

Richard Campbell comment

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TertiaryResponse2PWPP#1March2019

Campbell Creek Pilot Final Comments\_Liquori 012419

Helliwell Comments

Javier Silva Comments

Comments with email.

Received on 2/6/19 @ 11:37 AM.

Hi Elliot,

Thanks for the opportunity to provide feedback to the report. I appreciate all the time and work you and the PPIT put into the document. In general I would have welcomed a more active process and one in which the group's participation was not limited to so few meetings (many of which I could not attend, including the final meeting which was scheduled on a day not offered as an option to the group). I have tried to limit my comments to those I think would be additive.

If "the goals of this pilot project were to determine if existing, publicly available data sources (focusing primarily on the contents of THPs) could identify specific needs for restoration efforts and to catalogue cumulative impacts information," than I think the answer is pretty simply no. The only method that came close to claiming to identify restoration needs is the LiDAR method, and that is neither publicly available, part of a THP, or particularly reliable as I will describe below.

I am a bit skeptical of the ability of LiDAR to provide accurate estimates of all the forest metrics desired for assessing restoration need and opportunity, particularly as far as determining DBH goes. In my experience, LiDAR is good at measuring heights and getting better at differentiating species, but less so for diameter. However, there are remotely-sensed inventory layers that combine spectral analysis with ground-based data that can be more reliable. Many of these are commercial products and thus proprietary, but there are some in the public domain as well (LEMMA comes to mind). As with all these sorts of tools, the finer the resolution the less certain the data, and this may render these tools less than effective when considering such narrow bands of riparian forests in which error will likely be higher.

I had a different read on the comparison between LiDAR and the WFPB method in table 3-complete agreement on only 7 of 22 units does not seem good enough, especially when the information required is so small-scale and precise. I would also suggest that at least for the redwood region, a different stratification of forest types is used. A redwood should certainly not be considered large at 20" DBH! It will be some work to develop forest-type-relevant stratifications but may be worth it if the goal is to develop restoration treatments based on the data.

Please let me know if you have any questions. I will be interested to see a summary of the feedback and the steps taken to address it.

Cheers,

Richard

**STAND** FOR  
THE  
**REDWOODS**  
STAND FOR THE FUTURE

100 YEARS IS JUST THE BEGINNING

*Save The Redwoods*  
LEAGUE\*

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February 11, 2019

Elliot Chasin, Chair  
Campbell Creek Pilot Project Working Group

**RE: Comments Regarding Draft Report and Findings and Recommendations for the Campbell Creek Watershed Pilot Project Study**

Dear Elliot and Campbell Creek Pilot Project Working Group Leadership Team:

The following comments pertain to the Draft Campbell Creek Pilot Project Watershed Study Report and the Draft Findings and Recommendations. These comments are presented on behalf of myself, as a subject-matter expert and as a Public Member of the Pilot Project Working Group, and may not necessarily represent the perspectives, comments or opinions of my organization of employment, the Environmental Protection Information Center—(EPIC).

There is not enough time for me to address all the various aspects of the PPWG process, all the concepts, the promises made and not kept, or the double-passive largely unfounded pronouncements contained in the Draft Findings or deficiencies of the Draft document. It deserves far more time than I will presently be able to afford it.

It is my opinion that while this process has borne some merit, that on balance, it was a grotesque waste of time, money, people's expertise, and is a good opportunity squandered. It is my opinion that the PPWG was overly captured by and contained within the Agency Leadership Team and the insulated sub-group, Scope-of-Work Team meetings.

Speaking to the Draft Report and Findings and Recommendations, I find that this entirely ignores critical points that I have raised since the very first meetings of this PPWG process— That the THP process and THP standards do not exist in isolation or as a consequence of private timberland owner benevolence, but rather exist to provide the information, documentation, and compliance measures necessary to satisfy a myriad of State and Federal Laws and regulations, primary among these being the Z'Berg-Negedly California Forest Practice Act of 1973 and its implementing regulations in the Forest Practice Rules and the requirements of the California Environmental Quality Act (CEQA) and the Functional Equivalent Certified Regulatory Program through which the THP process is administered.

