

1 CHRISTOPHER J. CARR (BAR NO. 184076)
Email: CCarr@mofa.com
2 WILLIAM M. SLOAN (BAR NO. 203583)
Email: WSloan@mofa.com
3 MORRISON & FOERSTER LLP
425 Market Street
4 San Francisco, CA 94105-2482
Telephone: (415) 268-7000
5 Facsimile: (415) 268-7522

6 Attorneys for Appellant
ROSEBURG RESOURCES CO.
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10 BEFORE THE STATE OF CALIFORNIA
11 BOARD OF FORESTRY AND FIRE PROTECTION
12

13
14 IN THE MATTER OF THE APPEAL OF
ROSEBURG RESOURCES CO. FOR THE
15 RETURN OF TIMBER HARVESTING PLAN
NO. 2-06-106 SHA (4) BY THE DIRECTOR OF
16 THE DEPARTMENT OF FORESTRY AND
FIRE PROTECTION
17

THP No. 2-06-106 SHA (4)

**ROSEBURG RESOURCES CO.'S
BRIEFING ON APPEAL**

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1 CalFIRE agrees that the Blacktail THP is in conformance with the rules and regulations of
2 the Board and the provisions of the Act, except for one issue—alleged visual impacts from the
3 clearcut harvesting of Unit 102. The CalFIRE Redding Office contends that the harvest of Unit
4 102 will create significant adverse visual impacts and that the THP’s mitigation measures will not
5 reduce those impacts to a less than significant level. Roseburg will demonstrate to this Board that
6 CalFIRE’s contention is wrong, and that the record supports a finding of no significant impacts.

7 **I. THE EVALUATION OF AESTHETIC IMPACTS MUST BE PERFORMED**
8 **IN THE CONTEXT OF THE PROJECT LOCATION—THESE ARE**
9 **LANDS ZONED FOR TIMBER PRODUCTION**

10 At issue are privately-owned timberland production zone (“TPZ”) lands that, by law, are
11 “devoted to and used for growing and harvesting timber.” Cal. Gov’t Code § 51104(g). The
12 Timberland Productivity Act provides that zoning land as TPZ creates “a presumption that timber
13 operations . . . may reasonably be expected to and will occur on that parcel.” *Id.* § 51115.1(a);
14 *see also id.* § 51115.1(b) (Legislature’s intent “to make clear . . . that timber operations are
15 expected to occur on that parcel at a future date”).

16 The zoning of a parcel of land is important in the evaluation of aesthetics because “[t]he
17 significance of an environmental impact is . . . measured in light of the context where it occurs.”
18 *Bowman v. City of Berkeley (Affordable Housing Associates)*, 122 Cal. App. 4th 572, 589 (2004).
19 Here, the context is that timber harvesting is, by law, expected to occur on these lands. The
20 *Bowman* court further observed that zoning is an important factor in the evaluation of aesthetics:

21 That some, or perhaps all, environmental impacts have an esthetic
22 facet, does not mean that all adverse esthetic impacts affect the
23 environment. That is neither good logic nor good law. Some
24 questions of esthetics do not seem to lend themselves to the detailed
25 analysis required Like psychological factors they “are not
26 readily translatable into concrete measuring rods.” [Citation.] The
27 difficulty in precisely defining what is beautiful cannot stand in the
28 way of expressions of community choice through zoning regulation.

29 122 Cal. App. 4th at 591 (quoting *Maryland-National Capital Park & Planning Comm’n. v. U.S.*
30 *Postal Serv.*, 487 F.2d 1029, 1038 (D.C. Cir. 1973)). Here, the zoning regulation is
31 unambiguous—the lands are zoned for timber production.

32 ///

1 The TPZ zoning designation exists in order to implement the following policies of the
2 state, expressly adopted by the Legislature:

3 (1) Maintain the optimum amount of the limited supply of
4 timberland to ensure its current and continued availability for the
growing and harvesting of timber and compatible uses.

5 (2) Discourage premature or unnecessary conversion of
6 timberland to urban and other uses.

7 (3) Discourage expansion of urban services into timberland.

8 (4) Encourage investment in timberlands based on reasonable
expectation of harvest.

9 *Id.* at § 51102(a). “Maintain[ing] the optimum amount of the limited supply of timberland” is a
10 cornerstone of forest resource management in California. *Id.*

11 Moreover, the State’s Forest Practice Act and Forest Practice Rules mandate the
12 maximum sustained production (“MSP”) of high-quality timber products, and require every THP
13 to demonstrate MSP. Cal. Pub. Res. Code § 4513(a); Cal. Code Regs. tit. 14, § 933.11. The MSP
14 requirement optimizes sustainable production of timber, ensuring supply for California consumers
15 and encouraging investment in timberlands. MSP is more than a statement of policy; landowners
16 must expend significant resources to demonstrate that their lands will be managed in a way that
17 meets MSP. The demonstration is an exercise that involves balancing growth and harvest over
18 time, looking in detail at projected inventories, average annual projected yields, growth
19 potentials, stand vigor and regeneration, among other factors. Cal. Code Regs. tit. 14, § 933.11.
20 In developing a THP, the Registered Professional Forester (“RPF”) is required to select
21 silvicultural systems “which achieve maximum sustained production of high quality timber
22 products.” *Id.* at § 933.

23 **II. THE THREE-STEP EVALUATION OF VISUAL RESOURCES**

24 The evaluation of visual resources under the Forest Practice Rules’ Technical Rule
25 Addendum No. 2 (Cumulative Impacts Assessment), is a three-step process. Cal. Code Regs.
26 tit. 14, § 932.9.

27 After a visual assessment area is established (“the logging area that is readily visible to
28 significant numbers of people who are no further than three miles from the timber operation”), the

1 THP must first “identify any Special Treatment Areas designated as such by the Board because of
2 their visual values.” *Id.* Relevant to this appeal, the definition of Special Treatment Area
3 includes areas within 200 feet of a state park boundary or areas within 200 feet of state designated
4 scenic highways or scenic corridors. *Id.* at § 895.1. For the Blacktail THP, there are no Special
5 Treatment Areas, designated as such by the Board of Forestry for visual purposes, on or near the
6 plan area. AR 000137. Thus, Castle Crags State Park (“CCSP”) has not been designated for its
7 visual values, and the stretch of Interstate 5 from which Unit 102 is intermittently visible has not
8 been designated a scenic highway. In *Bowman*, the court rested its decision to uphold a finding of
9 no significant aesthetic impacts from a development project in part on the fact that the project was
10 “not located in an environmentally sensitive area, and it does not implicate any historical or
11 scenic resources.” 122 Cal. App. 4th at 590. As in *Bowman*, the project here is not located such
12 that it implicates any designated resources. Neither the park nor the highway meets the criteria of
13 the Forest Practice Rules for special treatment due to any visual values—thus, the THP properly
14 did not identify any such Special Treatment Areas.

