

Department of Forestry and Fire Protection
135 Ridgeway Avenue
Santa Rosa, CA 95401

To CAL FIRE:

Please enter my comments in to the administrative record for 1-08NTMP-009MEN (the Bower NTMP).

I am writing as a concerned citizen regarding protection of the wildlife habitat that is provided by the remaining patches of old growth forest (late-seral habitat) within the Gualala River watershed.

The Department of Fish and Game (DFG) has identified the last known 18 acres of old growth habitat (LSFS) in the Doty Creek Watershed containing large redwood trees that are estimated to be *at least* 120 to 450 years old.

The Doty Creek old growth grove provides suitable nesting and roosting sites for both marbled murrelets and spotted owls. It is a specialized habitat that many animals need to survive. This high quality late-seral refuge is located in a steep canyon behind the Gualala Airport, in Unit 9 of the Bower NTMP (Non-Industrial Timber Management Plan).

The Bower NTMP proposes cutting down most of the old growth redwood and other mature trees in Unit 9, along with harvesting the largest trees on approximately 600 acres of Gualala River Watershed forest.

The Forest Practices Act directs CAL FIRE to balance the landowner's desire to profit from timber harvest with the public's interest in "**protecting soil, air, fish and wildlife, and water resources from *unreasonable degradation.***"

I believe that removing the large old trees from the last remaining old growth habitat in the Doty Creek Watershed would result in "unreasonable degradation" of forest elements the Department of Fish and Game considers "irreplaceable features for wildlife habitat."

In addition, as a scientist I have serious concerns about possible misrepresentations of scientific work in a memorandum dated November 12, 2009 from William Snyder, Deputy Director of Resource Management for DFG, regarding evaluation of green house gas considerations for 1-08NTMP-009MEN. In the memorandum Mr. Snyder states:

"A number of researchers have demonstrated that managed forests have been

shown to sequester more carbon and have emissions than unmanaged forests (Birdsey et al. 2000, Krankina and Harmon 2006)."

Though Mr. Snyder fails to provide references for these citations a reasonable assumption is that re. Krankina and Harmon he was referring to:

O.N. Krankina and M.E. Harmon (2006). Forest Management Strategies for Carbon Storage. In: Forests, Carbon & Climate Change - Summary of Science Findings, Oregon Forest Resources Institute, pp. 79-92

But the above statement from Mr. Snyder's memorandum seems to be in direct contradiction to a number of statements in the Krankina and Harmon paper, e.g. on page 87:

"Hence, protecting the remaining old growth, creating additional protected areas, and using longer rotations may be more effective for increasing carbon storage on land than in other forest regions."

I feel strongly that any decisions regarding timber harvest plans that rely on scientific work must be based on a proper understanding and characterization of that scientific work and that further clarification of the implications of the work of Krankina, Harmon and others for this and other timber harvest plans is important.

I support DFG recommendations to protect the Doty Creek old growth grove. I request that CAL FIRE make the permanent protection of all DFG identified old growth habitat in Unit 9 an enforceable condition for approval of the Bower NTMP. In addition I would greatly appreciate any clarification as to whether the work of Harmon and Krankina has been properly utilized for decisions regarding the Bower NTMP,

Respectfully Yours,

Dr. Karl Young
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