



October 23, 2015

AB1492 Team
Dr. Russ Henley, Assistant Secretary of Forest Resources Management
AB1492Program.comments@resources.ca.gov

Re: Comments on Forest Planning Watershed Pilot Projects Concept.

Dear Dr. Henley and the AB1492 team,

Please accept the following initial comments on the Forest Planning Watershed Pilot Projects Concept. These comments are summarized here with more discussion below.

Comments Summary:

1. Need to better define the goals of the project.
2. Provide clarity on how the members of the PPWGs will be determined including the process and extent of public participation.
3. Suggested criteria for selecting pilot project watersheds:
 - a. Set a minimum rate of THP submission within the watershed; one THP every three years.
 - b. Watershed should have an “average” amount of data available, primarily limited to the THPs, and not a wealth of data from additional studies and projects.
4. Consider landowner incentives.

Comments Discussion:

1. Need to better define the goals of the project. Through the concept paper and the Ukiah Workshop the details of project objectives are not clear. In general they seem to be: a) identify restoration opportunities and b) streamline the cumulative impacts assessment process.
 - a) The identification of restoration opportunities seems straightforward however it is unclear what this will mean. First of all there is a lack of clarity as to what constitutes restoration and this may be too open-ended unless better defined. It was made clear at the workshop that landowners will not be required to perform restoration activities where opportunities are identified. It would be valuable to clarify the exact use of the information, such as aiding landowners to obtain restoration grants.
 - b) The extent and focus of streamlining the cumulative impacts assessment process is not clear. Is a potential goal of this process to submit suggestions to the California Board of Forestry for modification of the Forest Practice Rules as they relate to cumulative impacts?

In general it is hoped that a better definition of the goals at the outset will improve the quality of the results.

2. Provide clarity on how the members of the PPWGs will be determined including the process and extent of public participation. It is not clear who will make up the Pilot Project Working Groups (PPWGs) or how these individuals will be selected. During the workshop it was pointed out more than once that the public should be represented and that such representation should be clearly defined in advance. The process for determining membership of the PPWGs should be clearly defined to ensure an appropriate balance of representatives. It is critical to get this process clarified early in order to ensure that these groups are efficiently created and able to effectively implement these projects. The expected/required level of public access to landowner's property should be clearly articulated.
- 3a. Suggested criteria for selecting pilot project watersheds: Minimum THP submission rate. This criterion would ensure that the watershed was of an appropriate size and had sufficient timberland to make the project worthwhile. Having multiple THPs will also ensure that there is data to work with and help to achieve the "average" goal discussed below. The suggested minimum rate is one THP every three years; however an increase or decrease in the rate may be warranted.
- 3b. Suggested criteria for selecting pilot project watersheds: Average Amount of Data. This criterion is intended to focus these pilot projects on watersheds which are more or less typical in terms of data availability. The minimum threshold of THP submissions, discussed above, helps to ensure at least a minimum of data availability. However, a watershed with a wealth of additional data could, potentially, lead to a final product which is unachievable in many other planning watersheds. This criterion would be met by avoiding watersheds with substantial, thorough studies such as Caspar Creek in Mendocino County. By focusing the pilot projects on typical watersheds the results could have more utility to a wider range of other watersheds.
4. Consider landowner incentives. In order to incentivize landowner participation in the Planning Watershed Pilot Project, investigate opportunities for state funded information gathering systems such as LiDAR. Such information could be a useful aspect of the pilot project and may encourage more landowner participation.

Thank you for the opportunity to provide comment in this interactive process.

Sincerely,



Michael Tadlock
Resource Manager