

**From:** [N.D. Fenton](mailto:N.D.Fenton)  
**To:** [Public.Comments@BOF](mailto:Public.Comments@BOF)  
**Cc:** [nanidrew@comcast.net](mailto:nanidrew@comcast.net)  
**Subject:** BOARD MEETING OCT 1, 2015 - ADDITIONAL CONCERNS REGARDING DROUGHT MORTALITY HARVESTING  
**Date:** Thursday, October 01, 2015 1:54:30 AM

---

Dear Board of Forestry Members,

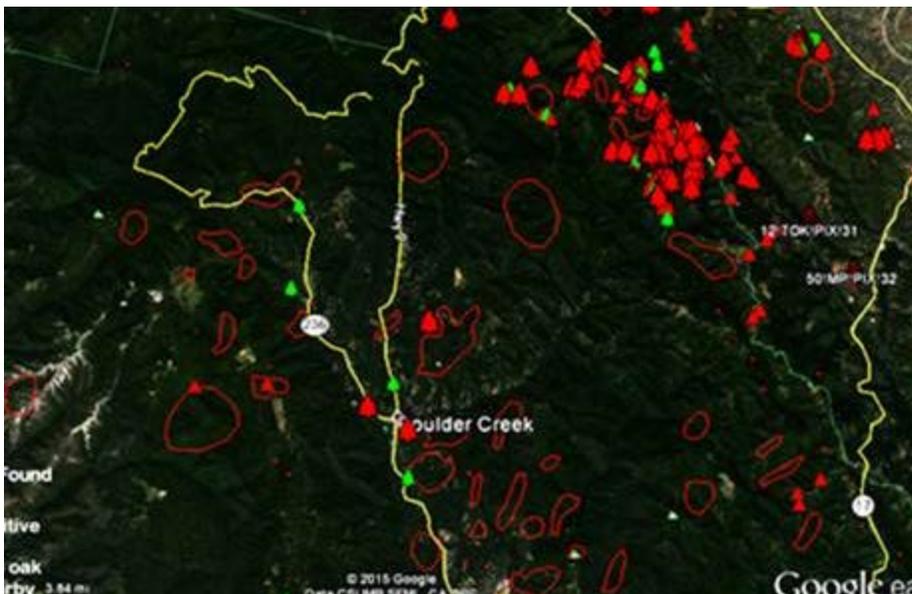
I would like to supplement my prior concerns with the Board. I recently was able to find and view CalFire's recent July 2015 mapping for the DROUGHT MORTALITY EXEMPTION proposed, yet is currently being authorized under an "EMERGENCY" EXEMPTION. This has brought Serious concerns, due to mapping errors as explained below.

ALL AREAS available for resource management activities ( DROUGHT MORTALITY HARVESTING) Have been mapped by CalFire (see pic).

RED CIRCLED OUTLINED AREAS as seen are CALFIRE'S "all proposed activity locations derived from GIS data" is where drought logging has been planned.

-  
**Major mapping Errors**

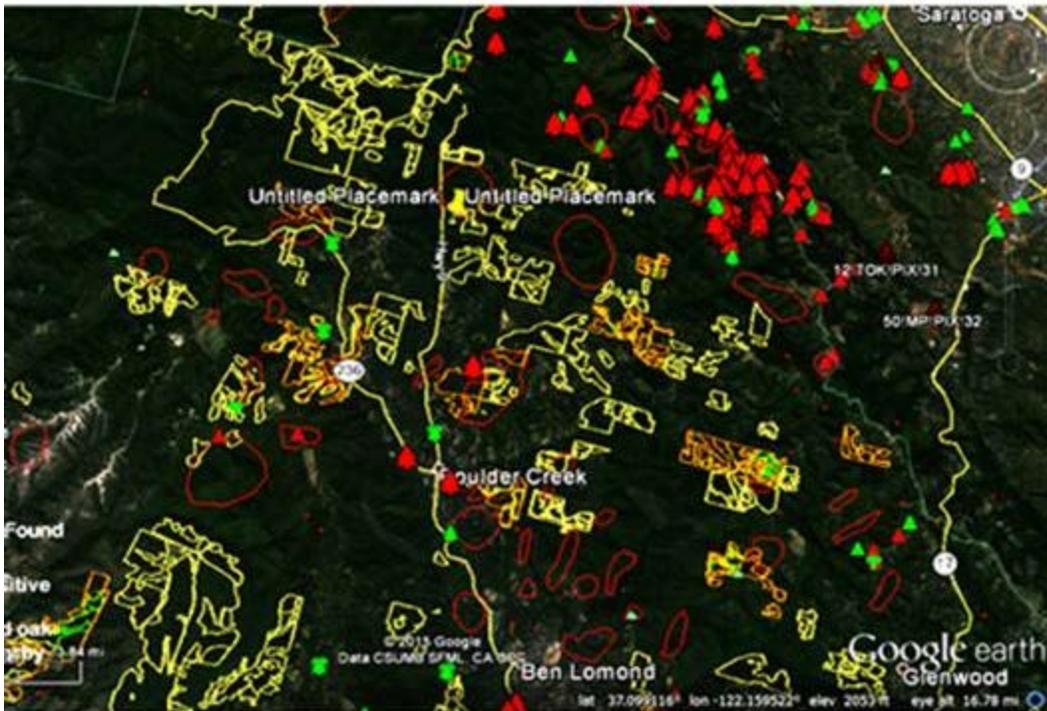
- CalFire claims, "Damage Agent(s): sudden oak death" (marked in red circles) *where there really aren't any SOD dead trees.*



