



# YSS

## YOSEMITE STANISLAUS SOLUTIONS

March 18, 2016

### **RE: Yosemite Stanislaus Solutions (YSS) Comments on the Sierra Nevada Watershed Improvement Program**

Dear Mr. Branham:

YSS would like to offer our appreciation and commend the Sierra Nevada Conservancy for recognizing the much needed change in approach to managing our National Forests. The WIP focus areas of Investment in Restoration, Policy Change and Infrastructure Needs are crucial to achieving the goals set forth by the program. The task at hand is monumental and transitioning from concept to tangible results will be challenging. In light of the challenges ahead, please accept the following comments in the cooperative nature they are intended towards achieving our common goals.

### **Specific Comments**

#### ***Pilot Watersheds pp. 5***

“The WIP will build upon existing efforts while providing a basis for exploring new models for getting restoration work done more effectively at the watershed level. At least two pilot watersheds will be selected where agencies and stakeholders will work to explore and potentially employ new models for delivery of watershed restoration activities.” p.5

YSS applauds this pilot watershed approach as a sensible way to first develop and implement new models. Long-lasting perceptions and judgments will be made as to whether this approach warrants continued and increased support based on its initial application. Consequently, we urge that you choose pilots where key elements needed for success are in place.

This includes having needed infrastructure to undertake the scale and scope of work in an economically efficient manner. As importantly, a supportive social infrastructure is highly relevant. As one Forest Service District Ranger observed, having the benefit of consensus support from a community-based collaborative “provides the social license to implement forest treatment.” As YSS knows first-hand, it takes years to develop the common understandings and trust required

*American Forest Resource Council*  
*American Motorcyclist Association, District 36*  
*Blue Mountain Minerals*  
*California Forestry Association*  
*Central Sierra Audubon Society*  
*Central Sierra Environmental Resource Center*  
*CT Bioenergy Consulting*  
*Friends of Berkeley Tuolumne Camp*  
*Jim Dambacher Construction*  
*Groveland Trail Heads*  
*Merced Dirt Riders, 4x4 in Motion*  
*Mule Deer Foundation*  
*Sierra Pacific Industries*  
*Stanislaus Bike Trail*  
*Tuolumne County*  
*Tuolumne County Alliance for Resources and the Environment*  
*Tuolumne County Farm Bureau*  
*Tuolumne County Resource Conservation District*  
*Tuolumne County Sportsmen, Inc.*  
*Tuolumne Group of the Sierra Club*  
*Tuolumne Me-Wuk Tribal Council*  
*Tuolumne River Trust*  
*Yosemite Deer Herd Advisory Council*

***Liaison Members***  
*Bureau of Land Management*  
*CA Fish & Wildlife*  
*National Park Service, Yosemite National Park*  
*Sierra Nevada Conservancy*  
*South West Interface Team*  
*United States Forest Service*

23862 Marshall Way, Twain Harte, CA 95383  
209-694-4299

to reach consensus support for specific science-based protection and restoration work. Yet without that foundation of public understanding and support, the historic polarization on forest management will almost certainly result in delays and higher costs, if not outright paralysis.

***Increased Investment pp. 10 - 12***

“Correct “wildfire borrowing” by putting wildfire disasters on par with natural disasters ...”

YSS strongly supports this re-alignment of recognizing wildfires for the natural disasters they are. We believe that this should be a major focus by all stakeholders to restore the funding essential for the Forest Service to meet its multiple responsibilities as land managers.

On the State Government level, YSS strongly supports allocations from Proposition 1, Greenhouse Gas Reduction, and other appropriate funds for forest health and resiliency investments. Sharp increases in Greenhouse Gas Reduction Funds are particularly warranted. We detail the justification below in the *GHG Emissions Reduction and Carbon Storage section*.

Through a grant from the National Forest Foundation, YSS was able to survey the efforts and successes of other collaboratives in the West. We would like to bring to your attention some of the relevant Colorado Bark Beetle Cooperative’s experience in dealing with their Bark Beetle epidemic and broader Forest Health challenge. Their collaborative promoted and helped pass a number of State Bills with the assistance of the Colorado State Forester We encourage you to further explore some of their ideas, and stand ready to assist with outreach to them.

***Private Stakeholders p. 11***

We concur that engaging the private sector is key to making timely progress. Again, you may find value in Colorado’s experience. The Colorado Bark Beetle Cooperative involved the timber industry in their work. Notably, they worked with State Legislature and the Governor’s Office. Together, they drafted and supported more than 16 pieces of legislation over 5 years. By way of example, they secured legislation for tax abatement for timber harvested and purchased in Colorado, saving a contractor about \$3,000 for framing material for an average home- a significant incentive to buy timber harvested in Colorado rather than continuing to buy from Oregon and Washington, where the timber was not affected by the beetles.

***Nonprofit Organizations p. 11***

Recognizing the importance of non-profit and community-based collaboratives is a good start towards harnessing the breadth of contributions they need to make for the WIP to succeed. More is needed, however, than simple recognition. Certainly, helping to fund their capacity to attain a common understanding of the current state of scientific research, as well as having the services of a skilled facilitator would accelerate the learning curve required to forge agreement between diverse interests. To your credit, YSS benefitted from small grants from both the Sierra Nevada Conservancy and the Forest Service. Having a skilled, neutral facilitator has made a significant contribution to developing common understanding and building trust that is the foundation for our growing agreements.

