

From: [Susan Robinson](#)
To: Borras_Themi@BOF
Subject: FW: Greenhouse gas comments submitted on Railroad Gulch THP
Date: Tuesday, December 01, 2015 3:56:26 PM
Attachments: [Greenhouse gas comments submitted on Railroad Gulch THP.docx](#)

Themi Borras and BOF FPC

Re FPC work on Tech Addendum No 2 and Greenhouse Gas Impacts

It is critical that the BOF gets this right. This work will face intense scrutiny and it must be unbiased and reflect the likely conditions our forests and our forest ecosystems will be facing in the near future in terms of due to climate change including species loss, drought, beetle, fire and increased temperatures. It must reflect the urgency of the need for fewer emissions asap!

- **Prior to approval the BOF should seek out and get independent peer review including opinions of Dr. Mark Harmon.**
- **Additionally, CEQA legal experts need to review drafts including the issue of alternatives to the THP project as discussed below.**
- **To increase transparency of the FPC re this issue, the audio of the minutes of the FPC deliberations should be available and posted on the BOF web.**

Other points for the FPC to consider include:

- **EPIC's previously submitted letter to the FPC on this matter is valid and should be addressed point by point.**
- **The points addressed in the attached excerpts from Tom Lippe's comments on the Railroad Flat THP (is Timber Harvest Plan 1-14-080 MEN (Railroad Gulch) should also be addressed point by point. The FPC needs to address the immediacy of the climate crisis and the fact that we need fewer emissions now - immediately –asap as well as increased sequestration to avert crisis.**
- THP analysis must include alternative silvicultural methods which will produce fewer emissions in the near future. CEQA requires alternatives to be evaluated – and not just no project or housing as examples.
- Some silvicultural methods produce far greater emissions (clearcutting) and the replanted non biodiverse tree plantation will not be climate neutral for 20-40 years.
- **The timing of emissions and quantity of emissions from each silvicultural method must be clear and must include soil and root and emissions from burn piles etc.** Industry is incorrect that no calculations should have to be done due to the concept that forests are net sequesters. The sequestration ability of CA private forests has dramatically deteriorated due to drought, beetle, fire, and harvest impacts.
- The increased likelihood for fire and fire emissions from loss of evenaged forests needs to be honestly discussed whether or not plantations will in fact ever sequester adequate carbon in likely future scenarios. They are not resilient and offer less biodiversity than required in climate change scenarios.

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