GUERNEVILLE FOREST COALITION

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January 2, 2022

Forest Practice Program Manager
Cal Fire
135 Ridgway Ave.
Santa Rosa
CA 95401

Dear Forest Practice Program Manager,

Re: THP# 1-20-00084-SON (Silver Estates)

Please find below comments from the Guerneville Forest Coalition regarding THP # 1-20-00084-SON and the recent revisions to the Plan.

We notice that few of the revisions to the THP address the serious concerns raised by the GFC and members of the public over that past 18 months.

1. Failed Culvert on Neeley Road

   The revised THP does not provide any information on when the plan submitter, Redwood Empire, will apply for a permit to Sonoma County to replace the failed culvert at Map Point 1. The language used in the THP regarding this issue is confusing. Staff of the California Geologic Survey consider this culvert to pose a safety hazard because of its size and condition. Sonoma County Public Works agrees that the culvert should be replaced and the THP submitter has indicated its willingness to work with the County to replace the culvert. Failure to do so prior to any logging operations would be a breach of basic CEQA principles regarding mitigation of potentially significant impacts. Please clarify the process through which you will require the plan submitter to work with Sonoma County to replace this failed culvert, including specific timings (i.e. prior to any THP operations). At present, it is unclear how the plan submitter and Sonoma County Public Works will collaborate and coordinate to replace the culvert at Map Point 1. Furthermore, revised items listed under STZ-G1 assume that the Map Point 1 culvert issue has been resolved, which it clearly has not.

   Please also explain why the THP fails to examine the potential impacts of the culvert replacement itself and ensure that these impacts are minimized or mitigated to below a significant level.

2. Neeley Road Landslide Complex/Erosion Concerns

We have submitted detailed comments about the risk of landslides along Neeley Road based on analysis by an independent geologist (Vic Madrid, PG CHg). While the THP has been revised to take into account some of our concerns, it does not exclude logging on the full 30 acres identified by this geologist as part of the Neeley Road Landslide Complex. It has also failed to update relevant maps and continues to refer to the Plan area as located in the Santa Cruz mountains.

The THP states clearly that *"No operations are proposed on unstable areas."* Yet elsewhere it states: *"Operations may occur on unstable areas during the winter period only under conditions described above in Item 4(c)."* The THP also clearly states that harvesting will take place in Special Treatment Zones, including *"unstable feature"* G1 (STZ G1). In a letter dated December 2, 2021, Cal Fire Forester Dominik Schwab also states that *"Page 33 has been revised to state that operations may occur on unstable areas during the winter period under conditions described in the Winter Operating Plan."* Please explain these contradictory statements.

We also do not understand how the THP continues to allow for ground-based operations on unstable areas during the winter period when Cal Fire has acknowledged (letter to the RPF, dated December 10, 2021) that the impacts of these operations were not evaluated in the Geologic Report included in THP Section V. You requested that the RPF provide a memo from a licensed geologist clarifying whether ground-base operations on unstable areas during the winter period are appropriate. Has this memo been made available to the public? Under Cal. Pub.Rec.Code § 21080.5(d)(3)(B), it should be made available for a reasonable time for review and comment. That said, in our letter to you, dated Jan 1, 2021, we provided reasons why such operations would not be appropriate on unstable areas but have received no response.

We note that you have revised the THP to reflect that the entire THP area (outside the WLPZ) qualifies for a High Soil Erosion Hazard rating. Yet it is not clear whether this soil erosion hazard revision has led to any significant revisions to proposed timber harvest operations, harvest exclusion zones, or silviculture designations that would mitigate any significant adverse impacts (e.g. on STZ-G1 along Neeley Road or STZ-G12 along Mays Canyon Road). Please explain how the THP has been modified to include an analysis of the increased likelihood of significant environmental impacts that result from the change in the soil erosion hazard rating.

3. Traffic Assessment Area

The THP claims that, because there are no posted weight restrictions on any of the roads to be used for log transport, there will be no cumulative impacts. Yet, as mentioned above, the THP has identified a drainage culvert (at Map Point 1) that crosses under Neeley Road (a County right of way), which staff of the California Geologic Survey state may pose a public safety hazard. Furthermore, the Sweetwater Springs Water District (SSWD) has expressed concern about the impact from heavy logging trucks to their water lines that run under Neeley Road. These lines consist or "very brittle" asbestos pipes from the 1950 and 1960s. A discussion took place between representatives of SSWD, the RPF, and the landowner representative which proposed mitigations for protecting the waterlines. However, no such mitigations have been added to the THP because the plan submitter states that the transport of logs along Neeley Road is in compliance with State Law as there are no posted weight limitations. Clearly, Cal Fire has chosen to ignore the fact that both Sonoma County and SSWD have warned of significant adverse cumulative impacts to the Traffic Assessment Area. This is particularly egregious given that, for most of the year, Neeley Road provides the only direct means of egress for hundreds of residents in this area. Any road failure will leave them cut off and prevent access by emergency services. Given that this THP fails to adequately take into account the cumulative impacts in this area, we request that you deny approval.

