

alford-How Do I comment.txt

Subject:
RE: How Do I comment?
From:
Warren Alford <warren@sierraforestlegacy.org>
Date:
Thu, 29 Nov 2007 16:07:09 -0800
To:
'Steve Church' <schurch@arb.ca.gov>

Thanks Steve, here are my questions/comments:

Good Afternoon,

My name is Warren Alford, Community Forestry Coordinator for Sierra Forest Legacy, an 89 member group coalition focused on federal forest lands management. I am currently the co-chair of the California Biomass Working group. My question is focused solely on the forestry sector, though we look forward to commenting on the overall report.

We are generally supportive of efforts to restore resiliency to California's forests and also support a variety of biomass utilization efforts that have potential GHG emissions benefits- especially small-scale wood-heat applications including wood densification since the most efficient way to get energy from wood is to create heat.

My first question relates to Item A linking forest management and biomass utilization "Co-Benefits/Mitigation Requirements" section on page 7-7. This item states that CEQA processes are "well developed for assessing forest management mitigation projects". The major industrial forest landowner in the Sierra Nevada, Sierra Pacific Industries, is in the process of converting forests to plantations by clearcutting with a long-term plan to convert more than one million acres of forest to plantation in the coming years. The effect of this conversion is decreasing the resilience of Sierra forests and degrading the other values a forest provides. The forest protocols recently adopted by the ARB recognize that this type of forestry is not in-line with meeting the goals and objectives of AB 32. The multiple benefits that forests provide must be taken into consideration along with meeting the carbon sequestration objectives.

Since there have been at least 5 significant critiques of the California Forest Practices Act that indicate serious problems in its practical effect of meeting CEQA, how does the ETAAC plan to address the shortcomings of the California Forest Practices Act in providing assurance that environmental impacts from increased utilization will be mitigated so that water, air quality, wildlife and other public resources are not adversely impacted?

A second comment relates to Item B, Reforestation and Forest Management for enhanced carbon storage p 7-8 which focuses on reforestation of under-stocked stands including those affected by wildfires. Recent studies suggest that plantation forests in the Sierra Nevada have an abysmal record of persisting to maturity as they are extremely vulnerable to wildfire and that post fire rehabilitation that minimizes soil compaction and other activities that damage naturally re-seeding,

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rather than re-planting, is a better strategy for post-fire rehabilitation and ultimately better long-term sequestration of carbon.

A final comment is in regards to item D, California Grown Climate Solutions. It seems like a good idea to create a system that allows the general public to use their buying power to reward better practices. The California Grown program as it exists today rewards damaging practices that reduce the resilience of forests to both the effects of fire and climate change. We would encourage the ETAAC report to tie any CA Grown forest sector strategy to apply only to those practitioners who are consistent with the current forestry protocols adopted by the Air Resources Board.

Thank you for the opportunity to attend the meeting via webcast and for the opportunity to comment on the report.

Respectfully submitted,

Warren Alford, Community Forestry Program Coordinator

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