

# Timber Harvest Plans in California

*Review, Tracking, and Comment-Writing*

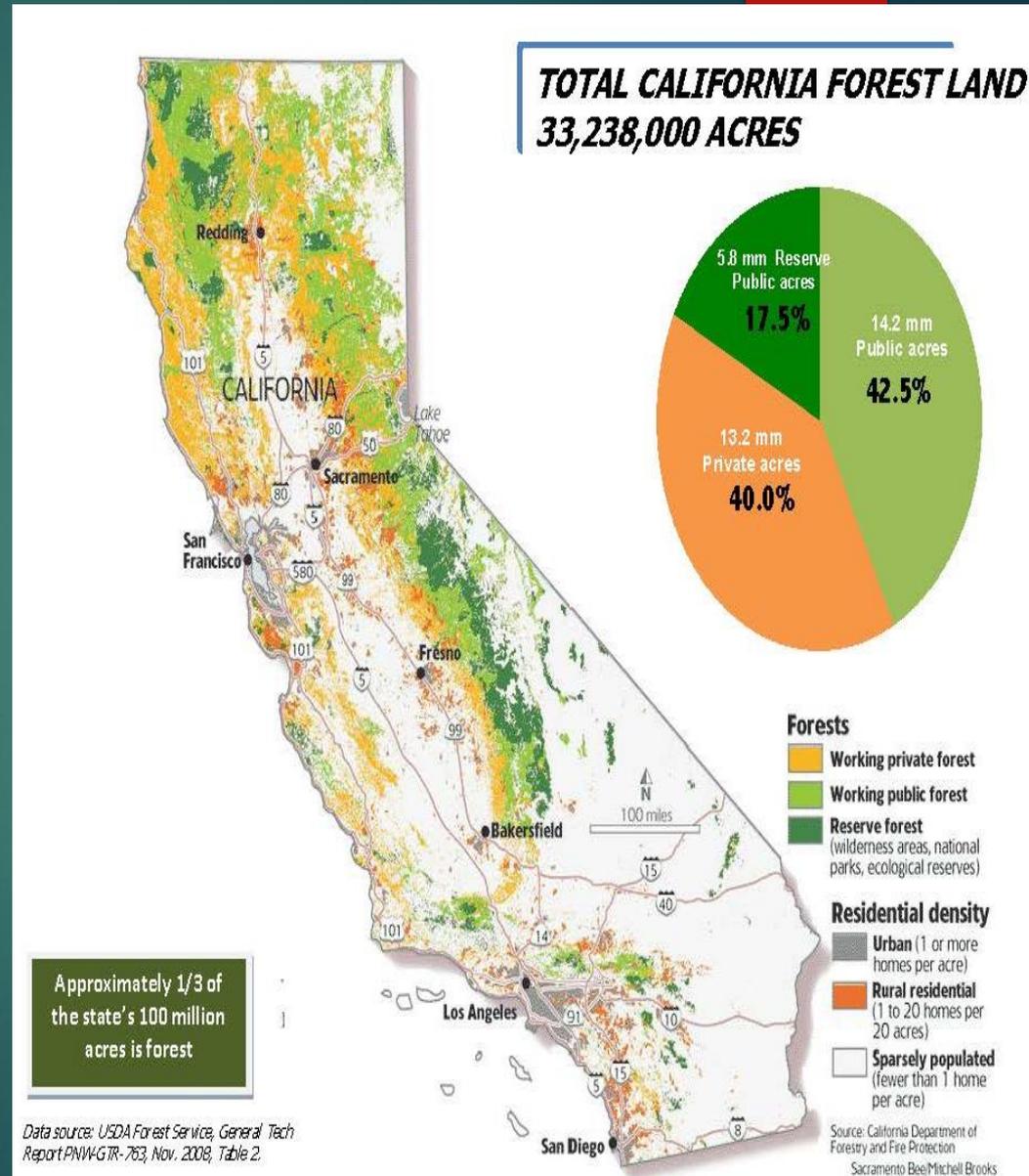


Rob DiPerna, California Forest and Wildlife Advocate  
Environmental Protection Information Center (EPIC)



