



Ebbetts Pass Forest Watch

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State of California
 The Resources Agency
 Department of Forestry and Fire Protection
 VIA: EMAIL TO: Chris.Browder@fire.ca.gov

Ebbetts Pass Forest Watch Comments on proposed Timber Harvest Plan Form revisions

November 19, 2009

Dear Mr. Browder:

Thank you for the opportunity to comment on Cal Fire’s proposed revisions to the Timber Harvest Plan submission form. Ebbetts Pass Forest Watch (EPFW) appreciates the work and effort expended to improve current THP forms.

Overall, EPFW finds the proposed changes for THP submission and analysis to be positive. EPFW believes that the draft contains significant improvements that move the process toward the clearly-stated and important goals outlined in the October 14th scoping letter. Proposed changes help clarify and address CEQA requirements for THPs, particularly through increased specificity. As well, EPFW feels the “new and improved” format is clear and easy to use.

The following are brief comments on several items EPFW considers important for inclusion or revision in the various THP Submission Form sections

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| <p>Vehicular Traffic Impacts. Vehicle impact and noise on residential areas</p> | <p>Address and delineate hours and days of truck operations</p> <p>Include a noise impact analysis</p> |
| <p>Habitat Conditions Page 8-9 THP Section 4-B Cumulative Effects Assessment Form 1</p> | <p>Include more specific information on:</p> <p>1) Oaks: In addition to included habitat rankings, add description of oak conditions in the harvest area, including number, size, species, volume across plan area, and existing impacts to oaks within the planning watershed from previous logging or other activities</p> |

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| | 2) Bat maternity roosts and habitat conditions: specifically, include bat maternity roosts as a category under wildlife. |
| Herbicides | <p>Include a discussion of planned or likely use of pesticides/herbicides as part of the harvesting and stocking process. This may be included as part of THP Section 4- Cumulative Effect Assessment Form 2 (page 2) in the “Chemical Contamination Effects” section or elsewhere as appropriate.</p> <p>Included elements to include among others:</p> <ul style="list-style-type: none"> • Planned or likely specific substances to be used • Amount anticipated to be used • Number and timing of application(s) • Method of application(s) • Likely or known effects on: <ul style="list-style-type: none"> Native plants Hardwoods Wildlife species Wildlife habitat Water resources Humans, including forest workers, local residents, and downstream water users • How activities associated with the proposed project will or will not combine with those of other past, present and reasonably foreseeable probable future projects to result in cumulative chemical contamination effects |
| Scenic Vistas Page 1 THP Section IV-A (Analysis of Potential Project-Related Environmental Impacts) | <p>Add the following “yes /no” items to further identify potential impacts</p> <p>Will visual impacts from the THP be observed by:</p> <ul style="list-style-type: none"> • Visitors to sites such as State, National or local parks, rivers or lakes, ski resorts, trails, or campgrounds? • Local residents from their homes or communities? |

EPFW recognizes that formatting and synthesizing so much information into a clear and concise manner is a difficult task, but believes it has been well done. The result will improve the current THP process.

Thank you again for the chance to review and comment on this draft document. Feel free to contact either of us if you have further questions.

Sincerely,



Addie Jacobson



Susan A. Robinson

For Ebbetts Pass Forest Watch