It should be plain and clear to all that participated in the THP "mining" exercise that either a lack of adequate Rules, templates, or proper and consistent administration of the requirements of the Forest Practice Rules is a primary reason why the "mining" exercise proved to be an inadequate means of evaluating potential environmental conditions, the potential for existence or occurrence of new cumulative watershed and other cumulative effects, or to evaluate restoration needs and opportunities.

For the entirety of the PPGW proceedings, I urged the Group and the Leadership Team to use existing legal and regulatory requirements as a baseline against which to evaluate the

adequacy, consistency, strength, validity and overall utility of information contained in THPs for the Campbell Creek Watershed. This was never done or taken seriously, and the desire to ignore the critical implications of the overall inadequacy of THPs to demonstrate legal compliance and to serve as environmental impact assessment and public informational documents is similarly reflected in the absence of any acknowledgement of this in the Draft Report.

The Draft Report acknowledges that THP “mining” proved to be ineffective, and explains some of the reasons why, but completely fails to make the next logical leap and step. Again, THPs, and all things contained therein are not a bi-product of private timberland owner benevolence and have been fought for in one way or another by public interested groups and won. The failure of the PPWG and the Draft Report and Findings and Recommendations to grapple with the legal and regulatory baseline as a means of evaluating the current system and processes and its outcomes is a major failing and an opportunity wasted.

I want to offer my thanks to the PPWG, and the Agency Leadership Team for including me in this exercise. Please do not hesitate to contact me should there be any questions about my comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob DiPerna", with a long horizontal flourish extending to the right.

Rob DiPerna  
145 G Street, Suite A  
Arcata, CA 95521  
[rob@wildcalifornia.org](mailto:rob@wildcalifornia.org)

Richard Gienger

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18 February 2019

RE: INITIAL RESPONSE TO THE FIRST PLANNING WATERSHED PILOT PROJECT  
& DRAFT FINAL REPORT

To Elliot Chasin and Concerned Parties:

I am writing this initial response on behalf of myself and Forests Forever. There is a great disappointment in the initial Planning Watershed Pilot Project (PWPP) intended to examine the Campbell Creek Planning Watershed in the South Fork 10 Mile River. This examination had a number of goals related to the implementation of the Timber Regulation & Forest Restoration Fund/Program (TRFR) of AB 1492 which became law in 2012. The great hope for this initial PWPP was that examination of circumstances and information in a given Planning Watershed (which is almost always the scale at which cumulative watershed impacts have to be evaluated and responded to) could result in making solid strides in organizing information to be both the basis for a credible cumulative impacts process, and facilitate forest and watershed restoration opportunities. There was great anticipation of a process that would be transparent and with full public participation.

Instead, although some good work was accomplished, there was a failure to deliver the promises and substantive, straight-forward, results. Retired RPF, Pete Ribar, admonished the PWPP Working Group to focus on say, 8 things to improve upon, instead of flailing around with too many complexities. I would imagine, in hindsight, Pete may have suggested 4 things. What was claimed to be an inclusive process became basically and entirely agency driven. Forest Forever and other stakeholders insisted that consultants representing public and public trust interests be engaged from the beginning. I would cite comments on the draft Report made by Michael Liquori that substantiates the failure to do so.

A number of other moves/circumstances prevented the fulfillment of positive goals. One was that the business of the PWPP was relegated for almost half of the Project time to a Scope of Work Committee that basically squelched public involvement and participation. Another was delay of qualified and engaged personnel to do the work necessary to really delve into the complexity of the THP/NTMP records to give recommendations for changes to reform organization, formats, and types of information/data to meet the purposes of a credible cumulative effects process and facilitation of watershed/forest restoration.

All of these problems were not unimagined when the project started. The resources and personnel were available using the TRFR Fund, but were directed elsewhere and not to improving on-the-ground conditions and restoration potential in the THP and related processes through real Planning Watershed applications. There were a number of agency work groups (no public involvement, not even one ombudsman for each of these groups). These groups were often working on several projects that would have benefitted from integration with PWPP. One example is CalTrees, wherein the type of and format of needed information from the work of the PWPP could have, should have, benefitted the quality and utility of CalTrees.