CalFire *MISSED* most of the actual locations of SOD infected trees (shown in symbol as red triangle tree) already mapped by UC BERKELY's SOD map project (<http://www.matteolab.org/>).

CalFire maps for DROUGHT logging, where no such incidence of Drought death occurs. Other errors mapped where "info" tab claims "bears" caused mortality – but no bears live here. Also seen is a small marked area (ADS ID: LA0616213902) in the center of Big Basin State Park, "info" at the same plot one claiming "Host(s): WHITE/RED/JACK PINE GROUP; Damage Agent(s):drought" the other "Host(s): Monterey pine, Damage Agent(s): drought" WHICH IS IT? ITS WRONG!

**FULL 8.6**



Shown above in CalFire's Santa Cruz County mapped for Drought area display a coincidence:  
 -all CalFire mapped areas (red circles) happen to be plotted outside already harvested TPZ lands (yellow and orange) AND are forested areas, without residential homes on the plots.

-The "information" tabs INCORRECTLY CLAIM most areas "Host(s): WHITE/RED/JACK PINE GROUP" but it is FACTUALLY second growth coast redwood forest with old growth redwood group.

The Wrong Exemption being utilized.

Hundreds of areas are [wrongly] marked by CalFire, the majority info claiming "Damage Agent(s): sudden oak death" (a Disease) yet is planned to be harvested under the DROUGHT exemption (and not the Disease Exemption). The board and CalFire encourage and facilitate abuses of exemptions.

Violate USDA quarantine regulations

harvesting SOD dead trees that are dead or dying from a forest (soil) pathogen and under strict U.S. D.A. quarantine is not suggested as it will cause the pathogen to spread. Drought exemption harvesting should not be allowed in Santa Cruz county and will violate USDA quarantine regulations

A lead agency is not allowed to delegate its own duty.

The DROUGHT MITIGATION FORM allows the Registered Forester or stakeholder applicant in each case, to make the determination whether the project will or will not "have a significant effect on the environment." Delegation of its duty to the industry to self-issue exemption logging to themselves ( a bias, financially involved, and conflicted party to the permit). The prohibited determination will be useless, unverifiable, and no assessment or confirmation of existing conditions will be made, and not required to be made per CalFire's proposal.

The State of Ca developed a DROUGHT OPERATIONS PLAN: And CalFire is not included.

This Drought Operations Plan and Operational Forecast (the Plan) is based on collaborative discussions between the U.S. Bureau of Reclamation (Reclamation), California Department of Water Resources (DWR), U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), California Department of Fish and Wildlife (CDFW), and the State Water Resources Control Board (State Water Board). The plan's mission notes that the already fragile economic well-being of many of our rural communities, and our employees and their families. Our response to this critical situation must demonstrate our commitment as conservation leaders, and must align with our two foundational focus areas: Ecological Restoration and Healthy Workplace and Workforce"

CalFire collaborates with no other entity. It is clear that collaboration with stakeholders have targeted areas of old growth and 2<sup>nd</sup> growth redwood forests – to be harvested under the guise of a DROUGHT exemption, without any DROUGHT mortality even claimed by CalFire. There are many other agencies that assist each other, here, CalFire refuses to utilize other available and free expertise. This is not a DROUGHT or DISEASE management project. **(Drought related mortality is not even a requirement under the drought mortality exemption, You can substitute ancient growth trees instead.)**

"The SODmap Google Earth based map of SOD distribution is an invaluable tool for SOD disease management"

Thank you for this opportunity to express concerns,  
DREW FENTON

**FULL 8.6**