15 The second step in the evaluation of visual resources is to “[d]etermine how far the
16 proposed timber operation is from the nearest point that significant numbers of people can view
17 the timber operation. At distances of greater than 3 miles from viewing points activities are not
18 easily discernible and will be less significant.” Cal. Code Regs. tit. 14, § 932.9. For the Blacktail
19 THP, the RPF explained that there is no location where all 19 acres of Unit 102 are visible—the
20 nearest point where any acreage in the unit is visible is 0.5 air miles. AR 000139. And to the
21 extent there are locations where portions of the unit may be visible, the plan explains that those
22 locations are almost all screened by intervening vegetation and nearby trees. AR 000138.

23 The third and final step for evaluating visual resources is to “[i]dentify the manner in
24 which the public identified [in the previous steps] will view the proposed timber operation (from
25 a vehicle on a public road, from a stationary public viewing point or from a pedestrian pathway).”
26 Cal. Code Regs. tit. 14, § 932.9. The Blacktail THP explains that portions of Unit 102 are visible
27 for stationary viewing at three locations (one being a gas station, and the other two locations—a
28 state park kiosk area and parking lot—affording partially screened views of Unit 102).

1 AR 000138. With respect to the two hiking trails evaluated, hikers may only see portions of the
2 unit intermittently for ten seconds at walking pace. AR 000138. Finally, portions of Unit 102 are
3 visible intermittently by car traveling southbound on Interstate 5 for a total of one minute, with
4 intervening roadside trees screening the view at several points during that period. AR 000138.

5 Thus, with respect to the Blacktail THP, there are no Special Treatment Areas with special
6 visual values, there is no location where the entire unit may be viewed, and the locations where
7 portions of the unit may be viewed are either partially or entirely screened by intervening
8 vegetation (and viewing from most such locations is fleeting). No one has disputed the facts of
9 this evaluation.

10 **III. THE AGENCY REVIEW OF THE BLACKTAIL THP'S VISUAL**
11 **IMPACTS WAS INCONSISTENT, CURSORY, AND UNTIMELY**

12 Roseburg submitted the THP to the CalFIRE Redding Office on September 8, 2006, and
13 the THP was filed ten days later on September 18, 2006. AR 000360. The deadline for the
14 Preharvest Inspection ("PHI") was September 28, but the RPF for Roseburg agreed to extend that
15 deadline to October 3 "[t]o ensure that everyone can attend." AR 00362. For the CalFIRE
16 inspector, the PHI Report included the following general question about visual resources: "Please
17 ascertain if the proposed project will create significant adverse impacts. Should the RPF provide
18 additional mitigations to prevent significant adverse visual impacts?" AR 000366. The same
19 report expressly confirmed that the silvicultural method for the THP was "appropriate."

20 AR 000368.² Notably, the California Department of Parks and Recreation ("State Parks") did not
21 appear for the PHI. AR 000368-69.

22 The PHI Report further stated that the THP complies with the goals of restoring,
23 enhancing and maintaining the productivity of the state's timberlands, that the THP complies with
24 MSP requirements, that the THP contains leave trees of good form and that are capable of good
25 future growth capacity, that the leave trees are uniformly distributed throughout the area, and that

26 _____
27 ² The report also shows that no response to concerns would be required prior to approval
28 to mitigate potential impacts. AR 000368.

1 the regeneration and site preparation plan are sufficient to ensure prompt regeneration.
2 AR 000370-71. At the conclusion of the report, however, there is a recommendation that asks
3 about potential visual impacts from the harvesting of Unit 102 based on a PHI stop at the top of
4 the unit from which CCSP could be seen. AR 000379-80. The recommendation goes on to
5 request additional details and digital photography to evaluate any possible impacts to visual
6 resources. AR 000380-81.

7 Before the recommendations were received by Roseburg, the RPF for the THP discovered
8 that concerns were being raised about visual impacts and learned that a second PHI was
9 supposedly being planned. The RPF contacted CalFIRE and asked for documentation and also
10 expressly requested “information on what standards we are using for assessing impacts to visual
11 resources.” AR 000383. To this day, no standards have ever been provided by CalFIRE or any
12 other agency. Instead, CalFIRE’s position appears to be that if clearcut timber operations occur
13 anywhere within the vicinity of the state park or highway, they are conclusively presumed
14 significant adverse impacts to visual resources.

15 **IV. THE REVIEW TEAM EXPRESSED CONCERNS THAT ARE**
16 **ADDRESSED, AND RECOMMENDED MITIGATIONS THAT ARE**
17 **INCLUDED, IN THE PLAN**

18 During November and December of 2006, Roseburg met with agency staff and sought to
19 address any concerns regarding visual resources. The agency questions were initially of the most
20 general nature—indeed, State Parks sent nothing more than an unsigned one page letter on
21 December 1 (never before seen by Roseburg until this appeal) that consisted of a recitation of the
22 Forest Practice Rules, as opposed to any substantive comments. AR 000394.

23 Finally, on December 5, 2006, almost 29 days after the THP was filed, the Review Team
24 added some detail to their concerns (without any accompanying substantive evidence), stating
25 that the team “disagrees” with the Registered Professional Forester’s assessment of the
26 significance of visual impacts. AR 000421. Notably, the Review Team recommended two
27 options—either that the plan

28 [1] be amended to state trees at least 16" DBH representative of the
dominant or codominant portion of the stand and chosen for their
screening attributes be retained. It would help greatly if trees were

1 left in the tractor portion of the unit to create a “fuzzy” boundary or
2 [2] the tractor portion be changed to selection silviculture.

3 AR 000421. Restated succinctly, the recommendation was to either (1) retain trees for their
4 screening attributes and leave trees to create a fuzzy boundary, or (2) change the silvicultural
5 method from clearcut to selection.

6 The record shows that Unit 102 readily meets the first recommended option. A variety of
7 measures have been included in the THP to retain trees for screening and boundary mitigation.

8 The plan specifies for the unit that:

9 [A]pproximately 2 individual leave-trees per visible acre are
10 scattered throughout the unit to breakup outline of the unit on the
11 hillside. In addition, 3 large black oaks are retained along
12 southeastern ridge. Two HRAs [Habitat Retention Areas] have also
13 been placed within this unit: One is on the western ridge and will
14 screen a portion of that ridgeline. A second HRA is placed adjacent
15 to a spring in center of unit along north boundary. Portions of
16 unit’s boundary have been configured with irregular edges to blend
17 into the surrounding landscape. Two Class III watercourses in the
18 northern 1/3 of the unit will have understory cover retained.

15 AR 000144. Individual leave-trees range in size up to 36” DBH. AR 000008. The RPF further
16 explained in the plan that the leave-trees “have full crowns and are orientated to screen the
17 clearcut from motorists on Interstate 5. These trees are distributed in the portions of the unit
18 which are not screened by the adjacent trees along the boundary of the clearcut.” AR 000420.

19 For context, the plan also explains that far more visible canopy openings exist, or have
20 been permitted in the past. “Natural and manmade openings occur throughout the Sacramento
21 Canyon. Such openings include road cuts, UPRR, Interstate 5, transmission lines, brush fields,
22 old fire scars, and existing clearcuts.” AR 000421. Nevertheless, the RPF reassured that, to the
23 extent there could be any impacts from the Blacktail THP, they would be temporary:

24 All visual impacts caused by timber harvesting are relatively short
25 in duration. All evenaged regeneration units will be effectively
26 restocked with conifer seedlings, usually during the first year after
27 harvest. Green-up will begin within 2 to 3 years of harvest and
28 within 10 years canopy coverage by young trees and other
vegetation will be 70 to 100 percent.