A couple of, “at-a-minimum”, results that I thought the Findings and Recommendations would surely include: (1) Basic quantitative and qualitative cumulative effects information would be organized and accessible for each Planning Watershed – one 'clearing house' of valid information that would be changed only if conditions significantly changed or a project would adversely change conditions. The excellent summary of historical impacts on the Campbell Creek Planning Watershed made by Lyme Chief Forester, Zack Jones, would be an example of what would be part of a Planning Watershed record of cumulative impacts.

The other, (2), would be that the information necessary for facilitation of restoration potential and implementation would include putting that information in a uniform format and location for a submitted THP or other logging plan – and included in the Planning Watershed record of cumulative impacts which also would contain restoration projects implemented. Comprehensive inclusion and standards for 14 CCR 916.4 would be a key requirement for logging plans – with adverse conditions -- for instance, be considered significant, that are increasing sediment or temperature in listed salmonid species habitat.

Yes, lessons were learned, lessons that appear to be given short shrift in the Draft Report. These lessons include having adequate public and public trust involvement; making obvious changes in on-the-ground reforms without putting action off for decades; and taking seriously the need to fulfill AB 1492's intent for forest and watershed restoration, carbon sequestration, greenhouse gas reduction, road and riparian management plans, and responding to fire issues.

I intend to go further into this, including examples in the 14 appendices, in the days ahead.

Sincerely,

Richard Gienger  
and on behalf of Forests Forever

Richard Gienger

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30 March 2018

Summary Letter Regarding Necessary Budget Allocation Changes for the  
Timber Regulation & Forest Restoration Fund/ Program (TRFRF) of AB 1492

To:

Senate Budget Subcommittee #2 on Resources, Environmental Protection, Energy, and Transportation  
Assembly Budget Subcommittee #3 on Resources and Transportation

I have actively participated as a public person in forestry and watershed issues in California since at least 1975. This includes working in a large range of watershed restoration projects as well as following the evolution of forest practices, and participating in stakeholder working groups seeking to improve practices and incentives for good forestry and forest/watershed recovery. I followed and gave input during the formation of AB 1492 and its subsequent implementation since it became law in 2012. A document that I sent to Subcommittees' staff earlier this week, "A Last Chance", gives more background and important specific provisions and intents of AB 1492 and the TRFRF/Program.

My basic criticism is that the existing personnel needed and the processes being funded are not up to timely accomplishing the needed reforms stated in AB 1492 and the TRFRF/Program. While some good steps are being taken and funded, and capable agency staff are engaged – it is just not enough to address pressing forest and watershed restoration needs. These range from unrealized long-term sustained yield of high quality timber products to completely inadequate evaluation and response to adverse cumulative impacts. We are talking about decades of reports and blue ribbon panels that remain unheeded – and rules changes, while improvements have been made, fail to come to grips with major shortcomings.

I will say that the promised transparency of the TRFRF/Program process is failing to represent the regulated and affected public and public trust in an integrated manner with involved agency personnel. One of the great hopes of the process has been to effectively evaluate at least three Planning Watersheds in Pilot Projects to give direction to actions necessary to implement the provisions and legislative intent – including data reform of use to all stakeholders, forest and watershed restoration opportunities, and credible progress on addressing cumulative impacts. This basic step has been crippled by inadequate funding and personnel. The initial Pilot was supposed to take two years – by some accounts it's already past that – and the Scope of Work Subcommittee has still not established what that scope is and we're told that Pilot Project findings and recommendations are due by the end of this year. I'm fully aware of the multiple fire-related emergencies that have pulled important personnel away from working on the Pilot, but adequate staff focused on the important work of the Pilots has not been hired. The CalFire GIS staff and the California Geological Survey and the rest of agency staff and public engagement need augmentation.

