

## Stakeholder THP Form Comments and Recommendations

### Preliminary Comments (in response to initial scoping letter and not based on form)

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CGS	<b>Explain All Operations</b> If a checklist is used in a new THP form, include the requirement to succinctly explain the proposed operations that are checked “yes.”	Y	Y	Y	Y	N	N
CGS	<b>All Unstable Area Info in One Location</b> All information on unstable areas should be located in one place in the plan, instead of being in several parts of the plan as it is now.	Y	N	N	Y	Y	Y
CGS	<b>Request Info on Unstable Area Presence</b> The checklist portion of the plan should ask whether unstable areas are present within the Plan area.	Y	N	N	Y	Y	Y
CGS	<b>Request Info on Inner Gorge Presence</b> The checklist portion of the plan should ask whether inner gorge areas are present within the Plan area.	Y	N	N	Y	Y	Y
CGS	<b>Request Public Safety Info</b> The checklist portion of the plan should ask whether areas of timber operations are adjacent to public roads or near any residential structures where timber operations could affect public safety.	Y	N	N	Y	Y	Y
DFG	<b>Add Table of Contents</b> Include a standard table of contents in each THP to facilitate locating information therein.	Y	N	N	Y	N	N
DFG	<b>Request Email Address</b> In Section I, add a box to collect the plan submitter’s email address.	Y	N	N	Y	Y	N
DFG	<b>Add ASP Checkboxes</b> In Section II, add check boxes for specific items related to 916.9 of the Forest Practice Rules, Threatened or Impaired Watersheds (TI rules).	Y	Y	Y	Y	N	N
DFG	<b>Add ASP Pre-consultation Checkbox</b> Add a check box at the top of the TI rules checklist asking whether the plan submitter has pre-consulted with DFG prior to plan submittal.	Y	N	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
DFG	Revise <b>Item 26(d)</b> so that it is clear whether LSAA notification is occurring pursuant to Fish and Game Code 1602 or 1611.	Y	Y	Y	Y	N	N
DFG	Remove references to 1603 from <b>Item 26(d)</b> . Revise 26(d) to the following: Is this THP to serve as the CEQA document for a Department of Fish and Game Lake and Streambed Alteration Agreement (LSAA)? If yes, then either attach a copy of the LSAA Notification to Section II or complete the information in 26(e).	Y	Y	Y	Y	N	N
DFG	<b>Add 26(e)</b> – “Is this THP to serve as Notification to the Department of Fish and Game for a Lake and Streambed Alteration Agreement? If so, please provide information using Section 1611 form and attach to the end of Section II.”	Y	Y	Y	Y	N	N
DFG	Include all LSAA notifications submitted with THPs at the end of Section II.	Y	N	N	Y	N	N
DFG	In Section II, revise <b>Item 32(b)</b> as follows: Are there any non-listed species which will be significantly impacted by the operation? If yes, identify the species and the provisions to be taken for the protection of the species. Address species which are not formally listed under the Federal Endangered Species Act, the California Endangered Species Act, or the Native Plant Protection Act, but which may be considered rare, threatened, or endangered as described under California Code of Regulations Title 14, Chapter 3, Section 15380.	Y	N	N	Y	N	N
DFG	In Section II, revise <b>Item 32</b> - add check boxes for NSO 919.9(g) items, similar to the checklist for TI watersheds.	Y	N	Y	Y	N	N
CLFA	<b>Form Same, Process Different</b> When first implemented, a complete THP required a few days of a forester’s time to prepare the form, maps and supporting documentation upon completion of the necessary field work. Today, while the form is much the same, field data gathering can take more than a year to prepare for submission and the review process takes an additional several months to navigate. It’s not the form-- it’s the process.	N	N	N	N	N	N
CLFA	<b>Include Operational Sheet for LTO</b> A pull-out worksheet with an itemized list from the RPF of critical plan items and agreements could be included as part of the form for use by the LTO.	Y	Y	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CLFA	<p><b>Standardized Maps Needed</b> Standardized high quality base maps could be provided from the State; acceptable shading colors and flexibility in size (letter, legal or tabloid) would greatly improve visual transference of information to those implementing the THP on-site.</p>	N	N	N	N	N	N
CLFA	<p><b>Include RPF in All Plan-Related Communication</b> An area of transparency that requires improvement is a policy of consistent inclusion of the RPF responsible for the conduct of the plan in all public-to-agency, inter-agency and intra-agency communications.</p>	N	N	N	N	N	N
CLFA	<p><b>THP Preparation Cost High</b> The cost burden to the California forestland owner exceeds tens of thousands of dollars (i.e., often the equivalent to a purchase of a new mid-range vehicle, ex., \$40,000) for each THP. The expense of the current regulatory process is so great that many timberland owners are forced to consider uses for their property other than timber management or are moving their investments out of State. Duplicative efforts between State agencies as well as a host of individual charges add to the load.</p>	N	N	N	N	N	N
CLFA	<p><b>Need Different System</b> The regulatory encumbrance for California forestland owners is so great that 80% of the wood utilized in the state is imported. California's system makes it economically viable to transport wood from sources hundreds or even thousands of miles away. California needs a solution that creates incentives for long-term forestland ownership and investments in infrastructure. For California to be a leader in green energy, carbon sequestration and fire resistant forests, an efficient process needs to be proposed wherein a multitude of 'best management practices' are recognized. All agencies will need to be involved in the process, working together, realizing that absent a viable forest products industry, high-quality jobs, water quality, wildlife habitat, carbon storage potential, air quality, and forest health will suffer significant consequences.</p>	N	N	N	N	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CLFA	<b>Sec I-II Operational, Sec III-IV Standardized, Database-Driven</b> What's needed is a common process wherein standardized documents, repetitive attachments, and other common database informational requirements for Sections III through VI of the THP can be pre-established by or for the landowner or forest district, and the return of a simple site specific Section I & II document with detailed maps for the individual plan.	Y	Y and N	Y	Y	Y	N
CVRWQCB	<b>Link Form to Database</b> Most of the fields of the existing 11-page THP form could be linked to a database online where the RPF could enter the basic information directly. Alternatively, a pdf document with fields that could be filled in would make filing THPs easier.	Y	Y and N	Y	Y	Y	Y
CVRWQCB	<b>THP Has Broad Scope</b> There will always be a concern with large, broad-scope documents (like the THP) that the parties responsible for on-the-ground implementation will struggle with locating specific direction. The THP document frequently goes through multiple changes during the review process, sometimes producing discussion and direction for a single mitigation to be repeated several times throughout the document. Central Valley Regional Board staff is not sure exactly how to do that, other than to better define what each section of the THP is supposed to include. Submitters and reviewers need to remind themselves that aside from meeting the basic CEQA requirements for disclosure, the THP is utilized to ensure correct implementation of operations.	Y	Y	Y	Y	N	N
CVRWQCB	<b>Include Operational Sheet for LTO</b> As THPs continue to grow in size, it becomes more cumbersome to find important information. Perhaps a summary of all mitigations above and beyond the FPR rules that are developed pre- and post-review and PHI recommendations could be developed. Examples of these would be site specific mitigations for rock, beveling CMPs, rock depth, timing, widths or lengths of rocked approaches for crossings, etc.	Y	Y	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CVRWQCB	<b>Review Team Important</b> A Review Team composed of responsible agencies is critical to maintaining the functional equivalency of CEQA. When responsible agencies review the THP, attend the PHI, recommend mitigation measures, it seems the process is maintained.	N	N	N	N	N	N
CVRWQCB	<b>Separate Process Needed Due to Lack of Monitoring</b> The Central Valley Regional Board has a timber-harvest related policy to address potential discharges from timber harvest activities. The development of the policy evolved, in part, to address a perceived lack of protection for water quality during and after timber harvest activities. The policy provides a feedback loop with required monitoring, the result of which allows the Board and the proponent to provide adaptive management based upon the results of that monitoring. Unless CAL FIRE, through the Board of Forestry, adds a monitoring requirement into the THP process, the Central Valley Regional Board will continue to have a separate policy to address the issue.	N	N	N	N	N	N
CVRWQCB	<b>Cost Reductions Unknown</b> The review costs of THPs should be reduced, at least on CAL FIRE's side through the new electronic filing process. Central Valley Regional Board staff cannot speak to the costs of THP preparation from the industry viewpoint. We can only hope that streamlining the THP form and process for review (like the electronic filing system) is the best path for reducing review costs for most parties. Other anticipated suggestions for reduced review time are likely to be met with resistance by responsible agencies that suffer from budgetary restrictions on staffing.	Y	Y	N/A	N/A	N	N
CVRWQCB	<b>Public Transparency Provided</b> Currently the public can look at the THP status table on the CAL FIRE website and see what plans are filed, which county, and how large, which watershed, and the specific township, range and section. This seems pretty transparent. With plans now being posted electronically, perhaps providing a link for public access would meet the transparency requirements.	Y	Y	N/A	N/A	N	N

**End Preliminary Comments (in response to initial scoping letter and not based on form)**

## CAL FIRE Comments on Internal 9-15-09 Draft Form

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CAL FIRE	<p><b>RPFs Lack Certain Knowledge</b>                      What I see attached is an EIR based "guide" for the RPF. I can say that many RPF's (within my scope here), are not aware of the relationship between their project and other projects within the bigger picture and how they may combine to cause a significant impact. I do not believe many even know what a significant or cumulative impact looks like short of a cease and desist order. Some of the RPF's I have experience with appear to believe that you always check the box for No Impact or the plan will not go through. I have had to explain that "No after mitigation" is a reasonable response in that they have identified problems and outlined mitigations. This seems to be foreign to them in every case.</p>	Y	N	N	Y	N	N
CAL FIRE	<p><b>Form Is Too Detailed</b>                      The goal is to produce a plan and get it approved in time to log in a favorable market. Plain and simple. As the plans become more detailed, more room exists at first review for things to be missed. Terminating a PHI over an issue missed in first review is poor form but having too many PHI recommendations is considered worse. I think that the more information you detail, the more likely it is that we will all miss something and in the end, we still haven't logged and all involved have spent a lot of money.</p>	Y	N	N/A	N/A	N	N
CAL FIRE	<p><b>Helps Direct Assessment of Impacts</b>                      So reading through, what I see is existing rule items that are supposed to be addressed and assessed for the potential to add to other existing issues and in a way to help direct the RPF in determining more specifically what issues may exist. Now, will this be an addendum to the THP or replace the existing cummies check list? All the questions are reasonable questions and a format is provided to elaborate on each subject area where needed.</p>	Y	N/A	N/A	N/A	N	N
CAL FIRE	<p><b>District Specific Forms Needed</b>                      Forest Practice District-specific forms may help simplify the form and improve operational utility.</p>	Y	N	N/A	N/A	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CAL FIRE	<b>Working Towards an EIR</b> What I see is an incremental direction toward an EIR and the "Functionally Equivalent" is apparently no longer working where the State is now spending more staff time creating an official EIR response in reply to public comment.	Y	Y	Y	Y	N	N
CAL FIRE	<b>Will Help RPF and Reviewers</b> The document will help the RPF and Reviewers: More thought and formal discussion on behalf of the RPF and less time searching the document for hidden issues on behalf of the reviewer. I do not intend on reviewing the document for grammar or conflict issues with other documents as I know a lot has already been done here before you sent it. In general, a problem (potential impact) is identified, explained and mitigated or it is not. I will still find issues glossed over in the plan or not addressed adequately on the ground regardless of the volume of written detail.	Y	Y	Y	Y	N	N
CAL FIRE	<b>Delete Unneeded Text</b> <b>Item 14b</b> , for example you checked the box group selection, then you go down to "Stocking" and find "group selection" and checked the box, the form references the rule and it does not allow the writer to check a box for minimum basal area as it shows under "selection". If a person is only planning on unevenaged management (group selection), then can delete the rest of the unnecessary information that does not pertain to them?  In Section III, can the plan writer delete an item that does not apply to the plan?  Section I-II-- It was discussed during our conference calls to allow RPFs to delete questions/sections not applicable. I think this may make review more difficult, and any changes in the form should not be allowed.	Y	N	N/A	N/A	<b>Y</b>	<b>Y</b>
CAL FIRE	<b>Pilot Needed</b> Pilot program with demonstration forests and some consultants may help sort out benefits and shortcomings of new form before the form is imposed on all timber operations in California.	Y	N	N/A	N/A	<b>Y</b>	<b>Y</b>

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CAL FIRE	<b>Format Change Needed</b> Template formatting: in THP template, put rule references immediately at end of question. Otherwise, response to question gets sandwiched between question and rule reference.	Y	N	N/A	N/A	<b>Y</b>	N
CAL FIRE	<b>Section I-II--</b> Where no code section is cited, (None) is listed, and should be deleted to avoid confusion. Pages 9,12, 14, 15 and 28.	Y	Y	N/A	N/A	N	N
CAL FIRE	<b>Item 5</b> Revise to state "...who is responsible for the conduct of the [timber] operation"	Y	Y	Y	N/A	N	N
CAL FIRE	<b>Item 8</b> It appears that reference to APN # has been removed. I think that should be required (not optional as in the past). All of the counties utilize the APN # and when it comes to illegal conversions which often occur post harvest (post THP) that is valuable information for determining current owner, etc.	Y	Y	N	N/A	N	N
CAL FIRE	<b>Item 8—(Plan Area Only)</b> Can this box self-total the sum of the above acres?	Y	N	N/A	N/A	<b>Y</b>	<b>Y</b>
CAL FIRE	Under <b>item 8b</b> , it would be nice if there was a question about whether this is a T&I watershed.  <b>Item 8--</b> State whether it is T&I here for quick reference.	Y	Y	Y	N/A	<b>Y</b>	N
CAL FIRE	<b>Item 9(b)</b> Change the phrase "submitted or approved" to "submitted and accepted". Conversion Exemptions for Subdivision Development are exemptions that CAL FIRE accepts or rejects, but does not approve. It is the associated THP which is received and approved.	Y	N	Y	N/A	<b>Y</b>	N
CAL FIRE	<b>Item 11</b> Reinsert even-aged adjacency question into new THP form [Ref 14 CCR 913.1(a)(4)(A)].  I would like to have a question regarding adjacent even aged regeneration units that have not met the 5 year or 3 year and 5 feet standard. This provides a reminder to the RPF to check for it, and to address it in the timing of start up, if necessary, and means we don't have to ask during review.	Y	N	N	Y	<b>Y</b>	<b>Y</b>

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CAL FIRE	<b>Item 11</b> If an NTMP exists on the plan area either the area needs to be deleted out of the NTMP or the proposed THP. Same for an existing THP. What about Erosion Control Maintenance?	Y	N	N	Y	Y	N
CAL FIRE	<b>Item 13(b)</b> Revise the question to ask "...and erosion control [structures] and facilities".	Y	N	N	Y	Y	N
CAL FIRE	<b>Item 13(j)</b> In the certification statement, address meeting on site with the LTO prior to ops on a regular THP [Ref. 14 CCR 1035.2].	Y	N	N	Y	N	N
CAL FIRE	<b>Item 14--</b> Right of Way	Y	Y	N	Y	N	N
CAL FIRE	<b>Item 14(a)</b> Add a prompt near the box for MSP Option A asking for the THP # which the Option A document is tied to.	Y	N	N	Y	Y	N
CAL FIRE	<b>Item 14</b> Selection method, - only box to check is for site I on coast forest – we have more than just site I land on the coast forests.  Not all stocking standards listed for Selection in the Coast Forest District.	Y	Y	Y	N/A	N	N
CAL FIRE	<b>Item 14(b)</b> Old Item #14(a) (dated 02-03) which utilizes a table to list silvicultural categories is preferable. It saves space and is easier to reference.	Y	N	Y	N/A	Y	N
CAL FIRE	<b>Item 14(b)</b> Being able to delete silvicultural categories which do not apply would reduce the size of Item #14 and improve the utility of Item #14 operationally.	Y	N	N/A	N/A	Y	Y
CAL FIRE	<b>Item 14(b)</b> Under the selection and commercial thinning silvicultural prescriptions with different stocking standards, revise to state "on Site...[timber]lands..."	Y	N	N/A	N/A	N	N
CAL FIRE	<b>Item 14(c)</b> Add stocking standards for even-aged methods based on site class. Could also be included under Item #14(h).	Y	N	N	N/A	N	N
CAL FIRE	<b>Item 14(d)</b> Revise question to state "Describe how the LTO will determine which trees will be harvested or retained, [and how the CAL FIRE Forest Practice staff can enforce the proposal]." Ability to enforce silvicultural compliance is critical.	Y	N	N	N/A	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CAL FIRE	<b>Item 14(e)</b> Include “Poles” and “Biomass” as forest products to be harvested.	Y	Y	N/A	N/A	N	N
CAL FIRE	<b>Item 14(g)</b> Revise to state “Describe other instructions to the LTO concerning [timber] felling operations”.	Y	Y	N	N/A	N	N
CAL FIRE	<b>Item 14(i)</b> Prompt for Winter Period site preparation plan necessary?	Y	N	N	Y	N	N
CAL FIRE	<b>Item 18(a) &amp; (b)</b> Consider combining items. Prompt to delete either items applying to watersheds with or without anadromous salmonids which do not apply (to improve operational utility).	Y	N	N/A	N/A	N	<b>Y</b>
CAL FIRE	<b>Item 18--</b> If mulching, state the type/depth	Y	Y	N	Y	N	N
CAL FIRE	Under <b>item 18 b,c</b> , it appears that you can combine both and reach the same conclusions.	Y	Y	N/A	N/A	N	N
CAL FIRE	<b>Item 18(c)</b> To the statement that begins with “Where straw mulch is used...” add at the end the phrase “or prior to the winter period whichever occurs first”.	Y	N	N	N/A	N	N
CAL FIRE	<b>Item 18c</b> , second to last box: Where straw mulch is used, the minimum coverage shall be 90%... 916.9(n) lists “Where straw, mulch, or slash is used...” add language to be consistent with rule (add slash too).	Y	Y	Y	N/A	N	N
CAL FIRE	<b>Item 18(d)</b> Uses the term “ongoing” erosion sites in the question. Replace the term “ongoing” with the term “active” [Ref. 14 CCR 916.9.1(o)].	Y	N	Y	N/A	N	<b>Y</b>
CAL FIRE	<b>Item 21</b> Not a lot of space saved by combining questions using 1-08-183 MEN as an example, because the explanation of the exceptions is still required and operationally relevant. Old format may lend itself better to data collection in a database, and upfront disclosure. Although the new format may reduce return rates involving this item, it may hinder the detection of mistakes during first review, and subsequently put the burden on the inspector and subsequent levels of review.	Y	N	Y	N/A	N	<b>Y</b>
CAL FIRE	<b>Item 21(a)</b> Revise to state “...and list any specific instructions to the LTO [in Section II]”.	Y	N	N/A	N/A	N	N
CAL FIRE	<b>Item 24</b> Ask whether proposed roads will be permanent, seasonal, or temporary.	Y	Y	Y	N/A	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CAL FIRE	<b>Item 25</b> Not a lot of space saved by combining questions using 1-08-183 MEN as an example. Old format may lend itself better to data collection in a database, and upfront disclosure. Although lumping previous THP form's questions into one may reduce return rates involving this item, it may hinder the detection of mistakes during first review and subsequently put the burden on the inspector and subsequent stages of review.	Y	N	Y	N/A	N	<b>Y</b>
CAL FIRE	<b>Item 26:</b> need to add numbers/letters for reference to identify sub-headings.  Item #26 subheadings should be numbered for ease of reference in Section III.	Y	Y	N/A	N/A	<b>Y</b>	N
CAL FIRE	<b>Item 26</b> Improve operational utility and form simplification by allowing deletion of items that do not apply	Y	N	N/A	N/A	N	<b>Y</b>
CAL FIRE	<b>Item 26</b> For Class II-S category: Make a table for slope % and which core zone distances apply, and for the inner zone as well. Also, what if multiple Class II's with different inner and outer zone widths in plan area?	Y	N	Y	N/A	<b>Y</b>	N
CAL FIRE	<b>Item 26</b> Replace single checkboxes with "Yes" and "No" checkboxes.	Y	N	Y	N/A	<b>Y</b>	N
CAL FIRE	<b>Item 26</b> Ask how the Core, Inner, and Outer Zones are identified in the plan and on the ground for administration and enforcement.	Y	N	N	Y	N	N
CAL FIRE	<b>Item 26(g) &amp; (h)</b> What is the difference between questions 26(g) and 26(h)? The introductory question reads the same: "Will the plan propose new permanent culverts at logging road watercourse crossings?"	Y	N	Y	Y	N	N
CAL FIRE	<b>27(a)(10)</b> Refers to retaining the "75% filter strip". Is this question referring to the 75% surface cover requirement or the 25% reduction in the WLPZ width [Ref. 14 CCR 916.4(b)(5) & (6)].	Y	Y	Y	Y	N	N
CAL FIRE	<b>Item 34</b> Last sentence is poorly worded. It sounds like the LTO is being mitigated for adverse effects.	Y	?	Y	N/A	<b>Y</b>	N
CAL FIRE	<b>Item 37--</b> Add a checkbox for the Maintenance Period , 1 year or 3 year. Check 3 year if T&I or if based on a PHI Recommendation the item can be revised before second review	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CAL FIRE	<b>Item 38 &amp; 39</b> Preoperational check-list and operational summary should be something designed by the individual forest practice inspectors if desired. This burden should not be placed on the plan-preparing RPF, nor is there a rule requirement for the RPF to do so.	Y	N	N	Y	N	N
CAL FIRE	<b>Items 18(d) &amp; 39</b> Duplication of map point lists in Item 39 and Active Erosion sites under Item 18(d).	Y	N	N	Y	N	N
CAL FIRE	<b>Item 39</b> , Section II – Operational Summary: Please keep this in the form as it would provide a quick reference to link mapped items with written text. This is long overdue.	Y	Y	N	Y	N	N
CAL FIRE	<b>Item 38-39 Not Needed</b> Do we really want to include in a State issued form items that have no apparent mandate in law, case law, or regulation but are apparently sought for the sole convenience of the Department’s review and enforcement roles (items 38 and 39)?	Y	N	N	Y	N	N
CAL FIRE	<b>Add Check Box for 897(e)</b> Consider check box for the proposal of an alternative practice pursuant to 14 CCR 897 (e) et. Seq. There are situations where an alternative practice could be proposed for Rules that do not otherwise specifically state the capacity to propose an exception, in-lieu, or general alternative. We just don’t see them that often because the burden placed on the RPF is high and the capacity for Responsible Agency veto is present.	Y	N	?	Y	N	N
CAL FIRE	<b>Add Unstable Areas Item</b> I would like an Item for unstable areas. While not required by the rules to be discussed in the plan, except relative to other activities (tractor yarding, road construction, winter operations), it is required to be disclosed, and it is required to be mapped. An unstable areas item would provide a known location to find all information related to unstable areas, instead of searching through other items to glean information. It would also help RPFs by providing a consistent place to provide the information, and a reminder that they need to be mapped.	Y	N	N	Y	<b>Y</b>	<b>Y</b>
CAL FIRE	<b>Section III</b> Item #26 subheadings should be numbered for ease of reference in Section III.	Y	N	N/A	N/A	<b>Y</b>	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Can Be Required on Form?	Can Be Addressed in Guidelines?	Needs to Be Addressed?	Needs Policy Decision?
CAL FIRE	<p><b>Section III</b>            Seems like a reiteration of Sections I and II excepting 14 CCR 1034 jj and the consideration of alternatives required by CEQA. How about retaining 14 CCR 1034 jj and the alternatives followed by an instruction that Section III shall then contain the Rule citation and explanation and justification for all proposed exceptions, in lieu practices, general alternatives, and alternative practices as well as any items that the RPF wishes to further discuss that are identified in Sections I and II in the same sequence as they appear in Sections I and II. Could probably save some paper, reduce RPF hours for preparation of the form, and reduce the cost born by the public when they seek a copy of the THP from the Department.</p>	Y	N	N/A	N/A	Y	Y
CAL FIRE	<p><b>Section IV Item 8(d)(B)</b> Marijuana cultivation on some timberland in Mendocino, Lake, Sonoma, Humboldt, Trinity, Del Norte and other counties are setting up some environmental disasters including deforestation, liquid fertilizers, trapping of wildlife, dewatering streams, loss of erosion controls, etc. Known unpermitted activities should also be disclosed in the cumulative impacts section.</p>	Y	N	?	Y	Y	Y