AR 000147.

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1 Again, no one has disputed these facts.

2 **V. ROSEBURG COMPILED EXHAUSTIVE EVIDENCE AND CONDUCTED**
3 **A COMPREHENSIVE VISUAL ANALYSIS**

4 Notwithstanding that the THP already included the mitigations that CalFIRE had
5 requested, Roseburg went further and collected evidence to show that there was no basis for any
6 concerns regarding visual impacts even in the absence of the mitigation. Roseburg's RPF
7 engaged in a detailed investigation and analysis of any alleged impacts to visual resources from
8 all locations within three miles of the harvesting units. Over the course of three months, the RPF
9 ran computer software modeling and conducted field investigations with digital photography
10 cross-referenced with GIS positioning to evaluate whether there was any legitimacy to the
11 concerns that had been raised. Visibility of Unit 102, especially from CCSP, was extensively
12 analyzed by the RPF. The plan states that "[v]isibility of proposed operations [in Unit 102] is
13 about 75% obscured at the kiosk parking lot and about 99% obscured at the upper vista point."
14 AR 000150-51.

15 The RPF established this limited visibility with respect to Unit 102 through the use of
16 visual evidence, submitting to CalFIRE the digital photography and landscape simulation
17 software model results. AR 000158. The RPF exhaustively documented—location-by-location
18 with serial photographs and simulation models—the screening effects of intervening vegetation
19 and ridge lines. AR 000158-71. For example, the model shows where Unit 102 is situated to the
20 south of the CCSP vista point. Exhibit A-1.³ Then, a photograph was taken from that vista point
21 facing south, showing the hardwood screen that eliminates any view of Unit 102. Exhibit A-1.
22 The same exercise was done for the park campground. Exhibit A-2. In another example, the
23 model shows where Unit 102 is situated to the south of the CCSP park kiosk and lower parking
24 lot. Exhibit A-3. Then, a photograph was taken from that kiosk location facing south, showing
25 the vegetative screening virtually eliminating any view of the unit. Exhibit A-3. The same was
26

27 ³ For ease of reference, Roseburg is submitting an appendix with this brief as Exhibit A.
28 All of the images in the appendix are included in the administrative record within AR 000158-71.

1 done in the kiosk location facing southwest. Exhibit A-4. In yet another example, the model
2 shows where Unit 102 is situated to the south-southwest of the CCSP park entrance. Exhibit A-5.
3 Then, a photograph was taken at the same park entrance location facing south-southwest, to
4 demonstrate the roadside tree screening of the unit. Exhibit A-5. The record shows that
5 Roseburg's RPF comprehensively reviewed all visible areas and presented detailed evidence that
6 visual impacts were either non-existent, or irrefutably not significant.

7 No one has disputed the integrity of this evidence.

8 **VI. SEVERAL MORE MONTHS PASSED BEFORE CALFIRE DECIDED,**
9 **WITHOUT ANY CONTRARY SITE-SPECIFIC EVIDENCE, TO SIMPLY**
10 **DISAGREE WITH ROSEBURG AND DENY THE THP**

11 All of Roseburg's evidence and analysis was received by CalFIRE on March 23, 2007.
12 AR 000137-209. Thereafter, several weeks passed with no response. Indeed, it was not until
13 June 18, 2007 that State Parks decided to submit an objection, ignoring the analysis that Roseburg
14 had presented. The essence of the objection was:

15 As California State Parks has stated from the beginning of this
16 process, there is only one unit, #102, that is of concern. A 19-acre
17 clearcut with only 30 leave trees in the middle of the ridge less than
18 one mile from the park will create an unappealing break in the
19 forest scenery for at least seven years until the planted trees have
20 had sufficient time to grow.

21 AR 000456. No mention is made of the limited visibility of Unit 102 as demonstrated by the
22 submitted photographs, or the habitat retention areas and boundary mitigations for the unit, or
23 even the fact that no more than 16 acres of the unit are ever visible at once from any vantage
24 point in the park. State Parks continues its objections by suggesting that the public "perceives
25 clearcuts as excessive exploitation or destruction of the land and its ecosystems. Even when
26 stand structure and timber quality suggest a clearcut, other factors such as location and aesthetics
27 needs to be considered." AR 000456. This anti-clearcut comment (one based on irrational
28 perceptions) is indicative of the few other comments submitted—none of which evaluated the

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1 view of Unit 102 from any site-specific locations. AR 000559-62.⁴ While the comments may be
2 included in the record, CEQA provides that “[t]he existence of public controversy” is not an
3 adequate basis for finding a significant impact on the environment. Cal. Code Regs. tit. 14,
4 § 15064(f)(4).

5 No explanation exists for CalFIRE’s (and State Park’s) failure to address the
6 comprehensive analysis of visual impacts that the RPF had performed and submitted—and is now
7 before the Board (*see, esp.*, Exhibits A-1 to A-5). Having delayed nine months before submitting
8 its objection (second review of the THP was completed by October 27, 2006 [AR 000385]), State
9 Parks ignored the CEQA timeliness requirement for the submission of comments.

10 Comments from the public and public agencies on the
11 environmental effects of a project shall be made to lead agencies as
12 soon as possible in the review of environmental documents ... in
13 order to allow the lead agencies to identify, at the earliest possible
time in the environmental review process, potential significant
effects of a project, alternatives, and mitigation measures which
would substantially reduce the effects.

14 Cal. Pub. Res. Code § 21003.1(a). The comments of State Parks came beyond the last minute—
15 they were made approximately nine months late.

16 Exacerbating the prejudice from this delay, CalFIRE’s Review Team Chair took State
17 Parks’ comments and only six days later (on July 2, 2007) relied on it to recommend denial of the
18 plan—the only alternative being to change the silviculture method on Unit 102. AR 000539.
19 Perhaps more troubling, internal communications included in the record suggest a predetermined
20 outcome was reached at least three months before the denial decision was made on August 2,
21 2007—an email from a CalFIRE forester, sent May 11, 2007, states: “[f]rom my understanding
22 during the review of this THP Mike and yourself had already determined that clearcutting would
23 not be appropriate.” AR 000455.

24 This anti-clearcutting policy of the CalFIRE Redding Office runs afoul of another critical
25 aspect of CEQA and its Guidelines—the prohibition on unsubstantiated or narrative

26 ⁴ *See, e.g.*, AR 000561 (“This type of logging never looks good, and does not help
27 forests”) and AR 000562 (“We believe this type of greed-driven harvesting is of no benefit to the
28 forest.”)

