November 23, 2015

Mike Miles, Chairman
Forest Practice Committee
State Board of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Re: October Technical Rule Addendum 2 Plead; Greenhouse Gas (GHG) Impacts

Dear Chairman Miles and Committee Members:

As a California citizen and practicing Registered Professional Forester, I am concerned about greenhouse gas impacts as well as regulatory requirements for Timber Harvest Plans (THPs). I have produced several THPs in recent years utilizing the THP Greenhouse Gas Emissions Calculator 061110. This calculator is fairly easy to use but does add another step to an already lengthy and expensive process. Low net revenue for timber owners, partly due to the cost of plan preparation, is causing many small landowners of previously harvested parcels to decide not to harvest. When local resources are not available, inelasticity of demand causes the supply to shift elsewhere which increases GHG emissions. I have provided opinion and suggestions for addressing GHGs in THPs below. Overall I believe the issue regarding THPs is currently being adequately addressed and that the revised rule language should not unduly place an increased burden on foresters, timber owners, regulators, and the California forest products industry as a whole.

In the State of California timber harvesting practices are required to be sustainable per the Forest Practice Rules under 14CCR 913 Timberland Productivity, Sustained Forestry Planning, Addendum. Productivity refers to forest growth and shall be maintained through stocking, appropriate silviculture, regeneration, and soil protection. If forest stocking is sustained over multiple rotations, there is no significant change in carbon storage on average over that time period.

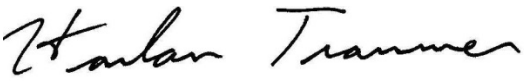
If the BOF insists on requiring modeling or methodology that produces estimates of net changes in carbon storage it should be more specific in order to avoid stalling projects due to disagreements over the method of carbon accounting. The BOF or CalFire should provide a tool for carbon accounting as is currently the case and/or identify which models and methods are acceptable. This specificity should be written into the FPRs.

A programmatic approach would be appropriate to estimate GHG impacts based on the type of project, the amount of area covered, geographic region, silviculture, and haul distance. Projects that are the same with regard to these elements would have roughly the same GHG impact. This approach would save project proponents and agencies time and money by eliminating the tasks of conducting, defending, reviewing, revising and approving a complex analysis for every project whose outcomes are predictable.

For THPs and other one-time projects, growth and yield analysis is speculative and overly onerous as the plan submitter may choose to do something different in the future or may no longer be in control of the resource in the future. Your Board should consider the negative consequences of an additional regulatory requirement that will force these landowners to pursue other, less environmentally responsible land uses.

If research shows that the harvesting levels and methods proposed result in net carbon sequestration, a quantification of net GHG sequestration or emission resulting from the project should not be necessary.

Sincerely,



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