# EPIC's Private Forestlands Advocacy

- ~33,238,00 acres of forestland in California
- ~13.2 million acres of private forestlands in California (about 40 percent of total forestland base)
- EPIC monitors private timber harvest in seven counties in NW California.
- EPIC's private forestlands advocacy has helped shape forestry law, regulation, and policy in California
- EPIC's work has lead to long-term conservation: (e.g. Sinkyone Wilderness State Park, Gillham Butte, Headwaters Forest Reserve)



# Why Monitor Private Lands Logging?

- *Logging on private lands can affect forest, wildlife, and watershed resources*
- *Advocate for a better project*
- *Watchdog industry and state activities*
- *Ensure compliance with state and federal laws*
- *Protect the public's interest in forestland management, conservation, restoration, enhancement, and stewardship*



# Primary California State Laws

*Nexus for Public Participation in Private Forestry*

- **California Environmental Quality Act (CEQA) (1970)**
- **California Timberland Productivity Act (TPA) (1982)**
- **California Z'berg-Negedly Forest Practice Act (FPA) (1973)**



# Other Applicable State and Federal Laws

- *Federal Endangered Species Act (ESA)*
- *Federal Clean Water Act (CWA), including 303(d) and TMDLs*
- *California Endangered Species Act (CESA)*
- *California Porter-Cologne Water Quality Control Act (Porter-Cologne)*
- *California Administrative Procedures Act (APA)*
- *California Global Warming Solutions Act*



# What is a Timber Harvest Plan?

- *Functional Equivalent of a CEQA Environmental Impact Report (EIR)*
- *Subject to CEQA “Certified Regulatory Program,” as a “Functional Equivalent,” of an EIR*
- *Discretionary permitting process for private forestland owners*
- *Also serves as environmental analysis document*
- *Rules and regulations promulgated by Board of Forestry (Title 14, California Code of Regulations Section 895 et seq.)*
- *Review and approval process administered by CAL FIRE as “lead agency”*



# Players in the THP Process

- *Private Timberland Owner*
- *Registered Professional Forester (RPF)*
- *Licensed Timber Operator (LTO)*
- *CAL FIRE (“Lead Agency”)*
- *Other Review Team Agencies (DFW, CGS, Regional Water Boards, Native American Heritage Commission, Counties, etc.)*
- *General Public*



# Commonly Used Abbreviations

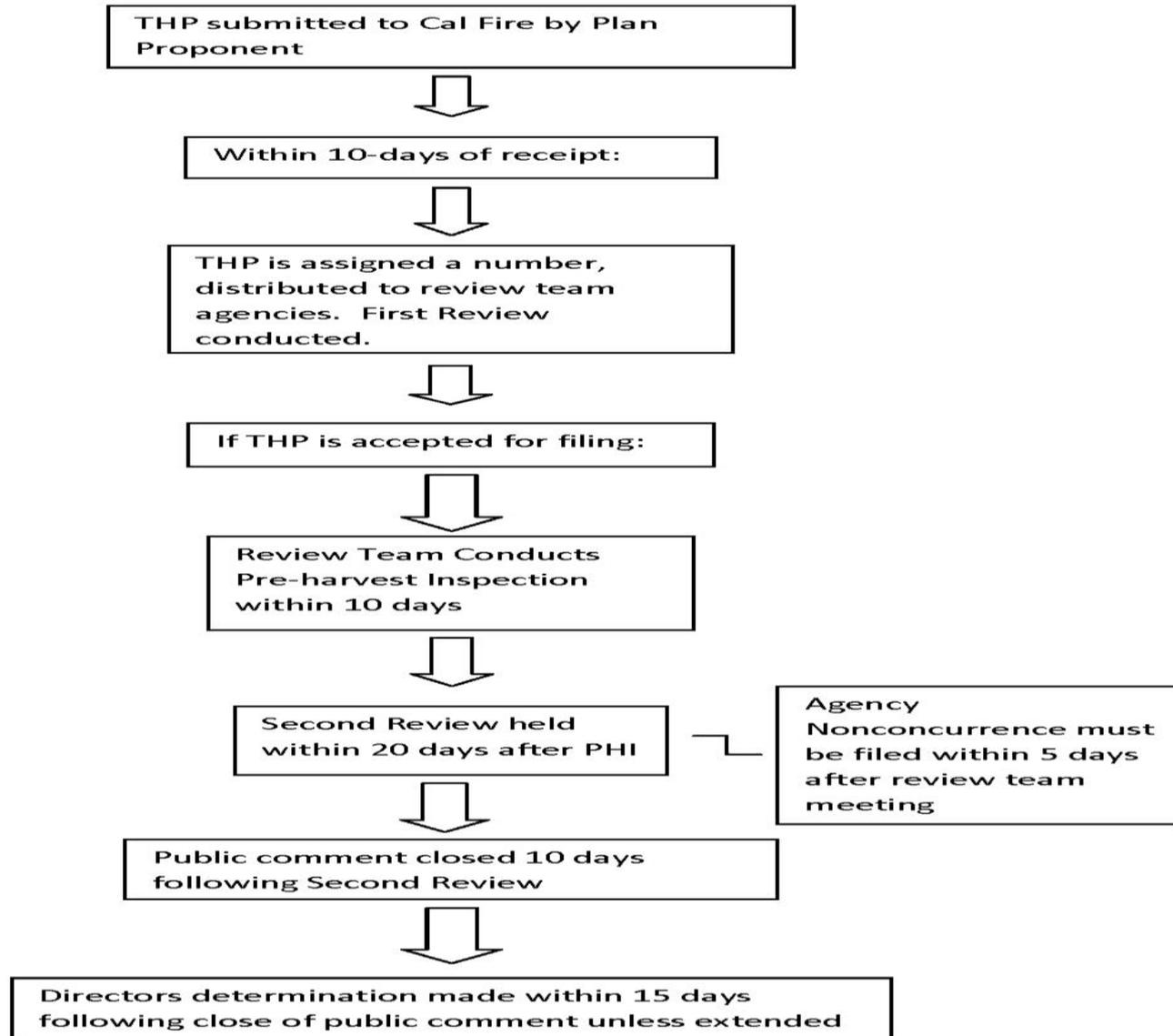
(Title 14, CCR Section 895)