1 findings/comments without reliable supporting evidence. "Reviewers should explain the basis for
2 their comments, and should submit data or references offering facts, reasonable assumptions
3 based on facts, or expert opinion supported by facts in support of the comments." Cal. Code
4 Regs. tit. 15, § 15204(c). "Argument, speculation, unsubstantiated opinion or narrative, [and]
5 evidence which is clearly erroneous or inaccurate ... does not constitute substantial evidence."
6 *Id.* at § 15384(a). It should be noted that the CalFIRE Redding Office did not dispute the
7 evidence submitted by Roseburg. In fact, the Deputy Chief who issued the denial letter wrote in
8 an e-mail to Roseburg: "I would like to commend Bob Lewis and Roseburg Resources for a well
9 written plan, and the presentation of the visual analysis was very clear and understandable; we
10 just came to different conclusions on Unit 102." (This email was apparently overlooked by
11 CalFIRE for inclusion in the hearing record, but is attached hereto as Exhibit A and submitted for
12 annexation into the record.) The "different conclusions" are articulated in the Official Response:

13 Unit 102 can be viewed by the public from southbound Interstate 5
14 and at various locations within Castle Crags State Park, including
15 the Pacific Crest National Scenic Trail. ... In the final revised THP
16 document, the RPF disclosed that 16 of the 19 acres of the unit will
17 be visible from most of his identified public viewing points and that
18 the probability of change in the visual setting was High. His
19 proposal to mitigate the potential impacts to the visual resources
20 from this unit consists of leaving approximately 2 individual leave-
21 tress per visible acre, 3 large black oak, 2 habitat retention areas,
22 and irregular edges of the boundary.

23 ...

24 As presented to the Review Team the harvesting of Unit 102 as
25 proposed with mitigation by the RPF would remove a majority of
26 the continuous tree canopy that now exists, exposing the two
27 seasonal roads and their associated cuts and fills near the top of the
28 unit (and possibly the proposed seasonal road in the bottom third of
the unit) and the resultant bare ground from the operations to public
view from southbound Interstate 5 and numerous locations within
Castle Crags State Park. The amount of mitigation proposed by the
RPF would be insufficient to adequately screen the effects of the
operation from view; thereby creating a significant cumulative
impact to visual resources.

AR 000552-3. The Review Team chair made his recommendation for the denial of the plan during the final interagency review of the plan held on July 2, 2007 and in a letter to the RPF

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1 informing him of the recommendation for denial, he invited the RPF to change the silvicultural
2 method for Unit 102 as a means to reduce the visual impact to less than significant.

3 This Official Response fails to meet the legal requirement for drawing a conclusion that a
4 significant impact to visual resources would result from the plan. The California Supreme Court
5 has explained that an agency “must set forth findings to bridge the analytic gap between the raw
6 evidence and ultimate decision or order. ... [T]he intended effect is to facilitate orderly analysis
7 and minimize the likelihood that the agency will randomly leap from evidence to conclusions.”
8 *Topanga Ass’n for a Scenic Cmty. v. County of Los Angeles*, 11 Cal.3d 506, 515-16 (1974). Here,
9 the undisputed “raw evidence,” in the form of photographs and landscape modeling, shows
10 limited-to-no visibility of timber operations. With nothing to refute these pictures, CalFIRE has
11 taken the impermissible random leap to conclude that visual impacts will be significant and, on
12 that sole basis, deny the plan.

13 CalFIRE's arbitrary conclusion is the equivalent of decreeing “you may like chocolate, but
14 I like vanilla.” Its arbitrariness is not diminished by the fact that the conclusion is in the realm of
15 aesthetics. The maxim that “there is no disputing taste” cannot justify CalFIRE's conclusion
16 especially where, as here, the lands are TPZ lands, clearcutting was found to be silviculturally
17 appropriate, and the RPF irrefutably demonstrated the visual impacts were not significant.

18 CONCLUSION

19 Aesthetic impacts from the production of timber on TPZ lands should rarely be a basis for
20 denying operations, and only when the findings are based (as they must be) on scientific and
21 factual data. Cal. Code Regs. tit. 14, § 15064(b). In this appeal, all of the scientific and factual
22 data in the record show that there will be little to no visibility of the operations at all and that the
23 THP is in conformance with the rules and regulations of the Board and the Forest Practice Act.
24 Clearcutting is a legal silvicultural method and was deemed appropriate for this THP—there is no

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basis for its denial. For all the foregoing reasons, Roseburg respectfully requests that the Board approve the Blacktail THP.

