To Mary Nichols and the members of the ARB:

I am writing regarding the Forestry Protocols that you are in the process of adopting. I am writing on behalf of the Mother Lode Chapter of the Sierra Club as well as on behalf of the Battle Creek Alliance.

It is my understanding that you have added an edit that would allow clearcutting to be included in the offset program. If that is so, i can only believe that you have no experience or understanding of what clearcutting really is. There is a great deal of misinformation from the timber industry and their related groups that is used to support their monetary desires. At this time, with all of the changes and impacts the world is facing, there **must** be attention paid to the values that outweigh business interests if we are to continue to have a world where there is water we can drink and air we can breathe and diversity of species, a world that is not unbearably hot and barren. The words "irreparable harm" are easy enough to type and read. It will be quite a different story to live in such a world if action is not taken rapidly.

I live in the foothills of Mt. Lassen, where the Sierra and the Cascades overlap. I also live down the road from many thousands of acres of timberland that is owned by Sierra Pacific Industries (SPI), the largest landowner in the state and the second largest in the US. For the past 10 years, SPI has been engaged in the systematic destruction of the Battle Creek watershed where i live, as well as in other watersheds from central California to the Oregon border. Unfortunately, SPI is not the only company that practices clearcutting in the state.

I have lived in Manton since 1989 and became involved in working against clearcutting—not against logging— when i learned of a Timber Harvest Plan (THP) that was in the Digger Butte area and on Digger Creek, which is one of the borders of my home. As time passed, i learned how many other THPs were in the area between Manton and Highway 44. There are 13 with a fourteenth just filed, that cover nearly 20,000 acres. Each one of these was filed with almost no disclosure of the adjoining THPs and no discussion of the cumulative impacts associated with the sum total of them all. (Map on page 4.)

## According to the Dept. of Fish & Game website

(www.dfg.ca.gov/habcon/timber) there are not quite 3 million acres of timberland in private ownership in California. Sierra Pacific Industries owns 1.7 million of those acres or 58%. (That's about the size of the state of Delaware or twice the size of the state of Rhode Island.) Their ownership is also across 15 counties, so i think it is fair to say that what they do matters and has consequences. CalFire oversees the THP process and according to their records, by 2006 SPI had been given approval for clearcutting and other plantation conversion of 45,413 acres in Shasta County alone; the figure is over a quarter million acres across all of the counties they own land in. Scientists find that the temperature in clearcut areas increases 5 to 10 degrees while the humidity decreases by 35%-- actually anyone who has ever walked out in a clearcut doesn't need a scientist to tell them that.

At a time when water supplies are in decline throughout the west, our watersheds that provide most of the water for the entire state need to be protected. Many new studies have been released recently that find forests are even more important than was thought previously in protecting the regularity of water flows and the water quality. Studies also show that plantations are more fire prone and burn at a higher severity than natural forests. Tree plantations of between 1 foot and 5 foot tall trees, that have piles of logging debris pushed right up against the trees will be lucky to survive the next 30 or more years it takes for them to start becoming a forest that can perform all of the complex functions that life as we know it, depends on.

Attached also is the first chapter of the recently published book "The American West at Risk-- Science, Myths, and Politics of Land Abuse and Recovery" by Howard G. Wilshire, Jane E. Nielson and Richard W. Hazlett. I would like it to be considered along with my comments.

I encourage anyone who reads this and anyone who ever turns on a faucet with the expectation of water flowing out, to look at the Google Earth views of the state at: www.thebattlecreekalliance.org

Please do not condone the practice of clearcutting by allowing it in the Forestry Protocols. Be the people who leave a legacy of protecting the state, not the people who encourage the destruction of it.

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(Above) What the water looks like after it rains, 7 miles from the nearest logging. (Below) Oct. 2008 aerial view of the Battle Creek watershed, west of Mt. Lassen





Map of the logging plans where i live. The different colors represent different plans and the turquoise blue lines are the watercourses. The solid blocks represent clearcuts (generally).



Some people talk about how ugly clearcuts are. But that's not what is important about them. I hope you will try to understand the complexities of what is important about them, based on science from independent sources (as opposed to the spin from the timber industry).