4. Visual Assessment

The revised THP has not been updated with an independent visual assessment despite that fact that 60 percent of the plan can be seen from Scenic Highway 116. Cal Fire is relying on assurances from the RFP that there will be only minimal impact on the scenic corridor. The Plan states clearly that the harvest area can be seen by pedestrians, recreators and/or vehicles traveling on Highway 116, Mays Canyon Road, Neeley Road, the Russian River, the Northwood Golf Course area, and the subdivisions of East Guernewood, West Guernewood, and Vacation Beach. To assess the impact, the RPF *"toured these neighborhoods"* and *"after a complete assessment, it was determined that the configuration of houses, buildings and large redwood trees make the plan area difficult to see from most locations."* What constitutes a "complete assessment?" What are the qualifications of the RFP with regard to visual assessment? How many previous visual assessments along a scenic corridor have been conducted by this RPF? Furthermore, the THP states that *"uneven-aged management will provide sufficient residual trees and vegetation that will not be visually displeasing."* What is the RPF's definition of "visually displeasing." The subjectiveness of this "visual assessment" is evident. Has Cal Fire evaluated the impact using criteria specified by Caltrans? Is Cal Fire aware that, under the 1988 Final Report of the Sonoma Scenic Corridor Study,

"timber harvest plans as they affect the views from the highway will be reviewed by the County." Have you forwarded the RPF's view shed analysis to Permit Sonoma for review? If not, why do you believe that this is not necessary given the clear requirements under the 1988 Final Report agreed by both a state agency (CalTrans) and the County of Sonoma?

5. Greenhouse Gas Impacts

The revised THP claims that the Plan is not expected to have an adverse impact on global warming. It states that carbon from trees harvested will be sequestered for decades or longer in the form of wood products cut from logs. It also states that additional carbon will be sequestered in the future as newly planted, sprouting and growing crop trees occupy and grow on the site. These assumptions fail to take into account the urgent need to increase carbon sequestration in existing forests, wetlands and soils.

Climate change and its consequences are arguably the biggest existential threat to mankind and life on earth. Any foreseeable levels of reductions in greenhouse gas emissions will not be enough to meet the conservative maximum target (2.0°C and under) that climate scientists say is needed. The study that accompanies this letter (link below) points to conserving the existing bigger trees in existing healthy forests as a best method to meet the needed target reductions, i.e. we need to adopt a "Proforestation" approach. The principal author has been a lead author of five Intergovernmental Panel on Climate Change (IPCC) Reports. Link to study: https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full

The area covered by this THP is a temperate, mixed conifer/redwood forest. This type of forest represents the world's best at capturing and storing the maximum amount of atmospheric carbon. New science reveals how we need to protect watersheds from being managed as "tree farms" and instead manage them as diverse, mature, healthy, ecosystems that are vital to the global effort needed to counter climate change. Why does this THP fail to mention the most recent scientific studies on forest health and carbon sequestration and relies instead on studies that are nearly 20 years old?

Please also explain:

- why the revised THP fails to provide the current inventory of carbon sink potential of the largest tress that will be harvested despite claiming that the model or methodology used to calculate GHGs "*should at a minimum consider*" (a) Inventory, growth, and harvest over a specified planning horizon, and (b) Projected forest carbon sequestration over the planning horizon.

- how the GHG calculations are sufficient when they fail to include a baseline inventory of current carbon sequestration occurring within the trees intended for harvesting.
- why the revised THP fails to include a detailed explanation of the 'Cal Fire' model used to calculate GHG emissions and its underlying methodology.
- why the revised THP provides no empirical evidence of claims made by the RFF that "forests growing at faster rates store more carbon at a correspondingly faster rate. Younger forests grow more quickly and have lower decay rates than older decadent stands of timber."
- why the revised THP provides no data regarding the impact of climate change on the growth rates of young redwood trees, given arguments within the THP that younger trees will sequester more carbon at faster rates.
- why the revised THP states that *"no models reliably predict the rate and direction of climate change…. (IPCC 2007)"* when this is clearly no longer true. The Coupled Model Intercomparison Project Phase 5 (CMIP5) presents an unprecedented level of information on which to base projections including new Earth System Models with a more complete representation of forcings and new Representative Concentration Pathways (RCP) scenarios. It is disturbing that this section of the THP is riddled with contradictory statements and falsehoods based on outdated data. The most egregious of these is the statement that *"the scientific literature on the phenomenon of global warming is conflicted and politically charged."* Multiple studies published in peer-reviewed scientific journals[1] show that 97 percent or more of actively publishing climate scientists agree: Climate-warming trends over the past century are extremely likely due to human activities. In addition, most of the leading scientific organizations worldwide have issued public statements endorsing this position.
- why, under Project Alternatives, does this THP fail to mention California's carbon emissions offsets program that allows timber companies to sell credits to climate polluters in exchange for growing trees or taking other steps that reduce or absorb greenhouse-gas emissions?