**End CAL FIRE Comments on Internal Draft Form**

## All Stakeholder Comments on 10-12-09 Draft Form

### General Comments

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE	<b>Add Mitigation Monitoring Plan</b> Consider incorporating a mitigation monitoring and reporting plan (MMRP)	Y	N	CEQA	N/A	N	N
DFG	<b>Add Table of Contents</b> Include a standard table of contents in each THP to facilitate locating information therein. The table of contents will facilitate California Environmental Quality Act-related review.	Y	N	N	Y	N	N
RPF	<b>Add RMP Question</b> A question should be added to the form referencing the Road Management Plan provisions of the Forest Practice Rules.	Y	N	N/A	Y	<b>M</b>	N
RPF	<b>Add N/A Box</b> There are many questions that have a yes or no box, but the appropriate response may be 'N/A'; have you considered adding a 'N/A' box for those questions?	Y	N	N	Y	N	N
Public	<b>Pagination</b> The pagination is confusing. Starting each section over from page 1 would be better if the page number at the bottom also included the Section number. The preferable alternative, however, is to begin pagination from Section I and continue throughout the whole plan as is the current practice.	Y	N	N	Y	<b>Y</b>	N
RPF	<b>Use of Macros</b> Whenever the document developer uses Macros in a form, it can lead to problems as not everyone may have the software that matches the software with which the form was written. The more basic the form can be kept the better.	Y	N	N	N/A	N	N
RPF	<b>Use Different Font in Text Areas</b> The areas where a response is filled in should be set up for a different type font. This helps the preparer and reviewers.	Y	N	N	Y	N	N
RPF	<b>Add Signature Page</b> They probably should just go ahead and set up a page 1.1 with Signatures. That keeps the confidentiality of the signatures for those who worry about that.	Y	N	N	Y	<b>Y</b>	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF DFG	<p><b>Allow Deletion of Unrelated Text</b></p> <p>Because many questions may not be relevant to a particular THP or area we work in; can the RPF delete all these questions such as: questions related to areas Outside Coastal Anadromy Zone, Southern Subdistrict, Standard WLPZ Protection Measures that are superseded by ASP rules etc.? If not, can RPFs shade/stipule those non-applicable questions or rule citations to facilitate ease of use by the LTO?</p> <p>In a worst case scenario, if the new form must be used, I would hope that RPFs could simply delete the parts, and checkbox statements, that don't apply to any specific THPs. THPs don't need to be any longer than they already are.</p> <p>To reduce confusion and the cumbersome bulk of the document, it would be beneficial to allow for the deletion of form items not applicable to the specific THP. These items would potentially include T&amp;I rules, exceptions not proposed in Section II, etc.</p> <p>Question: Is it O.K. to delete form text relating to Regions not applicable to my THP? ? I suspect it is. If so, a note that it is O.K. to delete would be worthwhile, that way we know it will be O.K. The ScoPac template THP is set up with a million options and you just drop out the stuff that does not apply and that works well for both plan preparers and CDF.</p> <p>I suggest that there be a method to remove items or section (such as T&amp;I rules) from the THP when the items or section does not apply. It would be similar to procedures that CDF takes when they remove the Confidential Archaeology Addendum from the public file. A page could be included that simply states that items #-## do not apply to the proposed logging area and therefore have been removed (or therefore they are not included) in the proposed THP.</p> <p>General comment: Can we delete the sections that don't apply to a particular THP? Or is CDF going to want to see the whole form...which I disagree with.</p>	Y	N	N	Y	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
DFG Public	<p><b>NTMPs</b> One cannot notify pursuant to 1611 for NTMPs. This is a confusing point for RPFs and landowners at times. For NTMPs, a plan submitter must use the 1602 notification process, which includes submitting notification after NTMP approval (oftentimes, notification actually occurs with/prior to submission of a notice of operations, but the NTMP is already approved). FGC section 1611 states it's for THPs and has not been interpreted to include NTMPs. Also, in practice, it usually doesn't make sense for the landowner to notify after NTMP approval, like with a THP, because it's so unknown exactly when a timber operation will be conducted, unlike most THPs.</p> <p>If there is a special section for those rules that apply to NTMPs, we did not see it in Section II, but feel it should be included.</p>	N	N	Y	N/A	N	N
RPF	<p><b>Supports Check Boxes</b> General: It appears that the check boxes may save us (RPFs) having to develop a lot of text and the reviewers having to decide of the text we develop complies with the rules. If that is the objective and we can replace text with checked boxes that would probably be a good thing.</p>	Y	Y	N	N/A	N	N
RPF	<p><b>Only Helpful to a Few RPFs</b> This change will only be helpful to a few new RPFs that have little experience putting a THP together. During your first few THPs as an RPF, the scope of the process is very intimidating, and having a cookbook type form might help cover all the bases.</p>	Y	N/A	N/A	N/A	N	N
RPF	<p><b>Form Will Confuse LTO</b> This, many pages longer, THP would be more confusing to LTOs. LTOs in any given region are used to looking at the types or requirements and mitigations that are critical for their area. They don't want to wade through pages of stuff that does not apply to their THP. They will only be less likely to read the important parts of the THP and thereby force even more administration by the RPF. I already have to re-write large portions of section II for the LTOs so it more properly applies to any specific operation. I don't want to have to do even more.</p> <p>If an automated deletion in the form could be created, this would make the plan easier to read and more site specific to the LTO, who must follow the plan.</p>	Y	N	N/A	N/A	?	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Trial Use of Form</b> I do like the "check the box" approach of this new THP form. As for now I still prefer the old form. I would like to see the new THP form done on a voluntary basis for at least a year so that RPFs working on THPs in 2009 can submit their THP on the old form in 2010. Also, new THP forms done on a voluntary basis can be a way to improve the new form so that we can have a very good THP form. I believe a new THP form can come closer to meeting your goals if time is allowed to improve the THP form on a volunteer basis with all interested parties giving input. There should not be a rush in getting a completely modified THP form in place if you are trying to meet the goals you have set forth.</p> <p>Has CalFire thought about having a few trial THPs submitted with the form prior to its full implementation. Trial use on a few THPs may be the way to work out any kinks if there are any.</p> <p>If the new form is put into action at the start of 2010, then there should be at least a one year transition period. This will allow</p> <ul style="list-style-type: none"> <li>• RPF's who have THP's partially completed on the old forms to complete their work.</li> <li>• The Review Team's to become familiar to the new form and develop standard language and requirements.</li> </ul>	Y	N/A	N/A	N/A	?	Y
RPF	<p><b>New Form Won't Help</b> The "New Form" solution is a classic trap. It is a mistake that has been repeated time and time again with agonizing regularity, despite the lessons of history. Let us please not do it again. THPs take too much time already.</p> <p>This new form will only make review more complicated.</p>	Y	N/A	N/A	N/A	?	Y
CAL FIRE	<p><b>Additional Data Entry Burden</b> Adding more data entry burden may increase CAL FIRE clerical workload on approved plans by 200–300% (from a 15-minute entry on approved plans to 45 minutes/plan).</p>	Y	N/A	N/A	N/A	Y	Y
RPF	<p><b>LTOs Left Out</b> LTOs are an extremely important part of this process as well, and it appears that they are being left out of the process.</p>	Y	N/A	N/A	N/A	?	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Changes Will Increase THP Preparation Costs</b></p> <p>This change will actually add to the cost of producing a THP. It undoubtedly will require more paper and will increase the size of THPs by many pages, something we should be trying to avoid at all costs. The fact is, you can't checkbox your way to a THP and this is a reality created by CalFire and interagency review. Checkboxes are just never good enough. We (RPFs) are always forced to write more (by CalFire, DFG, Water Quality, etc). In the case of the new forms, there are only a few instances where I feel I would actually have to write less. I would still have to write almost all of the extended explanations that I currently write, while pages and pages of checkboxes that don't apply to many THPs would be added.</p> <p>The new THP form will take more paper, cost more money, and will be more confusing. There is really no doubt about it. Think about it this way, when has any agency produced "New Longer, but Easier, Form" for ANY permitting process that has actually been easier to use or cheaper to produce. I don't think anybody can name even one instance where this kind of re-work helped.</p>	Y	N/A	N/A	N/A	?	Y
RPF	<p><b>Form Sends Wrong Message on Mitigations</b></p> <p>Many of the checkbox mitigations make it appear that you are skirting the rules if you don't check the box. A perfect example is in item 33 where the checkbox states that ALL snags should be left unless otherwise stated and justified. Nobody in their right mind would check this box. It is a violation trap. However, if you don't check the box and you write a justification, you now look like you are skirting the rules. Leaving all the snags for wildlife habitat is a rule, but it is a rule that is trumped by five other rules (919.1, 939.1, 959.1(a-f)), many of which require the falling of snags. This is a no win situation for the RPF. We may have to fall snags for public safety, but the form makes it look like we are out to hurt cute fuzzy critters. What was wrong with the old item 33, which discussed the need to fall snags for fire protection and public safety?</p>	Y	N/A	N/A	N/A	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Process Is Problem, Not Form</b></p> <p>The high costs of producing THPs are caused by the process of review not by the THP form. There are certain timelines and processes required by law that are not followed by the agencies. Some of the problems are beyond CalFire's control, such as the need for public comment and plan recirculation. However, much of the cost is something that could be addressed, such as the fact that my plans are often reviewed 5 times, or more, with new issues brought up each time that were not predicated by public comment. These issues should all be addressed in first or second review. No new issues should be brought up unless they are a result of public comment. The fact is the timelines that are purposefully in the Forest Practice Rules and in the Forest Practice Act, to protect plan submitters from excess review costs are routinely ignored by the review agencies. This is the biggest cost. It has nothing to do with the form. If CalFire directed their efforts toward organizing the review process, and holding the other agencies feet to the fire, this would save both the industry and the State many hundreds of thousands, if not millions, of dollars.</p>	N	N/A	N/A	N/A	N	N
CAL FIRE	<p><b>Additional Data Entry Burden</b></p> <p>Adding more data entry burden may increase CAL FIRE clerical workload on approved plans by 200–300% (from a 15-minute entry on approved plans to 45 minutes/plan).</p>	Y	N/A	N/A	N/A	Y	Y
RPF	<p><b>Make Form Use Optional</b></p> <p>If this form is used, it should be understood to be optional. It is in fact optional by law anyway. No particular form is required by the Rules or the Act. However, administrative power often forces RPFs to do many things not required by the Rules. I would hope that it would be made clear that it is optional AND that the old form can be still be used.</p> <p>Even if the new form is found acceptable by the Department, an RPF could still use the old form, providing that all the required information was in it.</p>	Y	N/A	?	N/A	?	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Create Multiple Forms</b></p> <p>The new Anadromous Salmonid Protection Rules have generated many of the changes in section #2. Has it been considered to create two THP Forms; one for projects within watersheds with coastal anadromy, and one where there is no coastal anadromy? It seems to me that it would really ‘clean-up’ the form for those outside of coastal anadromy.</p> <p>There should be separate forms for anadromous watersheds and non-anadromous watersheds.</p> <p>I would like to see specific THPs for T&amp;I THPs and Non T&amp;I THPs. This can help reduce errors and save on paper.</p> <p>Have you thought about separating Section II into plans that don’t have salmon issues and those that do. The questions within the Section would flow a lot easier and be able to be followed by the general public. Would have to have a Section II for non-salmon area, another for salmon areas, and a third for THPs with both types of areas. The same could be done for Section III. The Department needs to remember that not only does the form need to be useable by RPFs, but it also must be clearly understandable to the general public. I don’t think it is, as it stands right now.</p>	Y	N	N/A	N/A	?	Y
RPF	<p><b>Still Have to Include Unnecessary Text?</b></p> <p>Since virtually every rule section has been cited with each item number, does that mean I can stop including definitions for everything (such as hard frozen and saturated soil conditions)? OR does that mean I can stop listing every rule pertinent to road building?</p>	Y	N/A	N/A	Y	Y	Y
RPF	<p><b>No Improvement in Operational Clarity</b></p> <p>In order to compare the current THP form the proposed version, we took one of our recently approved THPs and rewrote the plan using the proposed form. The resultant THP did not appear to provide any improved operational clarity.</p>	Y	N/A	N/A	N/A	?	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>More Time for Comment Needed</b></p> <p>I think it is a good effort, but probably needs a little more time to allow adequate review and comments. November 20th cutoff date which allows only one month for review is a little on the short side.</p> <p>Much more time is needed to adequately review the new form. We should also be allowed to review and comment on any changes developed from this comment period.</p> <p>This form is a long way from being complete. It needs to be slimmed down and have all of the unnecessary information removed. This process can not be rushed, as has been the business as usual approach by Cal Fire and the Board of Forestry in recent years. I would suggest that Cal Fire sit down with all of the parties involved and get their input. RPF workshops are very useful and should be done before the form is finalized.</p> <p>The revision of this form will have a long-standing impact on landowners, RPFs, LTOs, and the forest products industry. I urge CAL FIRE not to rush the process to get a revised form in use by January 1, 2010. Even if it takes another year, that is better than adopting a new format that exacerbates the already cumbersome process. The revised THP must meet the review team's needs, the public's right to clearly understand what is proposed and result in a document that the RPF and the LTO can easily interpret and follow. The THP revision as written appears to mostly benefit the review team at the cost of a larger, more confusing document for the public, RPF, and LTO due in large part to the inclusion of unnecessary items in a site-specific document. I appreciate your attention to these recommendations and strongly encourage a longer review period to ensure the accuracy and adequacy of the new revised form.</p>	Y	N/A	N/A	N/A	?	Y
RPF	<p><b>Completely Filled Out Form Should Be Filed</b></p> <p>Since the form is very detailed and thorough, consideration should be given for a standard that if the form is completely filled out, the THP shall be filed.</p>	N	N/A	N/A	N/A	?	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Update CLFA Checklist?</b> Are there plans for CAL FIRE to work with the California Licensed Foresters Association to update the CLFA checklist once the form revisions are complete?	N	N/A	N/A	N/A	<b>Y</b>	N
RPF	<b>Maybe Good for Small Landowner but Too Rigid For Large</b> My general sense of the forms: They may work well for a small landowner with a single unit THP, but for large industrial plans with multiple units the form is so rigidly structured (particularly III) that it will not likely work well.	Y	N/A	N/A	N/A	<b>?</b>	<b>Y</b>
RPF	<b>Questions Repeated and Inconsistently Worded</b> In many instances the same question is asked multiple times in the same section, just under different items. Sometimes it is phrased slightly differently, leading to confusion.	Y	N/A	N/A	N/A	<b>Y</b>	N
RPF	<b>Form Goals</b> It is my hope that the new harvest plan forms will do the following: <ul style="list-style-type: none"> <li>• Be easier for the LTO to understand.</li> <li>• Make finding items within the plan easier for all involved.</li> <li>• Incur less writing than existing harvest plan, especially in sections III &amp; IV.</li> <li>• Eliminate unnecessary reciting of rules and regulations.</li> <li>• Eliminate duplication between ALL AGENCIES.</li> </ul> <p>In general, it appears the authors of the new THP form concentrated on creating a document that is easy to review by CAL FIRE and contains information desired by other agencies that take part in the review process. However, the primary function of the THP form must be a document that is easy to read and understand by the public, easy to convey what is proposed by the RPF and landowner, and easy to interpret and implement by the LTO. I do not believe that this revision will achieve these functions.</p>	Y	M	N/A	N/A	<b>?</b>	<b>Y</b>
CAL FIRE	<b>Different Focus Needed</b> The effort should be refocused to take the existing form, add provisions to compliment the new ASP rules, and make E-filing functional.	Y	N/A	N/A	N/A	<b>?</b>	<b>Y</b>