THP	Timber Harvest Plan
CAL FIRE	Department of Forestry and Fire Protection
DFW	Department of Fish and Wildlife
RPF	Registered Professional Forester
CEQA	California Environmental Quality Act
CCR	California Code of Regulations
PRC	Public Resources Code
FPA	Forest Practice Act
FPR	Forest Practice Rules

# Important Rule Sections

Article 1 (14 CCR 895)	Abbreviations and Definitions
Article 2 (14 CCR 912)	Ratings and Standards. Includes Cumulative Impacts Assessment Checklist, Technical Rule Addendum No. 2 (14 CCR 912.9)
Article 3 (14 CCR 913[933, 953])	Silvicultural Methods
Article 6 (14 CCR 916 [936, 956])	Watercourse and lake protection measures
Article 9 (14 CCR 919[939, 959])	Wildlife protection practices

# Timber Harvest Plan Review Process



# Substantial Evidence

*To challenge a THP:*

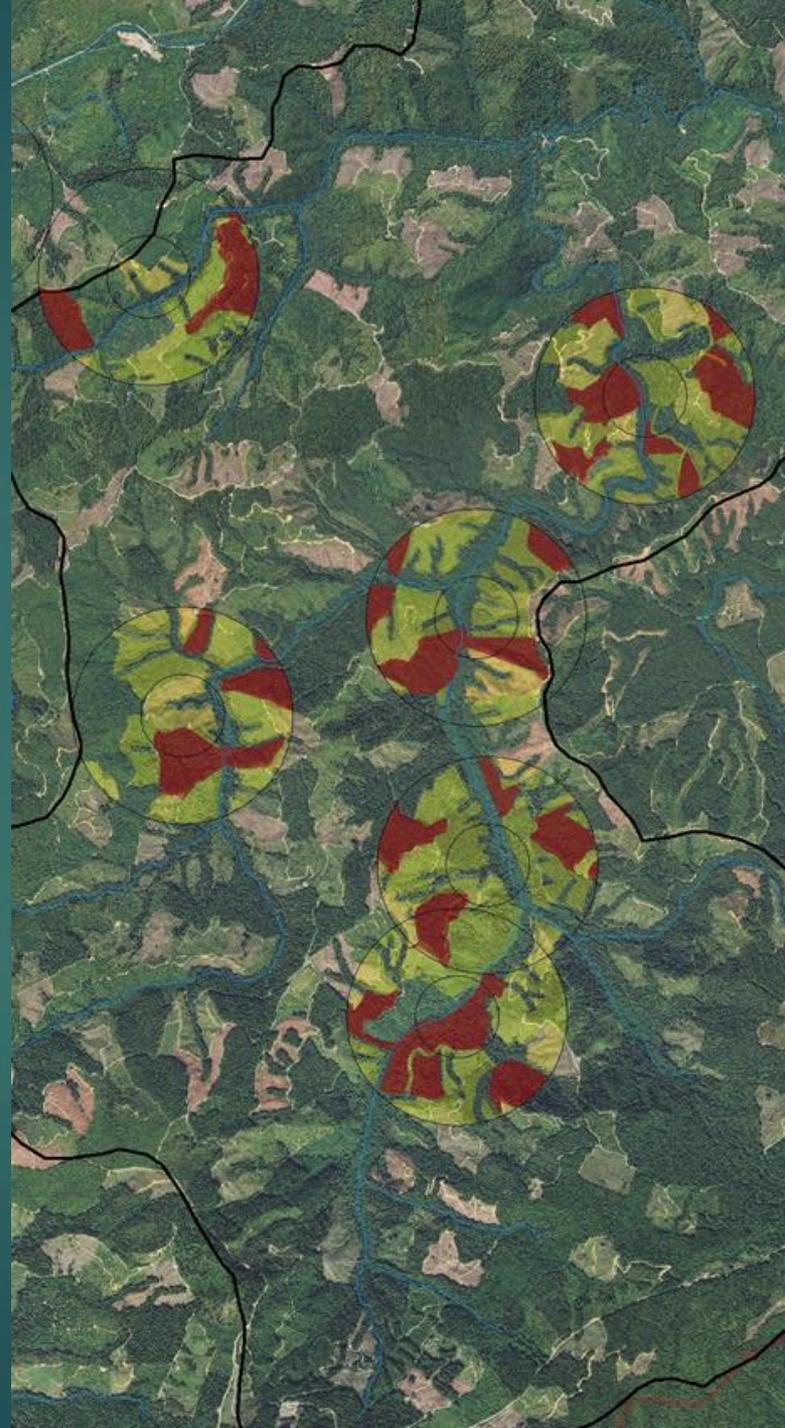
*Present Substantial Evidence that a project may have a significant effect on the environment based on substantial evidence in light of the whole record.*



