

# Jeffrey Stone

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Jane Van Susteren  
California Board of Forestry and Fire Protection  
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Submitted electronically to: [Jane.VanSusteren@bof.ca.gov](mailto:Jane.VanSusteren@bof.ca.gov).

Dear Ms. Van Susteren:

I'm surprised that CalFire's practice of approving Timber Harvest Plans (THPs) before the required botanical (and wildlife) surveys have been completed is not addressed in the Botanical Resources Guidance Document presented during the April 5, 2022 session of the Forest Practice Committee. This practice eliminates the ability of the public and the California Department of Fish and Wildlife (CDFW) to meaningfully consult on the environmental impact of THPs, as mandated by the Forest Practice Act. Withholding survey results and data until after the review process ends precludes CalFire from considering potentially valuable feedback from CDFW or from members of the public with expertise, as there is no legal avenue for considering input after the approval process is completed. CDFW staff have expressed frustration with this state of affairs as they don't believe that their input is being valued, or even heard. It makes no logical or legal sense for CalFire to allow timber harvest activities to commence before biological surveys have been completed and vetted by the public and cooperating agencies.

I was also shocked to learn that an analysis of noxious weeds is not required at any time during the biological survey process. As you know, noxious weeds are a huge problem in California, and ground-disturbing activities such as timber harvesting are a primary cause of their spread. A THP should include an inventory of noxious weeds present in the analysis area, a spread prevention plan, and a control plan. Ignoring

the issue should certainly not be an option as the effects of uncontrolled spread of noxious weeds is tremendous.

While I sympathize with anyone that has to spend countless hours to create (or read) a THP, biological surveys legally required by the THP process (which is supposed to be equivalent to CEQA) are intended to prevent deleterious impacts to plants and animals. RPFs can't use the excuse that they are just too much trouble to complete. CDFW and the public must be able to fully understand and provide input on the biological ramifications of a given THP, which necessitates that surveys must be completed, using the best available science, before the THP is approved by CalFire.

Sincerely yours,

*Jeffrey Stone*

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