



July 13, 2015

Members Michael Miles and Richard Wade
Forest Practice Committee
California Board of Forestry and Fire Protection
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Re: Addition of Greenhouse Gas and Wildfire Risk to Technical Rule Addendum (TRA) #2.

Please accept these comments regarding the development of proposed changes to TRA #2 for future discussion during the committee meetings.

Greenhouse Gas (GHG) Impacts – What is the assessment area expected to be? The existing resource subjects (Watershed, Soil Productivity, Biological...) describe how to derive the assessment area yet this is lacking for the GHG Impacts. The present GHG calculator, provided by CAL FIRE and used by many RPFs preparing their plans, is based solely on the project area. The factors to consider in the proposed TRA#2 GHG evaluation are identified and values are produced by the GHG calculator thus suggesting that the assessment area for the GHG Impacts assessment would be limited to the project area.

Wildfire Risk and Hazard

1. A primary concern for the addition of this resource subject is; why is it needed? Is there reason to believe that management of timberlands is causing cumulative negative impacts in regards to wildfire risk and hazard? Where it seems logical that the creation of slash could add to fire danger there are several other benefits which could easily outweigh this concern. For instance active management supports infrastructure and maintaining access for fire suppression. Furthermore, a robust forest products market makes fuel treatments such as understory thinning and fuel break creation, feasible. If this resource subject is retained in TRA #2 it would be beneficial to include language describing positive factors.
2. Here again there is a concern over what is the assessment area expected to be? The existing resource subjects in TRA #2 describe how assessment areas are to be derived and this is generally based on areas where effects are likely to have an impact. It is not clear what logic should be followed to determine an assessment area. It could simply be the project area; however metrics to be considered include the assessment of the physical setting including highways near the project area and use of adjacent landscapes.
3. In general the proposed wording lacks discussion and clarification of just how to assess the various metrics to be considered. Reviewing the existing portions of TRA #2 you see that most factors to be considered are accompanied by a description of the role the factor plays in the environment and how management could be detrimental or beneficial. The proposed language for wildfire risk and hazard does not include any such discussion and could lead to unexpected consequences.
4. Slash is not always bad. The wording in the assessment indicates that a significant factor affecting wildfire risk is fuel loading created by slash. Slash has value on the landscape

for nutrient cycling, soil stabilization and wildlife needs. More discussion is required in the TRA to clarify the conditions in which slash can be detrimental to fuel loading.

5. The metrics of crown bulk density and crown base height/height to live crown could be seen to suggest that unevenaged systems increase wildfire risk. Unevenaged systems tend to have more open-grown overstory trees which can have longer and more dense crowns. Such a generalization is not always true; however one reading of the proposed language suggests that to be fire safe stands should be managed for short crowns with reduced bulk density.
6. Flame lengths, fire weather and rate of spread are metrics which fluctuate with conditions and can be difficult to determine. It is understood that some generalizations can be made about historic conditions; however guidance should be provided on how to go about this assessment. Otherwise, it is mere speculation to develop assumptions about future conditions. When the conditions for catastrophic fire come about most general predictions are typically exceeded exponentially.

Thank you for this opportunity to comment and bring forth a few subjects for discussion. I look forward to taking part in future committee meetings to discuss the development of this proposed rule language.



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