

Comment	Name	Affiliation	Position	Comment	Date Rcvd	Supporting Documents
1		CAL FIRE	State Forest Manager	<p>I recommend that the EMC look into the question of the resilience of redwood trees to different fire severities and the effects of defect on wood quality. This question has implications for Emergency Notices and timelines as well as methodology for determining sanitation salvage priorities post fire, economic viability over time and reforestation needs.</p> <p>A pilot study has begun in Santa Cruz County in the 2020 CZU Lightning Complex area on the San Vicente Redwoods property. The RPF for the property is Nadia Hamey and she has developed initial data collection and monitoring. I recommend that this monitoring be expanded to other properties and various burn severities with support from the EMC.</p> <p>See attached study description and contact information for Nadia Hamey as well as photos from the pilot study.</p>	7/21/2022	1. CZU Fire Redwood Damage Assessment.pdf 2. Redwood Defect Study at SVR.pdf
2		EMC	EMC	<p>I don't think that the Critical Monitoring Questions and Themes need to be changed at this time. They are still very relevant and reflect priorities on monitoring that we've been given by the Board, stakeholders, etc.</p>	7/15/2022	NA

3		Public	Public	<p>The top Theme of the EMC should be recovery of private and state forests and associated watersheds. This should be closely connected to the touted provisions of AB 1492 which became law in 2012. Among the poorly or non-implemented provisions of that law are the failure to determine and implement ecological performance measures.</p> <p>Some of the top questions which need answering are the necessary standards for achieving high quality forests and watersheds for the range of forest types and conditions. One graphic example is given on page 19 of the April 4th, 2018 Report of the LAO: "Improving California's Forest and Watershed Management". This relates to the continuing failure to establish sustained yield quality standards and credible evaluation and response to cumulative impacts.</p> <p>You have plenty of detailed questions under multiple themes, but the broad and obvious changes necessary for adequate reform and recovery remain far, far away and unrealized. Many of the detailed questions have already been answered, like critical Questions (a) and (b) under Theme 5: Fish Habitat: and the answers are NO. (See Coho Recovery Plan and 1999 SRP Report). Part of the problem is lack of transparency, engagement, and participation by the affected, multidisciplined, knowledgeable, public and communities. Implementation of AB 1492, we were assured, was going to change that.</p>	7/15/2022	NA
---	--	--------	--------	---	-----------	----

4		Water Boards	Water Boards	<p>The Central Valley Water Board (agency I represent) has the following suggestions for critical monitoring questions. We are not clear if these questions need new themes or can fit into existing themes. Themes 1-3 all seem like they could use post-fire components, or perhaps there needs to be a new theme for these post-fire questions. We are aware that some of these may overlap with existing questions, so it may be more appropriate to modify existing questions that are subject to additional post-fire issues.</p> <p>Are the FPRs and associated regulations effective in...</p> <ul style="list-style-type: none"> • Protecting water quality from the effects of contaminant-laden, or nutrient-enriched sediment delivery to watercourses? • Protecting water quality from accelerated rates of sediment delivery to watercourses from concentrated flows associated with roads and/or skid trails in post-fire settings? • Protecting water quality from watershed-scale herbicide applications resulting from site-prep in post-fire settings? • Protecting water quality by using non-discretionary permitting in post-fire settings? • Accurately describing cumulative impacts in watersheds affected by wildfires? • Promoting wood-recruitment in WLPZ/ELZ areas in post-fire settings? <p>The Central Valley Water Board adopted in 2017 a timber harvesting General Order of Waste Discharges (a.k.a. permit) which has conditions that go beyond some FPRs, or address issues not currently addressed by the FPRs. These were approved by the Central Valley Water Board members based on the justifications provided to them by staff. These justifications are based on published research and summarized in Attachment D of the permit, which can be found here:</p> <p>https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2017-0061_att_d.pdf</p>	7/29/2022	NA
---	--	--------------	--------------	---	-----------	----