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Sent to: reddingpubliccomment@fire.ca.gov on date shown below

July 24, 2014

Mr. Mike Bacca
CALFIRE Forest Practice Manager
6105 Airport Rd
Redding, CA 96002

Re: EPIC Comments for Timber Harvest Plan 2-14-026TRI “Slider”

Dear Mr. Bacca and CAL FIRE Officials:

The Environmental Protection Information Center (EPIC) presents the following comments regarding Timber Harvest Plan (THP) 2-14-026TRI “Slider.” Please include these comments and any referenced-attachments in the record for the above-referenced THP.

Summary

The “Slider” THP is incomplete and inadequate to allow meaningful assessment of potentially significant impacts to late seral habitat elements and “large, old trees” due to a lack of adequate discussion, disclosure or associated mitigation. Furthermore, the “Slider” THP is incomplete and inadequate because it fails to include the information required pursuant to 14 CCR 1034(m)(1) to demonstrate achievement of Maximum Sustained Production (MSP) pursuant to SPI’s option (a) document. The “Slider” THP is therefore incomplete and inadequate to allow meaningful assessment by either CAL FIRE or the public. The “Slider” THP therefore meets special conditions requiring disapproval pursuant to 14 CCR 898.2(c).

Who We Are and Why We Care

EPIC is a community-based, membership-driven non-profit environmental advocacy organization with nearly 20,000 members and online supporters. EPIC works to protect and restore ancient forests, watersheds, coastal estuaries, and native species in Northern California. EPIC uses an integrated, science-based approach, combining public education, citizen advocacy, and strategic litigation.

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EPIC and its membership have a vested interest in the protection, enhancement, and restoration of public trust resources, which include not only water, but also fish and wildlife resources. EPIC and its membership hold a stake in the protection of late seral forest stand characteristics, and “large, old trees” as well as insuring that MSP is achieved on SPI lands while giving consideration to the afore-mentioned public trust resources.

Lack of Disclosure of Potential Impacts to Old Growth, Late Seral Habitat Elements, and “Large, Old Trees”

The “Slider” THP provides a woefully inadequate treatment of the potential for late seral forest elements and/or “large, old trees” to be impacted by operations of the THP as currently proposed.

Firstly, the stand description provided in Section III, page 46 of the plan is incomplete and is inadequate to allow for meaningful assessment of pre-project conditions and potential impacts to late seral habitat elements, old growth, or “large, old trees.” For example, no approximate stand component age(s) have been provided. Furthermore, no average stand diameter information has been provided. Finally the only discussion of stand vegetation structure provided fails to even indicate whether the stand is evenaged or multi-layered, and fails to provide a discussion of the post-harvest condition of the stand. Finally, the stand description in Section III, page 46 of the plan is completely silent on the issue of whether or not any old growth, late seral, or “large, old trees” habitat elements are extant in the THP area, or within the THP biological assessment area. Further discussion and disclosure is necessary to allow for meaningful review of the project as proposed, and to allow for evaluation of any potentially significant adverse impacts that may occur.

Secondly, the discussion of late seral forests, late seral habitat elements, and “large, old trees” provided in Section IV, pages 126-127 of the plan is similarly vague. In fact, the discussion of potential late successional forests and late seral habitat is inaccurate and materially misleading. For example, SPI states in Section IV, page 126 the following:

“Late succession forest stands are at least 20-acres in size and late seral (mature) forests, not previously harvested, should be at least 80-acres in size as defined in 14 CCR 895.1 and technical rule addendum #2.”

This statement is incorrect and is materially misleading. Firstly, there is no requirement per the definition in 14 CCR 895.1 that late successional forests must be unlogged, and there is no requirement that such stands should be at least 80-acres in size. Secondly, there is currently no definition of “late seral forest” in the Forest Practice Rules. The insinuation that no late successional forests or late seral forests or legacy late seral habitat elements are extant in the plan based on the statement cited above is misleading, and can lead to inaccurate disclosure of and evaluation of potentially significant impacts.

The Appendix to Technical Rule Addendum #2 at (C)(4)(f) addresses and calls for the evaluation of late seral (mature) forest stands and characteristics. The Appendix to Technical Rule Addendum #2, (C)(4)(f) states that the evaluation of the presence or absence of late seral stands and structural characteristics provides the basis for evaluating the influence of management activities on associated wildlife ((C)(4)(f)). This same subsection of the Appendix to Technical Rule Addendum #2 then provides a means of evaluating such characteristics and the implications on the management of such characteristics for extant wildlife should include estimating the

percentage of land base within the project biological assessment area occupied by these stands and characteristics as described in (C)(4)(g)-(h).

The RPF and SPI have failed to provide any discussion or any evidence that the analysis required pursuant to Technical Rule Addendum No. 2 has been conducted, leaving the public and the reviewing agencies with no baseline for consideration of potentially significant adverse impacts to late successional forests, late seral forests, or “large, old trees.” The discussion provided in Section IV, page 127 is ‘canned’ language and is not specific or pertinent to this particular THP, leaving the plan incomplete and inadequate to allow for the assessment of potentially significant adverse impacts.

Failure to Demonstrate Maximum Sustained Production of a High-Quality Timber Product

14 CCR 1034(m)(1) requires landowners demonstrating MSP utilizing option (a) to disclose certain information, including pre-and-post harvest stocking levels, stand age information, growth projections, and volume estimates. This information appears to be lacking from this THP, as it is not found in either Section II, Item #14, or in an addendum to Section II, Item #14 in Section III. The absence of this information leaves the “Slider” THP incomplete, and inadequate to allow for the assessment of compliance with requirements to achieve MSP.

Conclusion

The “Slider” THP lacks meaningful information and discussion regarding the potential existence of late successional, old growth, late seral, or “large, old trees” and lacks sufficient information to allow for meaningful evaluation of potentially significant impacts to these public trust resources. What’s more, the plan appears to lack sufficient information to demonstrate that MSP will be achieved. The “Slider” THP is therefore incomplete, and inadequate to assess or address potentially significant adverse impacts, and is also materially misleading given the faulty discussion of late successional and late seral habitats. The “Slider” THP therefore meets the special conditions requiring disapproval pursuant to 14 CCR 898.2(c), and must accordingly be denied.

Sincerely,



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