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Make It User-Friendly</b> Working daily with landowners and LTOs, a common theme is that they don't understand 90% of what is in a Harvest Plan. Landowners in particular don't understand why they pay so much money for something that doesn't make any sense to them. As an RPF, it is our job to make the harvest plan as user friendly as possible to all that use it, but with all the agencies involved, duplication and unnecessary explanations and justifications riddle the existing format and this new form as well. I see a document in which Sections I – III are 50 pages without even having any information about the plan put on paper. This is way too much.	Y	M	N/A	N/A	?	Y
RPF	<b>Need Simplification</b> Simplification of the process is of the utmost importance to landowners and all of the agencies that are reviewing harvest plans. This process needs to be simplified and not made more complex, time consuming and expensive.	Y	M	N/A	N/A	?	Y
RPF	<b>Create Optional Per-Unit Approach</b> There was obviously an attempt to move non-operational question to Section III, which is good. However, This approach to Section II still appears to be for a reviewer, covering every possible iteration. I would rather see a stripped down Section II that focused on operational information for the LTO relative to that plan, and organized in operational blocks. I would like to see an optional approach where by site specific issues are dealt with by unit. I.e. instead of listing all the ops on unstable areas in one place, have each unit as a separate page, with all the exceptions which occur in that unit listed.	Y	N	N/A	N/A	N	N
RPF	<b>Modify Form for Landowner?</b> What if the Option A for a landowner has different stocking standards than shown in the form? Can the form be modified to suit the particular landowner? Is there a process for that?	Y	N	N/A	N/A	?	Y
RPF	<b>Form Includes Items Not Required by Rules</b> Numerous additional items are included in the form within the revised THP form that are not found within the old form or even required as part of the contents of plan under 14 CCR § 1034.	Y	N	?	N/A	?	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Add ECP</b> One thing that is completely missing from this Harvest Plan revision is an erosion control plan. Water Quality isn't going away and erosion control plans are required in most of the forest districts. This should be a part of the plan, so that RPFs don't have to cut and paste or creating a whole new document to satisfy WQ. This should not continue to be a part of Section V.	Y	N	Y	N/A	<b>Y</b>	N
CAL FIRE	<b>Checkbox Approach Potentially Flawed</b> A check box approach may be a less credible way of presenting technical information and reducing plan review-related issues.	Y	N	N/A	N/A	<b>?</b>	<b>Y</b>
RPF	<b>New Form Unnecessary</b> Most of the information that is required (rules citations) in this new document is already included in the last several THPs that I have submitted (excluding new rules) so I am not sure if the new form (Sections I & II) is needed to obtain this information. Review Team has asked for rules citations over the years and it has become standard language from several of our plan writers.	Y	N	N	N/A	N	N
CAL FIRE	<b>Modifying Form Complicates Matters</b> Certain timberland owners requesting to modify the THP form may complicate CAL FIRE's business practices.	Y	N	N/A	N/A	<b>?</b>	<b>Y</b>
CAL FIRE	<b>Uncertain Future and Goal Achievement</b> In the current budget crisis and uncertainty of FP program staffing in the future, it may be unwise to pursue adopting a form that is viewed by our own working group as more complicated, less functional from a practitioner's standpoint, will be a major change and time demand for our clerical who enter FPS data and will not reduce preparation costs.	Y	N	N/A	N/A	<b>?</b>	<b>Y</b>

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>THP Will Be Longer</b> This form will add pages to the THP.</p> <p>There is no reason that harvest plans need to be 300 pages long. I found that going through the new THP form will add at a minimum an additional 40 to 50 pages of information that is repeated in several places, and cost the landowners an additional 10 to 20% over existing plans.</p> <p>In order to compare the current THP form the proposed version, we took one of our recently approved THPs and rewrote the plan using the proposed form. It was not our intention to provide only negative feedback, but after honest effort, in our opinion the new form did not measure up to the goals CAL FIRE has given for revisiting the form. Our experience found the proposed form to be more cumbersome, lengthier (15 more pages in Section II, 5 more pages in Section III), and more redundant than the current form.</p> <p>The new blank form (sections I, II, and III) is longer than my last THP through sections III. It follows then that a filled out new THP is going to be substantially larger.</p> <p>Anecdotal feedback from other foresters that have reviewed the two forms support longer plans and no increased operational clarity by using the new form, with a strong preference of the current THP form over the proposed revision.</p> <p>The new form will increase the total number of pages submitted in every THP due to the inclusion of the T&amp;I rules in the standard form and the inclusion of all possible exceptions from the rules in Section II and the justification of all possible rules exceptions in Section III.</p> <p>Using new Section I-II-- Original Document 32 pages and New Document 48 pages</p>	Y	N	N/A	N/A	?	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Automate Form</b></p> <p>A solution to the problems of longer THPs with much un-needed information is to automate the form. If an RPF checks “no” in Section II, the form question in Section III should be removed from the plan. The redundancy in the form could be eliminated by having only pertinent information included in Section III, not a plethora of checked “no” boxes. If an automated deletion in the form could be created, this would eliminate numerous pages and save the plan preparer/submitter and the reviewing agencies time and money.</p> <p>The THP form should be formatted so that checking a checkbox "yes" triggers the related text to appear. If the checkbox is checked 'no' then the text would stay hidden, saving space and eliminating unnecessary text. For example, see Section II Item 26.b. A-K and 26.c - there are several pages of text that could be eliminated if not relevant, and only shown if relevant.</p> <p>The revised form contains a lot of text which only applies if the preceding question is checked yes. In the instances where a specific question is checked no and there is text that no longer applies given the answer, is there a way that CAL FIRE could make the form delete the non-applicable text if a certain box is checked? This would eliminate a lot of extra text, making the form more readable.</p>	Y	N	N/A	N/A	?	Y
CAL FIRE	<p><b>FPS-Related Matters</b></p> <ul style="list-style-type: none"> <li>• Every THP item should be uniquely numbered and lettered in outline format. In-lieu of that, a Review Team Office forester should enter the data on the Information tab.</li> <li>• The same query asked of data collected before and after January 1, 2010 will yield a dissimilar answer.</li> <li>• Multiple versions of the form should be avoided.</li> <li>• Evaluate what information on the THP form (which items) should be captured in the FPS.</li> </ul>	Y	N	N/A	N/A	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE	<p><b>FPS-Related Matters, Cont'd.</b></p> <p>To achieve the most accurate data entry possible, we suggest the following:</p> <ul style="list-style-type: none"> <li>• Determine what information types we want to capture in FPS</li> <li>• Identify each information type clearly with a number</li> <li>• Place each information type in a single location, e.g. do not ask the same yes-no question in both sections II and III <ul style="list-style-type: none"> <li>○ Some items now located in Section II are relocated to Section III, and some yes-no questions are located in both sections. Instead of repeating the question in section III, could wording such as “If you answered yes to Item XX in Section II, then...” be used?</li> <li>○ Another problem with redundant yes-no questions in sections II and III is that the RPF must make corrections/changes in two places instead of one. This invites discrepancy.</li> </ul> </li> <li>• Item 14 in the new form spills onto five pages, and Item 26 spreads across eleven pages. With so many pages involved it’s easy to lose track of where you are. Is it possible to repeat the Item number in major headings (e.g. 26 C, 26 D)?</li> </ul> <p>It’s difficult to estimate data entry time with the proposed new form. If a plan now typically takes 15 minutes data entry at approval, it appears that data entry time would double or possibly triple.</p> <p>With the considerable increase in information types to be captured in the new form, it would serve us well to consider ease of data entry in the final design. Should FPS data entry become a cumbersome and inefficient slog, the inefficiencies will reveal themselves as inaccurate and unreliable data.</p> <p>I looked over the proposed 2010 THP Form and the items to be included in the FPS Information Tab. This is very extensive information to collect.</p>	Y	N	N/A	N/A	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE	<p><b>FPS-Related Matters, Cont'd.</b></p> <p>With the current list of information types, program tech's just go through the items and match up "yes" answers to associate that information type to the plan. A few of the items like Forest District, Yarding and EHR have a few boxes to choose which is simple enough to check all that apply because all the types are grouped together in one item. I found it difficult to follow some of the items that went on and on for pages, like item 14 and item 26. Then it required reading the item and checking FPS to see if it was in the list of item types. I got lost!</p> <p>In addition to updating the Information Tab at approval, the Info Tab is supposed to be updated during the operational period through both Substantial and Minor amendments. For example, if a plan proposed helicopter logging at approval, was later amended to include cable and tractor, then that is changed in the information tab. Or if winter op's are proposed, that gets changed in the Info Tab. Since only 1 out of 3 clerical in our office is trained on how the items in the Info Tab are collected, I doubt these changes are being made with the amendments. So this raises quality control issues for me with the small list of items we currently have. I can see this turning into a bigger quality control issue with the addition of new items to be added.</p> <p>I think if we want to collect this information in a somewhat accurate manner than either the boxes all need a number and letter (or letters) next to them or we need to ask Foresters to be responsible for updating the Information Tab.</p>	Y	N	N/A	N/A	Y	Y
<b>End General Comments</b>							

## Section I Comments

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
BOE	<p><b>Restore Language Allowing CDF Agents on Property</b>            There also used to be a statement on the THP form about allowing CDF employees and their agents to have access to the property for inspection purposes. That statement has been modified to remove the ‘and agents part’. Timber tax would like to see the wording restored to allow us to have permission to inspect the property for appraisal and compliance purposes.</p> <p>Revenue and taxation Code, Division 2, Part 18.5, Chapter 8, Section 38704 states ‘ The board or any person authorized in writing by it may examine the books, papers, records and timber of any timber owner or timber operator as defined in Section 4526.5 of the Public Resources Code and may investigate the character of the business of the person in order to verify the accuracy of the return made, or, if no return is made by the person, to ascertain and determine the amount required to be paid.’</p> <p>The ‘board’ in this reference is the Board of Equalization.</p>	Y	N	Y	M	Y	N
BOE	<p><b>Restore Timber Tax Message</b>            Board of Equalization requests that you consider including a notice regarding Timber Yield Tax responsibility similar to what has been used on past forms.</p>	Y	N	M	Y	Y	N
DFG	<p><b>Request Email Address</b>            In Section I, add a box to collect the plan submitter’s email address. This will facilitate agency communication with the plan submitter.</p>	Y	N	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE RPF	<p><b>Other Agency's Permitting Processes</b>            Include some check-boxes on the first page that indicate whether the THP:</p> <ul style="list-style-type: none"> <li>• Is going to be used as a 1611 application for streambed alteration</li> <li>• Includes ECP provisions for WQ</li> <li>• Expects WQ WDR coverage under an 1) individual waiver, 2) general waiver, 3) watershed-wide WDR, 4) general WDR, 5) individual WDR, or any other category for coverage.</li> <li>• Has an HCP or NCCP approved that the THP tiers to</li> <li>• Is in anadromous salmonid range (i.e. needs special ASP rules)</li> </ul> <p>One of the listed short falls of the THP document in achieving full compliance with CEQA is that it does not contain a list of the other responsible agencies that will use the document in the issuance of their permits. Has there ever been any discussion to include this in the form. If the form were to include a list I think it would be limited to, CDGF, RWQCB, and Local ARB. ARB in the form of N. Coast Unified Air Quality District, for Asbestos exemptions and or notifications. DFG in the case of the 1600 agreement and maybe an ITP. WQ in the case of some individual waivers or WDRs.</p>	Y	Y, N	Y, N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE	<p><b>Conservation Easement Question</b> Somewhere on the form we need to add:</p> <p>Yes__ No__ The property/or portions of the property is/are encumbered with a conservation easement? If Yes, a copy of the conservation easement, complete with exhibits must be attached to the THP.</p> <p>Yes__ No__ If yes above, has the grantee been sent a copy of this proposed THP?</p> <p>The reason for this is that most "working-forest" conservation easements have restrictions in them over and above the FPR; e.g. limits on opening size, silvicultural restrictions to even age management only, wider WLPZ, often with a "no harvesting" restriction. The Review Team needs to be aware of this at the beginning of the process not down the line when the easement holder gets around to reviewing the document and making comments.</p>	Y	N	N	Y	?	Y
RPF	<p><b>Item 3:</b> If the LTO is still going to be required to supply an LTO Responsibility Form it would be good to also put that info here.</p> <p><b>Page 2, Item 3.</b> Is a separate LTO Acknowledgement Form going to be required or can that info be inserted into the THP here?</p>	Y	N	Y	Y	Y	N
RPF	<p><b>Item 4(a):</b> 1032.7 allows parties other than the 3 listed to submit THPs. There is conflict between 1034(e) &amp; 1032.7.</p>	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Item 4d and 4e.</b> Each asks two separate questions but only has 1 check box. Need to reformat and provide boxes for each question.</p> <p><b>Item 4(d):</b> should be 2 part question. What if TLO has signed the plan, does the plan submitter still need to provide notice that a plan is submitted when the owner has signed?</p> <p><b>(Page 2) Items 4 (d &amp; e)</b> - There is a single Yes/No selection for two questions. I believe the second question should be phrased as a statement... If no, the plan submitter shall...</p> <p><b>Page 3, Items 4.d and 4.e.</b> This is confusing because each item asks two “yes or no” question but only provides boxes for one question. You need to re-format and provide boxes for all questions.</p> <p><b>Item 4(e):</b> should be 2 part question. What if TLO has signed the plan, does the plan submitter still need to provide notice that a plan is submitted when the owner has signed?</p>	Y	N	N/A	N/A	Y	N
RPF	<p><b>Page 2, under item 4.d.</b> Current regulations require that an RPF send by certified mail, a notice to a Timberland Owner that did not sign the proposed plan submitted to CAL FIRE for their review. This letter is to be sent AFTER the plan has been submitted (PRC§4582), as the letter is supposed to state that a plan has been submitted. Therefore, it is impossible to have “proof of certification” included in the submitted plan before the letter is sent. One could even make a case that you can’t include a copy of the letter that hasn’t been sent yet either. Either that Department can ask in this question if the notification letter to the timberland owner will be sent by certified mail, or request a copy of the letter and the certification receipt as a review team request.</p> <p><b>Page 2, under item 4.e.</b> One can not provide a copy of letter sent after the plan has been submitted in the submission. Also, regulation cited does not require that a copy of the letter be a part of the plan. If you are trying to streamline a THP so that it doesn’t have a bunch of unrequired information in it, # 1 above and this would be a place to start.</p>	Y	N	Y, N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 6.</b> There should be check boxes for the appropriate location and contacts for the notification of the startup of operations.	Y	N	Y	Y	Y	N
RPF	<b>Item 6:</b> thought CAL FIRE was moving towards a 5 year plan?	N	N	N	Y	N	N
Public	<b>Page 3, item # 7</b> requires identification of Forest District, Special Treatment Areas and Listed Anadromous Watersheds, but DELETES identification of Counties with Special Rules.	Y	N	N	Y	Y	N
RPF	<b>Item 7:</b> (check ALL that apply): NOTE: this will get confusing	Y	N	Y	Y	Y	N
RPF	<b>Item 8</b> Make the legal description a table.	Y	N	N	N/A	M	N
RPF RPF	<b>Page 3, item 8.a.</b> The Assessor's Parcel Number is an optional item that is not required by the current Forest Practice Act or by current regulations. That should be noted on the form.  <b>Page 3, Item 8.a.</b> APN is optional and the form should state that fact.	Y	N	Y	N/A	Y	N
RPF	<b>Page 3, Item 8.b.</b> The most current version is CALWATER 2.2.1 not "2.2".	Y	N	Y	N	M	N
RPF	<b>Item 8(c):</b> With availability of digital maps how relevant is the date of a USGS quad anymore?	Y	N	N	N	N	N
RPF	<b>Page 4, Item 8.c.</b> The RPF should specify 7.5' or 15' map.	Y	N	N	Y	N	N
RPF CVRWQCB	<b>Page 4; Item 11:</b> add new item 12 that would address evenaged adjacency constraints  Possible question: "Are there any evenaged regeneration step harvest units that do not have a Report of Satisfactory Stocking and where the dominant and codominant trees do not average at least five years of age or at least five feet tall and three years of age which are contiguous to proposed evenaged regeneration step and applicable Seed Tree Removal Step and Shelterwood Removal Step harvest units?" If, so identify the THP number and applicable harvest units.	Y	N	N	N/A	M	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF CVRWQCB	<b>Page 4; Item 11, Cont'd.</b> The “contiguous even aged unit” check box has been removed. In the past few years, CAL FIRE Pre-Harvest Inspection (PHI) recommendations for including/correcting this information have increased. Since those PHI recommendations are frequently needed, please consider leaving the question in the new Timber Harvest Plan (THP) form. Proactively reminding Registered Professional Foresters (RPFs) to check the appropriate box is much easier than attempting to mitigate the effects of increased flow in crossings related to two adjacent units (which may already be oversized units) harvested in error.	Y	N	N	N/A	<b>M</b>	<b>Y</b>
RPF	<b>Page 4, item 13.a, b &amp; c.</b> All three questions ask if the RPF has informed the Timber Owner, Timberland Owner and Licensed Timber Operation if they were informed of their “...responsibilities under the Act and Rules?” Actual regulations state that an RPF must inform them only of their responsibilities for meeting the stocking requirements and for maintenance of erosion control structures. It does not state that one must notify them of all of their responsibilities under the Act and Rules. In addition, copies of the letters sent to them are not required to be included in the THP. Another place where THP content could be reduced.	Y	N	Y	N/A	<b>Y</b>	N
RPF	<b>Page 4, item 13.d. &amp; e.</b> What does the term “proof of notice” mean? Believe this is the only place this term is used. Is not in used in either 14CCR§1034(u) or its reference back to 14CCR§1032.7(b). Also, a copy of the letter is not required to be included in a THP.  The revised form states to attach a copy of the letters informing the timber owner, timberland owner and LTO of their responsibilities. Written notification is not required by the rules and therefore this request should be removed from the revised form. Please refer to 14 CCR § 1034(p).	Y	N	Y	N/A	<b>Y</b>	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 13 g</b> – Add question “If you have been retained to provide professional advice, has the Submitter authorized you to file Minor and/or Substantial Deviations to the Plan?” This caveat will place the responsibility for deviations appropriately. I have seen an RPF get fired by the Submitter because the landowner retained the RPF but did not transfer this authority and the Submitter got the violation. In effect, inclusion of this statement provides a level of protection to the RPF in this scenario.	Y	Y	N	Y	N	N
RPF	<b>Page 5, 13j</b> , RPF Info: Above the RPF signature line add Name or Printed Name	Y	N	Y	N	<b>Y</b>	N
<b>End Section I Comments</b>							

## Section II Comments

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	There are variations in the way questions are presented in Section II. In some items the questions just ask if there are exceptions to any of the standards for a given practice, easy enough. In other instances there is a check box for every available book response, as well as an open slot. Lastly, there are some instances where questions are only asked about a subset of exceptions, & the preparer is left to figure out on their own if they have any more.	Y	N	N	N	Y	N
RPF	<b>Section II:</b> General comment above about separating salmon areas and non-salmon areas and using different Section II forms for each. Also a both areas present form, like it is now.	Y	N	N	N	Y	Y
CGS	<b>Unstable Area Item</b> From the perspective of CGS, the THP form would benefit if the THP incorporated all information on unstable areas in one part of the plan. We understand that a goal of the new form is to have it in a check-box format as much as possible, and recommend the following inclusion into Section II:  Unstable Areas  [ ] Yes [ ] No Are unstable areas present within the Plan area?  If yes, show these areas on an Unstable Areas map and include a description of each feature, including information on the size of the feature and measures taken to avoid potentially affecting the stability of the feature. Describe any restrictions to silviculture, equipment use, and winter operations. If a consulting geologist prepared a report for the THP, include the limitations or recommendations to harvesting in Section II and a full copy of the report in Section V  [ ] Yes [ ] No Are inner gorge areas present within the Plan area?	Y	N	N	N	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CGS	<p><b>Unstable Area Item, Cont'd.</b>            If yes, show these areas on the Unstable Areas map. If activities are proposed on inner gorge slopes, include the limitations or recommendations to harvesting identified by the consulting geologist in Section II and a full copy of the report in Section V.</p> <p>Additionally, RPFs will sometimes want to harvest on some slides but not on others. An "Unstable Area Table" that numbers and describes the slides and states what they intend to do on each one (avoidance, harvest, cross with road or trail or have equipment exclusion) would be very helpful as part of the disclosure in the THP. Although requiring this Table may be beyond what can be required on the THP form, CGS anticipates that if a table or description such as this is included, there will be less potential for returns of THP's at 1st Review. Specifically, if the THP includes only a description of individual landslides but no statement as to what the intended operations on them would be, we frequently request that the plan be returned for us to adequately conduct the first review</p>	Y	N	N	N	Y	Y
CGS	<p><b>Public Safety Item</b>            We believe that the THP should explicitly identify areas of timber operations adjacent to public roads or near any residential structures where timber operations could affect public safety. These public safety areas of concern should be shown on the THP Operations Map in Section II. The plan should describe avoidance or state mitigation measures for each public safety area. If the public safety issues relate to geologic conditions, the consultant limitations or recommendations to harvesting should be presented in Section II and a full copy of the consultant report in Section V. We suggest the following check boxes be included in Section II:</p> <p>Public Safety:</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No Are areas of timber operations adjacent to public roads or near any structures where timber operations could affect public safety?</p>	Y	N	N	N	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CGS	<b>Public Safety Item, Cont'd.</b> If yes, show these areas on the operations map. Describe avoidance or mitigation measures for each area of concern. If the public safety issues relate to geologic conditions, include the limitations or recommendations to harvesting identified by the consulting geologist in Section II and a full copy of the report in Section V.	Y	N	N	N	<b>Y</b>	<b>Y</b>
Public	<b>Lacking Southern Subdistrict Rules</b> The new form (as well as the old) tries to be everything for everyone. Unfortunately, it fails to do so for the Southern Subdistrict (SSD) which largely encompasses counties with Special Rules. Those I represent in the SSD would like to recommend a separate form, tailored to the SSD, to be used by RPFs preparing plans in this area. This would save a lot of paper and a lot of confusion and review time for reviewers as well as plan preparers, as many items could be eliminated which are not applicable in the SSD.	Y	N	N	N	<b>Y</b>	<b>Y</b>
RPF	<b>Use Rule Language Only</b> I would like to see in Items such as Site Preparation, Winter Operating Plan, and Alternative Prescription the word layout exactly how the rules are, or leave out the wording and let the RPF add it in.	Y	M	N	N	N	N
RPF	<b>Downsize Section</b> I would like to see Section II, or III downsized. It appears that Section II and III are asking some of the same questions. Maybe it is better to combine Sections II and III, or at least portions of them.	Y	N	N	N	<b>Y</b>	<b>Y</b>

