



Ebbetts Pass Forest Watch
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April 16, 2010

Lisa Hartman
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Sent via email to: lisa.hartman@fire.ca.gov on April 16, 2010

Re: 2010 Forest and Range Assessment, Draft Strategy Report Chapters
EPFW FRAP STRATEGIES Comments April 16

Dear Ms. Harman and CDF Forest and Range Assessment team,

Ebbetts Pass Forest Watch (EPFW) welcomes the opportunity to provide feedback and comments regarding the “Draft Strategy Report Chapters” for the 2010 Forest and Range Assessment (FRA). Ebbetts Pass Forest Watch is a 501c(3) not for profit organization. Our mission “is to protect, promote, and restore healthy forests and watersheds to maintain the quality of life in the Sierra Nevada.”

Ebbetts Pass Forest Watch (EPFW) commented on the FRAP Assessment Report online, and those comments are pertinent to the Strategies documents. Because the FRAP Assessment Document did not include some critical information, science and risks as referenced in our letter, the Strategies documents is absent any strategies to deal with those issues.

Please include our previously submitted comments as part of our comments on the Strategies Document. EFPW also supports the well-developed comments submitted by both Vivian Parker and Chad Hanson

The following summarizes our concerns:

- **GENERAL - A number of very important studies and information sources were not used nor referenced in the Assessment Chapters. This omission biases the findings and strategies, causing important risks to be overlooked and therefore not addressed in the Strategies.**
 - Recent credible and peer reviewed science/reports on fire, climate change, effects from herbicides in forestry, acreage and threats from large industrial-scale conversion of forests through clearcutting to tree plantations did not seem to be reviewed. We referenced several in our previous comments
 - The FRAP assessment contains no information about forest conversion to plantations or extensive herbicide use in our forest ecosystems and watersheds.

- Ebbetts Pass Forest Watch’s comments as well as those from Chad Hanson and Vivian Parker contained further information and references to missing information and incorrect or biased assumptions.

- **1.1 Population Growth and Development Impacts**

Ebbetts Pass Forest Watch finds the strategies limited and inadequate by its the pre-determined choice to restrict addressing ecosystem strategies simply focused on issues caused or exacerbated by population growth and residential development, despite clear evidence that these are not the only elements leading to ecosystem degradation. By doing so, stand-level threats other than population growth and related structures which are occurring simultaneously in many locations and which have the cumulative “potential to do damage across broader landscape-level ecosystems” are ignored in the Strategies.

Intensive human use impacts including over-grazing, conversion to agriculture, and timber harvesting, continue to be significant threats to California high ecosystem value landscapes and specific strategies need to be developed to address them. Given the conversion of hundreds of thousands of acres of mixed conifer forests by intensive evenage timber harvesting and the conversion of oak woodlands as well as rangelands to intensive agricultural use in the recent past, there is certainly a clear and present threat from such continued activities over the next ten to thirty years. This important risk is left with no strategies despite the fact that information is easily accessible through information such as CalFire’s GIS timber harvesting data which includes information on the specific harvest methods such as clearcutting. In many rural counties, human growth with its expanded structural footprint will be, for many constraining reasons, limited to a small percentage the acreage of those counties. However, the loss of ecological integrity, benefits, and diversity from widespread clearcutting or intensive agriculture will potentially affect a much larger portion of those counties.

Unfortunately, the “analytical framework” used for this section “to identify ecosystems at risk from development” does not include these intensively-altered areas and so cannot result in their identification as “priority landscapes.” Therefore, they cannot be addressed in the strategy-related section of this analysis nor can the toolbox determine means to protect them. And ultimately, they cannot achieve “the final goal – landscapes of desired future condition.”

Finally, Ebbetts Pass Forest Watch notes another unsubstantiated assertion page 1.1.2) that is inaccurate for the portions of the Sierra Nevada of which we have first-hand knowledge. This assertion states that: “In general, large parcel size and close contiguity with similar landscapes enhances ecosystem values, while smaller size, isolation, constriction and fragmentation detract from overall functioning and worth.” In fact, in many Sierran counties, the largest private landowner is an industrial timber company contributing to ecological fragmentation and lessening of overall functioning and worth. Their ecologically disruptive activities stress the functionality of contiguous public lands and smaller units owned by local individuals. In reality, it is the stewardship of small landowners working in concert with the public managers that maintain the majority of ecosystem values. It could be argued that, in fact, the ecological integrity and diversity of many of the higher elevation housing

developments are greater than those on industrial lands that have been intensively used for human use, making the timberlands a greater development threat than the housing complexes.

Strategies need to be developed that will address large industrial clearcutting, herbicide use and conversion of natural, biodiverse forests into tree plantations. Strategies need to be developed to deal with the disappearance of critical wildlife corridors due to the issues mentioned above.

- **1.2 Sustainable Working Forests and Rangelands**

No strategies were developed to address the significant real risk of conversion of natural forests to tree plantations through large scale industrial clearcutting. Since the Assessment document completely ignored this issue, strategies are absent.

The FRAP assessment report was surprisingly devoid of both discussions and maps showing where forestlands have been clearcut/nearly clearcut and converted into tree plantations. EPFW recommended that this serious oversight needed to be corrected because tree plantations are more susceptible to fire and also have other significant adverse impacts. All the information needed to produce maps showing the converted forest areas is readily available in CAL FIRE databases. Without including this information in the FRAP report, an adequate representation of the state of California's forests is not presented, and this is required for funding and actions driven from this report.