Dated: October 23, 2007

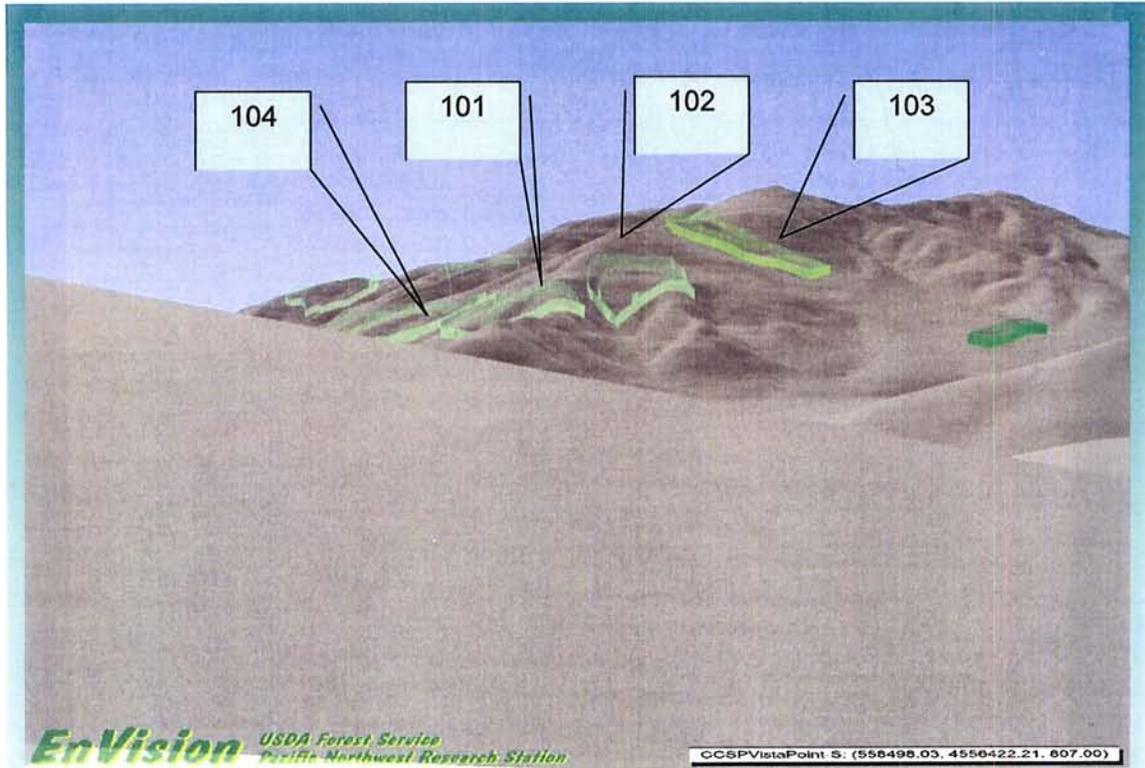
MORRISON & FOERSTER LLP

By: 
Christopher J. Carr

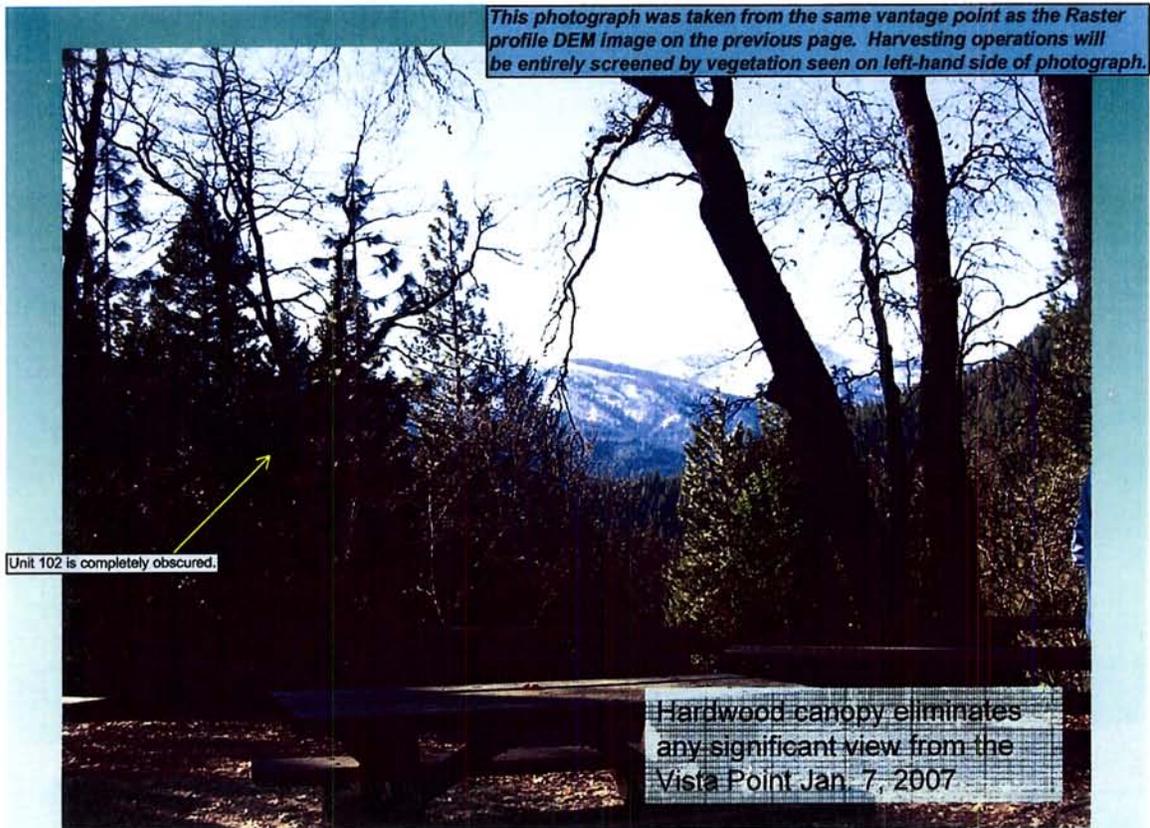
Attorneys for Appellant
ROSEBURG RESOURCES CO.

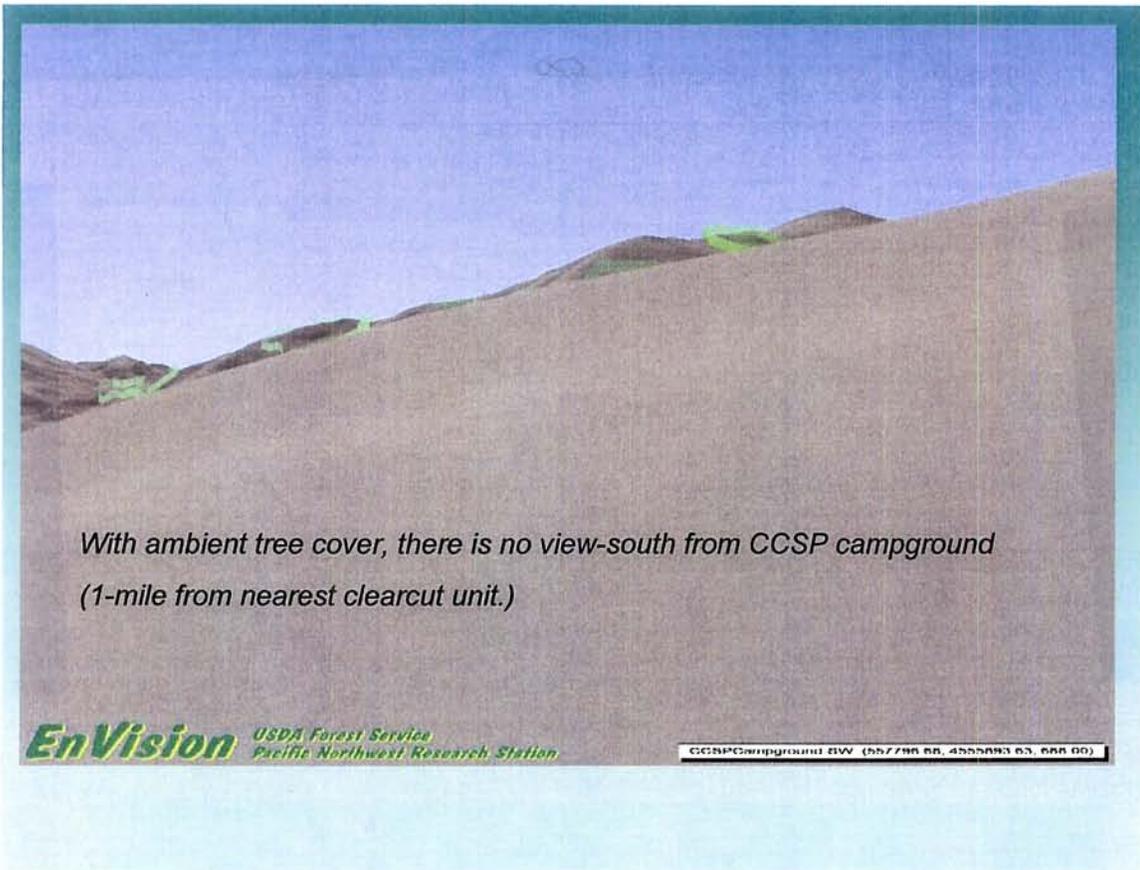
Briefing Appendix

Exhibits A-1 through A-5



Tree cover will effectively shield the project from the view-South from CCSP vista-point. (Approx. 1.5 miles to nearest Unit #102)

