From: Pablo Bobe
To: Public Comments@BOF
Subject: Re: Proposed Definition of "Meadows and Wet Areas" and Proposed Botanical Resource Guidance document
Date: Tuesday, April 26, 2022 7:08:30 AM

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

Dear California Board of Forestry,

I write to oppose two upcoming proposed actions by the Board of Forestry (BoF). First, the BoF should not adopt its proposed definition of "Meadows and Wet Areas" and instead adopt the State and Regional Water Boards' definition. The proposed BoF definition does not adequately protect these areas because it fails to account for drought years – which we are seeing more and more of.

Additionally, the proposed BoF definition does not protect areas where the substrate is damp but the surface is not. The State and Regional Water Boards' definition has already undergone considerable stakeholder review and is better equipped to protect these sensitive areas.

Second, the BoF should not issue the proposed botanical resource guidance document and instead should complete a formal rulemaking process and create regulations for
botanical resources that are sufficiently protective. The proposed guidance document is far too permissive and gives registered professional foresters far too much leeway when it comes to protecting botanical resources.

The timber harvest plan review process is meant to be functionally equivalent to an environmental impact report (EIR) but this guidance document allows many actions that would not be permitted under an EIR.

Sincerely,
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