# Defining Substantial Evidence

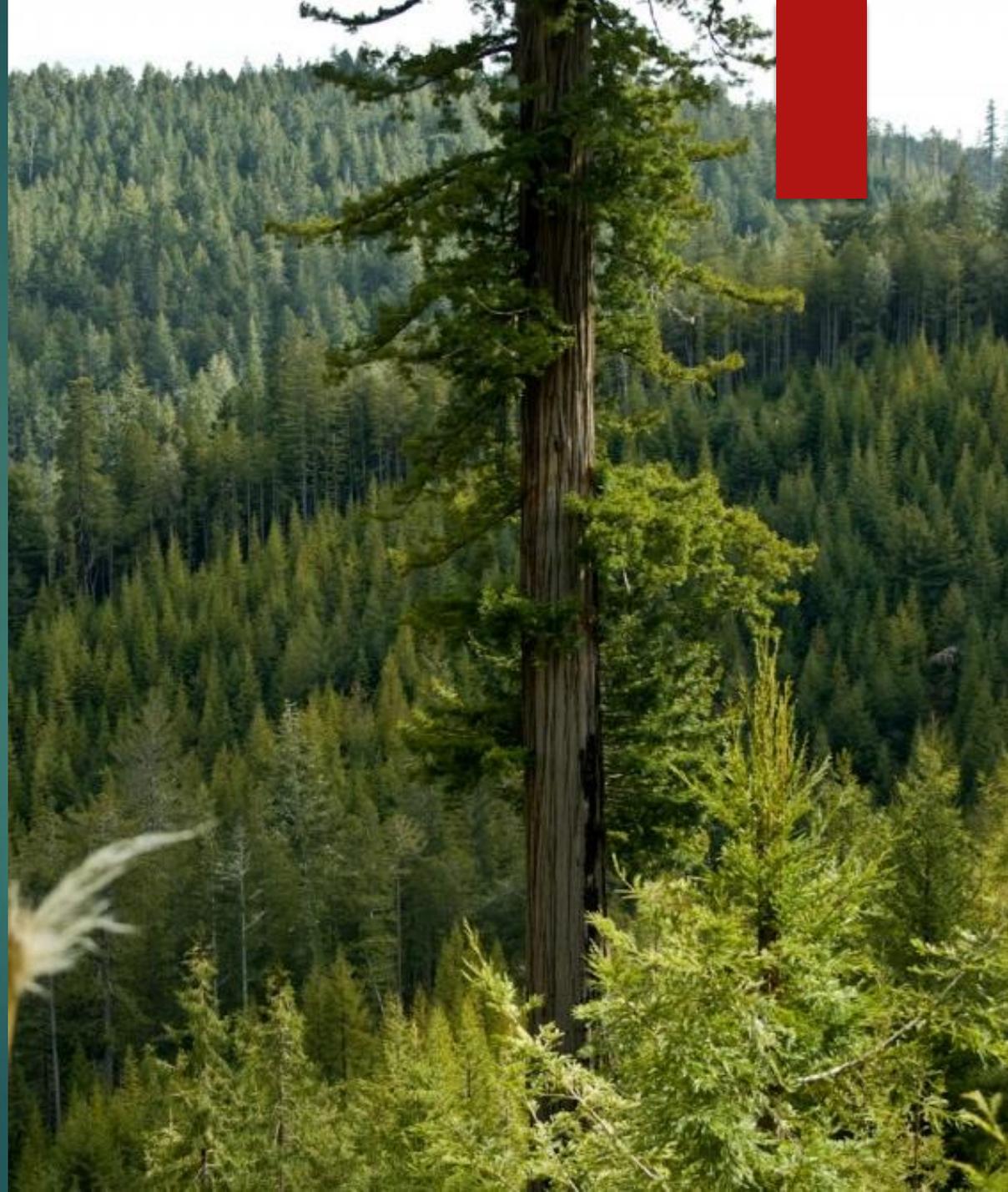
*Substantial evidence: facts, reasonable assumptions based on facts, or expert opinion supported by facts, including:*

- ▶ *Enough relevant information and reasonable inferences that a fair argument can be made to support a conclusion, even if other conclusions can also be reached.*
- ▶ *Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency.*
- ▶ *Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate.*
- ▶ *Evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.*



# Challenging a Timber Harvest Plan Approval

▶ An abuse of discretion may be shown only if the decision is not based on substantial evidence, or if the department did not proceed in the manner required by law in approving the plan.



# Finding a Copy of the THP

<https://caltreesplans.resources.ca.gov/caltrees/>

All THPs and related documents submitted to CAL FIRE are now available on the CalTrees Website

Click “Search Timber Harvest Documents”

\*Hint: you do not need a user name or password!

The screenshot displays the CalTrees website interface. At the top, there is a navigation bar with the CalTrees logo (Timber Regulation and Forest Restoration), a search icon, and links for 'Search', 'CalTREES Information', and 'CalTREES User Guide'. Below the navigation bar, there is a breadcrumb trail: 'Home > Timber Harvest Document > CalTREES Public Services'. A search bar is present with the text 'Advanced Search'. Below the search bar, there is a login section with fields for 'User Name or E-mail' and 'Password', and a 'Login »' button. Below the login section, there are links for 'Remember me on this computer', 'I've forgotten my password', and 'New Users: Register for an Account'. A 'Welcome to CalTREES' section follows, containing text about the California Timber Regulation and Environmental Evaluation System (CalTREES) and its benefits. At the bottom, there is a dark green button labeled 'Search Timber Harvest Documents'.