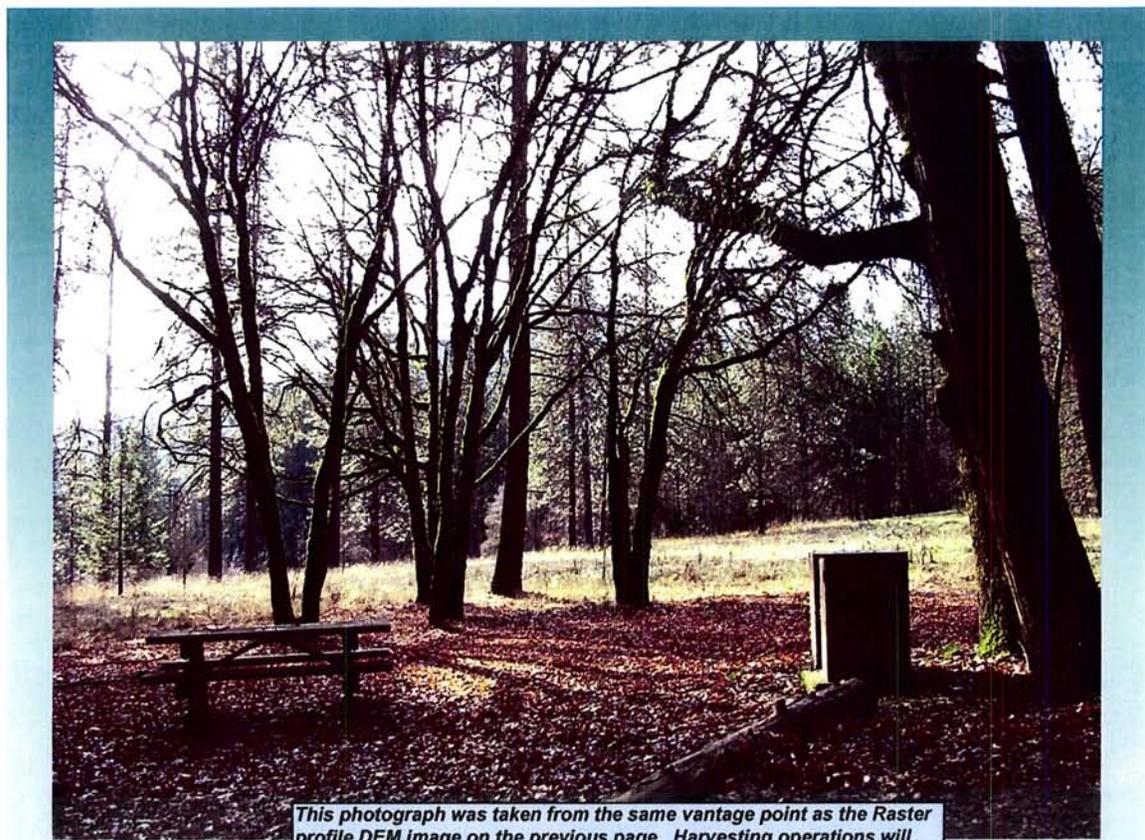




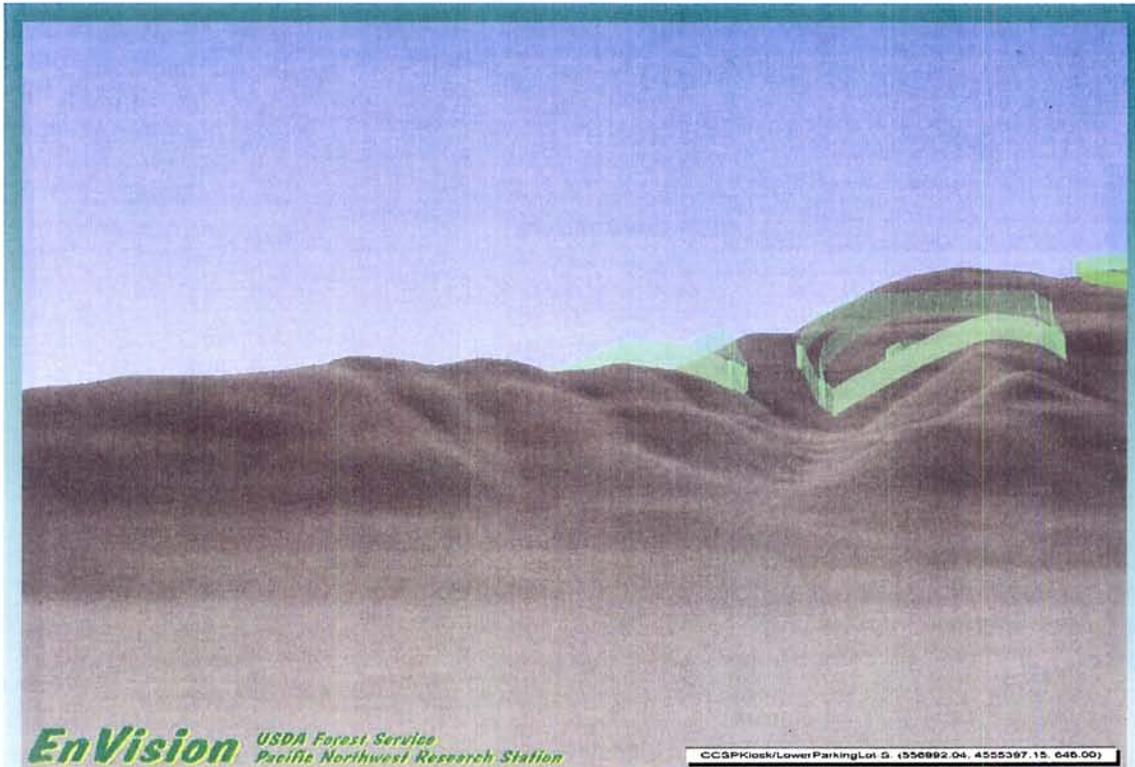
*With ambient tree cover, there is no view-south from CCSP campground
(1-mile from nearest clearcut unit.)*

