logging, which is simply a dangerous and inexcusable omission.

• Industrial forest management must be subject to an honest and scientifically based climate impact assessment. The role of past deforestation; the role of ongoing clearcutting and high intensity industrial forest management practices; the role of high-density selection forestry; the role of fossil fuel intensive pesticides, herbicides, and fertilizers; and the role of short rotation forest management must all be subject to a rigorous scientific review in order that the true climate impacts of industrial forestry in California are fully understood. As an example of what needs to be fully examined, short rotation forestry results in poor quality wood products, reduced carbon sequestration, and impaired forest function—yet the draft carbon plan ignores or obfuscates these critical issues that must be addressed to develop
effective policy, never once even mentioning the negative impacts of short rotations. It is clear that this industrial forestry model must be fully and correctly assessed to determine the extent of the real harm that ongoing forest degradation by the timber industry in California is doing to the local and global climate.

- The concept of permanence needs to be revisited. We suggest that the original old growth forest be considered the baseline for the concept of permanence when discussing carbon sequestration potential and limits in forests in California. To suggest that 100 years is by any means permanent when speaking of forest carbon is laughable when one considers that it is a commonly known fact that an old growth redwood tree can remain intact on the forest floor after finally falling over for as long as it lived, which is to say many hundreds of years, at the least. It is imperative that a baseline for carbon sequestration for California’s forests is based on forest ecology and that it includes the appropriate ecologically based time-scale. For developing science-based policy it is imperative that pre-industrial frontier forest conditions be better taken in to account when discussing what is the appropriate forest carbon management policy in order that the State of California actually take effective steps to avert the worst impacts of human induced climate change, and that an honest assessment of the climate and environmental damage that deforestation and the liquidation of ancient forest ecosystems in California has done to the state and the planet.

- Harvested wood products are not sequestered forest carbon; a reservoir of harvested wood products is scientifically defined as an Anthropogenic Store of carbon. Anthropogenic Carbon Stores are notoriously retained for very short periods of time, with a quality of permanence that is elusive at best, especially when the wood products are coming from an industrial model based on short forest rotations that produce wood products that are widely known to be deficient in durability due to the immature qualities of the harvested wood.

In conclusion, it is the view of our organization that a correct and science based assessment of the climate impacts of industrial forest management in California will reveal that the timber industry is actually a significant source of emissions and actually contributes in a significant way to the negative affects of climate damage in California, and that industrial forestry is not the benign climate positive sector that is portrayed in the Draft Forest Carbon Plan Concept Paper. Failure to engage with the pursuit of an honest and science-based evaluation of forest management in California is to develop policy that will be based on erroneous assumptions. Such a route is particularly dangerous because it will waste precious time and will not support the development of policy for the State of California that will assist in averting the worst impacts of human induced climate change.
It is a moral and ethical imperative that the State of California does not pursue a policy vision for the role of forests in responding to climate change that is harmful to forests and wildlife, harmful to the global climate, and harmful to the desires of the citizens of California to develop a science based response to the threats of climate change that is actually effective in taking steps towards a sustainable and indeed inhabitable future in the State of California. As such we reiterate our main comment that this Draft Forest Carbon Plan must be subject to significant and dramatic revisions in order that it adequately inform the development of a correct understanding of the role of forests in establishing climate change mitigation policy for the State of California that will actually assist in averting the worst impacts of human-induced climate change.

Respectfully,

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