



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Division of Ecosystem Conservation
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EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



October 13, 2014

Susan Britting, Ph.D., Member
Richard Wade, Member
Michael Miles, Member
Forest Practice Committee
California Board of Forestry and Fire Protection
1416 Ninth Street
P.O. Box 944246
Sacramento, CA 94244-2460

Dear Dr. Britting, Mr. Wade and Mr. Miles:

**COMMENTS AND RECOMMENDATIONS FOR REVISIONS TO AUGUST 19, 2014
DRAFT PLEAD REGARDING SECTIONS 912.9, 932.9, 952.9 CUMULATIVE IMPACTS
ASSESSMENT CHECKLIST AND TECHNICAL RULE ADDENDUM NO. 2; PROPOSAL
TOWARD REFORMS TO CUMULATIVE IMPACTS ASSESSMENT PROCEDURES**

California Department of Fish and Wildlife (CDFW) staff has reviewed the August 19, 2014 draft plead titled, "Forest Practice Committee Cumulative Impacts Assessment Discussion". This plead pertains to proposed changes to Title 14, California Code of Regulations, sections 912.9, 932.9, and 952.9, Cumulative Impacts Assessment Checklist [All Districts], including, "Technical Rule Addendum No. 2 Cumulative Impacts Assessment". CDFW is taking this opportunity to provide comments and recommendations for revisions, which are included in the enclosed copy of the August 19, 2014 draft of the plead, for the Forest Practice Committee's consideration. Also enclosed for the Committee's consideration is a proposal for a comprehensive review of the cumulative effects procedures under the Forest Practice Rules (FPRs).

The draft plead proposes numerous but relatively modest changes to sections 912.9, 932.9, and 952.9, Cumulative Impacts Assessment Checklist [All Districts] and Technical Rule Addendum No. 2. One stated impetus for the draft plead is to bring the procedures under the Forest Practice Rules (FPRs) intended to address cumulative effects in line with reforms under the California Environmental Quality Act (CEQA) and the CEQA Guidelines that pertain to greenhouse gas emissions. CDFW adds to the suggested text changes in the enclosed draft plead.

While the proposed changes in the draft plead have merit, CDFW recommends the Committee consider a more fundamental review of the cumulative effects procedures under the FPRs that have been in place now and largely unchanged for some 23 years. These procedures long have been seen by many as onerous yet providing limited guidance on how to actually determine whether a proposed timber harvesting plan would create or add to existing significant cumulative effects on the environment. The proposed changes to the plead do not address these concerns.

Susan Britting, Ph.D., Member
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The enclosed proposed problem statement and suggested way forward calls for a comprehensive review of the findings and recommendations regarding cumulative effects prepared by earlier Board of Forestry and Fire Protection committees, and panels formed by other entities during these past nearly two-and-a-half decades. The enclosed document notes the convergence of interest in a review of the FPR's cumulative effects assessment procedures and the statutory mandate to establish ecological performance measures under AB1492.

CDFW appreciates the opportunity to provide comments and recommendations to the Forest Practice Committee on the August 19, 2014 plead and to offer an approach for a robust review of the cumulative effects procedures. Should you have any questions and/or would like to discuss our input, please contact Environmental Program Manager William Condon with the Department's Timberland Conservation Program in the Habitat Conservation Planning Branch, at (916) 651-3110 or by email at William.condon@wildlife.ca.gov.

Sincerely,



Sandra Morey
Deputy Director

Enclosure

cc: J. Keith Gilliss, Ph.D., Chair
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