You also wisely recognize that: “The collective influence of this sector will be extremely important, and unified messaging is essential.” Again, this requires more than recognition. Community-based collaboratives and most non-profits are already over-extended in terms of inadequate resources to meet their core mission. Consequently, they would greatly benefit from the WIP hosting an annual or semi-annual gathering where, among other activities, they can share lessons learned and seek to forge a common voice that will help amplify their message in support of this approach. We would welcome the opportunity to further develop this concept with you.

***Out-of-Region Beneficiaries pp. 11 - 12***

Engaging partners and beneficiaries beyond the Sierra Nevada Region in investing to protect and enhance those benefits is essential. We recognize that it is extremely difficult to persuade such current beneficiaries, quite accustomed to their “free lunch,” that they should voluntarily contribute. The reality is that if one downstream beneficiary volunteered while others did not, the result would likely be a combination of creating a competitive disadvantage for the entity volunteering and resentment from their ratepayers.

Instead we suggest that you explore how to equitably have beneficiaries contribute to what they receive from healthy forests. Government has long embraced the responsibility of requiring those who profit from an activity to pay its full cost, including controlling pollution, rather than have the public subsidize their activities through increased public health costs. The corollary today is to fairly gauge the economic value to downstream beneficiaries attributable to forest health treatments. This should then become a basis for a public benefits charge that would be a very small cost to individual beneficiaries but a significant revenue stream for maintaining and enhancing forest and watershed health.

***Air Quality and Prescribed Fire pp. 12 - 13***

We are encouraged by the recent MOU on this policy area, and will carefully review it. We certainly strongly support an updated approach to facilitating prescribed fires as both a means to more efficiently restore and maintain forest health, as well as reduce the severe public health hazards created by uncontrolled wildfires.

***GHG Emissions Reduction and Carbon Storage pp. 13 - 14***

The stark reality is that California’s laudable GHG reduction targets are not and cannot be achieved if we fail to address the growing trend of mega-fires that began before the current drought and according to the recent science will likely worsen in coming decades.

As was highlighted in the public comments of Lucy Blake, President of the Northern Sierra Partnership, at your March 3 Public Forum, the current accounting by ARB of GHG emissions in California is grossly incomplete by their failure to factor in wildfire emissions. Resources Agency Secretary Laird has publicly noted that the Rim Fire alone emitted the equivalent of the annual emission of 2.3 million cars. Perhaps more relevant is that the Rim Fire GHG emissions replaced almost three years of reductions achieved from all other sectors. In fact, the Rim Fire emitted substantially more GHG than from the much more publicized Porter Ranch natural gas leak, the largest ever in U.S. history.

***Wood and Biomass Utilization pp. 15 -16***

While minor modifications to existing policies and contracts are now being explored due to the bark beetle crisis, restoring forest health can only occur with much more significant changes in current policies and investments. Again, achieving California’s AB 32 GHG reduction goals simply cannot be achieved without far-reaching advances in environmentally responsible utilization of the humongous volumes of biomass. Without a fundamentally new course of action, the existing forest biomass both enable future mega-fires and will emit vast streams of GHG even if they do not burn, but decompose in place. This was powerfully communicated in your coordinated August 4, 2015 presentation to the ARB that from such mega-fires, the burnt area “...will continue to emit GHG for decades resulting in emissions more than 4 times greater than those during the event.”

Wood and biomass require solutions commensurate with the magnitude of the challenge and the risk they pose to our forests and public health. Again, we urge full consideration of the Public Benefit Charge described above in relationship to downstream beneficiaries. In this case, all Californians are genuinely downstream beneficiaries.

***Socio-Economic Implications pp. 16 - 17***

YSS is deeply concerned that the current California screening criteria used to identify Disadvantaged Communities may be sound for urban areas, but is highly prejudicial when applied to rural areas, such as Tuolumne County. This issue was particularly well- articulated and documented at the August 4, 2015 ARB public meeting by Jonathan Kusel as a panel participant representing the Sierra Institute. We request that you engage on this issue as the failure to fairly recognize rural disadvantaged communities deprives them of significant public resources, including from the AB 32 GHG funds.

***Communications and Outreach pp.17 - 18***

YSS is highly dependent on timely, reliable communications from public agencies. We have particularly benefitted from such publications as the Sierra Nevada Conservancy's State of the Sierra Report, and now your jointly issued Draft Watershed Improvement Program Regional Strategy, on which we are now commenting. YSS's survey of other collaboratives documented that among their chief needs is the ability to have timely communications from public agencies and whither collaboratives. As you develop your program, we encourage consideration of low-cost mechanisms to facilitate such time communication, in addition our earlier recommendation on hosting an annual conference.

In closing, YSS is grateful for the opportunity to work together on our common goals of restoring the resilience and productivity of our forests and the communities which depend on them. Please keep us informed as you progress and contact us if we may be able to provide assistance.

Respectfully,

A handwritten signature in blue ink, appearing to read "Chris Smith". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chair, Yosemite Stanislaus Solutions