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Section II</b> As I look over the new forms, I see anything but an easy to understand document. What I see within the document is 100% duplication. Sections II &amp; III are complete duplications of each other. Everything that an RPF says in Section II must be repeated within Section III. This duplication seems very unnecessary and much more time consuming than the existing Harvest Document.</p> <p>For example: Item 13 In most cases today a THP is laid out up to one year ahead of time and in most instances the LTO isn't know. Why is it necessary to explain and justify that the LTO isn't known at the time of plan submission in both Sections I and III. It seems to me that a simple statement in Section I would be sufficient instead of duplicating the question in Section III and the RPF having to say again that the LTO is unknown and will be amended later.</p> <p>This duplication exists with almost every question in Section II. Section II should be a checklist. The only writing in Section II beyond the checklist should be to explain something different than the standard rule to the LTO. This section is getting too complex for an LTO to understand and for reviewing agencies to find what they are looking for.</p>	Y	N	N	N	Y	Y
RPF	<p><b>Item 14(a)</b> The question should read, "If no, provide a description..." Under the FPRs, a stand description is only necessary if you are not meeting MSP using Option A. This is also an example of redundancy in the form. If the check box in Section II is checked as Option A, then this item in Section III is unnecessary and should be removed.</p>	Y	N	N	N/A	N	N
RPF	<p><b>Page 6, under item 14.a.</b> Should include a fourth box, and say "Not Applicable (Conversions)". A THP being filed to cover a timberland conversion project does not have a box to check under this item.</p>	Y	N	M	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 14(b)</b> of the revised form, under the “Other Prescriptions and Treatments” heading, lists “Road Right of Way” as a potential silvicultural prescription. We suggest removing this from this section for several reasons. First, road right of way is not a silvicultural prescription. Second, we are unaware of any regulatory authority which talks about “Road Right of Ways” and the need to disclose the amount of acres in that status. We assume this phrase is related to the construction of logging roads. A more appropriate metric for road construction would be the length (not area) of construction. As you are aware, the Board of Forestry and Fire Protection is currently reviewing rules related to logging roads. As part of that process, the necessity for the disclosure of the length of roads being constructed could be discussed and implemented into the Forest Practice Rules if necessary.	Y	N	Y	Y	<b>Y</b>	<b>Y</b>
RPF	I also do not see the need to list every silvicultural treatment in <b>Item 14b</b> . This is only going to confuse the LTO. There is no need to put the requirements of an even-age harvest plan into an uneven-age harvest. This information I understand, but only fear that it will lead to more confusion than is necessary. In talking with the LTOs too much information is a distraction and they give up trying to find the piece of information that they are looking for.	Y	N	N	N	<b>Y</b>	<b>Y</b>
RPF	<b>Item 14</b> : There appears to be nothing regarding waiving adjacency limits on removal cuts. Also for removal cuts there is no check box regarding MSP, there is one for selection.	Y	N	N	N	N	N
RPF	<b>Item 14</b> The check boxes in item # 14 look like they will simplify that section.	Y	N	N	N	N	N
RPF	<b>Variable Retention</b> . We have discussed this before. There appears to be an underground policy within CDF (Snyder memo that has not been circulated outside of CDF) that limits VR to age requirements of evenaged management. If this is an underground regulation that CDF intends to enforce then they might as well put a check box in the VR section of item # 14 asking the stand age.	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF CAL FIRE	<p><b>Item 14b - Stocking</b> This may be obvious, but since it is a ‘form’, a guideline should be added to advise the RPF to remove stocking methods not applicable to the plan silviculture. This will help to reduce non-pertinent information in the plan, reduce review time, and save paper.</p> <p><b>Item 14</b>-The concern is that including all silvicultural prescription basal area and seed tree retention standards is not necessary. Could the RPF have the option to delete all silvicultural prescription rule references not used?</p> <p><b>Item 14 b</b> – Allow plan writers the option of deleting the District that does not apply to the plan. Allow writers the option of deleting code reference that doesn’t apply to the district. Allow writers the option of deleting language that doesn’t apply, i.e no Class I watercourses in the plan area would allow deletion of Class I protection measures from the form. Decluttering Section II seems to be in everybody’s best interest.</p>	Y	N	N	N	Y	Y
RPF	<b>Page 7</b> , under the general heading of Stocking: the general public may be confused as to why you only list those harvesting methods that use unevenaged methods or intermediate treatments. One has to go to Section III to find the remaining harvesting methods.	Y	N	Y	N	N	N
RPF	<b>Page 6, Item 14b.</b> Planning Watershed Identification: Include a question or area on the form where the following information can be specified: Planning Watershed Names, CALWATER Version, Identification Number and Landowner Watershed Name and Number.	Y	N	N	N	N	N
RPF	<b>Page 6, Item 14b.</b> : Consider providing space for the RPF to submit an optional summary table either at the bottom of page 6 or following item 16 “Harvesting Matrix” that would summarize acres by harvest unit, silviculture and yarding method	Y	N	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Page 7, Item 14b.</b> stocking: Re-title as “Retention Or Stocking To Be Met Immediately Upon Completion Of Timber Operations”. What is the rationale for only providing retention or stocking requirement boxes for some methods and not all? There is nothing provided for Seed Tree Seed Step, Shelterwood Preparatory Step, Shelterwood Seed Step, Transition, Alternative Prescription. Also, what about how stocking is to be achieved by evenaged methods? In the past we have been required to stipulate compliance with 14 CCR 912.7(b)(1). If evenaged stocking information is added then maintain the same sequence (e.g. evenage, unevenage, intermediate etc.).  <b>Item 14(b):</b> Why no stocking stds for prep steps, seed steps, or removal steps?	Y	N	N	Y	N	N
RPF	<b>Page 7, 14b.</b> Group selection: Add another box: “Not more than 20% of the THP area harvested by this method shall be covered by small group clearings.”	Y	N	Y	N/A	Y	N
RPF	<b>Page 8, 14b.</b> , Variable Retention: Consider adding the following question:” Will dispersed retention be utilized? Y/N Specify the retention level by harvest unit. Then following the Aggregated retention questions ask the following “Will a combination of dispersed and aggregated retention be utilized? If yes, specify the location and level of respective retention.	Y	N	M	M	Y	N
RPF	<b>Item 14, Commercial Thin.</b> Change formatting. All check boxes regarding site and stocking should be indented as they are a subset of the questions about pre-harvest dominant and co-dominant trees greater or less than 14 inches.	Y	N	N	N	Y	N
RPF	<b>Page 8, Item 14.b.</b> Under the heading “Northern, Southern” there are 8 check boxes related to “Site”. The next line is a “yes or no” that is not related to “Northern, Southern” but applies to all districts. Recommend a new heading before this line to create separation – suggest “All Districts” for the heading.	Y	N	N	N	Y	N
RPF	There are some questions which do not reflect the actual rules (for instance, how can a selection harvest go below 75 sq ft and not be considered an AP, or how can a seed tree seed step harvest not retain seed trees?)	Y	N	N	N	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 14(b):</b> Selection System and Group Selection-- Allow for differentiation between just groups and groups with harvesting between groups.	Y	N	Y	Y	<b>M</b>	N
RPF	<b>Item 14(b):</b> Special Treatment Area (THIS IS NOT A SILVICULTURAL PRESCRIPTION!!)	Y	N	Y	Y	<b>Y</b>	N
RPF	<b>Item 14(c):</b> Does not address Shelterwood Removal requirements (size applies unless stocking met with 100 4" TPA). Question is asked again in section III in a different format. Likely lead to confusion. CAL FIRE has listed all the potential stocking scenarios, why not do the same here?	Y	N	Y	N/A	<b>Y</b>	N
RPF	<b>Page 8, Item 14c.</b> Evenage Limitations: Separate into two questions rather than one. The first would address MSP exemptions related to minimum harvest age for even-age regeneration step methods. The second would address exceptions to the standard harvest unit sizes for even-age regeneration step methods. This is consistent with Item 14(c) in Section III, page 6. NOTE: the questions provided need to be broadened beyond the evenaged regeneration step methods to include other silvicultural methods where limitations may apply: Seed Tree Removal Step (depends on disturbance) and Shelterwood Removal Step (always for Coast FD and depends on disturbance for the Northern and Southern FDs).	Y	N	Y	N/A	<b>Y</b>	N
RPF	<b>Item 14(d)--</b> Are rules being changed to require marking of selection areas (913.1(a)(5))	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Page 9, Item 14f.</b> Non-indigenous Group A and Group B: Re-title as: Group B and non-indigenous Group A Species. Suggest changes to the questions. Shouldn't the first question be: "A. Are Group B commercial species proposed to be utilized to meet the resource conservation (minimum stocking) standards?" Y/N If yes, specify level of Group B retention/stocking. "B. Will the Group A to Group B site occupancy ratio be maintained?" Y/N If yes, specify any enforceable standards and instructions to the LTO and in Section III specify methods, treatments etc.. If no, provide the required explanation and justification information of 14 CCR 912.7(d)(1) in Section III. "C. Will Group A commercial species which are non-indigenous to the area be used to meet the resource conservation standards or is an exception to the pre-harvest basal area percentage standards for Group B specified proposed?" If yes list any specific instructions to the LTO and the required explanation and justification information of 14 CCR 912.7(d)(1) in Section III. NOTE: Question 14(f)(a) regarding management as specified in 1034(l) appears to only apply when exceptions regarding the stocking level of either Group B commercial species or Group A non-indigenous are proposed and not more broadly when Group B species is used to meet stocking within maintaining the Group A/B site occupancy ratio; therefore the first question 14 (f)(a) should be deleted.	Y	N	Y	Y	Y	N
RPF	<b>Page 9, item 14.f.</b> Wouldn't it be more appropriate to have the part of the question that asks for specific instructions for the LTO to put that under g.?	Y	N	N	N/A	Y	N
RPF	<b>Items # 14(h) and 19, 24(c), 25(a),</b> and etc. should have a note to strikeout or delete the word 'None' if either of the boxes are checked.	Y	N	N	N/A	Y	N
RPF	<b>Item 14 h :</b> We are more and more using artificial regen when it is not required as well. As well as hardwood reduction.	Y	N	N	N/A	N	N
RPF	<b>Item 14(i)(v)--</b> This question asked differently in Section III (alts. To standard Site Preparation Rules). Leads to duplicity. Should point to other relative items (tractor ops, etc.)	Y	N	N	N/A	Y	N
RPF	<b>Item # 14(j).</b> If they are going to provide an outline for site preparation under 14(i), they might as well provide one for a Regeneration Plan under 14(j).	Y	N	N	M	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 15(c)</b> This may be a good addition where one can discuss salvage operations.	Y	N/A	N	N/A	N	N
RPF	<b>Page 11, Item 17.</b> Refer the LTO to the location of the EHR map at the end of Section II. Refer the agency reviewers to the calculation tables in Section III.	Y	N	N	Y	<b>M</b>	N
RPF	<b>Page 11, Item 18.a.</b> If the RPF checks “no” based on road design, but the LTO builds the road with a +20 feet slope distance of fill or sidecast, then the area should be treated if it has access to a WLPZ. Suggest the “yes or no” question be changed to: “Does the plan propose new road construction or road reconstruction in locations where sidecast or fill material has access to a watercourse or lake which is protected by a WLPZ? If yes, specify how sidecast or fill material extending more than 20 feet in slope distance shall be treated to adequately reduce soil erosion.”	Y	N	Y	N/A	<b>Y</b>	N
RPF	<b>Item 18:</b> For areas disturbed from May 1 through October 15, treatment shall be completed prior to the start of any rain that causes overland flow across or along the disturbed surface.  For areas disturbed from October 16 through April 30, treatment shall be completed prior to any day for which a chance of rain of 30 percent or greater is forecast by the National Weather Service or within 10 days, whichever is earlier.  BOTH of the above are REQUIRED. They should not be ‘optional’ check boxes.	Y	N	N	N/A	<b>M</b>	N
RPF	<b>Item 18(b)</b> A table that includes waterbreak spacing should be included in the form.	Y	N	N	Y	<b>M</b>	N
RPF	<b>Page 11 under item 18.b.</b> Second box, shouldn’t it read “...treat bare areas created within a WLPZ”, as it does not apply to bare areas in other areas of the plan.	Y	N	Y	N/A	<b>Y</b>	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Page 12, Item 18.c.</b> (near the middle of the page) I don't see where the cited rule allows 75% slash coverage. The rule says 90%.</p> <p><b>Item #18(c)</b>, middle of page 12, there is a check box that states: "Where slash mulch is packed into the ground surface through the use of a tractor or equivalent piece of heavy equipment the minimum slash coverage shall be 75 percent "and references 916.9(n). As far as I can tell slash packing per 916.9(n) requires a coverage of 90%. Is this possibly being confused with 14 CCR 916.4(b)(6), which requires 75% surface cover in the WLPZ? Also, the item uses the term "slash mulch". Slash and mulch are usually considered two different things ("where straw, mulch, or slash is used...").</p> <p><b>Item 18</b> : I downloaded the 2009 FPRs fresh to make sure I wasn't missing something, but I do not see any reference to "Where slash mulch is packed into the ground surface through the use of a tractor or equivalent piece of heavy equipment the minimum slash coverage shall be 75 percent.". Indeed, searching for the combination "slash mulch" does not yield results. Nor does examining 916.9(n) where they are supposed to be.</p>	Y	N	N	N	N	N
RPF	<p><b>Item #18(d)</b> asks for disclosure of "active" erosion sites, but uses the term "ongoing" erosion sites in the question.</p> <p><b>Page 12, Item 18.d.</b> The question should refer to "active erosion sites" instead of "ongoing erosion sites".</p> <p><b>Page 12, Item 18d</b>, Stabilization of erosion sites: Delete the modifier "Active" from the question as the term active erosion site has been deleted from the ASP rule 916.9(o). We have been putting this information in old Item 38 (new 37) rather than embedding a lengthy map point table here; we will likely continue that process with a simple reference under this item of where the LTO can find the information.</p>	Y	N	N	N	N	N
RPF	<p><b>Item 18(d)</b> : is simply going to have a stock response- see map point table Item 38.</p>	Y	N	N	N	<b>M</b>	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 18(e):</b> Are there any permanent or seasonal logging roads (new or existing or both?)	Y	N	Y	N/A	<b>Y</b>	N
RPF	<b>Item 18 :</b> Area of bare mineral soil – just have a fill in line, in this THP areas of Bare mineral soil exceeding _____ sq. ft. shall be treated....	Y	N	M	Y	<b>Y</b>	N
RPF	<b>Item 18 :</b> The “Where straw mulch is used” statement is in error. The FPRs state “Where straw, mulch, or slash”. This should be placed under the Mulch check box and before chemical.	Y	N	Y	N/A	<b>Y</b>	N
RPF	<b>Item 18 :</b> The RPF is allowed to propose alternative treatments for erosion control, but the only place is the “other” box, which should be “alternate”	Y	N	N	Y	<b>Y</b>	N
RPF	<b>Item 18 :</b> Technically, “Replanting” is not a treatment for disturbed areas, but rather where undisturbed natural cover will not be sufficient.	Y	N	N	Y	N	N
RPF	Page 12, Item 19 Layouts: Suggest Either moving this item after Item 21 Tractor Operations or deleting it entirely as a separate item, OR if not used that frequently, simply including information under Item 37.  <b>Item 19 :</b> Layouts are rarely used, can’t we ditch Item 19 and consider it to fall under 21(b)?	Y	N	N	Y	<b>Y</b>	N
RPF	<b>Item 20(a):</b> Need a place to address ground based equipment use in cable areas for the purposes of remediation work.	Y	N	M	Y	<b>Y</b>	N
RPF	<b>Item 21 :</b> In my area, Item 21(a) is simply going to be checked very frequently, because one of those five will generally be encountered.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 21 :</b> While not a rule code, it might be useful to have a box- Operations on an unstable area are proposed, have all unstable areas been classed as dormant by a Geologist?	Y	N	N	M	N	N
RPF	<b>Item 21a :</b> I object to the inclusion of 4) with the other categories. 4) is allowed so long as the restrictions are followed. This means I could check 21(a) “yes” and have no section III E&J required.	Y	N	M	N/a	<b>Y</b>	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF Public	<p><b>Item 21(a):</b> Why is this presented differently in Section III?  (Section III has a check box for each item, not lumped).</p> <p><b>Item 21a.</b> This question should be reformatted to have each of the five bullets its own check box.</p> <p><b>Item 21,</b> Tractor Operations, on page 13 lumps a variety of potentially problematic actions under one 'Yes or No' answer. We feel these should all have their own boxes to be checked in Section II so the reviewer (or LTO) does not need to go to Section III to find out what is being proposed.</p> <p><b>Page 13, Item 21a</b> Tractor Operations: Retain old format where each of the 5 listed practices had its own question and Y/N box. You check the box and provide guidance to the LTO; proposed practice by proposed practice. This is already done in Section III this way; why not here?</p>	Y	N	N	N/A	Y	N
RPF	<b>Page 14, Item 23e,</b> Extended Wet Weather Period in ASP watersheds: Add the following parenthetical to improve clarity: "... extended wet weather period (October 15 to May 1)...".	Y	N	Y	N/A	Y	N
RPF	<b>Item 23(e):</b> the extended wet weather period  (what is this?)?	Y	N	N	N/A	N	N
RPF CVRWQCB	<p><b>Page 14, Item 23.e.</b> Typo at the end of the 1st sentence, should be "period" not "eriod".</p> <p>Item 23e. There is a typographical error near the end of the third line. "Period" is misspelled.</p>	Y	N	N	N/A	Y	N
RPF	<b>Item 24 and Beyond</b> Beginning with this item the form gets redundant and hard to follow.	Y	N	N	N/A	Y	Y
CAL FIRE	<b>Item 24-</b> I am pleased to see that the Draft THP requires the RPF to classify new roads as permanent, seasonal and temporary in Section II. I am also pleased about the manner in which watercourse crossings and road decommissioning is addressed in Section II of the Draft THP form.	Y	N	N	N/A	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CGS	<b>Item 24</b> One of the most difficult tasks in reviewing a THP is assessing the road work to be performed. Again this involves going to multiple places within the THP in order to extract the information necessary to review the proposed road work for potential geologic issues. CGS suggests that the portion of Section II on roads should be expanded to include: (1) Types of road to be constructed. (2) Number of segments of road to be constructed. (3) Length of each type and segment. (4) Proposed construction methods. (5) Brief description of the geomorphic location (lower slope, upper slope, ridgeline etc.).	Y	N	N	Y	<b>M</b>	<b>M</b>
CVRWQCB	<b>Item 24 &amp; 25 (old THP form Item 24a, 14 CCR 943.1(g)(1)).</b> Did CAL FIRE intend to eliminate the prompt to RPFs to explain and justify roads wider than single lane if the roads are not in/upstream/contiguous to listed anadromy?	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 24a.A.</b> The check boxes for Permanent, Seasonal, and Temporary should be indented as they are a subset of the question above.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Page 14 under item 24.a.B.</b> Shouldn't reconstruction question also have the boxes for Permanent, Seasonal and Temporary? Also must realize that all the boxes might be checked within a plan, due to multiple roads being constructed or reconstructed.	Y	N	N	N/a	<b>Y</b>	N
RPF	<b>Item 24(a)</b> Outside of T&I? Unsure whether to skip a, b, c. Road const. Information in two places would be hard to follow for LTO. Combine Road/Landing/Const/Reconst & Abandonment with side by side rules for T&I and Non-T&I.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 24d(B)</b> : .... with adequate turnouts	Y	N	M	N/A	<b>Y</b>	N
RPF	<b>Item 24d.</b> Formatting issue. The lower case "d." should be in front of "Watershed with Listed Anadromous ..." on the lines above. A and B should be indented as they are subsets of the question about roads and landing being abandoned.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 24d(A)</b> : This is either not operational information, or is covered under other items, such as 25C, and should not be in section II.	Y	N	N	N/A	<b>Y</b>	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Items 24a(C), b(C), c(C)</b> : Why ask if things are being abandoned since it will be obvious when you get to 25C? Consolidate everything there.</p> <p><b>Item 24(d)</b>: Will logging roads or landings be constructed or reconstructed? Already asked above?</p> <p><b>Item 24d</b> : There is no need to ask again if logging roads/landings are being constructed, as it was already asked under 24a and 24b.</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 24(e)</b>: There are specifics relative to this type of construction.</p> <p>All other items include the required stuff, why not this one?</p>	Y	N	N	N/A	Y	N
RPF	<b>Items 24-26</b> : shouldn't "New logging roads shall not exceed a grade of 15% except that pitches of up to 20% shall be allowed not to exceed 500 continuous feet (152.4 m)." be a question?	Y	N	M	N/A	Y	N
RPF	I find I dislike the Number, lower case letter, upper case letter system of presentation. I would much prefer 24 A 3 or 24 A iii or 24 A III to the current 24 a (C ) system.	Y	N	N	N/A	Y	N
RPF	<b>Item 25</b> : Should the title include "construction, reconstruction and" ?	Y	N	N	N/A	Y	N
RPF	<b>Page 15, Item 25a</b> , Site Specific Logging Roads and Landings-Exceptions: Shouldn't all the standard exceptions be listed in the question (see list provided in Section III on pages 8-9; this approach was used for Tractor Ops. Item 21(a)) such as "Will any logging roads/landings be constructed/re-constructed: (1) in a WLPZ, marsh, wet meadows and other wet area NOTE: this is contained under Item 27a In-lieus on page 25; if deleted here also should be deleted in Section III, (2) on unstable areas, (3) slopes >65%, (4) on slopes >50% which are within 100 feet of the boundary of a WLPZ, (5) roads with steep road grades, (6) landings in exceeding ½ acre in size?" and may be have a catch-all (7) for other non-standard exceptions?	Y	N	N	N/A	Y	N
RPF	<b>Item 25c</b> : I like the consolidation of the abandonment language here.	Y	N	N	N/A	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 25c.</b> Should refer to items 24 (a), (b), or (c).  <b>Page 15, Item 25.c.</b> The sentence should refer to "...THP Item 24(a), (b) or (c)..."	Y	N	N	N/A	<b>Y</b>	N
CVRWQCB	<b>Item 25c</b> Logging Road, Landing and Logging Road Watercourse Crossing Abandonment. Roads, landings, and crossings are mentioned, but only Item 24(c) is referenced. Please consider adding a reference to Item 24aC and 24bC as well.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Page 15, Item 25d</b> Roads in WLAS: This question is redundant to Item 24a. Suggest re-titling so lead-in would be: "Constructed and Reconstructed Logging Roads in Watersheds with Listed Anadromous Salmonids...". A. and B. would be reworded to "Specify the locations..."; "Specify the maximum width ...".	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 26</b> – general- Stating the rule requirements on the form seems like an attempt to be useful, but that is what the rule book is for. Stepping through the zones and requirements per zone is simple rule recital, and should be eliminated. The LTO does not need to know that QMD shall be increased, that should be dealt with by the terms of the mark or the marking waiver, etc. The bulk of the text here is aimed at the RPF and reviewer. Further, if a watercourse is shown as II-S, then the LTO should be responsible for knowing the rules regarding that without it being re-iterated yet again.	Y	N	N	N/A	N	N
RPF	<b>Item 26:</b> 26. Watercourse and Lake Protection Measures  CHECK ALL BOXES IN ALL SECTIONS THAT APPLY	Y	N	N	N/A	<b>Y</b>	N
CVRWQCB	<b>Item 26</b> "Watercourse Crossings in All Watersheds" (old form Item 26b). The reminder for RPFs to map crossings as per 14 CCR 1034(x)(7) has been deleted; however plan proponents are still proposing to use Class III crossings when water is flowing. Please consider returning this reminder to the new format.	Y	N	N	Y	<b>Y</b>	N
RPF	Also within <b>Item 26</b> , there isn't a place to provide alternative WLPZ protection rules if proposed.	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF CAL FIRE	<p><b>Item 26</b> Can unused portions be deleted from this point forward?</p> <p>If deletion of parts is not an option the variants in <b>Item 26</b> alone will cause great confusion. I understand why CAL FIRE is hesitant to allow preparers to delete portions of the 'standard form'. I would suggest that the rule items covered by the new changes be aggregated into one part of the THP form, and that that sub-section be tailored to the anadromous region that the plan is being prepared in.</p> <p>A guideline should be added to advise the RPF to remove Class I and II WLPZ protection methods (or keep the Item check box and delete at least the description of the protection measures) not applicable to the plan. This will help to reduce non-pertinent information in the plan, reduce review time, and save paper.</p> <p>Again, we don't need to know about every type of watercourse, only the watercourses that are in the project area.</p> <p>The concern is it necessary for the RPF to answer all questions concerning watercourse protection measures. Example if there is no flood zone Class I watercourses. Again can the form be used to delete out all watercourse protection measures not applicable for a given THP?</p>	Y	N	N	N/A	Y	Y
DFG	<p><b>Item 26:</b> In the revised form, the Class I, II, and III streams and the various anadromous/non-anadromous watersheds are broken into separate items. A summary table for WLPZ protections for all watercourses would aid the reviewer and RPF. Currently, the RPF generally uses a table to identify both the Class type and the proposed associated WLPZ width, including a box that is checked if it is within a particular sensitive watershed.</p> <p>A table with side slopes classes and applicable WLPZ widths should be made part of the standard form</p>	Y	N	N	N/A	Y	N
RPF	I am not up on all of the changes proposed for 916.9, but the check boxes under <b>item # 26</b> appear to be a comprehensive list of all of the possibilities.	Y	N	N	N/A	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Page 22-24, Item 26a et. al.</b> : Fix question language: measures, Class IV a watercourse. Is it clear that even if you are in a WLAS the standard watercourse rules still apply unless they are preceded by the ASP rules? For example ASP Class II WLPZ widths on slopes >50% are 100’ without the cable reduction allowed in the standard rules; but you always have to comply with applicable 916.5(e) protection measures “A”-“I”. So under Item 26c.A. do you still check the Y/N box but not check any WLPZ width boxes; while the form still informs the LTO that the WLPZ has been flagged and trees marked and what the retention standard is if not preceded (e.g., under “G” still have to retain 50% of the understory). There are similar issues with Class II waters: sometimes Class II-L precedes (e.g. widths and Overstory canopy) and for CII-S standard rules apply except for widths. For Class III (<30% slope ELZ widths preceded by ASP along with some but not all protection measures (e.g., still need to describe or flag areas of heavy equipment use). One way to clarify is to copy all those applicable standard WLPZ rules back into the relevant WLAS questions. Also, can’t rely on Item 27a because might not have any in-lieus for WLPZ practices where the standard requirement is listed. Either way it is going to take some additional modification of the Form or additional instructions to RPFs.	Y	N	N	M	Y	N
RPF	<b>Item 26a.</b> Last sentence should be “...and contains a Class IV watercourse...”	Y	N	N	N/A	Y	N
RPF	Is the plan located in a watershed with listed anadromous salmonids? If yes, indicate the applicable protection measures in THP Item 26(b). If no, indicate the applicable protection measures in THP Item 26(c). If the plan is located in a watershed with listed anadromous salmonids and contains Class IV a watercourse, address it under THP Item 26(c)(C). (14 CCR § 1034(w))  Already asked in Item 7	Y	N	N	M	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 26b(A)</b> : “[...], will the plan propose measures for habitat restoration”... I wonder if this occurs often enough to justify a line item. Predominantly, the discussion will occur in Section III to satisfy the language of 916.4(2) is “The opportunity for habitat restoration shall be described within the plan for each Class I watercourse, and for each Class II watercourse that can be feasibly restored to a Class I.” This wording requires description of opportunity, not necessarily action. Further, in my experience there is rarely an opportunity to feasibly restore habitat, it does occur, but the elements that rarely occur should not have a line item, but come other some generic other.	Y	N	N	Y	Y	N
RPF	<b>Item 26b(B)</b> : Anadromy is misspelled.	Y	N	N	N/A	Y	N
DFG	<b>On page 19, Section II 26(b)(E)</b> , first yes/no check box paragraph. The text from the Forest Practice Rule needs to be corrected to match the rule language. Delete the word minimum.	Y	N	Y	N/A	Y	N
RPF	<b>Item 26(b)(H)</b> Need to define total width of WLPZ for watercourses with multiple zones.	Y	N	N	N/A	Y	N
RPF	<b>Page 22, Item 26b.J</b> : Add rule reference below list of subsection (h) requirements.	Y	N	N	N/A	Y	N
RPF	<b>Page 22, Item 26b.K</b> . Water drafting. Are we correct in assuming that we would list all approved water drafting agreements here and attach them to the end of Section II?	Y	N	N	Y	Y	N
RPF	<b>Item 26(b)(K)</b> : Will water drafting for timber operations from within a channel zone of a natural watercourse or lake occur? If yes, describe the water drafting site conditions and proposed water drafting activity in THP Section III and under this item list any specific instructions  This should refer back to the 1600 issues by DFG	Y	N	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CVRWQCB	<p><b>Item 26cA, B, C</b> has check boxes for WLPZ width, but it does not associate the different widths to different slope classes; thus is ambiguous as to what width is used for each slope class. Please consider using the standard slope class and associated WLPZ width in table format (similar to the table format that most RPFs now submit), rather than the “check box” format proposed in the draft. Regional Board Resolution R5-2005-0052 Attachment A (II)(D)(1)(c)(3) references slope class as per 14 CCR 936.5 Table 1. In order to comply with current Resolution/Waiver language and reduce review time, please consider making the slope classes unalterable by RPFs. If the intent is to allow RPFs to continue proposing substandard WLPZ widths, please consider creating the table to allow RPFs to change/insert the width proposed rather than change the slope class. If a table format is not attainable and check box format is preferred, please consider having the different widths in check box format next to each of the unalterable slope classes (a “not applicable” check box next to the widths check boxes may/may not need to be added as well).</p> <p>If a table is created as suggested in Regional Board comment #5, then please consider having a separate table for Class III and Class IV waters.</p> <p>In the Class III and Class IV tables, please consider allowing RPFs to choose/insert if an ELZ or EEZ will be used.</p> <p>Thank you for adding the detail on the “Applicable ELZ Protection Measures”, in particular the reminder to flag skid trails before the PHI if locations/limitations are not adequately described.</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 26c.C.</b> There should be check boxes in front of each applicable WLPZ protection measures. The check box for “Will the plan propose alternatives to protection measures C, F, or H?” should be indented the same as the applicable new boxes for each applicable WLPZ protection measure.</p>	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Page 23, Item 26.c.</b> Change the heading to “Standard WLPZ Protection Measures In Watersheds Without Listed Anadromous Salmonids”.	Y	N	N	N/A	Y	N
RPF	<b>Item 26c-</b> why are we including the “applicable WLPZ protection measures” in Section II? The LTO has no need to know that marking has to be done prior to the PHI etc, etc. State WLPZ rules of 916.4(b) apply and leave it at that.	Y	N	N	M	Y	Y
RPF	<b>Pages 23 &amp; 24, under items 26.c.A., B. &amp; C.</b> Will it be confusing to the general public and possibly Review Agencies if multiple boxes are checked under each item because a plan may cover multiple class I, II, III and IV watercourses, each with possibly different WLPZ widths?	Y	N	N	N/A	Y	Y
RPF	<b>Item 26 d-f</b> : Seems odd, but I am surprised there is no general question regarding the presence of any new permanent, or any new or existing temporary crossings. One can generally tell from that map, but it’s useful info for both LTO and Reviewer.	Y	N	N	Y	Y	N
RPF	<b>Page 25, 26 d-h and i-k:</b> Formatting, Bold the headings.	Y	N	N	N/A	Y	N
RPF	<b>Item 26e.</b> Should be “If yes provide any...”	Y	N	N	N/A	Y	N
RPF	<b>Page 25, Item 26.e.</b> and <b>Item 26.g.</b> Typo in both, change the second sentence to “If yes, provide any non-operational.....”.	Y	N	N	N/A	Y	N
RPF	<b>Item 26(f):</b> Will the plan propose new permanent culverts at logging road watercourse crossings? If yes, specify the minimum diameter  This is going to vary by site	Y	N	N	N/A	Y	N
RPF	<b>Item 26(g):</b> Will the plan propose new permanent culverts at logging road watercourse crossings on watercourses that support fish? (what about bridges?)	Y	N	N	N/A	Y	N
RPF	<b>Item 26g.</b> Should be “If yes provide any...”	Y	N	N	N/A	Y	N
RPF	<b>Item # 26(g) and (h)</b> are the same question.	Y	N	N	N/A	Y	N
RPF	<b>Item 26(i):</b> Are there conditions relative to the road network on the plan that elevate risks to the values set forth in 14 CCR § 916.2(a), [936.2(a), 956.2(a)]? If yes and crossings will not be removed Which crossings? ALL, temporaries?	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 26(j):</b> Is the plan located in a watershed with listed anadromous salmonids, or in a planning watershed immediately upstream of, and contiguous to, a watershed with listed anadromous salmonids  This is kind of a given considering the heading this question is under.	Y	N	N	N/A	Y	N
RPF	<b>Page 25, Item 26.j.</b> Has this already been addressed on page 14, Item 23.e.?	Y	N	N	N/A	Y	N
RPF	<b>Item 26k</b> – This could be rephrased to “indicate under which exceptions(s) A-E in THP Section.	Y	N	N	N/A	Y	N
RPF	<b>Item 27a.</b> This question should be reformatted to have each of the 10 bullet points its own check box.  <b>Page 25, Item 27a.</b> In-lieu WLPZ Practices: Retain old format where each of the 10-11 listed practices has its own question and Y/N box. You check the box and provide guidance to the LTO; proposed practice by proposed practice. This is already done in Section III this way; why not here?	Y	N	N	N/A	Y	N
CVRWQCB	<b>In Item 27a(3),</b> “or lake” has been deleted, while in Item 21a(5) (page 13) “or lake” remains. Please consider adding “or lake” back into Item 27a(3) for consistency and LTO clarity.	Y	N	N	N/A	Y	N
RPF CVRWQCB	<b>Page 26, Item 28</b> Domestic Water Notification: Retain the existing THP format; it is easier to understand and clearer as to what is required.  In <b>Item 28</b> , the reference to “landowners within 1000 feet” has been removed and replaced with a reference to 14 CCR 1032.10. Please consider allowing the distance to remain a part of the THP format.	Y	N	N	N/A	Y	N
RPF	<b>Page 26, under item 28.</b> Shouldn’t question read “...domestic water supplies located on , within 100’ downstream, or adjacent to ...the plan area...”? That is the way current regulations describe areas, not “near”.	Y	N	N	N/A	Y	N
RPF	<b>Item 28:</b> Are there domestic water supplies located on or near  Now we have to consider upstream?	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Page 26, item 29.</b> Should read “Has any required inventory or growth....”. Am afraid general public will think that all THPs are required to have inventory and growth data in them.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Page 26, item 30.a.</b> Should read “Is hazard reduction “to reduce fire and pest risks” required.... This lets general public know what type of hazard reduction we are talking about.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 31</b> should simply be (d) of Item 30.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Page 26, Item 31.</b> In the 1st sentence delete the words “be utilized”.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 32</b> What about CNPS listed species? And species of special concern? DFG is going to make us address these things.	Y	N	N	Y	N	N
DFG	<b>Sections II &amp; III, Item 32 -</b> Provide an item requesting information about the methods used for scoping potential impacts, including referencing the location in the plan where the information is attached.	Y	N	N	Y	N	N
DFG	<b>Sections II &amp; III, Item 32 –</b> Provide in the plan maps showing locations of sensitive species and/or their habitats, including known CNNDDB or other historic sightings, potential habitats, and special management areas.	Y	N	N	Y	<b>Y</b>	<b>Y</b>
RPF	<b>Item 32</b> Like the format for species status classification	Y	N	N	N/A	N	N
DFG	<b>Item 32:</b> In the revised THP form there are areas for late seral, snags, LWD, plus some other general areas such as "special habitat elements", however, hardwoods, chaparral, talus, cliff, cave, rock, or aquatic habitats for non-listed species are not identified specifically. At the very least, there should be some guidance to the RPF to consider all of the potentially sensitive habitats.	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Item 32a – Listed species</b>  Requiring federally listed, state listed, and BOF sensitive species to be identified in separate tables will unnecessarily add bulk to this section of the plan, and the extra information it provides here does not seem to be LTO operationally relevant. The listing status can easily be contained or expanded upon in Section II or IV. Additionally, if they are listed separate, the protection measures appear to have to be listed twice (or three times) if you have a species that is fed, state, and/or BOF listed. I recommend creating one table with headings for Mammals, Birds, Fish, Amphibians, Invertebrates, and Plants, and possibly having checkboxes for listing status next to each category column. This would provide a summary table and then the mitigation measures for each listed species can be described below the table.</p> <p><b>Page 26-27, Item 32, Species Specific Protection:</b> This will require us to reshuffle all the species discussed in THPs as they are currently listed by biologically similar species management groups (birds, other terrestrial, aquatic, botanical etc.) not by listing status. Prefer to be able to list as we currently do provided we address listing status, species presence, habitat presence, protection measures. NOTE: I see no specific questions for NSOs; also there are the recent rule changes to 919.9, 919.10 and no specification of which processing approach is proposed by the RPF. Maybe this issue is simply to complex to incorporate specific questions and information requirements.</p> <p><b>Item 32b.</b> Should not separate out Board of Forestry sensitive species. Delete (b) and provide boxes for each species listed to check as Federally listed, State listed, and/or BOF sensitive. Since a species may meet one or all of these categories, the current draft form is confusing. Would I have to list a species that is both federally listed and is a BOF sensitive species under both 32a and 32 b.</p>	Y	N	N	Y	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Item 32a – Listed species, Cont’d</b>  <b>Page 27, Item 32b.</b> BOF Sensitive Species. If you do not accept the approach we request then you need to clarify that this list excludes Listed Species already addressed in a. above. Otherwise, species may have to be redundantly discussed.</p> <p><b>Item 32(b):</b> b. Board of Forestry and Fire Protection Sensitive Species</p> <p>What about species that can qualify under more than one of these categories (such as the NSO) which is Fed listed, State listed, and board listed. Do they need to be repeated under each heading?</p>	Y	N	N	Y	Y	Y
RPF	<p><b>Sec II, Item 33:</b> 919.1 has 6 different categories where removal of snags is allowed without E&amp;J? Do we now need to provide E&amp;J to fall a snag that OSHA mandates be felled?</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 33 – Snags</b>  The question is misleading and leads the reader to believe rule-based exceptions to snag retention requirements of 919.1 do not exist. I recommend revising the first sentence as follows “Will the plan propose an exception to retaining snags within the logging area other than as provided in 919.1 (a) through (e) to provide wildlife habitat? It should not be necessary to explain and justify exceptions specifically provided in the rules.</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 34.</b> Should be “Are late succession forest stands proposed for harvesting and will such harvest significantly reduce...”</p>	Y	N	N	N/A	Y	N
Public	<p><b>Pg 28, item # 34.</b> Only requires identification of LSF Stands IF certain criteria are presumed on the part of the RPF. Has the Department already forgotten the policy directive that came before the Board for full review and development and was drafted by Mr. Shintaku REQUIRING identification and discussion of all large old trees in the plan area? Such identification must be included in the plan, or CAL FIRE will continue to give the public another opportunity to easily slow down the review of THPs which neglect to do so.</p>	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
Public	<b>Number 34 of THP section 1-2</b> addresses “Late Succession Forest Stands.” This section should be revised to explicitly point out that all late-seral habitat impacts should be addressed in this area of the THP. That way, the public and decision-makers will be able to view information about impacts to late-seral habitat all in one place, whether it be 0.25 acres, 2 acres, 20 acres, or 40 acres of late-seral habitat. This is important for at least 2 reasons. First, the current format perpetuates the mistaken belief that a THP need only address impacts to late-seral habitat when it exists in stands 20 acres in size or greater. As explained by CBD in a letter to the Policy Committee last month, THPs must disclose all late-seral habitat within a THP area, “even in those situations involving a single tree or small stand of trees less than 20 acres in size.” Currently, it is sometimes the case that only during a PHI is it discovered that such “situations” actually do exist in the THP area. That should never occur. The public and decision-makers should always be able to clearly tell from a THP document whether any late-seral habitat at all will be impacted. By requiring that late-seral impacts be discussed in one area of the THP, Cal Fire will better ensure that THPs will be understandable, that THPs are adequately addressing late-seral issues, and that there will be informed decision-making.	Y	N	N	N/A	Y	N
RPF	<b>Item 35:</b> As all of the standard wildlife requirements pertain to federal, state, or board listed species shouldn't this question be up there?	Y	N	N	N/A	Y	N
RPF	<b>Page 28, 35b.</b> Protection of Wildlife Insert parenthesis: (Northern and Southern Districts).	Y	N	N	N/A	Y	N
DFG	<b>Item 35b</b> has aspen, meadows and wet areas identified under protection of wildlife habitat. This should also include hardwoods, chaparral communities, aquatic habitats (for example, amphibian, fish, turtle), cave, cliff, talus habitats, and early seral sensitive habitats.	Y	N	N	Y	N	N
RPF	<b>Item 36c</b> This new form is going to be public information available on the internet or on request. I have a real problem alerting people that there is a site on a project. This information should be only available in the Confidential Section of a plan.	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Page 28, Item 37:</b> Additional Instructions: This is the same as old Item 38. We currently populate this with several items of additional information: a reference that an Operators map point table is attached to Section II. A statement regarding no conduct of timber operations until the LTO has met with RPF (pre-op meeting). A THP Flagging Code Table, Geologic Review recommendations, standard plans/diagrams for implementing proposed logging road and watercourse crossing activities.	Y	N	N	N/A	N	N
RPF	<b>Item 38/39:</b> It might be beneficial to use one of these Items specifically for providing information for General Alternatives as required under 14 CCR 897(e)	Y	N	N	N/A	N	N
RPF	I fully support <b>Items 38 &amp; 39</b> as a location to summaries to the LTO and to reviewers all of the things that need to happen. I think that this will be a big help to all involved and a vast improvement to the existing plans.	Y	N	N	N	N	N
RPF	<b>Item 38:</b> I don't see this box getting checked yes very often.	Y	N	N	N/A	Y	N
RPF	<b>Item 39:</b> why would someone recap the entire plan here?	Y	N	N	N/A	Y	N
RPF	<b>Item 39</b> This question might be confusing if information is provided in previous THP sections, or at least duplication.	Y	N	N	N/A	Y	N
RPF	<b>Item 38, 39</b> : So..if I check yes, I have to make a long list. Worse, I have to include all the in-lieus and exemptions I just covered??? It's going to always be "No". These should be deleted and the old additional info for LTO section put back.	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE NCRWQCB RPF CVRWQCB	<p><b>All Mitigations and Map Points in One Location-- Item 39</b></p> <p>I would like to suggest that the RPF be guided to provide all mitigation measures pertaining to specific map points in one table or spot (e.g. under Item #39), instead of “peppered” throughout Section II. As an example Item #18d asks about erosion sites, and then asks for feasible remediation to be provided. Item #21b asks for other instructions to be listed, Item #24 asks for specifics, I would imagine that #26, and #27 also ask for specifics. With this approach, it has been my experience that people put the same information (specific mitigation) under two different items. For example, if there is a skid trail on steep slopes and also located within the WLPZ we will see the mitigation described under Item #21, and under Item #27. If it includes a culvert and is a 1600 site on top of that, it will be included under Item #26 in addition to being described under the 1600 section in Section III.</p> <p>I believe that a great reduction in redundancy and potential and real inconsistency could occur if the plan writer was guided to include all specific map point mitigation measures under Item #39. I have heard the argument that we can’t require that they identify the information in a table, but then we also can’t require that they provide the information in any one place. I do find when guidance is provided, people will follow. If a table format is provided, I would think that the majority of folks will utilize the table.</p> <p>Attached is a page from Green Diamond Resources. I would suggest that this is not the end and be all in that it would be valuable to have the Item # identified that the map point relates to, but otherwise it seems to meet most of the requirements. Secondly, I have attached a quick suggested beginning for development of a table, realizing that this also is not the end all and be all, particularly as it relates to incorporating a couple of items needed by WQ, but perhaps a guidance could help with that....</p>	Y	N	N	N/A	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE NCRWQCB RPF CVRWQCB	<p><b>All Mitigations and Map Points in One Location, Cont'd.-- Item 39</b></p> <p>I would also suggest that we work with DFG and WQ (realizing this is region specific) to develop a table that will provide them with adequate information such that the one table can be used by all instead of information replicated three times in the plan</p> <p>LTO specific instructions are not condensed into one location . An example is Item 14 g., 26 D., 26 I., 26 J. 26 c. A. and B., C. , and Items 38 and 39.</p> <p>As proper implementation can be assured by clear direction to LTOs. I suggest that specific LTO instruction be condensed into one location in Section 1 and 2 when such specific instruction is applicable.</p> <p>The following ideas are predicated on the assumption that most LTOs pride themselves on being non-paperwork “hands-on” type people. Section II, in its current form, was originally designed with the intention of providing the LTO operational information. However the current version has become something else. LTOs have to sift through a lot of supporting documentation for instructions/specifications. They tend to pull out the road work section and maps and use those in the field. Section II of the new form has appears to be even more detailed and unfriendly to the LTO. We should make the operational information clear, concise and easy for the LTO to find, understand, and disseminate to their subordinates. There is a need for an LTO operational “pull-out” type section. I believe</p> <p>Staff appreciates the addition of optional Items 38 (Pre-Operational Checklist) and 39 (Operational Summary). Inclusion will reduce agency inspection time when provided.</p>	Y	N	N	N/A	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE NCRWQCB RPF CVRWQCB	<p><b>All Mitigations and Map Points in One Location, Cont'd.-- Item 39</b></p> <p>...this may be the intention of Section II, Item 39. I suggest inclusion of the following items in an alpha/numeric format to Item 39.</p> <ul style="list-style-type: none"> <li>• Harvest and/or retention tree specifications. (This would include harvest and/or retention tree marking specifications to include color of paint, base mark and bole of tree requirements, diameter cut limitations etc...)</li> <li>• Yarding systems</li> <li>• General and site specific limitations and exceptions to yarding systems.</li> <li>• Layout construction/deconstruction specifications and mitigations.</li> <li>• Waterbar/erosion control structure construction and spacing specifications.</li> <li>• Other erosion control requirements of the LTO designated by the Submitter.</li> <li>• Wet weather/winter period operation triggers and mitigations.</li> <li>• Site specific road and landing specifications and mitigations. (I recommend moving the stuff normally included in Item 25.)</li> <li>• Watercourse designation and WLPZ identification specifications.</li> <li>• Domestic water supply identification and protection mitigations.</li> <li>• Hazard reduction zone identification and mitigations.</li> <li>• Listed species habitat protection area identification and protection mitigations.</li> <li>• Non-listed species protection mitigations.</li> <li>• Snag retention requirements.</li> <li>• Archaeological consultation with the RPF requirements.</li> </ul> <p>To avoid redundancy, the RPF can crosswalk the applicable Section II Items to the appropriate subsection of Item 39.</p>	Y	N	N	N/A	<b>Y</b>	<b>Y</b>