# Locating THP Status Table

[Home](#)
[Timber Harvest Document](#)
[CalTREES Public Services](#)

[Advanced Search](#)

User Name or E-mail:
  Password:

Remember me on this computer
 [I've forgotten my password](#)
[New Users: Register for an Account](#)

[Announcements](#)
 Accessibility Support
 [Register for an Account](#)
[Reports \(6\) ▾](#)

**Reports (6):**  
[1st Review Complete](#)  
[1st Review Tentative](#)  
[2nd Review Complete](#)  
[2nd Review Tentative](#)  
[NOS - NOR](#)  
[THP Status](#)

Click on “Reports” then Click on “THP Status”  
The THP table will pop up as a PDF

### Timber Harvesting Plans

Harvest Document	Received	Filed	Approval	Tentative End of Public Comments	Ext	Public Comment Period Closed	Total Acres	Watershed	Location	Land Owner(s)
<a href="#">1-19-00088-MEN</a>	6/20/2019	6/27/2019		7/27/2019			770.00	CHAMBERLAIN CREEK (1113.300302);NORTH FORK NOYO RIVER (1113.200105);OLDS CREEK (1113.200102)	MDBM: T18N R15W S16 ; MDBM: T18N R15W S17 ; MDBM: T18N R15W S19 ; MDBM: T18N R15W S20 ; MDBM: T18N R15W S21	MENDOCINO REDWOOD CO LLC
<a href="#">1-19-00093-HUM</a>	6/25/2019	7/3/2019		8/11/2019			121.30	LOWER ROACH CREEK (1105.110302);MIDDLE ROACH CREEK(1105.110301)	HBM: T10N R3E S18 ; HBM: T10N R3E S7	WILLIAM MELVIN
<a href="#">1-19-00094-HUM</a>	6/26/2019	7/3/2019		8/11/2019			242.50	SURPUR CREEK(1105.110704)	HBM: T11N R2E S10 ; HBM: T11N R2E S3 ; HBM: T11N R2E S4 ; HBM: T11N R2E S5 ; HBM: T11N R2E S8 ; HBM: T11N R2E S9 ; HBM: T12N R2E S34	GREEN DIAMOND RESOURCE COMPANY
<a href="#">1-19-00095-SCR</a>	7/26/2019	8/1/2019		8/31/2019			147.00	BOULDER CREEK (3304.120203) (3304.120203);KINGS CREEK (3304.120101)(3304.120101)	MDBM: T9S R3W S13	THE RMB REVOCABLE FAMILY TRUST DATED FEBRUARY 5TH, 1999
<a href="#">1-19-00096-SCL</a>	7/30/2019			8/15/2019			313.00	BLACKHAWK CANYON (3305.200303);PESCADERO CREEK(3305.200301)	: TO R0 S0 SALSIPUEDES	CASTRO VALLEY PROPERTIES LLC

# Finding a THP—Query Short-Cuts

## General Search

Record Number: 

1-14-103-HUM

Record Type:

Timber Harvest Plan 

Record Status:

--Select-- 

Record Created Start Date: 

08/06/2009 

Record Created End Date: 

08/06/2019 

Project Name:

Legal Description: 

▶ Search Additional Criteria

Search

Clear

# Query Menu Features

**CALTREES**  
Timber Regulation and Forest Restoration

Home **Timber Harvest Document** CalTREES Public Services

Search Timber Harvest Documents

Record 1-14-103-HUM:

## Timber Harvest Plan

Record Status: Approved

Record Info ▾

### Record Details

<b>Licensed Professional:</b> TODD J TRUESDELL TRUESDELL PO BOX 2517 MCKINLEYVILLE, CA, 95519 RPF 002969  View Additional Licensed Professionals>>	<b>Project Description:</b> LADOO WEST
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**CALTREES**  
Timber Regulation and Forest Restoration

Search

▼ More Details

- ▣ Related Contacts
  - Timberland Owner information**  
Organization  
GREEN DIAMOND RESOURCE CO KORBEL DIVISION  
Primary Phone:707-668-4400  
  
Mailing  
P O BOX 68  
KORBEL, CA, 95550  
United States
  - Timber Owner information**  
Organization  
GREEN DIAMOND RESOURCE CO KORBEL DIVISION  
Primary Phone:707-668-4400  
  
Mailing  
P O BOX 68  
KORBEL, CA, 95550  
United States
  - information**  
Individual  
TODD J TRUESDELL  
  
PO BOX 2517  
MCKINLEYVILLE, CA, 95519  
United States
- ▣ Application Information
- ▣ Application Information Table

