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Davis, CA 95618
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California Department of Forestry and
Fire Protection
Attn: Forest Practice
135 Ridgway Avenue
Santa Rosa, CA 95401

RE: NTMP 1-06NTMP-011SON

I have reviewed the proposed harvest plan and submit the following comments. I am retired from the University of California where I taught and conducted research in aquatic ecology with emphasis on the effects of land use on aquatic systems. Portions of this research were located in the coastal redwood region of California.

The proposed timber harvesting plan for the Bohemian Grove will result in substantial changes in the structure of the forest and increased disturbance to the watershed. The plan will reduce the amount of hardwood by 50% area-wide and have a similar reduction in the amount of large diameter conifers. The streamside zones (riparian) will lose significant functional processes and the aquatic community will suffer over time.

The reasons given for this change in conditions are to improve growth and harvest and to reduce risk of catastrophic fire. In the latter case, the logic presented is that the changed condition of the forest will be closer to the pre-logged state of the early 1900s. The basis for supporting this new condition is the claim that the redwood forests of the North Coast were formerly composed of widely spaced trees, open canopy, multiage, non-old trees (and presumably a clean understory).

Such a picture is surely the condition that will prevail under the proposed plan, but it has little basis in science as the natural condition. The description of this early condition sounds quite similar to the myths used to claim the Sierra Nevada forests looked the same way before intensive logging. Such a picture also implies that larger, old trees are a fire hazard when all evidence suggests that these aged trees are the most fire resistant. At the same time, slash generated by increased harvest in the plan can be left on the ground where it "will naturally deteriorate over time" (p. 32). Certainly over some amount of time the latter is a true statement; but if the concern is fire risk, why would a doubling of the amount of slash from current harvest levels (with annual additions) not be a fuels concern if living green material is? There is no discussion in relation to increased fire risk of a drier and warmer microclimate in forest stands likely to be created under this plan. The scientific basis is highly suspect for claiming fire risk necessitates such a change in stand conditions for the foreseeable future.

The proposed plan will certainly lead to increased harvests over time and a change in growth. The cost is the virtual elimination (except for the small area in the camp vicinity) of the largest size class of trees in the majority of the holding and a major change in the magnitude of entry and general disturbance.

From a long, and unfortunate, history of logging in the North Coast it is well known that even the best of intentions for mitigation fail when logging is extensive. The risks in this region are high when land disturbance occurs. The change proposed in this plan will increase the risk of mitigation failures, unforeseen sedimentation and other problems. Even when risks of high erosion hazards and steep slopes are acknowledged, the plan defends entry to these areas by tractor as the necessity to log.

Plans to mitigate disturbance to riparian zones, for example, are said to be more than required by regulations. However, in broad terms the level of harvest, trail crossings of watercourses, and reductions in near-stream large trees will have an impact on stream and riparian habitat. *The streamsize protection zones widths, although within the rules, are still on the order of fractions of a site potential tree height.* Abundant literature continues to support riparian protection that starts with width of the site potential tree height near streams as a critical

dimension for protecting stream functions. Thus, over time, the true riparian influence zone (scientifically known to be hundreds of feet) will be dramatically altered by this plan. For example, in the plan provision of large wood recruitment to the streams is said to be taken care of by a 50' zone near the channel (p. 24). Detailed studies at Caspar Creek showed that the chain of events that lead to wood recruitment is several tree lengths in distance from a channel. Leaf and needle fall to a stream and maintenance of riparian microclimate are other functions that will become impaired under the plan. Other so-called mitigations in the plan are long-term or permanent disturbances themselves, such as more channels in culverts and creating rip-rapped banks (armored ford crossings).

This plan for the Bohemian Grove timber harvest is a hard industrial model— removal of slower growth large trees, removal of “competing” non-conifer trees, herbicide use to enforce stand composition changes, maximization of growth and harvest, and development of a heavy-use permanent road system. What does the “N” mean in this NTHP?

Sincerely,

Don C. Erman
Professor Emeritus
