



PACIFIC FOREST TRUST

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Sierra Nevada Conservancy
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Submitted electronically to: theresa.parsley@sierranevada.ca.gov

RE: Comments on Regional Strategy Review

Thank you for the opportunity to provide feedback on your proposed regional strategies. Pacific Forest Trust appreciates the energetic work of the Conservancy, which has been extremely successful at catalyzing collaborations and leveraging resources to achieve our shared goals of protecting and restoring our forests and watersheds while maintaining a strong, stable rural resource economy.

Our main recommendation is to prioritize forest restoration projects where near-term actions are coupled with commitments to maintain resilient conditions over the long-term.

There are many areas in the Sierra where past management and fire suppression has led to unnaturally dense forest conditions, and there is a need to change forest structure to restore resilience. Investment in thinning to improve forest structure will achieve the most meaningful, reliable, and enduring benefits when combined with a commitment from the landowner to manage in a climate-smart manner over the long-term.

Also, and very importantly, forest restoration investments that are funded through the California Climate Initiative (aka GGRF) require benefits to persist for at least 50 years, with further preference given to landowners to agree to long-term forest management goals. See PRC 4799.05(c) (emphasis added):

(c) Moneys appropriated to the department for landscape-scale projects shall be allocated as follows:

(1) To subsidize the removal of small diameter material, especially surface fuels and ladder fuels, as well as dead trees, in order to help develop markets for beneficial uses of the material, including, but not limited to, animal bedding, biochar, cross-laminated timber, mulch, oriented strandboard, pulp, post, shredding, and veneer products.

(2) For multiple benefit projects, such as tree thinning, carbon sequestration, forest resilience, and improved ecological outcome projects, including, but not limited to,

restoring watershed health and function and supporting biodiversity and wildlife adaptation to climate change. The department shall give grant funding priority to landowners who practice uneven-age forest management with a resilient forest of diverse age, size, and species class within the boundaries of the project and whose activities are conducted pursuant to an approved timber harvest plan, nonindustrial timber harvest plan, or working forest management plan. *An application for a grant for a project under this subparagraph shall include a description of how the proposed project will increase average stem diameter and provide other site-specific improvement to forest complexity, as demonstrated by the expansion of the variety of tree age classes and species persisting for a period of at least 50 years. The department shall also give funding priority to landowners who agree to long-term forest management goals prescribed by the department.*

(3) For activities on National Forest lands to increase tree stand heterogeneity, create forest openings of less than one acre, and increase average tree stand diameter of residual trees. Any grants provided under this subparagraph shall be approved by the department, in collaboration with appropriate state agencies, including the State Air Resources Board.

The best, most established and permanent way to secure long-term changes to forest management and achieve our climate goals is through a voluntary working forest conservation easement that ensures that the forest is managed for certain characteristics that help achieve and maintain a resilient condition.

Also of note, the state is currently finalizing the CALAND model to estimate the potential carbon sequestration implications of various land management activities. Forest thinning projects that are coupled with a WFCE can be reliably expected to accumulate stable carbon stores out to 2050 and 2100 and will be modeled as such. Forest thinning that is not coupled with a permanent commitment for future climate-smart management will be reflected as an emission – certainly through 2030 and likely in 2050 and 2100.

In short, combining immediate forest thinning efforts with long-term binding commitments to climate-smart management can help ensure that we reduce risk now and over the long term, and help harness the forests of the Sierra to achieve our long-term carbon sequestration and climate adaptation goals.

Please contact me at (916) 214-1382 or pmason@pacificforest.org if you have any questions about these comments.

Yours,



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