There are other details and overall concerns that I will try and convey to you at next week's hearings. Hopefully some budget changes can be made to greatly improve the TRFRF/Program – which brings together all the issues facing forest and watershed management into the future.

rg



Richard Gienger

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12 March 2019

Tertiary Response to the Initial Planning Watershed Pilot Project (PWPP) of the  
Timber Regulation & Forest Restoration (TRFR) Fund/Program of AB 1492

To Elliot Chasin and those it may concern (Individuals and Organizations, including, but not limited to the California Natural Resources Agency, CalEPA, past and current administrations, the California Legislature, the timber industry, forestland owners & residents, tribes, the environmentally active public, and the general public):

My first response was written on 18 February 2019. My second response was on 8 March 2019 and requested inclusion of my presentation to the PWPP Working Group in the Fall of 2017. That presentation was intended to illustrate the general history and conditions of forestlands that the PWPP needed to address in the Pilot Project – notably the evaluation and response to cumulative impacts and the facilitation of restoration for forests and watersheds within the THP (and more general) review and approval process for timber operations.

Intended for inclusion in this ‘tertiary response’ are the two documents sent yesterday, on the 11 March 2019: “LastChanceExcerpt1.15.18rg” and “rgLet3.30.18REtrfrTOsubcoms#2&#3.docx”. These two documents give important relevant background and context for the intents and problems with this initial PW Pilot Project. This allows me to considerably condense this response.

I don’t want to get melodramatic, but this initial PWPP came about after decades of effort to make real progress in practical reform that benefited both recovery of forests and watersheds, and the long-term well-being of all forestland stakeholders. This progress is intended to be made possible by examining real Planning Watersheds and their conditions – and to make reality-based adjustments that will result in credible evaluation and response to cumulative impacts, which would include a variety of recovery actions affecting economic, environmental, and social values. It is understood that there are numerous types of forestland in California and that a variety of Planning Watershed Pilot Projects are warranted, so that process and solution actions can be tailored and applied more broadly as appropriate.

There are various arguments regarding scale. From my somewhat extensive experience in designing and carrying out restoration projects, examining THP impacts and mitigations – not to mention the scale for consideration of cumulative watershed impacts is almost always on that scale – that practical human restoration activity, on that scale, is most doable and effective. Larger scale scientific and sophisticated examinations can be important and educational, but integrated effective action on those larger scales requires massive amounts more of resources and will.

To return for a moment to the melodrama before I critique the Pilot Report Recommendations, it’s extremely frustrating – to the point of despondency – to continually be denied commonsense and open beneficial reform. This reform does require perseverance and laborious attention to detail. There is all this clamor for streamlining – to the point of even eliminating thoughtful discretion. It was emphatically pointed out during the PWPP process, by CalFire GIS head, Suzanne Lang, that it takes an enormous amount of work to get to any desired simplification and streamlining.

I guess here, it is appropriate, to thank everyone who worked to make the initial PWPP a success. There's quite a number and range of persons that should be thanked. I'm going to mention just a few that I especially appreciated: The CGS team of Dave Longstreth and Mike Fuller, the CalFire GIS team of Suzanne Lang and Francesca Rohr, the CalFire team of Pete Cafferata and Will Olsen, Ruth Norman and her mid-2018 crash engagement in "THP Mining" & sense-making, and Rich Walker and Lidarapplication. Much more positive results would have been realized if Ruth and Rich were 'on-board' from the start.

Here's some context for what was supposed to happen and what happened:

***From "Planning-Watershed-Pilot-Projects-Concept-Paper-Implementation-Draft-May-25-2016"***

***"The specific substantive areas to be addressed by the pilot projects include:***

***\*\* Data collection and characterization;***

***\*\* Identification of information and methods used for cumulative environmental impacts assessment;***

***\*\* Description of current forest conditions, and***

***\*\* Identification of restoration opportunities in forested landscapes."***

On to the recommendations:

"Overview" on page 85: Gosh, it seems that THPs aren't worth much. Lack of information, lack of qualitative information, even hindering restoration through procedural compliance with CEQA. Additionally getting the information needed for potential restoration is time-consuming. CalTrees, the new online timber harvesting system, is touted as a future answer to data problems – ". . . CalTrees lacks GIS capabilities and is not capturing a full suite of site-specific resource information, nor do the Forest Practice Rules necessarily require this information." The potential for LiDAR and remote sensing etc. are cited as giving a clearer picture of conditions in a shorter time than "mining THPs."

