



February 9, 2017

Russ Henley

California Natural Resources Agency

russ.henly@resources.ca.gov>

Please accept the following comments from Ebbetts Pass Forest Watch (EPFW) on the new CalTrees platform for online submission and review of timber harvest documents. Reference:

<http://resources.ca.gov/wp-content/uploads/2014/07/CalTREES-Afternoon-Public-Workshop-Agenda-1-23-17.pdf>

>.

EPFW has been reviewing and commenting on timber harvest plans for over 16 years. We have been involved in lengthy discussions with Cal Fire and the other resource agencies on the deficiencies, biases and lack of transparency within the existing THP review process. We have been forced to file Public Records Act (PRA) requests and demand investigations into various activities related to the THP process that resulted in lack of transparency, lack of compliance with CEQA, lack of resource protection, derogatory comments related to public THP comments etc.

The information that was presented in the PowerPoint as well as verbally at the last public stakeholder meeting was very high level and limited in details. That said, we are generally in favor of the concept of electronic submittal and documentation. We are hopeful that this process, and other improvements in Cal fire will perhaps bring it more transparency in efficiency to the public. We encourage that all timber harvest related activities, including exemptions and NTMPs etc. will ultimately be included in this process. Additionally, we are hopeful that this process will result in more timely and accurate statistics and mapping that will better reveal to the public (in an accessible manner), what is truly happening in California forests.

The following are our own specific comments and we have incorporated some of the comments directly that were made in an email from Alan Levine to Russ Henly.

Public Stakeholder Review/ Input. EPFW would like to be involved in future stakeholder meetings and periodically consulted on issues. We would like to have the project plan available on a website with other current key project documents that the public can access. This would include timelines, schedules, progress reports etc. In our over 16 years of experience, we have seen many projects take years and years to complete over their projections and has seen that industrial timber interests have been favored over public comments and transparency and we would like to monitor this effort closely.

We are hopeful that the professional consultant involved in this project will help ensure the project's success and transparency.

PDF documents should be in a “searchable” format- not scanned as they are now in an unsearchable PDF format. They need to either be filed in their original format or scanned documents should be converted with Adobe Pro software to a searchable format. This is necessary for efficiency for both the public and the various agencies involved in review and must be required. EPFW learned that other than many of the agencies also had to spend time converting the lengthy documents so that they could easily search for various issues/terms. This is quite do-able and important for efficiency.

The Electronic files for each project must be complete: All documents related to a THP, NTMP, Exemption (or other filing) must be included and maintained in an electronic file that is accessible to the public and responsible agencies for review.

The electronic file should include all letters and correspondence (including emails), photos and maps between agencies, first review questions and answers, changes to the plan, PHI reports, notices, comment letters, etc., That means everything relevant to the project that has transpired must be included and maintained in the file and be accessible to all parties.

ANY ATTACHMENTS to public comment letters also need to be included on line. This would include photographs, video documentation of conditions, and key reference documents. In the past Cal fire has refused to post these items and made it difficult for the public to even know that they exist and to obtain them. These documents also contain important information and evidence that has generally been ignored unfortunately.

The Electronic files must be clearly labeled and navigable: The individual items in the file must be labeled in a way that makes them readily identifiable to the public as to what exactly they are - so they may be easily identified and accessed. (the current system be used is cryptic - to the point that accurate document identification is difficult and time consuming). The document identification process may be solved by making folders for different sections, parts, or phases of the Review process - e.g. Letters, First review, Final THP, Initial filing without changes, changes, comment letters, Official Response, Public Comments, PHI reports, recommendation and response letters, etc.. The current on-line access is set up makes somewhat difficult to identify what is what.

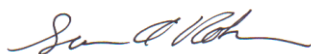
Public Comment Letters: Public Comment letters must be filed electronically and maintained as part of the file for the specific project – as long as the entire project file is maintained. Previously, Cal Fire enraged the public/environmental community by deliberately eliminating their comment letters from all approved THPs. Allegedly this was done to save space, but that was did not ring true due to the fact that the public comment letters were generally small (kb). The entire public comment letter and attachments need to be part of the record – not all of the NGO contact and identification information and not all of the letter is actually included in the OR as Cal Fire asserted and the complete letter is valuable to public review by others. If the full public comment letter is eliminated, then there is no way for the public to determine if indeed the OR addressed all issues. Nor can the public and auditors easily find the concerns others have voice re these projects.

Historic Plans: Files on historic plans should be maintained as complete files (containing all historic documents). Many of these plans have important mitigation and other requirements that have long term requirements and Cal Fire and others need to be able to determine what went wrong or worked well re future conditions. It is important for the review of current plans to be able to access the information in historic plans for an accurate review purposes.

Mapping: For plan review purposes, it is very important to be able to access a map of historic plans that have been completed in and around the area of any proposed plan in process. There is a cumbersome electronic mapping process available (not always quite up to date). The availability of mapping and linkage of current plans in process to the map of historic plans needs refinement - i.e., so that a person looking at a plan on line can link to the historic mapping. For review purposes - the Department must set high (higher) standards for accurate mapping. Often the mapping supplied in a proposed plan file is inaccurate and unreadable.

EPFW has had to request that maps be redone by the submitter because coding for the silvicultural methods was not clear – it turned out that Cal Fire gets colored maps sometimes because the maps in the submitted THP are so hard to understand, but these are kept hidden from the public. All maps submitted to /used by Cal Fire in the review should be made available to the public.

Thank you for incorporating our comments into this project.



Susan A. Robinson

Vice President EPFW

srmw@comcast.net