No strategies were developed to deal with the ongoing elimination of critical forest habitat through clearcutting. Strategies need to include how to assess and measure the loss of critical oaks, older trees, snags and downed wood. Strategies should be developed to restore these valuable resources that have been severely degraded in recent years. These are critical habitat structures noted in numerous reports including the USDA/USFS March 2009 Report "An Ecosystem Management Strategy for Sierran Mixed Conifer Forests."

The Strategies should have addressed the importance of the loss of early-successional forests addressed in the 2010 *Frontiers in Ecology and the Environment* article, "The Forgotten Stage of Forest Succession: early successional ecosystems on forest sites." Plantations are generally lacking early successional ecosystems due to the extensive use of herbicides. As well, normal diversity of age classes is missing in plantations and, of course, with repeated harvest there will never be a late succession forest element other than within small areas such as riparian zones.

- **2.1 Wildfire Threats to Ecosystem Health and Community Safety**
 - **Recommendation - Ebbetts Pass Forest Watch supports the comments on wildfire submitted by Vivian Parker and Chad Hanson. It is important that the FRAP documents reflect current fire science.**
 - **Recommendation – The Strategy for biofuels must include assessment of potential risks of biomass activities including greenhouse gas emissions, air pollution from facilities impacting residents and the potential for**

biomass facility to be designed in a manner that results in excessive biomass cutting and further destruction of forests and ecosystems. This is a real threat that other states are investigating. The Massachusetts State study which has been initiated concerning these issues should be consulted when findings become available on this issue.

- **3.7 Climate Change**

- **Recommendation – The Strategies should include a strategy to restore forests and prevent further degradation so that they will be healthier under climate change scenarios.** The FRAP Strategies document on climate change does not adequately address the need for strategies that create healthy forests that have trees of different ages within stands and have biodiversity. This is a critical strategy as shown in numerous scientific articles and reports, which is conspicuously absent.
- **Recommendation – The metrics in this section should include all relevant logging-related CO2 emissions due to logging methods and disturbance.**
- **Please ensure that EPFW’s following recommendations on the FRAP assessment document are considered in the Strategies recommendations:**
 - **Recommendation – Use best recent, credible science and research on resilient and healthy forests calling for non-evenaged, heterogeneous, biodiverse forests. Also review and include recommendations from recent science on fire that refute many current assumptions regarding carbon loss and other fire issues.**

- **3.1 Water Resources**

The Assessment section on water focused on threats such as fire in watersheds, but conspicuously omitted intensive management methods like clearcutting from the list of threats. Therefore, there is an obvious need to add this issue to the existing list which includes post-fire erosion, development, climate change snowmelt decline, impervious surfaces and water demand. Because of this omission, no strategies were developed to deal with this important threat.

- **3.4 Emerging Markets for Forest and Rangeland Products and Services**

- **The extensive recommendations in this section seek to advance biomass facilities and use prior to a necessary study being conducted to determine the potential risks and protections needed. The State of Massachusetts is prudently conducting such a study rather than rushing into production and promotion without first properly framing the caveats and protections needed.**
- **Recommendation – California urgently needs to conduct a study like the extensive one being done by Massachusetts or utilize their findings and study any other issues that might be unique to California. Risks include:**
 - Full understanding and assessment of emissions and risks to populations from biomass facilities as well as water usage issues.

- Note – serious air violations have occurred in California leading to health threats to nearby residents of biomass cogen plants
 - The threat of ecosystem damage from excessive biomass harvesting is real and current regulations are not adequate to ensure that irreparable damage is not done in “biomass harvesting”
 - The fact that all biomass is not automatically carbon-neutral or climate-positive
 - Possible extension of population growth into WUI from cogen providing electrical access to new residents
- **3.5 Plant, Wildlife and Fish Habitat Protection, Conservation, and Enhancement**

Because the Assessments section did not adequately address threats to plant, wildlife and fish habitat from clearcutting, with its conversion of naturally biodiverse forests into tree plantations and extensive use throughout California of forestry herbicides in sensitive forest ecosystems and watersheds, there are no strategies to address these threats. Please reference EPFW’s details comments from April 1 on the Assessment on these issues.

Recommended Strategies

- **CAL FIRE needs to develop detailed user-friendly maps using existing data and maps from CAL FIRE and the CA Pesticide Data base to map:**
 - **Conversion of natural forestland to intensely-managed tree plantations in order to provide details and scale of the risk of this conversion to biodiversity and fire in California’s forests**
 - **Use of herbicides by county and statewide showing geographically and by quantity and type of chemical where herbicides are being used in our public water supply watersheds. (note – these herbicides and plantations eliminate wildlife food and habitat sources and native plants and pose contamination threat to water resources)**
 - **Methods should be developed to incentivize and promote timber harvest methods such as selection that do not reduce biodiversity and do not use herbicides in our sensitive forest and watershed ecosystems. Methods should be developed to disincentivize clearcutting and plantation creation.**
- **3.8 Green Infrastructure for Connecting People to the Natural Environment**

The strategies in this section focused on development and did not adequately address other risks that are in fact as large or larger than population risks. Please review EPFW’s comments on the Assessment section for relevant comments.

Thank you for your serious consideration of our comments.
Sincerely,



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on behalf of Ebbetts Pass Forest Watch