
From: Baer, Isabel@Wildlife <Isabel.Baer@wildlife.ca.gov>
Sent: Tuesday, May 25, 2021 9:59 AM
To: Dias, Matt@BOF <Matt.Dias@bof.ca.gov>
Cc: Public Comments@BOF <PublicComments@bof.ca.gov>
Subject: CDFW comments regarding Botanical Guidance

Warning: this message is from an external user and should be treated with caution.

Good morning Matt,

Per your request during the May Forest Practice Committee meeting, please see attached, CDFW's comments on the Draft "BOARD OF FORESTRY AND FIRE PROTECTION RPF GUIDANCE REGARDING BOTANICAL SURVEYS INVOLVING PLANT SPECIES OF CONSEQUENTIAL STATUS UNDER THE FOREST PRACTICE ACT AND CEQA". CDFW appreciates the work the Board and Board staff have put into the development of the" and appreciates the opportunity to comment on the document. At the request of the Board and in order to assist the Board and Board staff with edits, we have attached a track changes version of the document with comments to this email.

As expressed in verbal comments at the May 4, 2021 Forest Practice Committee Meeting, CDFW also has some more general concerns about the document.

- CDFW recognizes that the intended audience for the draft document is RPF's, but suggests that the document instead be focused on a broader audience, including review team agencies. A primary goal of this process is to increase efficiency in plan review. A guidance document that addresses the review process in a more complete way may be helpful in achieving greater consistency, clear expectations, and review efficiency. Additionally, some information may benefit from being reformatted into a more easily referenced form, such as bullet points.
- The draft relies heavily on the professional judgement of the RPF. While the professional judgement of the RPF and the review team are invaluable in the THP process, our hope is that a guidance document contain more specific standards and a level of detail sufficient to ensure consistency and clear expectations for the landowner, the RPF, and the review team agencies. Clear expectations on all sides will increase efficiency in plan review. Other guidance documents from both state and federal agencies include these types of levels of details, including [CALFIRE's Recommendations for Addressing California Red-Legged Frog Take and Avoidance in Timber Harvesting Documents](#) and [USFWS Information Needs and Guidelines for Timber Harvest Plans for US Fish and Wildlife Service Technical Assistance](#)

[Analysis - San Francisco Garter Snakes](#) and [CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#). Because these guidance documents are not regulatory in nature, they provide an opportunity to outline more detailed best management practices and expected standards.

- The draft does not mention Sensitive Natural Communities, their significance, or provide any guidance on how they should be treated during review. Natural Communities with ranks for S1-S3 are considered Sensitive Natural Communities to be addressed in the environmental review processes of CEQA and its equivalents.
- In our February 26, 2021 letter to the Board, CDFW pointed out issues with the process of botanical and other species surveys being filed as minor deviations to the approved Plan. This process does not notify CDFW or allow for review. If surveys do need to be submitted after initial plan review and approval, CDFW encourages the Board to explore options for botanical survey submittal that allow for notification as well as an official forum for review by the review team agencies and the public.

CDFW looks forward to continuing to work with the Board and other stakeholders on this issue. If you have any questions about these comments or the attached document or would like further information, please contact Mr. Elliot Chasin, at (916) 206-0384 or elliott.chasin@wildlife.ca.gov.

Sincerely,

Isabel Baer
Environmental Program Manager
Timberland Conservation, Fire Resiliency and Native Plant Programs
Mobile (916) 203-3193
Isabel.Baer@wildlife.ca.gov