

Department of Fish and Wildlife recommended edits of July 11, 2014 DRAFT plead “Working Forest Management Plan”

The following are the Department of Fish and Wildlife’s recommended changes to the subject plead. Most of these changes are the same or similar to a subset of those presented on the June 6, 2014 draft plead enclosed under the June 11, 2014 letter from the Department of Fish and Wildlife.

Notes:

- a. For Item 1, DFW had proposed in its comments on the June 6 plead a language revision to simply refer to WFMP as defined in statute. The definition includes “promoting forestland stewardship” in addition to the stated, “with the long-term objective of an unevenaged timber stand and sustained yield”. Since this revision was not adopted, DFW proposes adding the second objective stated in the WFMP definition, “promoting forestland stewardship.”
- b. For Item 2, DFW proposes a change not suggested before. DFW was responsive to the concern that all “wet meadows and other wet areas” could not reasonably be mapped for an up-to 15,000-acre area. That said, we realized the same is not true for lakes, as defined (exceeding one acre). If all Class III watercourses can be mapped, it should be practicable to map all lakes too.
- c. Items 3 and 4 were not discussed during the committee meeting probably because DFW did not include “comment bubbles” with its proposed text change in its submittal on the June 6 plead. Nevertheless, DFW deems this disclosure as necessary to evaluate how the WFMP will manage these important resources.
- d. Items 5, 6, 8 and 10 all pertain to the same issue: the need for disclosure of sensitive resources both within and in the vicinity of the WFMP area where timber operations could adversely affect them. For example, if an osprey nest is 100 feet beyond the WFMP boundary, the review team agencies would want to know this.
- e. Items 7 and 9 pertain to the same issue: CalFire consulting with DFW regarding the suitability of an alternative to CWHR. Note: CalFire as lead agency would make the final finding but after conferring with DFW. CWHR is within DFW’s expertise. There are a number of precedents in the Forest Practice Rules for this arrangement.
- f. Items 11 and 12 pertain to the same thing: disclosure of waters under the Working Forest Harvest Notice. In lieu of disclosure of waters other than watercourses and (now) lakes in the WFMP, disclosure of all of these waters would occur in the Notice. However, DFW recommends disclosure of “marshes, wet meadows and other wet meadows” on a map, not merely a “description”. Note DFW adds here “marshes”, consistent with what is referenced under Section 916.3(c).

Suggested edits to the July 11 plead

1. Under 1094.3, Page 3, Line 23:

“Working forest landowner(s) with the long-term objectives of promoting forestland stewardship and of an uneven aged timber stand.....”

2. Under 1094.6 (d)(6), Page 7, Line 7:

“(6) Location of all lakes and watercourses with Class I, II, III, or IV waters.”

3. Under 1094.6 (e) (11), Page 9, Line 19:

“(11) A description of late succession forest stands, including their biological legacies and hardwoods, a map of the locations of these stands in the plan area, their acreage and their composition and structure and how the total acreage and functionality of these stands and of this type of habitat will be maintained and/or enhanced across the plan area....”

4. Under 1094.6 (e) (11)(A), Page 9, Line 23:

“(A) Measures for the Retention measures and recruitment of ~~for~~ existing and future late succession forest stands and biological legacies such as snags, trees with cavities or basal hollows, and down logs, and ~~address~~ how ~~management of~~ those stands and legacies shall be managed.....”

5. Under 1094.6 (e) (12)(A), Page 10, Line 9:

“...and habitats in the WFMP area and its vicinity where timber operations would likely impact them, and how.....”

6. Under 1094.6 (e) (12)(C), Page 10, Line 13

“(C) Information on the presence and known locations of key locations of key habitat or individual ~~species~~ ~~Board sensitive species~~ Sensitive species pursuant to 14 CCR § 895.1 in the WFMP area and its vicinity where timber operations would likely impact them.”

7. Under 1094.6 (e) (14)(B), Page 11, Line 7:

“...or comparable typing system approved by the Director after consultation with the California Department of Fish and Wildlife.”

8. Under 1094.8 (g), Page 14, Line 19:

“.....discovered in the ~~harvest~~ logging area and its vicinity where timber operations would likely impact these species since approval of the WFMP.”

9. Under 1094.8 (g), Page 14, Line 21:

“California Natural Diversity Database or another ~~other~~ public databases approved by the Director after consultation with the California Department of Fish and Wildlife for any species listed....”

10. Under 1094.8 (g)(2), Page 15, Line 11:

“...~~endangered, candidate, or rare,~~ discovered inside or in close proximity to the area of timber operations...”

11. Under 1094.8 (n)(4), Page 16, Line 22:

~~“(4) A description of lakes, Wet Meadows and Other Wet Areas.~~

12. Under 1094.8 (0)(9), Page 17, Line 21:

“Location of all Class I, II, III ~~or~~ and IV waters, including watercourses, lakes, marshes, wet meadows and other wet areas.”