EnVision *USDA Forest Service
Pacific Northwest Research Station*

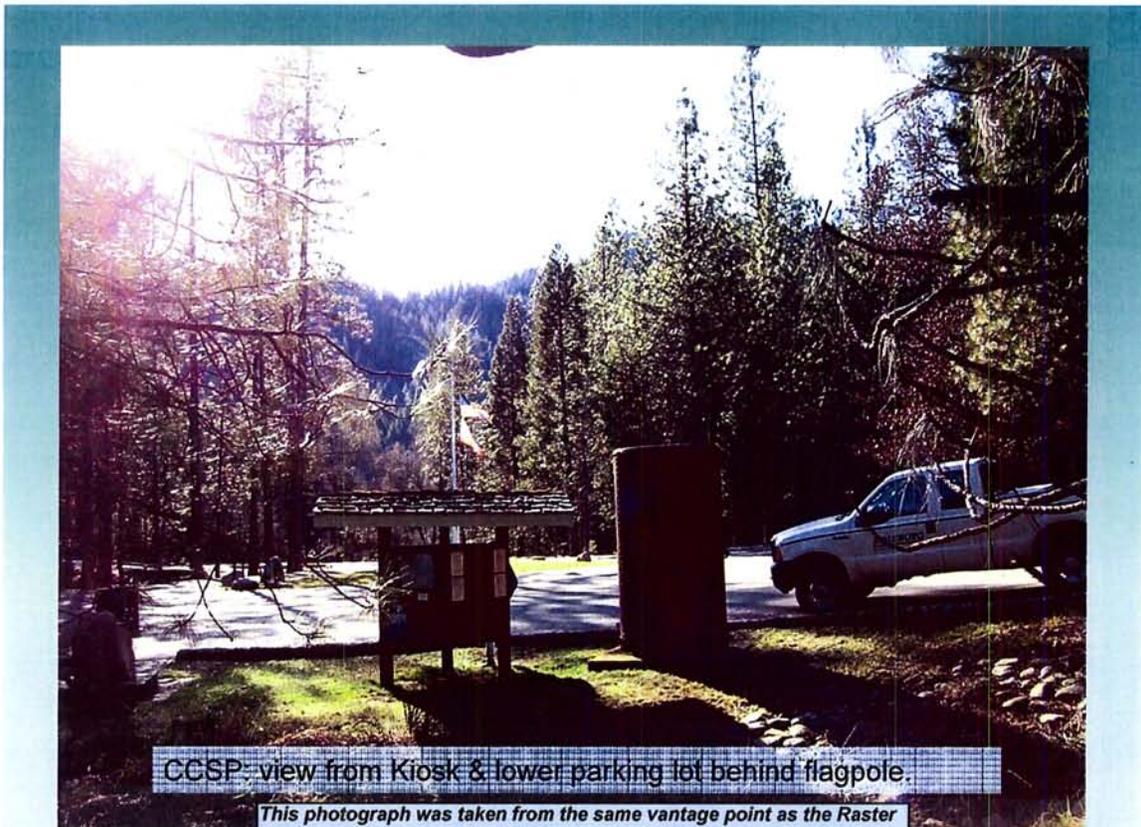
CCSPCampground EIV (567786 RB, 4555493 G3, PAR 00)

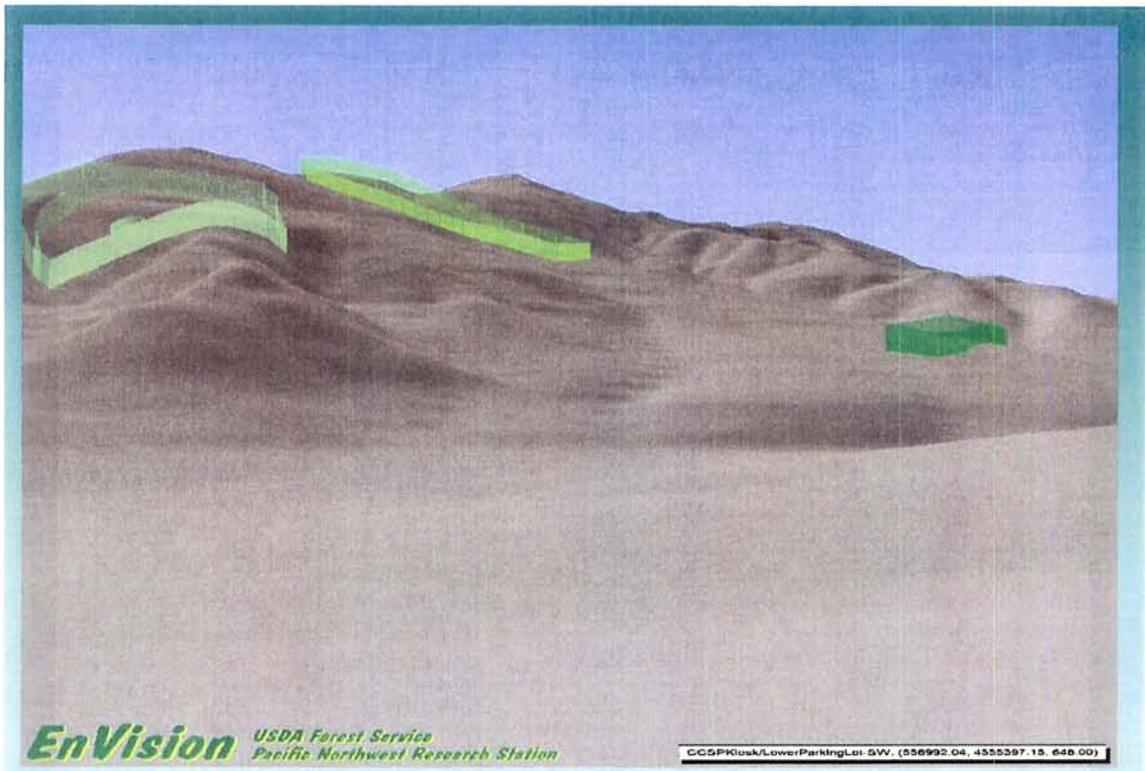


This photograph was taken from the same vantage point as the Raster profile DEM image on the previous page. Harvesting operations will be entirely screened by vegetation.