OK So where are the recommendations to correct these problems? I guess the "Overview" is really "Findings". Like, how and what kind and what format should be used for information/data to be incorporated into THPs to correct these problems? There is a repeated focus on aquatic "restoration" to the exclusion of describing actual forest conditions and restoration needs. Also, the addressing of information and methods for cumulative environmental impacts assessment is less than a second thought.

"Recommendations

1." The overall concept of the pilot projects was never implemented – so the call for re-examination is lame at best and more than a disservice. If THPs were seen to not be adequate, the goal was to make recommendations to modify THPs to sensibly identify and locate restoration opportunities and to catalog cumulative impacts information. That's a start. It's not about research questions, it's about achieving "explicit goals and objectives". There was no resolve to do this – and a major reason was lack of Working Group, general public, and professional public participation.

"2." No, no, THPs and NTMPs should be altered to have adequate data incorporated – now that would be promising. Get back/forward to adequate content, organization, format, clarity, transparency, and utility.

“3.” You are jumping too damn quick to a statewide scale. You need to get RPF, agencies, and the public the spatially explicit tools that work on a Planning Watershed scale – those tools will also can be expanded to the larger scales. Some folks will work on those larger scales, but the nitty, gritty of forest and watershed recovery is on the ground at the Planning Watershed scale. How in heck are you going to get adequate Ecological Performance at a larger scale if there is a predominate collective inadequate performance at the Planning Watershed scale.

“4.” It is helpful to have a “well-articulated understanding of the CEQA-based legal requirements of mitigation versus restoration, but is also important to expand the breadth, understanding, and application of “restoration”.

“5.” Certain measurements of Class I channel physical parameters are required in THPs (14 CCR 916.4). This could be improved and with the information well-formated and organized be a great tool for increasing the scope and implementation of restoration activity. This could have and should have started integral with the initial pilot. A recommendation now could be that the lead and trust agencies should upgrade 916.4 ASAP for implementation.

“6.” All right – some focus on 916.4! ((a)(2) citation given regarding opportunities for habitat restoration. The way it’s implemented now, it is piecemeal – and should and can be systematic and have a priority-based approach – and incorporated into each cumulative effects Planning Watershed summary which should be easily available for each Planning Watershed. Yes, the opportunity for systematic evaluation of needs and opportunities exists. This could have been, should have been, an explicit goal and objective of the first pilot. See my response to #5, above. Implementation from TRFR Funds as well as restoration grant programs are appropriate.

“7.” Yes, non-profits and others are working to accomplish restoration work. All would greatly benefit from some of the reforms I discuss above.

“8.” Yes, other Planning Watershed Pilot Projects should be conducted in less information-rich Planning Watersheds and in other forest-types of California.

“9.” Yes, LiDAR should be a key ‘lodestar’ standard for evaluation and response to spatial and forest/vegetation conditions, now and in the future – an essential tool, like aerial photographs have been for foresters, but are still not part of the public record for THPs. The exception in 916.4 is “may be required by the Director.”

Yes, there are many pilot project opportunities – to fully integrate LiDAR into description of conditions, conservation choices, evaluation and response to cumulative impacts, and restoration opportunities. These should meaningfully improve THP content and organization – and be applicable and available on a Planning Watershed scale.

“10.” Whew, if the minimum generally valid monitoring time is ten years as stated in the EPM white paper, it will be decades before verifiable performance measures could be implemented. The future for EPM and pilot projects is unlimited, along with research projects – while “good”, will not make many timely reforms that are and have been obvious for some time. One is setting standards for “healthy forests” containing large portions of larger, older trees – with incentives for achievement of those standards.

“11.” You need to go further than is stated here about future pilots and the agency/public mix. Public leaders, participants, and experts with workload capacity and/or resources-specific knowledge.

“12.” CalTrees should have increased capacity to ensure the highest standards of information ASAP. It should have been integrated with the initial PWPP – even had overlapping staff. Near-future PWPPs should be closely involved with CalTrees.