6. The Clar Tree

The revised THP has failed to add any additional protections for the 2,000 year old Clar redwood tree. The current proposal is to 'protect' the tree with a 75ft buffer zone. We have provided you with copies of correspondence between GFC member John Dunlap and Professor Todd Dawson at the Departments of Integrative Biology and Environmental Science, Policy and Management at UC Berkeley. In this correspondence, Prof. Dawson notes that a 75ft buffer zone around a tree 340ft tall is insufficient. According to Prof. Dawson, 75ft would potentially place the edge of the buffer zone (1) too close to the extensive root system of such an old and massive tree; and (2) reduce the above-ground microclimate buffer zone around the massive tree

crown creating a warmer and less humid microclimate, under which coast redwoods do not grow well. Prof. Dawson suggests that the protected zone should be larger around such a massive tree, not only to protect the tree itself but also to protect the ecosystem/forest that it both requires and helps create.

According to Prof. Dawson: "It is very clear that buffer zones that extend outwards the same distance that the trees are tall can make a huge difference for sustaining a suitable above ground microclimate needed for optimal carbon and water balance in the trees and a viable below ground resource environment (nutrients and water) for the tree and its microbial associates (not to mention the other understory plants that thrive under mature and undisturbed redwoods). Finally, maintaining larger buffers also maintains more viable wildlife habitat for birds, bats and small mammals. The foresters that work for timber companies know all of these facts; they know that when they cut trees from a redwood stand that the trees that remain on or at the edges of the uncut stand always suffer in terms of crown dieback, greater losses of the edge trees themselves compared to trees in undisturbed interior areas of the stand, and compromised tree growth because of the massive alteration of both the above ground microclimate and below ground resource environment. This is well known to foresters and has been for a very long time. Unfortunately, corporate profit outweighs forest sustainability and the simple preservation of monarch trees that underpin the very fabric of the healthy redwood forest."

Can you please provide us with the research evidence used by CDFW and/or the RPF to justify a 75ft buffer zone around a 340ft old growth tree? Without this factual evidence, we can only assume that the decision to create a 75ft buffer around the Clar Tree derives from factually baseless assumptions and conclusions.

7. Wildlife Surveys

Requests have been made on several occasions to both Cal Fire and CDFW for the public to review necessary biological surveys of endangered, rare and sensitive species associated with this THP. Following a public records request filed on November 20, 2020, we were informed by Cal Fire PRA Attorney Mark Springer that 'no records exist.' The revised THP continues to lack actual assessment of the cumulative impacts to biological resources, including endangered species. It relies on generalized references to observations that are insufficient. Should such surveys be conducted after the close of public comment and THP approval (as has become the practice), you will have denied us the opportunity to review and comment on crucial environmental information in violation of CEQA and the FPA.

Given the aforementioned concerns, the GFC strongly urges Cal Fire to deny approval of the Silver Estates THP.

We look forward to your response.

Sincerely yours,

Colin Baptie, Psy.D.

On behalf of the Guerneville Forest Coalition

REFERENCES:

1. J. Cook, et al, "Consensus on consensus: a synthesis of consensus estimates on human-caused global warming," Environmental Research Letters Vol. 11 No. 4, (13 April 2016); DOI:10.1088/1748-9326/11/4/048002

   Quotation from page 6: "The number of papers rejecting AGW [Anthropogenic, or human-caused, Global Warming] is a miniscule proportion of the published research, with the percentage slightly decreasing over time. Among papers expressing a position on AGW, an overwhelming percentage (97.2% based on self-ratings, 97.1% based on abstract ratings) endorses the scientific consensus on AGW."

   J. Cook, et al, "Quantifying the consensus on anthropogenic global warming in the scientific literature," Environmental Research Letters Vol. 8 No. 2, (15 May 2013); DOI:10.1088/1748-9326/8/2/024024

   Quotation from page 3: "Among abstracts that expressed a position on AGW, 97.1% endorsed the scientific consensus. Among scientists who expressed a position on AGW in their abstract, 98.4% endorsed the consensus."

   W. R. L. Anderegg, "Expert Credibility in Climate Change," Proceedings of the National Academy of Sciences Vol. 107 No. 27, 12107-12109 (21 June 2010); DOI: 10.1073/pnas.1003187107.

   P. T. Doran & M. K. Zimmerman, "Examining the Scientific Consensus on Climate Change," Eos Transactions American Geophysical Union Vol. 90 Issue 3 (2009), 22; DOI: 10.1029/2009EO030002.

   N. Oreskes, "Beyond the Ivory Tower: The Scientific Consensus on Climate Change," Science Vol. 306 no. 5702, p. 1686 (3 December 2004); DOI: 10.1126/science.1103618.