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE DFG	<p><b>1600 Permit-Related</b> Ensure all the info for the 1600 process is included in the appropriate place in the THP with as little duplication as possible</p> <p>DFG notes that the Lake and Streambed Alteration Agreement items, including DFG’s initial recommendations from April 28, 2009, have been consolidated in Section III, page 11. DFG also recommends that, in the absence of the former item 26(d) in Section II, there be a check box in Section II indicating whether or not an agreement or Fish and Game Code section 1611 notification is associated with the plan. Section II is referenced by the timber operator and including a check box will alert the timber operator to the FGC section 1611 notification or agreement. If notification is provided using FGC section 1602, the revised Section III requires the notification be attached to the end of section II where it will be visible.</p> <p>It’s not clear where maps will be attached, other than optional item 39 in Section II. Please provide a location and instructions for maps. For plan review, DFG recommends requesting maps of appurtenant roads and drafting locations be included in the roads and water drafting items in Section II or III. In addition, include a map showing locations of all section 1602 and 1611 notifications.</p> <p>Provide an item asking if there are any Class III crossings that require 1600 notification. This could be included with the water drafting or culvert maintenance.</p>	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<p><b>End of Section II.</b> Might want to add a note to have the signature section of a separate page or leave enough room as needed by CDF. I know that they have had an issue in the past with RPFs squeezing in the signature section at the bottom of a page.</p>	Y	N	N	N/A	N	N
<b>End Section II Comments</b>							