Of course there’s a lot more that can be said. I have not had time to carefully examine the appendices. There is a lot of information that was developed and that was valuable. Unfortunately the initial PWPP did not come up to expectations. I think most Working Group members wondered “why?”. Almost half of the PWPP work time was in the Scope of Work Committee which had little public or Working Group participation or transparency. It’s understood that the catastrophic fires kept much or most of the agency personnel from participating for long periods of time. There was a lot of talent on the Working Group that was never actively engaged and should have been. I don’t know if I ever saw Dan Wilson. Missed having everybody more involved. I think Javier Silva, and others, had concerns about cumulative effects, forest conditions, and restoration opportunities that were never able to be adequately considered. I was looking forward to hearing from Richard Campbell, Walt Duffy, Matt Greene, and Myles Anderson’s perspectives. Time was up and here we are. It’s been over six years since AB 1492 and the Timberland Regulation and Forest Restoration Fund/Program became law and progress in achieving the intended reforms is unacceptably slow. We didn’t even come to grips with cumulative fire, carbon sequestration, and greenhouse gas impacts. – which can and should be dealt with on a Planning Watershed scale that surrounding communities can be actively engaged in positively affecting.

rg

January 24, 2019

Elliot J Chasin  
Senior Environmental Scientist, Specialist  
Timberland Conservation Program  
Habitat Conservation Planning Branch - Sacramento  
California Department of Fish and Wildlife  
Sacramento, CA

Re: Campbell Creek Final Report Comments

Dear Elliot (and others),

I wanted to take a few moments to outline some comments on the Campbell Creek Planning Watershed Pilot Project Final Report dated January 14, 2019. As you know, I've been tracking this project for many years, from the early days of AB1492 through many of the elements of the Timber Regulation and Forest Recovery Act implementation.

I appreciate the public meetings you've held on this topic, and I hope that you find my comments in the constructive manner in which they are intended. Please feel free to share these comments with others as appropriate. As always, I'm happy to chat more if it would help to clarify any particular concepts.

In my opinion, the most fundamental recommendation coming from this project is the need to realign future efforts to the policy, management and restoration objectives. The project devolved somewhat into an open-ended analysis and scientific inquiry. We still are without a clear understanding for how to use science to guide the more critical management, policy and restoration questions. My recommendation is that the Natural Resources Agency should focus getting clarity on the Management, Policy and Restoration approach, and then develop the analytical strategy to achieve that approach.

I suspect that the agency-only approach to the work contributed to this drift in focus. Not that the agency staff were not excellent in their work, but that the context and roles they play in each respective organization had an excessive amount of influence in how they approach the problem. Expanding the working group to include landowners, consultants and others with more direct management focus would be essential. Of course, getting participation from these groups may require developing a financing mechanism to compensate for the large time and energy such an effort would require (its not fair to expect consultants and landowners to donate time to this project when agency staff are getting paid for their efforts).

To accomplish this more top-down approach, I might recommend evaluating some of the key assumptions embedded in current policy and regulation systems. This should be done in a very systematic level to identify 8-12 working hypotheses that could form the framework for an analysis. Then develop the study design based on the best ways to inform these working hypotheses.

For example, the geology assessment identified segments of the watershed that were likely outside the normal range of dynamic equilibrium (they called is disequilibrium). These were the result of excessive sedimentation accumulations with a pulse in landslide intensity, frequency and magnitude associated with legacy logging practices. Identifying such places on the landscape where these types of impacts have been observed AND developing a restoration strategy to mitigate for these impacts is EXACTLY the kind of work that AB 1492 envisioned.

Other probable effects might include thermal accumulations, spawning availability, channel incision & floodplain disconnection, and road drainage impacts.

Other areas probably are much better informed and regulated with existing forest practice rules. For example, wood recruitment is probably best managed through riparian treatments and regulation and may not necessarily benefit as much by a watershed-scale analysis.

The other major take-home recommendation that I strongly urge is to coordinate with the group that is developing the Ecological Performance Measures. The current approach recommended by that group will lead us down the very same path that the Campbell Creek pilot went down.

Instead of the indicator-based approach, I strongly recommend that EPM should consider models and working hypotheses as the guiding approach (see Dunne et

al 2001). Long lists of indicators tell us nothing about ecological performance, they are very expensive data to collect, and there is no clear way to use such data in a management context. In my 30+ years involved with sustainable forest management and policy, I've never seen such an approach work very well at informing how well ecosystems are performing in the absence of an effective synthesis process and working hypotheses.

