

Natural Resources Agency (Climate@Resources.ca.gov)
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The comments below are from California Forestry Association (Calforests). Calforests has a membership consisting of most of the State's industrial forest land owners, and many non-industrial forest landowners. This membership collectively manages around 4 million acres of timberlands.

Calforests has two comments on the "Draft Safeguarding California Plan: 2017 Update".

The first is in regards to page 88, in the last sentence of the second paragraph. It states:

"Progress has been made to reestablish new forests, yet, given the effects of each year's new fires, over 270,000 acres of planned reforestation treatments have not been implemented."

The Forest Service, California Region, best estimate of Reforestation Needs has been updated and now totals 583,818 acres (see attached table from Regional Silviculturist, Joe Sherlock).

The second is in regards to page 99, where it states:

"Develop best management practices consisting of silvicultural systems that are likely to create optimal forest structure and composition over a wide range of as-yet unknown future climate situations"

This statement seems to require the development of practices that are "likely" to create optimal conditions for an "unknown" future. Best management practices regarding silvicultural systems encompass more than future climate conditions. It should be noted that the Forest Practice Rules and the California Environmental Quality Act require optimum silvicultural practices that account for all environmental conditions. If what is intended is to encourage silvicultural practices that create conditions resilient to a wide range of future conditions, then perhaps instead the comment should read:

"Implement silvicultural systems that are likely to create optimal forest resiliency over a wide range of possible future climate situations, consistent with the California Forest Practice Rules"

Thank you for the opportunity to comment.

A handwritten signature in black ink that reads "Steven A. Brink". The signature is written in a cursive style with a large, prominent 'S' and 'B'.

STEVEN A. BRINK
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Enclosure

Summary 2000-2016 Fires (over 1,000 acres of forestland within the perimeter)

Summary of Vegetation Conditions							
Vegetation Type	treatments NOT permitted*		treatments permitted		treatments permitted		Total Within Fire Perimeter
	Deforested Forestland	Forestland that Remains Forested	Steep Deforested Forestland	Forestland that Remains Forested	Flat Deforested Forestland	Forestland that Remains Forested	
			STEEP GROUND (>30% SLOPE)		FLAT GROUND (<30% SLOPE)		
Alpine	4,901.65	6,760.68	10,522.22	5,615.31	5,513.49	2,924.83	36,238.18
True Fir	26,396.14	108,674.28	14,543.93	34,463.23	13,123.59	27,345.91	224,547.08
Pine	11,617.10	21,255.23	30,875.89	50,179.58	77,029.08	62,670.72	253,627.60
Douglas-fir	22,630.89	173,646.47	72,688.86	327,131.84	19,138.58	85,745.17	700,981.80
Mixed Conifer	41,646.49	107,376.98	108,443.91	186,902.12	109,007.79	143,233.16	696,610.44
Closed Cone Conifers	13,030.36	16,323.48	8,789.67	6,748.82	7,942.49	5,547.45	58,382.28
Coastal Conifer/Cypress	173.49	244.32	142.94	74.18	83.63	62.78	781.33
Pinyon-Juniper	10,123.08	2,854.27	12,532.32	6,258.11	20,259.96	6,761.12	58,788.87
Hardwood	80,998.82	99,363.02	70,009.81	91,948.16	23,746.63	20,493.98	386,560.42
Sub Total	199,054.68	500,320.33	321,830.75	649,021.44	261,987.48	348,117.62	2,416,518.00

Forest Service, California Region, current estimate of "Reforestation Needs" is 321,830.75 acre + 261,987.48 acres = 583,818 acres

Source of Table (Forest Service, California Region, Regional Silviculturist, Feb. 17, 2017)