### Section III Comments

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Eliminate Unnecessary Questions</b> The form should be re-structured to reduce answering unnecessary questions, especially in Section III.	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<b>Separate Salmonid Section</b> See General Comment on first page about have separate Section IIIs for salmon and non salmon areas. Then can use this version for plans that have both.	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<b>Too Much Duplication</b> I am opposed to a check box form for section III. Section III is for support documentation that may or may not be needed for something in section II. The way it is set up, I feel like I have to answer most of the items in sections I and II twice.  The form provides duplicate information in Section III that is already provided in Section II if no exceptions are proposed. This adds unnecessary time and work in both preparation and review.  Sec III, GENERAL NOTE: IF THE QUESTION WAS ASKED & ANSWERED IN SECTION II, THERE IS NO NEED TO ASK THE FULL QUESTION AGAIN.	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<b>All Alternative Info in One Place</b> I do not parse out my in-lieu's or alternative practices. I explain, describe, clarify, differentiate, and justify them in section II. It does not make sense to write half an in-lieu in one section, then describe it again and complete it in another section. Write it once and be done.	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<b>Check Boxes Good, But Not for Section III</b> Regarding Section III In general, I favor going to a more checkbox oriented THP form. However, I believe it is inappropriate to do so for section III, as the information contained in this section depends solely on the content of section	Y	N	N	N/A	<b>Y</b>	<b>Y</b>

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Don't Separate Sections II-III</b></p> <p>The excuse or justification for separating it out into section III is that section II is the "Plan of Operations" and is for the LTO. This has ceased to be the case for a long time. All the LTO wants is a map, and a list of reference points where he has to do something different. Otherwise, all LTOs are provided with a free copy of the rules and know what they are supposed to do. Everything else is for the Review Team's benefit. So again, it makes no sense to separate it out. It ultimately makes the plan longer and more confusing.</p>	Y	N	N	N/A	Y	Y
RPF CAL FIRE	<p><b>Allow Deletion of In applicable Information</b></p> <p>Section III-- Is it O.K. to delete questions that do not apply to an individual THP?? In most cases, the majority of the questions in this section may not apply to an individual THP. Is it better for the reviewing agencies and public to have an overly long form with lots of boxes checked 'No' or shorten the form (deleting non-applicable question) to contain only pertinent information?</p> <p>General: Eliminate redundancy of having to check unnecessary boxes by not re-asking the same question as answered in Section II. Simply require the applicable explanation and justification. Also, copy over the titles for each Item from Section II and some of the sub-titles under each Item could be made more clear/descriptive (e.g., 20(a) Ground-based Equipment in Cable Yarding Areas; 26(b) Exceptions to Channel Zone Requirements, 26(i) High Risk Watercourse Crossings etc.), thereby eliminating the need for the question and check box. Other Items would need to have a descriptive title added (e.g., 26(e) Class I Tractor Road Watercourse Crossings).</p> <p>Is it necessary for the RPF to address every exception, alternative and in-lieu practice in the Forest Practice Rules. Is it necessary for the THP form to include a description of every silvicultural practice listed under 14 CCR 913 when a RPF normally only proposes 2-3 silvicultural systems. An option could allow the RPF to delete out the silviculture and exceptions, alternative an in-lieu practices not being proposed for a THP.</p>	Y	N	N	N/A	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
NCRWQCB RPF	<p><b>Some Section III Info Applicable to Section II</b></p> <p>In regard to Item 3 "Elaborate upon any numbered item in THP Sections II" I suggest that if this information is related to clarifying implementation requirements, then it should be provided under separate heading under Section II as Specific LTO instructions. In the past I have often found the Section 3 information regarding specific mitigation measures to be applicable to Section II</p> <p>It seems like the information asked for in some of the questions in this section should be provided in Section II, the operational part of the plan. Sec III is just for back up information and additional, non-operational material.</p>	Y	N	N	N/A	Y	Y
RPF	<p><b>No Form Needed for Section III</b></p> <p>A 'form' for Section III is not necessary, and in the example provided it is counterproductive. There are several instances where the question asked in Section II for a given item does not match the corresponding item in Section III. The Section III form is very repetitive of Section II in that it usually asks the same questions as in II, rather than simply having a placeholder for the E&amp;J which Section II directs the preparer to provide.</p>	Y	N	N	N/A	Y	Y
DFG	<p>In section III, include a unique item that specifically asks if a particular habitat is present that needs special management considerations due to the presence of a potentially sensitive species. This would support the need to protect snags, hardwoods, and riparian areas if known species exist such as spotted owls, sensitive amphibians, or pika or mountain beaver. Special management considerations for non-listed species that are identified as sensitive must be considered to avoid decreases in the population that would cause it to be listed.</p>	Y	N	N	N/A	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Section III – all THP item headings</b></p> <p>I do not like having the checkboxes duplicated here. This seems unnecessary and creates more work, may cause consistency errors, and it will make a very ponderous document with large areas devoid of any useful information. Having the THP item number and explanation of item number is ok, just not the checkbox duplicated from Section II. If an Item is not used (box checked “NO” in Section I or II), the RPF should be instructed to delete the item to reduce review time, save paperwork and increase clarity.</p>	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
CGS	<p><b>Geologic Info Needed in Physical Description</b></p> <p>It is CGS’s opinion that physical characterization of the project is most important in order to understand the potential impacts of the proposed operations. In light of this we are suggesting that the general description of THP Section III include a description of geologic and geomorphic conditions based on the information that is readily available to the RPF and presented in a manner consistent with the RPF’s training and experience. In practical application this information is much more useful than recitation of the USDA soil classification and likely can be justified under the PRC and CCR sections cited in the draft. While in many areas there is a wealth of readily available published information we understand such information is difficult to obtain in other areas. In such cases the discussion might focus on the RPF’s on-site observation of materials observed in outcrop and road cut and the topographic features indicative of the presence of and potential for unstable conditions that should be readily identifiable to an RPF such as active slides, headwall swales and inner gorges.</p>	Y	N	N	Y	<b>Y</b>	<b>Y</b>
RPF	<p><b>Consideration of alternatives</b></p> <p>Is near the beginning of Section III the CDF preferred location for the discussion of alternatives? I would think the end of section III would be better (after the expanded discussion, explanation, and justification of the plan of operations). Seems to me it would flow better, having explained and justified why the RPF is doing something, and then go into potential alternatives.</p>	Y	N	N	N/A	<b>Y</b>	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>THP Item 4(a):</b> 1032.7 allows parties other than the 3 listed to submit THPs. There is conflict between 1034(e) & 1032.7.	Y	N	N	N/A	Y	N
RPF	<b>Items 13(a, b, c and j):</b> All of these Item 13 questions have already been asked in Section II. Why ask the question again, just provide a space for the answer.	Y	N	N	N/A	Y	N
RPF	<b>Page 1, items 13(a) and 13(b):</b> need to rephrase questions as only have to inform timber owner and timberland owner of their responsibilities for meeting stocking requirements and erosion structure maintenance.	Y	N	N	N/A	Y	N
RPF	<b>Item 14(a):</b> Option A Stand Information This is fine for a small landowner with one stand, I see industry completely altering this.	Y	N	N	N/A	Y	N
RPF	<b>Item 14(b) general :</b> On the ownership I work on, there are multiple units per THP. I'd rather see the MSP / Silv discussion on a per unit basis, than as presented. A "for each distinct site and silviculture combination, provide the following information" approach.	Y	N	N	N/A	N	N
RPF	<b>Item 14(b);</b> Regeneration Methods Used in Even-aged Management.unevenaged management.	Y	N	N	N/A	Y	N
RPF	<b>Item 14(b) :</b> Should not many of these silvicultures have a space for Site and stocking standard?	Y	N	N	N/A	N	N
RPF	<b>Item 14(b) :</b> Seed Tree and Shelterwood Seed Step "Will this plan retain seed trees?"...that is somewhat a requirement of the systems. The cited codes (c) and (f) do not provide for not leaving Seed Trees, rather the level of retention is specified under (a) of the same rules.	Y	N	N	N/A	Y	N
RPF	<b>Item 14(b) :</b> Shelterwood removal step is where one should ask about the size limitation and spacing limits, and which stocking standard is being used. If Removal cuts have been done before, discussion of under which THP may be useful to a reviewer.	Y	N	N	N/A	Y	N
RPF	<b>Item 14(b) :</b> Selection, group selection. The use of the "and" means that checking "yes" indicates you are both using selection, AND proposing lower stocking standards. So if you are only using selection per the normal rules, you should properly check "No"....I don't think that was the intent. Same problem with group selection	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>(Page 3) Group Selection (2)</b> - spelling will the (he)...	Y	N	N	N/A	Y	N
RPF	<b>Item 14 (b)</b> : Transition, since transition can only be used twice on a stand, should you not ask if it's been done before and under which THPs.	Y	N	N	N/A	Y	N
RPF	<b>Item 14 (b)</b> : commercial thinning, same “and” issue as selection.	Y	N	N	N/A	Y	N
RPF	<b>Item 14 (b)</b> : variable retention, should have a line saying ‘if retention is aggregated in groups, provide general description of locations or show on THP map’ etc.	Y	N	N	N/A	Y	N
RPF	<b>Item 14(b)</b> : Will this plan retain seed trees? If no, then provide a species specific plan to protect existing regeneration or provide for regeneration:  How can you have a seed tree seed step & not retain seed trees?	Y	N	N	N/A	Y	N
RPF	<b>Item 14(b)</b> : Will: (1) the seed tree removal step prescription be used; and (2) has the seed tree removal step been used previously in the life of the stand? If yes to both, explain why it will be used again: There is no allowed exception for successive use of the removal step method?	Y	N	N	N/A	Y	N
RPF	<b>Item 14(b)</b> : Selection System (1) Will the selection system prescription be used; and (2) will the plan propose a lower stocking standard than those contained in 14 CCR § 913.2(a)(2), [933.2(a)(2), 953.2(a)(2)]? If yes to both, provide an explanation and justification that indicates the proposed stocking standard will not be less than those specified in 14 CCR § 912.7(b)(2), [932.7(b)(2), 952.7(b)(2)] and which clearly demonstrates that the existing stand will grow substantially less than both the potential site productive capacity and the proposed post harvest stand under the stocking standard of 14 CCR § 913.2(a)(2), [933.2(a)(2), 953.2(a)(2)]: How does this NOT constitute an AP?	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Allow Deletion of Unrelated Text</b></p> <p><b>Item 14b</b> Again is every single treatment really necessary to put in a plan, or just the one that is being proposed?</p> <p><b>Item 14b</b> A guideline should be added to advise the RPF to remove silviculture methods (or other information) not applicable to the plan.</p> <p><b>Page 2-6, Item 14(b):</b> Delete the first question under each silvicultural method. This question has been answered already in Section II and additional information as required is expected to be located here. Strongly suggest that the RPF be allowed to delete all silvicultural methods that are not applicable to the plan as already stated in Section II. You should not have to check the “No” box to every silvicultural method not used. This will reduce unnecessary paperwork and limit review to what is proposed.</p>	Y	N	N	N/A	Y	Y
RPF	<p><b>Item 14(b):</b> Group Selection (1) Will the group selection prescription be used; and (2) will the plan propose a lower stocking standard than those contained in 14 CCR § 913.2(a)(2), [933.2(a)(2), 953.2(a)(2)]? If yes to both, provide an explanation and justification that indicates the proposed stocking standard will not be less than those specified in 14 CCR § 912.7(b)(2), [932.7(b)(2), 952.7(b)(2)] and which clearly demonstrates that the existing stand will grow substantially less than both the potential site productive capacity and the proposed post harvest stand under the stocking standard of 14 CCR § 913.2(a)(2), [933.2(a)(2), 953.2(a)(2)]: How does this NOT constitute an AP?</p>	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Item 14(b):</b> Commercial Thinning (1) Will the commercial thinning prescription be used; and (2) will the plan propose a lower stocking standard than that contained in 14 CCR § 913.3(a)(1), [933.3(a)(1), 953.3(a)(1)]? If yes to both, (1) note the proposed stocking standard cannot be less than those specified in 14 CCR § 912.7(b)(2), [932.7(b)(2), 952.7(b)(2)]; and (2) provide an explanation and justification for its use:</p> <p>How does this NOT constitute an AP?</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 14(b):</b> VR-- Are up to 50% of retained trees intended for harvest during future intermediate treatments of the regenerated portion of the harvest area where such harvest(s) are consistent with stated variable retention objectives? If yes, provide an explanation and justification for the practice:</p> <p>Doesn't this go hand in hand with the question below?</p> <p>Will the plan propose an exception to retaining trees for at least 50 years? If yes, provide an explanation and justification for such a practice:</p> <p>Doesn't this go hand in hand with the question above?</p> <p>Will specific WHR habitat elements be insufficient to provide functional wildlife habitat? If yes, provide an explanation and justification for alternatives to the standards of 14 CCR § 913.4(d)(3)(G)-(H) [933.4(d)(3)(G)-(H), 953.4(d)(3)(G)-(H)]:</p> <p>For what species?</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Special Prescription/Variable Retention.</b> There is no question about stand age in this section and CDF appears to be applying an underground regulation that the VR prescription can only be used on stands that meet the age requirements of 913.1(a)(1). At least on the Coast. If so, then there should be a question regarding stand age with a rule reference.</p>	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Page 6, Item 14(c)</b> Regeneration Methods used in Even-aged Management: The questions provided need to be broadened beyond the evenaged regeneration step methods to include other silvicultural methods where limitations may apply: Seed Tree Removal Step (depends on disturbance) and Shelterwood Removal Step (always for Coast FD and depends on disturbance for the Northern and Southern FDs).	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>THP Item 14(c):</b> Will an even-aged regeneration step prescription be used? If yes, address the following questions.  Already asked twice	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 14(c):</b> Will even-aged regeneration step units be larger than those specified in the rules (20 acres tractor, 30 acres cable)? If yes, provide substantial evidence that the THP contains measures to accomplish any of 14 CCR § 913.1(a)(2) (A)-(E) [933.1(a)(2) (A)-(E), 953.1(a)(2) (A)-(E)] :  Does not address the adjacency requirements of Shelterwood Removal (not an EE Regen step)	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 14 c :</b> Obviously if Clearcut, Seed tree Seed or Shelterwood Seed are checked yes, then even aged regen is used. First question should be struck. Remaining questions should be moved up to 14(b) immediately after the even aged regeneration silvicultures.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 14(d):</b> Does the plan propose a waiver of timber marking for any of the allowable prescriptions? If yes, indicate which prescriptions:  Are rules being changed to require marking of selection areas (913.1(a)(5)	Y	N	N	N/A	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Page 6, Item 14(f)(B)</b> Stocking Exceptions: Rephrase the question to: “Are exceptions proposed to maintaining relative site occupancy of Group A to Group B species or are non-indigenous Group A species proposed to meet the resource conservation standards? If so, provide the following information.”	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Page 6, item 14(f)(B)2., 3. &amp; 4.</b> Should qualify questions that they only apply to non-indigenous Group B species. As it reads now, appears to apply to all group B species.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Item 14(f)(B) &amp; General</b> : I would really prefer if questions like this, infrequently used, and with the steps defined by a rule, simple said “If yes, provide information required by rule X”. For one thing that means that if the rule changes, the form can stay the same. Embedding all the rules in the form means annual updates to the form. Which results in an annual race to get THPs submitted prior to Jan 1st so we don’t have to revise stuff.	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	“Will broadcast burning fully” : Since a yes answer to this means writing an exception, then it would qualify as an exception to the standard site preparation rules, and should have been addressed in the question immediately preceding. Therefore this question is redundant and should be struck.	Y	N	N	N/A	<b>Y</b>	N
RPF	“Additional silviculture discussion” : Again, would much rather see this set up on a unit(s) basis, rather than having site-specific considerations strewn across Item 14.	Y	N	N	N/A	N	N
RPF	<b>Item 14(i)</b> : Will there be any exceptions or alternatives to the standard site preparation rules? If yes, provide explanation and justification for such exceptions:  Same question asked differently in Section II (In Section II it is just exceptions to standard rules, not limited to site prep rules).	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<b>Item 20(a)</b> : We don’t need a second version of what’s already in Section II. Just a note <provide any needed 20(a) verbiage>	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<b>Item 21</b> : See 20(a). We should only have to check ONE box for each of these, be it in Section II or Section III, not different sets of boxes in different places. FAR prefer the old form.  <b>Item 21(a)</b> : Why is this item broken out by exception type here, but not in Section II?	Y	N	N	N/A	<b>Y</b>	<b>Y</b>