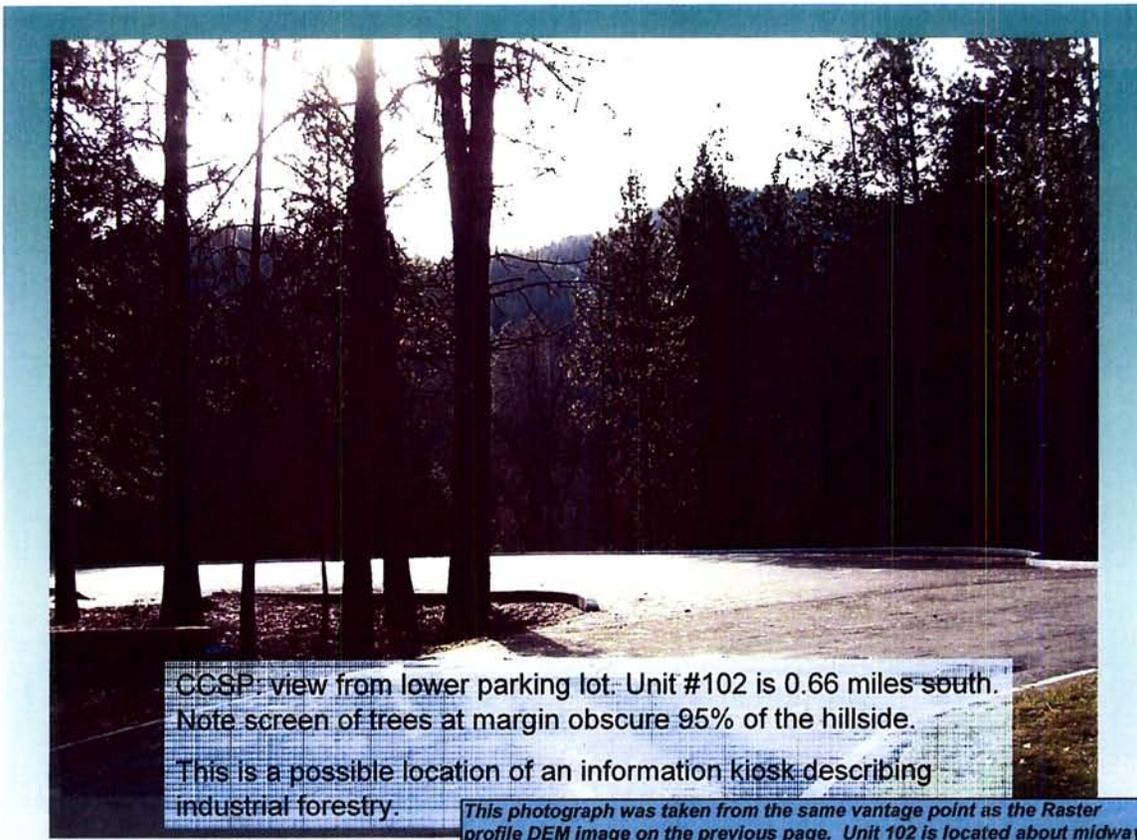


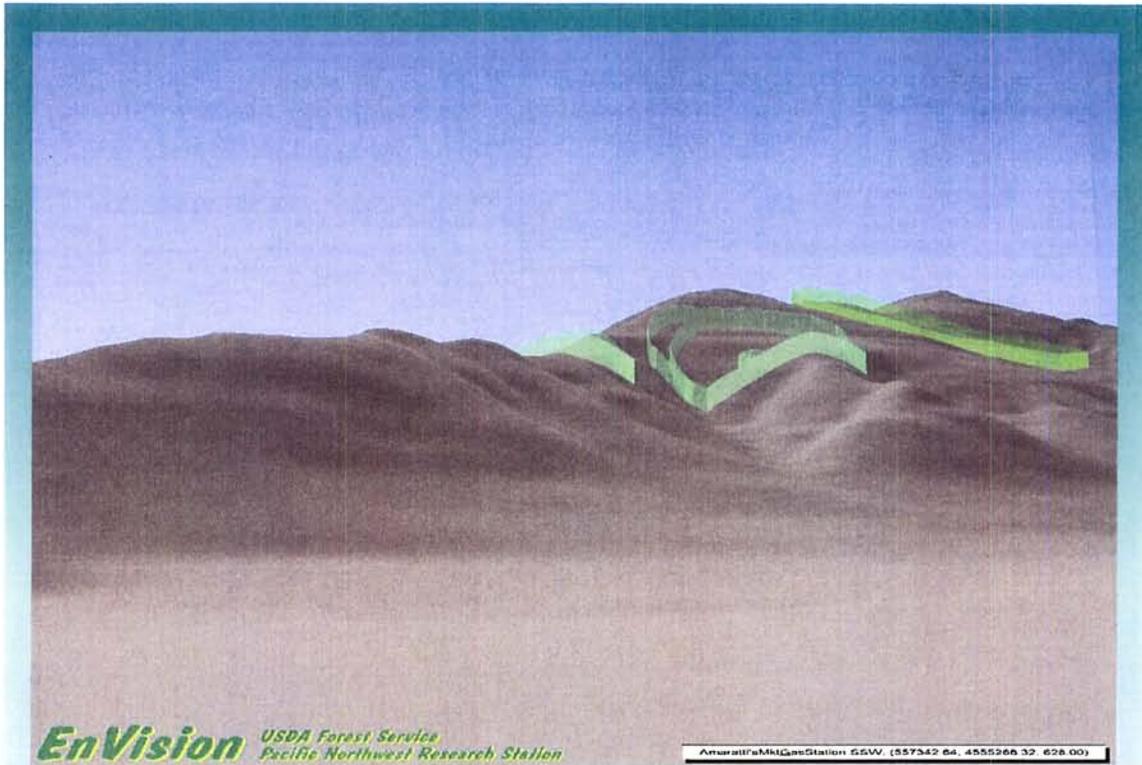
View-South from CCSP kiosk & lower parking lot.



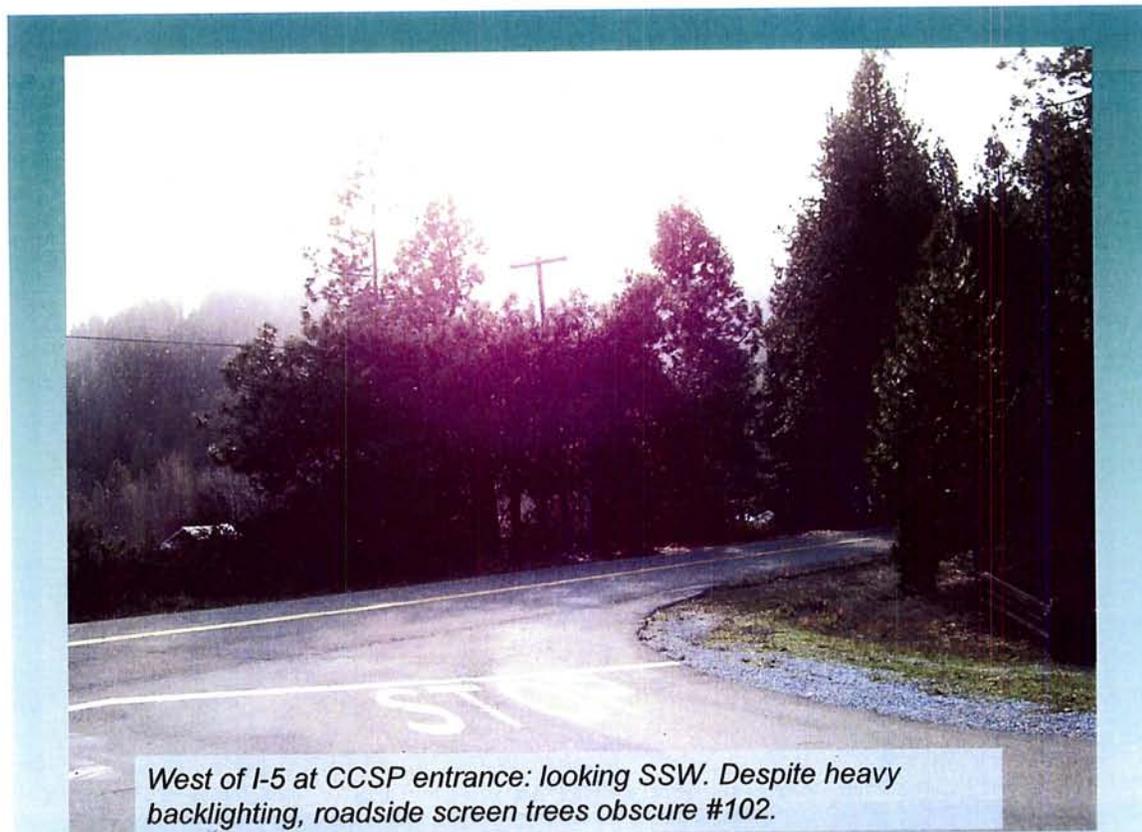


View-SW from CCSP kiosk & lower parking lot.





West of I-5 at CCSP entrance: looking SSW. About 0.8 mile from #102.



West of I-5 at CCSP entrance: looking SSW. Despite heavy backlighting, roadside screen trees obscure #102.