February 9, 2017

Russ Henly
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Re: CalTREES (Online Harvesting Document Submission)

Russ Henly:

Please accept the following comments submitted by our Center regarding the new CalTREES platform for online submission and review of timber harvest documents.

Our Center has been reviewing and commenting on THP's since the 1990s. The transition to a more user friendly, modern platform for this process is greatly appreciated. These specific comments are based in decades of involvement with this process.

Mapping

It is important to have accurate, detailed maps when reviewing a THP. Of particular interest is the history of treatments within and adjacent to the proposed THP. While maps of previous treatments are provided at times, those maps often do not easily align or overlay with the maps of the proposed treatments.

Most THP maps are fairly complex; these maps should be provided at a high enough quality that they can be meaningfully interpreted and utilized by THP reviewers. This means providing maps in color, not grayscale.

At a minimum there should be an option to download GIS files containing the detailed mapping. However, GIS software is not the most accessible to the public, so quality maps are still the most important and effective way to communicate THP activities to the public.

Our Center requests future THP's include a map that shows both the proposed treatments as well as the past treatments (for at least the previous 15 years) at a scale that is detailed enough to easily distinguish between units. Maps should be provided at high quality that is meaningful to THP reviewers; specifically maps should be in high resolution and in color (not grayscale) to provide the most detailed and accurate high quality map.

PDF Accessibility

While software exists to allow users to convert the PDF's (as they are currently provided) to a searchable format, that software is not free. Given the extensive content in each THP, it is invaluable to be able to search a document (if someone is looking for the section related to "hardwood retention") for specific content.

CSERC requests that future THP documents be provided in a "searchable" format so that members of the general public can easily and freely search THP documents.

Table of Contents

Currently, documents are provided on the ftp website with the filename format including the date, THP number and which "section" it is. If this system of naming files is maintained, a table of contents which describes the contents of each section would be helpful. Adding the description of the section to the filename would be helpful as well (for example, instead of _Sec2.pdf, a more informative filename would be _PlanofTimberOperations.pdf). A master table of contents, which would remain mostly the same for each THP, would help the public find the information they are seeking more easily.

Our Center suggests a table of contents be provided to make THP documents easier to navigate and to make specific information more easily accessible to the public. We also recommend using more descriptive filenames.

Maintaining a Complete Record

The public should have access to all documents relevant to the THP, particularly comments submitted by other members of the public. Although the substantive portions of public comment letters that CalFire provides a response to are available, the public should have access to public comments in their entirety. In addition to public comment letters, all correspondence between public agencies should also be provided to the public. This will further improve transparency through the THP process.

CSERC requests that ALL documents relevant to the THP, specifically including but not limited to public comment letters in their entirety and correspondence between agencies, be included in the record and made available to the public.

Thank you for considering our input,

Megan Fiske, biologist   John Buckley, executive director