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Pages 7-8, Item 21(a)</b> Harvesting Exceptions: Once again the title for each exception is sufficient. No Questions should be asked. Simply state: "Clearly explain and justify such use as required by the applicable FPRs." It is OK to list the applicable rules for reference.	Y	N	N	N/A	Y	Y
RPF	<b>Item 25(a):</b> Logging Roads on Unstable Areas-- Are any roads planned on unstable areas? If yes, explain and justify that unstable areas are unavoidable and site-specific measures to minimize slope instability due to construction are incorporated into the THP:  Does not address existing roads.	Y	N	N	N/A	Y	N
RPF	<b>Salmonid Habitat Restoration</b> : This needs to be rephrased. 14CCR916.4(a)(2) says the RPF shall , which means it should always be checked yes. Even in a THP with no watercourses, the answer should be yes. So the check box is redundant, and the phrasing needs correction. The question should be along the lines of "Has the habitat evaluation identified any feasible opportunities for restoration" ?	Y	N	N	N/A	Y	N
RPF	General : Not fully up to speed on what the final form of the new stream rules is, and what changes there were from the draft I read, so skipping through much of the Item 26 material.	Y	N	N	N/A	N	N
DFG	<b>Page 10, Class II-L Determination.</b> Add check boxes for each of the six office and field-based methods provided in 916.9(g)(1) for making the Class II-large determination. This will provide for a quick and efficient identification of which methods were used in the determination rather than scanning the written description only.	Y	N	N	N/A	Y	N
RPF	<b>Item 26(b):</b> Sanitation-Salvage in Watersheds with Listed Anadromous Salmonids-- Will sanitation-salvage harvesting occur in the core or inner zone of any Class I or II WLPZ wherein such harvesting must occur per 14 CCR § 916.9(u) [936.9(u), 956.9(u)]? If yes, discuss the objectives, goals, and measurable results for such streamside salvage operations:  A rule requires harvesting	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CVRWQCB	<b>Item 26b</b> , Water Drafting. In THPs with multiple drafting locations it appears the RPF will need to answer all questions for each drafting location if conditions are inconsistent. Will CAL FIRE Review Team request mapped unique identifiers for each drafting location to provide clarity if conditions are inconsistent?	Y	N	N	Y	Y	N
DFG	<b>Page 10, Water Drafting.</b> Move this item below the FGC section 1611 checklist.	Y	N	N	N/A	Y	N
RPF	<b>Item 26(b):</b> Water Drafting-- Will water drafting for timber operations from within a channel zone of a natural watercourse or lake occur? If yes, describe the water drafting site conditions and proposed water drafting activity, including:  Need to have an option that allows use of an existing 1600 agreement so all of the info in the 1611 does not have to be re-entered in the THP.	Y	N	N	N/A	Y	N
RPF	<b>Item 26(i):</b> Are there conditions relative to the road network on the plan that elevate risks to the values set forth in 14 CCR § 916.2(a), [936.2(a), 956.2(a)]? If yes and crossings will not be removed  Which crossings? ALL, temporaries?	Y	N	N	N/A	Y	N
RPF	<b>Item 26</b> For enforceability, doesn't 1600 information need to be located in Section II? This contains instructions to the LTO and the Plan Submitter.	Y	N	N	N/A	Y	N
RPF	<b>Item 26:</b> FGC § 1600 Information suggest CAL FIRE get a copy of the DFG form that DFG provides and incorporate it accordingly.	Y	N	N	N/A	Y	N
RPF	<b>Item 26:</b> If notifying per FGC § 1602, then attach a copy of the LSAA Notification to the end of THP Section II. The application does not contain the final conditions and should not be an operational part of the THP.	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item # 26, 1611.</b> For this we usually provide a copy of the 1611 Notification and put it in this section. For ease of use and eliminate duplication, these questions should be dropped. The questions under item # 26 should be reviewed for consistency with the 1611 form that we submit to DFG. If the information is contained in the 1611, I would just say so under the questions in this section.	Y	N	N	N/A	Y	N
RPF	<b>(Page 12) 1611 Item f</b> - first time I have seen this specific language...	Y	N	N	N/A	Y	N
DFG	<p><b>Page 11, FGC 1600 Information.</b> This item is not numbered for reference. Is it 26(j)?</p> <p>Reorganize and revise this item for clarification as follows:</p> <p>Is this THP to serve as the CEQA document for a Department of Fish and Game Lake and Streambed Alteration Agreement (LSAA)? If 1602, submit notification after THP approval. If 1611, complete the 1611 checklist and water drafting information below.</p> <p>Indicate whether LSAA notification is occurring pursuant to Fish and Game Code Section 1602 or 1611.</p> <p><input type="checkbox"/>Yes <input type="checkbox"/>No</p> <p><input type="checkbox"/>1611 Strike the checklist provided and add the more extensive 1611 template checklist provided by DFG (Green Diamond).</p> <p>Attached is a section 1611 template that DFG uses in its Northern Region office and distributes to RPFs to facilitate thorough, accurate, and consistent 1600 notifications in THPs. Green Diamond uses this template with a few company-specific modifications. The same information for 1611 notifications is requested by other DFG timber regions, as well.</p> <p>Move the water drafting checklist below the FGC section 1611 checklist.</p>	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Item 27(a)</b> : We really don't need 1-4 spelled out. Just makes the form even longer. Simply say point to the rule that needs to be satisfied.	Y	N	N	N/A	Y	N
CVRWQCB	<b>Item 27a</b> "Class I WLPZ Species Composition", "Class II WLPZ Species Composition", and "Class III and IV WLPZ Understory". CAL FIRE references 14 CCR [936.4(e), 956.4(e)]. Was the intent was to reference 14 CCR (936.5(e), 956.5(e))?	Y	N	N	N/A	Y	N
RPF	<b>Item 27 B</b> Alternative WLPZ : Spelling it out just makes the form longer. Point to the rule that lists the items to be covered, leave it at that.	Y	N	N	N/A	Y	N
RPF	<b>14 CCR § 916.3(c) [936.3(c), 956.3(c)]</b> : This isn't even a question asking if you are complying, simply a recitation of a standard rule category with a check box next to it. This and the following items down to "WLPZ surface cover retention" should be eliminated. Simply provide a space to state any exceptions/in-lieus to these.	Y	N	N	N/A	Y	N
RPF	<b>THP Item 27(c)</b> : Perhaps this is something that changed in the latest rule package, but the 2009 rules have 14CCR916.9(v) as : (v) Nonstandard practices (i.e., waivers, exceptions, in-lieu practices, and alternative practices) shall comply with the goal set forth in subsection (a) above as well as with the other requirements set forth in the rules. Which is a great deal shorter and less specific than the form has.	Y	N	N	N/A	N	N
RPF	<b>Page 15, Item 27(c)</b> Site-specific or Non-standard Provisions: Add to initial question the applicability and approval standard: "Site specific plans may be submitted when, in the judgment of the RPF, such measures or provisions offer a more effective or more feasible way of achieving the goals and objectives set forth in 14 CCR § 916.9 [936.9, 956.9], subsections (a) and (c), and would result in effects to the beneficial functions of the riparian zone equal to or more favorable than those expected to result from the application of the operational provisions required under 14 CCR § 916.9 [936.9, 956.9]."	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Item 28:</b>  <u>Exemption from letter notification.</u>  <u>Exemption from newspaper notification.</u>  <u>Exemption from letter and newspaper notification.</u>  <u>Delete this box, just have them check both above</u></p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 31:</b> THP Item 31  <u>For Hazard Reduction</u> will slash to be treated by piling and burning be treated later than April 1 of the year following its creation, or within 30 days following climatic access? If yes, provide an explanation and justification for such a practice:  Add underlined text.</p>	Y	N	N	N/A	Y	N
Public	<p><b>Item 32:</b> Section III specifically identifies a variety of species and asks if certain conditions have been met regarding Northern Goshawk, Bald Eagles and Osprey. We do not understand why these have been singled out to the exclusion of such species as Marbled Murrelet, California Red Legged Frog and San Francisco Garter Snake, to mention a few endangered species. Identifying some species while excluding others leads to confusion about which species must be considered during plan preparation and timber operations.</p>	Y	N	N	Y	N	N
RPF	<p><b>Item 32(b):</b> Commencing Operations Near to Nest Tree  Will the plan propose an exception to planning and operating timber operations to commence as far as possible from occupied nest trees?  Rule is only applicable to BOF species</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 32(b):</b> BOF Sensitive Species  What about species that can qualify under more than one of these categories (such as the NSO) which is Fed listed, State listed, and board listed. Do they need to be repeated under each heading?</p>	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Item 32(b):</b> Timber Operations in Osprey Buffer</p> <p>0 Yes 0 No Does the plan propose an exception to allowing timber operations in the buffer zone in the case that osprey have not shown historical tolerance to disturbance on the proposed plan area when there are no feasible alternatives. If yes, provide an explanation and justification as to why there are no feasible alternatives to such a practice:</p> <p>During the critical period? The way this question is worded it implies that operations are restricted year round.</p> <p>Buffer zone for Osprey not defined, only ‘up to 5 acres in size.</p> <p>What about all the other restrictions in 919.9?</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 32(b):</b> as most of these will not apply in most THPs, a simple reference to the rule and a directive to discuss the applicable elements would be superior.</p>	Y	N	N	N/A	Y	Y
DFG	<p><b>Item 32(c)</b> non-listed species - include language that states that many non-listed wildlife species are protected by Fish and Game Code and potential significant impacts need to be considered from management practices and timber operations.</p>	Y	N	N	Y	N	N
RPF	<p><b>Item 33:</b> 919.1 has 6 different categories where removal of snags is allowed without E&amp;J? Do we now need to provide E&amp;J to fall a snag that OSHA mandates be felled?</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 34 :</b> as most of these will not apply in most THPs, a simple reference to the rule and a directive to discuss the applicable elements would be superior.</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Item 34</b></p> <p>The section of LSF assumes that the watershed is open to the public for information gathering. What kind of information is going to be discussed in this section when you are dealing with small ownerships that don’t have access to the rest of the watershed?</p>	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
Public	<p><b>Item 34</b>, it states “Are late succession forest stands proposed for harvesting and such harvest will significantly reduce the amount and distribution of late succession forest stands or their functional wildlife habitat value so that it constitutes a significant adverse impact on the environment as defined in Section 895.1? If yes, . . . .”</p> <p>Again, this appears to incorrectly assume that late-seral habitat need only be addressed if it is at least 20 acres in size. As discussed above, there should be one cohesive section of the THP that a) discloses any late-seral habitat, no matter the size, “even in those situations involving a single tree or small stand of trees . . . .,” 3 and b) discusses any impacts to that habitat from the harvest.</p> <p>It should also be noted that there can be significant impacts to late-seral habitat even when it is not proposed for harvest (e.g., lack of a buffer). Therefore, there should be a part of the late seral section of the THP that explicitly asks for a discussion of how potential impacts to late seral habitat will be addressed if any at all exists in the THP area. The public and decision makers should not have to rely on PHIs, or any other mechanism (other than the THP), to learn that late-seral habitat of any size might be impacted by a THP.</p>	Y	N	N	Y	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Item 34</b>            If Cal Fire is going to put this much emphasis on LSF, some work should be done to address the current definition, as it is completely inadequate. The current definition states: “Late Succession Forest Stands means stands of dominant and predominant trees that meet the criteria of WHR class 5M, 5D, or 6 with an open, moderate or dense canopy closure classification, often with multiple canopy layers, and are at least 20 acres in size. Functional characteristics of late succession forests include large decadent trees, snags, and large down logs.”</p> <p>Any forest that is under single tree selection and managed for 2 or 3 rotations could very easily fit the definition of LSF as it will likely have 3 age classes or more, snags and down logs. This definition need to add some spatial considerations to make sure that second and third growth stands don’t meet this definition until they are at least 150 years in age.</p>	N	N	N	N	N	N
<b>End Section III Comments</b>							

## Section IV Comments

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Not Enough Time to Comment</b> I really don't have time before November 20th to really study the two different forms for Section IV. This is where it would be nice to extend the time frame for comments on this. The Department needs to take into consideration that RPFs don't have to use the new form, even if CAL FIRE gives its blessing to it. One can still use the old form, just making sure that all the required information is in it. So a little delay on comments about the new form may really help you get quality comments.</p>	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<p><b>Cookbook Approach Won't Work</b> This is especially true in section IV. Time and time again it has been proven, during review and in the courts, that a purely cookbook version of the cumulative effects analysis is not going to fly. An outline is helpful, but you can't stand on it. Section IV is also a moving target with new issues becoming more important and old issues fading away. Why are we trying to pin it all down with checkboxes? History tells us that all such attempts will fail. Why not simply suggest more current issues in the technical addendum covering cumulative effects. The new section IV, with or without the optional part, will simply add pages and pages to most THPs with no reduction to any of the other content we routinely supply.</p>	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<p><b>Form B-II Preferable</b> Regarding Section IV, as of the above date I have not had time to review in depth the multiple form options. However, based on a quick scan of the optional forms, Form B-II seems the most straightforward and simplest to use.</p> <p>Small landowners and THPs covering smaller acreages would probably be more likely to use Section IV-B Form II, rather than Form I. Form I appears on the surface to require a lot more site specific detailed information up front, while Form II allows for more narrative descriptions.</p>	Y	N	N	N/A	<b>Y</b>	<b>Y</b>
RPF	<p><b>Section IV-B, Form 1 vs Form 2.</b> Notwithstanding the discussion above, my preference is for Form 1, as it provides a method for assessing cumulative</p>	Y	N	N	N/A	<b>Y</b>	<b>Y</b>

