



Legacy – The Landscape Connection

Friday, February 05, 2016

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RE: Draft Concept Paper -
to describe pilot projects for implementation of A.B.1492,
in public discussion at Ukiah, Dec. 2, 2015

The primary goal of the pilot project(s) must be for baseline documentation of current, on-the-ground forest conditions among varying forest types ... measurement and characterization of soils, watercourses, wildlife habitat, topography, etc., to legitimately report change analysis on the landscape since enactment of California's Forest Practice Act in 1973.

Not until these baseline conditions are set forth-and discussed and agreed upon by all stakeholders, can a meaningful and effective set of approaches to analyze Cumulative Watershed Effects (CWEs) result.

The Draft Concept Paper states, "Products resulting from the pilot project are intended to support the development of improved, standardized information for conducting cumulative impact evaluations at the planning watershed scale." (Ref. page two, paragraph two, sentence four) This states well the essential purpose of the pilot projects, as well as A.B. 1492 itself, and should be a theme carried throughout the entire Draft Concept Paper.

"Effectiveness" belongs at least on a par with "efficiency." The pilot projects should not only be concerned with "efficiencies" of the regulatory process-figuring out ways to make timber harvest planning less costly and redundant. More important still, the pilot projects should evaluate and improve "ecological performance" of the regulatory process-that means doing a better job of keeping the air and water clean, protecting soils, safeguarding wildlife habitat, and other public trust values. We must have an efficient regulatory process, effective as well.

A full managerial role is needed for all public stakeholder groups. There should be a clear, concise statement that the public (as represented by stakeholder groups discussed

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Ukiah Office: PO Box 904, Ukiah, CA 95482; 707-472-0275.

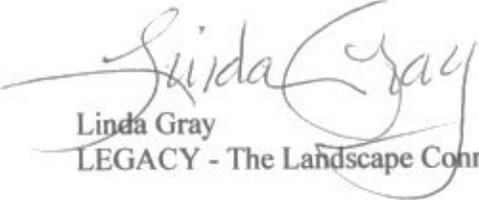
below) is not just being invited to a comment opportunity, but is actually participating fully, equally, and actively in management of the pilot projects.

Clarification in Pilot Project Working Group(s) (PPWGs) needs spelled out further - "Membership" should read "Two qualified representatives from the environmental community". Literal interpretation of "up to two" in draft language would allow 2 members or 1 or zero. By the same token, items five (re. Registered Professional Foresters), seven (re. watershed restorationists), and nine (re. Native American representatives) should also state "Two" rather than "Up to two..."

Mendocino County's Usal Forest is an excellent location for the first pilot project to roll out. Redwood Forest Foundation (RFFI), the nonprofit owner, has a mission consistent with the Timber Regulation and Forest Restoration Program's goals and has volunteered to host the first pilot. RFFI can be depended on to back the positive aims of A.B. 1492. Usal contains full planning watersheds, suitable sites to choose from.

Thank you for the opportunity to comment.

Submitted by motion carried
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Linda Gray

LEGACY - The Landscape Connection, Executive Director

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