I would hope that the lessons learned from the Campbell Creek pilot could be applied to the EPM project so that they do not do the same mistakes.

Finally, I suggest that there is some documentation of the effort involved in this project in terms of money spent, workforce hours, etc. Such knowledge would help to inform ways to more effectively allocate resources.

As always, please feel free to contact me with any questions. I can be reached at (206) 817-2137 or [mike@soundwatershed.com](mailto:mike@soundwatershed.com).

Sincerely,

Mike Liquori  
Principal, Sound Watershed

Helliwell Comments

Delivered in email: 2/19/19

Dear Elliot,

[REDACTED]

So, in short:

—Much good work was done exploring types of data that could be used to identify restoration opportunities.

—Under "Process Challenges" in the Draft Final Report, the first item notes unmet expectations and frustration by the public that the pilot project was not addressing forestry regulations. Some of this frustration could have been due to the name of the legislation, "Timber Regulation and Forest Restoration." Additionally, there was a lack of communication from leadership to the PPWG during the last year of the pilot project.

Representing PCFFA and IFR, I participated in all the meetings, the tour, and the webinars. I inquired about further meetings several times, and some were cancelled. The interagency team was supposed to support the PPWG in achieving the "Substantive Elements" laid out in the "Concept Paper," but we never got to the ground-truthing or identifying restoration opportunities. It seemed as though the "SOW" and the interagency teams took over the project and left out the PPWG. We certainly did not expect the process to delay for a year and then be presented with a Final Report and a final meeting, to abruptly end at the change of the State administration.

Some frustration at not having more on-the-ground or tangible results is due to the environmental crisis of severely declining salmonids and the coastal salmon-reliant communities that has been well documented since at least the early 70's

(<https://fisheries.legislature.ca.gov/content/california-advisory-committee-salmon->



[and-steelhead-trout-cac.](#) ; CACSST Annual Reports, starting with “An Environmental Tragedy” 1971, by Resources Agency Staff (included here by reference).

Cumulative effects analysis is described well in the Long Range Plan For The Klamath River Basin Conservation Area Fishery Restoration Program, Kier, 1991 (included here by reference), available

at: [http://www.krisweb.com/biblio/gen\\_usfws\\_kierassoc\\_1991\\_lrp.pdf](http://www.krisweb.com/biblio/gen_usfws_kierassoc_1991_lrp.pdf)

We would like to provide further, more detailed comments ASAP.

Please keep us posted on next steps of the AB 1492 TRFR.

**Javier Silva Comments**

Comments within email.

Received via email: F 2/22/19, 2:13pm.

Hello Elliot,

Sorry for the delay in getting this to you. Many things popping up. But here is a brief summary of my comments:

Please mention "Tribes" wherever it mentions the other stakeholders throughout the document.

Need to integrate more of the Tribal data (cultural sites, sensitive species of Tribal concern), which I can assist with but will take more time and collaboration.

I would like to see more information about how Traditional Ecological Knowledge (TEK) can be emphasized. The newly state designated Tribal Beneficial Uses should be explored as to how it can benefit a watershed plan/restoration effort.

Tribes would like to be included in the watershed/forest management plans and look to use the timber harvest plans as a way to do that. How can we make the timber harvest plans useful for Tribes aside from just archaeological issues? For example, identifying habitats suitable for harvesting sedge or willow for baskets, possibly for restoration or protection. Same can be said for fish and animal species, endangered and not endangered.

Overall, the pilot report sounds good, just needs more on how Tribal knowledge can play a role.

For more on the history, please see the attached report that Sherwood Valley submitted during the creation of the marine protected areas under the Marine Life Protection Act (MLPA).

Add references in Appendix to Assembly Bill 52, Executive Order B-10-11 Jerry Brown, Statewide Tribal Beneficial Uses and CA agencies Tribal Consultation Policy.

Please let me know if these help. I can elaborate more if anything is unclear.

--

Javier Silva

[Redacted]

[Redacted]

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[Redacted]



Please consider the environment before printing this email