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
CAL FIRE	Section IV – I am pleased that the Draft THP form includes Hazardous Materials and Noise Impacts. I am also pleased with the checkbox system to address cumulative effects.	Y	N	N	N/A	N	N
Public	<b>Vehicular Traffic Impacts.</b>  Vehicle impact and noise on residential areas  Address and delineate hours and days of truck operations  Include a noise impact analysis	Y	N	N	Y	N	N
Public	<b>Scenic Vistas</b> Page 1 THP Section IV-A (Analysis of Potential Project-Related Environmental Impacts) Add the following “yes /no” items to further identify potential impacts Will visual impacts from the THP be observed by: <ul style="list-style-type: none"> <li>• Visitors to sites such as State, National or local parks, rivers or lakes, ski resorts, trails, or campgrounds?</li> <li>• Local residents from their homes or communities?</li> </ul>	Y	N	N	Y	N	N
RPF	General: I believe there is significant utility in having the three documents to work from. THP <b>Section IV-A</b> provides excellent guidance for additional resources to be considered in the cumulative impacts assessment in addition to those specified in Technical Rule Addendum and appears to be based on CEQA documentation.	Y	N	N	N/A	N	N
RPF	<b>THP Section 4-A</b> : How...odd. Since this is optional, I presume this is in addition to technical addendum 2.	Y	N	N	N	N	N
RPF	<b>Section IV-A multiple pages...</b> Seems as though project related impacts should include another checkbox for "Potential Benefits" or "Positive Effects" to consistently lead into IV-B Form I or II Presently all of the choices are negative or neutral	Y	N	N	Y	N	N
RPF	<b>Section IVA</b> is a good working form, very similar to a negative dec. form that other types of projects use. It would be nice to be able to use it, with minor modifications, for the entire cumulative impacts section.	Y	N	N	N/A	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
Public	<p><b>Habitat Conditions</b> Page 8-9 THP Section 4-B Cumulative Effects Assessment Form 1</p> <p>Include more specific information on:</p> <ul style="list-style-type: none"> <li>Oaks: In addition to included habitat rankings, add description of oak conditions in the harvest area, including number, size, species, volume across plan area, and existing impacts to oaks within the planning watershed from previous logging or other activities</li> <li>Bat maternity roosts and habitat conditions: specifically, include bat maternity roosts as a category under wildlife.</li> </ul>	Y	N	N	Y	N	N
RPF	<p><b>IV-B Form I</b> I have provided an example of the format SPI uses for the channel inventory form.</p>	Y	N	N	N/A	N	N
RPF	<p><b>Form 1</b> appears to be closest to the approach we are currently using. We prefer the matrix approach to presenting the potential project watershed or biological effects rather than the check boxes (pages 4-5, 8-9); it is easier for the reviewer to visually gauge the range of effects from High to Low (i.e., list the issue on the left hand side with H, N, L ratings on the right side and outline or bold the applicable rating.</p>	Y	N	N	N/A	Y	N
RPF	<p><b>THP Section 4-B I:</b> The “Presence of Significant Wildlife Areas” should be renamed “Presence of Special Habitat Elements” to accord with Tech Addendum no. 2, and could we please ditch the questions about deer from the standard form? The coastal region isn’t like the Sierras in this regard. Overall this should just be a “If present, describe such areas”.</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Page 9, 4d. Presence of Significant Wildlife areas:</b> This veers significantly from what is specified for consideration in Technical Rule Addendum 2 C. 4. h. that specifies Special Habitat Elements. The difference is between assessing areas versus specific habitat elements. Suggest reverting back to the Technical Rule Addendum approach.</p>	Y	N	N	N/A	Y	Y
RPF	<p><b>Section IV Form 4B-1</b> I have already identified all of the rare, endangered, and threatened species (and all of the other plants, animals, etc.) in Sections II &amp; III. Is it necessary to list and discuss them again for a third time in the harvest plan?</p>	Y	N	N	Y	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>IV-B Form I</b> I am concerned with the repeated requests for past &amp; future project information pertaining to other landowners/agencies that we may be required to provide in this format.</p> <p>There is too much repetition of past, present, and reasonably foreseeable future projects in the revised form. These projects only need to be presented once and should just be referenced thenceforward in the THP. Reiterating the same information over and over is unnecessary, costly, and confusing for all involved. An alternative would be for the revised form to contain one table listing all of the past projects in the assessment area. Each project in the table could identify which resource area would be analyzed as it pertains to the specific project.</p> <p><b>2(b)</b>; There is a question about past projects and future projects. I think a general listing of past and future projects in the entire CIAA (Cumulative Impacts Assessment Area) which is the largest area of assessment for a THP project is a reasonable approach to getting the list of past and future projects without having to differentiate for each assessment area. For most of the THPS, the CIAA is the Watershed Assessment area, which is sometimes expanded to include an additional area to account for some biological resource analysis. This question could precede the questions about each assessment area.</p> <p><b>3 (b)</b>: this could be from a list generated in line with my comment above under 2). We should not have to re-list past and future projects for each assessment. This would be laborious and is un-necessary.</p> <p><b>3(e)</b>. Again, we should not have to re-list the same projects over and over again.</p> <p><b>4(c)</b>: Another re-hash of past and future projects. Unnecessary.</p> <p><b>5(c)</b>. Yet another list of past and future projects.</p> <p><b>Section 6</b>: ditto on comments for Section 5</p> <p><b>Section 7</b>: Greenhouse gas. Past and future projects. Ditto on comments on same topic above.</p>	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Data for Analysis May Not Be Available</b></p> <p>Everyone wants a watershed wide Cumulative Impact Report. Water Quality wants it for their TMDL. DFG wants it for their work. Form 4B-1 tries to get this information in a fairly decent table format. My question to Cal Fire is this: what if this data isn't available to the RPF? This form is geared towards the large industrial landowners who already have this data or can readily collect it. What about the small landowners? All too many times this data is only available on a very limited basis. It is found at a county road that crosses a creek once or twice, and that is the information available to make determinations on a 10,000 acre watershed. This isn't fair to small landowners.</p> <p>I have attached 2 maps to this letter. The first map is of Lower Marshall Creek where I am currently working on a 40 acre NTMP. This property is located at the top of the watershed. There are two public roads that run along the perimeter of this watershed and are the only viewing on the entire watershed as 100% of the ownership is privately held. What kind of information I am going to be able to gather on this watershed when I can't see 99% of it. How am I going to get information on streams within the watershed or animals?</p> <p>The second map is of the Upper South Fork of the Gualala River. This watershed is 8,403 acres in size. I have highlighted an NTMP that has been approved. This NTMP just touches the Gualala River for about 800 feet. The nearest public point is almost 4 miles downstream and is located in a different planning watershed. There is some additional viewing of the watershed some 8 miles upstream, but is it realistic to assume that this area is similar to the area 8 miles downstream.</p> <p>Luckily, both of these projects are within the Gualala River in which the NCWAP report was prepared for, but again very limited ground truthing was done and most of the watershed is not open to the public. Most of the information came from photos and second hand conversations and not from field level recognizance. This report was only completed for a few small watersheds.</p>	Y	N	N	Y	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Section IV Form I—Check Boxes OK to Point</b> The check box and question format is O.K. to a point. I don't like the section layout under Cumulative Watershed Effects Assessment, Stream Conditions, Section B. This part of the Cumies write up has always been a paragraph of text describing conditions in the area and not specific to any stream and it seems that this is the best way to go for this information.	Y	N	N	N/A	Y	Y
RPF	<b>Section IV Form I</b> Cumulative Watershed Effects Assessment, d) Past & Future Projects <ul style="list-style-type: none"> <li>It seems like this should be separated into Past Projects and Future Projects. That is how most of us approach this part of the information.</li> <li>It seems like the form could provide a fill in Table format for this information. I know that this information is supplies in a lot of formats for past THPs in the assessment area by RPFs, but maybe standardizing this section would add some uniformity to the information on past THPS that is needed. There could be a follow up question in this section about non-THP past projects.</li> <li>Future projects would be a separate question.</li> </ul>	Y	N	N	N/A	Y	N
RPF	<b>Section IV Form I</b> Section k): My Word spell checker does not like Waterbody as one word.	Y	N	N	N/A	Y	N
RPF	<b>Section IV Form I 3 (a) questions D &amp; E:</b> These are open ended questions with no guidance as to what information is requested.	Y	N	N	N/A	N	N
RPF	<b>Section IV Form I 3(c) A - G.</b> Using High, Moderate and Low is too general. Could have also used Great, O.K. and not so great. Without any definitions, standards or guidelines for each category (A-G) these judgment calls are not providing any useful information.	Y	N	N	N/A	N	N
RPF	<b>Section IV Form I 3(d);</b> You need a definition of what a Significant Wildlife Area is in order to answer question 3(d)(g)	Y	N	N	N/A	Y	N
RPF	<b>Section IV Form I 4(A)(c).</b> What is a significant number of people?	Y	N	N	N/A	Y	N
RPF	<b>Section IV Form I 4(c) and 4(d).</b> What is the difference between past and future projects and 'Other projects' ?	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Section IV Form I 5(a).</b> I know that the heading for this section follows the formats used for other assessment areas, but in this case, it doesn't make any sense. What is a Visual Resource Inventory? The question is really about the assessment area.	Y	N	N	N/A	<b>Y</b>	N
RPF	<b>Section IV Form I 5(d).</b> What are "other projects" ? Non-THP projects? Should be explained.	Y	N	N	Y	<b>Y</b>	N
RPF	<b>Section IV-B Form I (Pages 8-9)</b> - Suggest replace checkboxes "None" with "Negligible"; No RPF will want to check "None" because then a single occurrence could be viewed as a mis-statement of fact... "Negligible" would also be more consistent with Form I Appendix B where "None" actually has values of 0 to 1.5; 0 to 1; 0 to 10%; 0 to 1-mile...	Y	N	N	Y	<b>Y</b>	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Section IV-B, Form 1, Appendix A, Watershed Assessment Area</b> In paragraph one, there seems to be a double standard outlined for the selection of the assessment area. The instructions state that where two adjacent watersheds have different disturbance levels and operations area planned in the less disturbed watershed, the more disturbed watershed should be included in the assessment area. Yet, if the operations are planned in the more disturbed watershed, the less disturbed watershed should be excluded from the assessment area. This procedure would not provide an accurate portrayal of the conditions present in the area surrounding and downstream from the proposed project and is not sound science. If CAL FIRE wants to include the adjacent watershed in the analysis, then it should be included whether it is heavily disturbed or not. Good or bad, the downstream impacts need to be addressed. The elimination of the positive attributes present in one case and addition of the negative attributes in the other provides a skewed view of the actual total potential impacts. The only standard that should be used for determination of assessment area size and location should be the use of the planning watershed with proposed deviations approved by the Director as described in the FPRs. This eliminates the bias that is presented within Appendix A and provides a uniform standard. The current cumulative impacts assessment area determination is accurate and adequate and there is no need to modify it. I recommend removal of this analysis from Appendix A and reliance on the current rules for assessment area determination</p>	Y	N	N	Y	Y	N
RPF	<p><b>Section IV-B, Form 1, Appendix B, Snags</b> The definition of snags provided (16", 20 feet) is not consistent with the 895.1 snag definition. Granted 916.3 and 919.1 identify snag sizes, but Section IV is for cumulative watershed affects and smaller snags provide habitat components required for smaller wildlife and should not be excluded. Maybe have two ratings, one for smaller sizes, and one for larger sizes?</p>	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Section IV-B, Form 1, Appendix B, Downed large, woody debris</b></p> <p>The definition of woody debris provided is not consistent with the 895.1 definition. Why is large defined as 16” and 20 feet? This may exclude MANY chunks of historic large debris that were cut into 16 foot logs and left for cull in the woods (reference PALCO 2001 property-wide inventory of LWD). Consider modifying the definition to include smaller/shorter chunks, or maybe have two ratings, one for smaller sizes, and one for larger sizes? I think the diameter cutoff is ok, but the length should be between 8 to 16 feet.</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Section IV-B, Form 1, Appendix B, Multistory canopy</b></p> <p>The form lumps everything less than 10% as None. In my opinion, None = 0. These broad categories (H, M, L, N) are not going to capture small percentages of multistory canopy within the assessment area and these category separations will not provide adequate information to reviewers.</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Section IV-B, Form 1, Appendix B, Road Density</b></p> <p>The form says “Use the following to determine quality of the roads in the area.” Should read quantity. The form has the category ratings backwards. High road density would have &gt;4 miles, Low road density would have &lt;1 mile.</p>	Y	N	N	N/A	Y	N
RPF	<p><b>Section IV-B, Form 1, Appendix B, Old-Growth Forest Characteristics</b></p> <p>The Board has long struggled without success to define an “Old-Growth” forest and/or tree. The form presents very specific criteria to determine if an area is “Old-growth” or “contains significant old-growth characteristics”, but it does not provide any justification or support for these criteria, or explain why these criteria are important. This form misses the point that the purpose of this analysis is to assess whether Functional Wildlife Habitat as defined in 895.1 is present on the site, whether is important to the existing wildlife community within the planning watershed per 897(b)(1)(B), and whether timber operations proposed in the plan will significantly alter it. Very few if any wildlife species are old-growth obligates; their functional habitat needs can be provided by mature young growth and other forest structure features.</p>	Y	N	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Section IV-B, Form 1, Appendix B, Old-Growth Forest Characteristics, Cont'd.</b></p> <p>This whole definitions section is simply inappropriate and should be deleted. If the presence/absence of old-growth forest characteristics is to be addressed it should be as it relates to Functional Wildlife Habitat.</p> <p>Removal of old-growth trees, trees with significant old-growth characteristics, and/or stands with “oldgrowth” forest characteristics is of concern only if their removal will in some demonstrable way fail to maintain functional wildlife habitat in sufficient condition for continued use by the existing wildlife community in the planning watershed.</p> <p>If the ‘new definitions’ are retained in their present form, I have the following comments:</p> <p>Grammatical typo in the definition – the less than symbol (&lt;) was used, where I believe the definition intent is the greater than symbol (&gt;).</p> <p>Late Seral Forests have been described by Responsible/Trustee agencies as comprising less than 1% of the redwood region. The form lumps everything less than 10% as None. In my opinion, None = 0.</p> <p>These broad categories (H, M, L, N) are often not going to capture the known small percentages of late seral stands within the assessment area and these category separations will not provide adequate information to reviewers. Refine the ratings to more meaningful categories.</p> <p>The Forest Practice Rules 895.1 already provide a definition of Late Succession Forest Stands which includes identification of functional characteristics nearly identical to that as described on the form. It appears the form is attempting to re-define (as evidenced by the nearly identical references to dominant trees, multi-layered canopy, large decadent trees, snags, and large down logs) Late Succession Forest Stands, and in particular change the qualification of stand size.</p> <p>The form says “Forest stands can be any size that is meaningful to the wildlife resources of concern.”</p>	Y	N	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Section IV-B, Form 1, Appendix B, Old-Growth Forest Characteristics, Cont'd.</b></p> <p>The THP form indicates that the THP must specify the minimum block size used in the analysis. It is not unreasonable to believe that this could be used to identify weakness in the cumulative impacts analysis of large old trees. The forms forest size guidance (stands of any size) could be used to include 'stands' composed of a single or a few 'standing' trees, versus the 20 acre minimum stand size identified in the rules.</p> <p>Typically, the RPF can only assess the project area at high levels of resolution. The levels of resolution within the assessment area but outside of the project area are difficult to identify. It would be extremely difficult (often impossible/illegal due to trespass) to identify individual or small groups of trees in the biological assessment area that meet a small 'block size'. If the RPF cannot provide the level of detail necessary to show the distributed or isolated abundance of the resource, then that may be used to prevent the RPF from proposing to cut 'the last few trees the RPF identified' that provide functional wildlife habitat characteristics, when more trees may exist and no cumulative impact exists.</p> <p>The form says "Forests most likely to contain remnants of old-growth forests will possess many of the necessary characteristics." (Emphasis added) This definition implies that forests do not have to contain old-growth trees to be defined as old growth forests, they only need to possess characteristics of oldgrowth.</p>	Y	N	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Section IV-B, Form 1, Appendix B, Old-Growth Forest Characteristics, Cont'd.</b></p> <p>Many second growth forests (less than 100 years) contain more than 6 trees per acre of trees &gt;30" diameter. Granted the definition includes that the trees may be over mature (200+ years old), however the use of tree age as a determinant of large trees is impractical to implement. Trees can achieve diameters greater than can be sampled with industry standard increment borers in less than 100 years. To determine the age of large trees requires tree increment borers that exceed industry standard sizes, are extremely expensive, are impractical, and do not meet the test of feasibility. Additionally, the use of a fixed number of trees or tree size fails to take into account the observed variability of trees within specific stands. I have seen many smaller trees (18" – 30") that contain defect or other structural characteristics (broken, reiterative tops, forks, funky limbs) that may provide better habitat than 'clean' large trees. I believe it is much more efficient, useful, and feasible to focus on the characteristics desired and not the number, age or diameter of trees. When proposing timber operations in older, or larger tree stands, I recommend considering the use of a Wildlife Tree Evaluation Scorecard, as has been proposed by DFG for past plans and is currently in use by industrial landowners, and other smaller non-industrial owners.</p> <p>The scorecard provides a basis for determining quality of individual trees to provide functional wildlife habitat.</p>	Y	N	N	Y	Y	N
Public	<p><b>THP Section IV-B, Form I, Appendix B</b>, has a section titled "Old-Growth Forest Characteristics" which points out that such "forest stands can be any size that is meaningful to the wildlife resources of concern." While this section better acknowledges the situation, it would make much more sense to, as described above, have one section of the THP that fully discloses and discusses late-seral habitat whether it be one tree, 1 acre, or more.<sup>4</sup></p>	Y	N	N	Y	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<b>Section IV-B, Form 1, Appendix B, Snags</b> The definition of snags provided (16", 20 feet) is not consistent with the 895.1 snag definition. Granted 916.3 and 919.1 identify snag sizes, but Section IV is for cumulative watershed affects and smaller snags provide habitat components required for smaller wildlife and should not be excluded. Maybe have two ratings, one for smaller sizes, and one for larger sizes?	Y	N	N	Y	Y	N
RPF	<b>Section IV-B, Form 1, Appendix B, Downed large, woody debris</b> The definition of woody debris provided is not consistent with the 895.1 definition. Why is large defined as 16" and 20 feet? This may exclude MANY chunks of historic large debris that were cut into 16 foot logs and left for cull in the woods (reference PALCO 2001 property-wide inventory of LWD). Consider modifying the definition to include smaller/shorter chunks, or maybe have two ratings, one for smaller sizes, and one for larger sizes? I think the diameter cutoff is ok, but the length should be between 8 to 16 feet.	Y	N	N	Y	Y	N
RPF	<b>Section IV-B, Form 1, Appendix B, Multistory canopy</b> The form lumps everything less than 10% as None. In my opinion, None = 0. These broad categories (H, M, L, N) are not going to capture small percentages of multistory canopy within the assessment area and these category separations will not provide adequate information to reviewers.	Y	N	N	Y	Y	N
RPF	<b>Section IV-B, Form 1, Appendix B, Road Density</b> The form says "Use the following to determine quality of the roads in the area." Should read quantity. The form has the category ratings backwards. High road density would have >4 miles, Low road density would have <1 mile.	Y	N	N	N/A	Y	N
RPF	<b>Form I Appendix B (Page 1) Road Density</b> - Suggest replace last sentence "quality" with "density"; and scale units appear to be reversed i.e. High should be <4... Negligible would be >1 mile... Suggest change all "None" to "Negligible"	Y	N	N	N/A	Y	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
Public	<p><b>Herbicides</b>            Include a discussion of planned or likely use of pesticides/herbicides as part of the harvesting and stocking process. This may be included as part of THP Section 4-Cumulative Effect Assessment Form 2 (page 2) in the “Chemical Contamination Effects” section or elsewhere as appropriate.</p> <p>Included elements to include among others:</p> <ul style="list-style-type: none"> <li>• Planned or likely specific substances to be used</li> <li>• Amount anticipated to be used</li> <li>• Number and timing of application(s)</li> <li>• Method of application(s)</li> <li>• Likely or known effects on:               <ul style="list-style-type: none"> <li>• Native plants</li> <li>• Hardwoods</li> <li>• Wildlife species</li> <li>• Wildlife habitat</li> <li>• Water resources</li> </ul> </li> <li>• Humans, including forest workers, local residents, and downstream water users</li> <li>• How activities associated with the proposed project will or will not combine with those of other past, present and reasonably foreseeable probable future projects to result in cumulative chemical contamination effects</li> </ul>	Y	N	N	Y	Y	Y

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
RPF	<p><b>Section IV Form 4B-2—Make Section Simple Checklist</b></p> <p>Out of all of the sections, this section in any harvest plan is the most difficult to write and 90% of the time, I as an RPF never have access to the watershed or biological scoping area to really make an assessment. This is also the section in a harvest plan that most of the reviewing agencies skip. I can't think of the last time that I received a comment from DFG, WQ or the State Parks about this section in a plan. The new form seems to be adding even more information that isn't going to be read.</p> <p>This section should be a simple checklist on most of the watershed and biological conditions like Form 4B-1.</p> <p>This section of the plan isn't used and isn't read by anyone other than the RPF and Cal Fire. It should be kept simple and short. It also assumes that the RPF has enough information to make accurate statements about the area outside of the plan. Many of the items within Section IV ask the RPF, "Have you evaluated the on-site and off-site interactions of proposed project activities with the impacts of past, present and reasonably foreseeable probable future projects.....?" Again, in many circumstances as an RPF that prepares harvest plans for small landowners, I may answer this question NO. As mentioned above, I am currently working on an NTMP in which it's at the top of the watershed and 100% of the remaining part of the watershed is private land and has no public access. All of the roads within the watershed are gated and controlled. I can't answer this question YES because; I really don't know what the rest of the watershed looks like and 40 acres isn't a large enough sample of the watershed to make accurate statements on.</p>	Y	N	N	N/A	Y	Y
RPF	<p><b>Section IV Form I Section 7:</b> Greenhouse gas. We have no direction from CDF on this information.</p>	Y	N	N	Y	N	N
RPF	<p><b>Greenhouse gasses</b></p> <p>Not every THP is being asked to assess greenhouse gasses. Is Cal Fire going to require this for every plan? If so, under what Forest Practice Rule? From what I read in the attachment with this stuff, it says that the department shall assess GHGs in the attachments, not the RPF.</p>	Y	N	N	Y	N	N

Stakeholder	Comment	Form Related?	Addressed in Form Revision?	Rule Based?	Can Be Addressed in Guidelines?	Needs to be Addressed?	Needs Policy Decision?
Public	Finally, in order to provide a comprehensive GHG analysis to the public and decision-makers, the GHG section should require an explanation of the temporal aspects of GHG emissions. Because “a substantial portion of CO2 emitted into the atmosphere is not removed by natural processes for millennia, each unit of CO2 not emitted into the atmosphere avoids essentially permanent climate change on centennial time scales.” Consequently, mitigation efforts become less meaningful the longer they are delayed and “could result in substantially higher costs of stabilizing CO2 concentrations.” Therefore, it is undoubtedly preferable to remove a given ton of carbon in Year 1 rather than in Year 4, or Year 15, and so on, when it has wrought much more damage.	Y	N	N	Y	N	N
RPF	<b>THP Section 4-B II:</b> The phrasing of the 2 g (A)-(F) is ‘Have you evaluated’. If one checks “no” one has arguably not done the job. Therefore these will always be checked “yes” and require discussion. This pattern repeats for other resources. Would it not be simpler to simply say indicate discussion was required?	Y	N	N	Y	Y	N
RPF	<b>THP Section 4-B II:</b> for listed species under 4 d (A), we are currently expected to list the species evaluated. I see no desire for that in the new form, which is fine, but an odd omission of what seemed to have been informally required.	Y	N	N	Y	Y	N
<b>End Section IV Comments</b>							