**Plan Submitter information**  
Organization  
GREEN DIAMOND RESOURCE CO KORBEL DIVISION  
Primary Phone:707-668-4400  
  
Mailing  
P O BOX 68  
KORBEL, CA, 95550  
United States

**information**  
Organization  
COOK TIMBERFALLING  
Primary Phone:707-502-9972  
  
Mailing  
3420 JORDAN STREET  
FORTUNA, CA, 95540  
United States

### Attachments

**“Record Details” will show:**

*timberland owner/plan submitter/RPF/LTO  
(Or refer to Attachments, Section I, Items #1-5).*

# ...Menu Features

## Application Information & Table shows:

- ▶ Total Acres
- ▶ Detailed Location Information
- ▶ Township and Range
- ▶ Planning Watershed

### Application Information

#### Use Existing THP Values

Pre-Populate Section 1 and 2 from Existing THP: No

#### Acreage

Total Acres: 322

### Application Information Table

#### Location

Meridian:	Humboldt
Township:	04S
Range:	02E
Section:	36
Acreage:	0
County:	HUMBOLDT
Meridian:	Humboldt
Township:	05S
Range:	02E
Section:	1
Acreage:	0
County:	HUMBOLDT
Meridian:	Humboldt
Township:	05S
Range:	02E
Section:	2
Acreage:	0
County:	HUMBOLDT
Meridian:	Humboldt
Township:	05S
Range:	02E
Section:	11
Acreage:	0
County:	HUMBOLDT
Meridian:	Humboldt
Township:	05S
Range:	02E
Section:	12
Acreage:	0
County:	HUMBOLDT

### Watersheds

Watershed Identification Number:	1111.320703
Name:	Upper Sprout Creek
CALWATER Version:	2.2

# ...Menu Features

## Locate THP documents in Attachments

### - Review Section 2 for THP Docs/Operational Provisions of Plan



Search

CalTREES Information

CalTREES User Guide

#### More Details

### Attachments

Attachments below are for the selected record and may include any additional associated records.

To sort the Attachments list click on the column header of your choosing to toggle between ascending or descending order.

The maximum file size allowed is 250 MB.

Attachment Name	Attachment Type	Record ID	Record Type	Entity Type	Latest Update	Action
20190531_1-19-00076HUM_Sec6.pdf	Harvest Document Image	1-19-00076-HUM	Timber Harvest Plan	Record	05/31/2019	Actions ▼
20190531_1-19-00076HUM_Sec1.pdf	Harvest Document Image	1-19-00076-HUM	Timber Harvest Plan	Record	05/31/2019	Actions ▼
20190531_1-19-00076HUM_Sec2.pdf	Harvest Document Image	1-19-00076-HUM	Timber Harvest Plan	Record	05/31/2019	Actions ▼
20190531_1-19-00076HUM_Sec5.pdf	Harvest Document Image	1-19-00076-HUM	Timber Harvest Plan	Record	05/31/2019	Actions ▼
20190531_1-19-00076HUM_Sec3.pdf	Harvest Document Image	1-19-00076-HUM	Timber Harvest Plan	Record	05/31/2019	Actions ▼
20190531_1-19-00076HUM_Sec4.pdf	Harvest Document Image	1-19-00076-HUM	Timber Harvest Plan	Record	05/31/2019	Actions ▼
/Reports/FirstReviewReport_20190606_151827.pdf	RPF Questions	1-19-00076-HUM	Timber Harvest Plan	Record	06/06/2019	Actions ▼
/Reports/NOF_20190606_151930.pdf	Notice of Filing	1-19-00076-HUM	Timber Harvest Plan	Record	06/06/2019	Actions ▼
20190703_1-19-00076HUM_PHI-RespRPF.pdf	RPF Responses	1-19-00076-HUM	Timber Harvest Plan	Record	07/03/2019	Actions ▼
20190531_1-19-00076HUM_1stMemo.pdf	First Review Attachment	1-19-00076-HUM-REVIEW	THP Multi Agency Review	Related	05/31/2019	Actions ▼
THP_1-19-00076-HUM_CDFW_FirstReview_withFigure.docx	First Review Attachment	1-19-00076-HUM-REVIEW	THP Multi Agency Review	Related	06/03/2019	Actions ▼
20190605_1-19-00076HUM_1stReview-WQ.pdf	First Review Attachment	1-19-00076-HUM-REVIEW	THP Multi Agency Review	Related	06/05/2019	Actions ▼
CALFIRE_FPGIS_RTQ-01.PNG	First Review Attachment	1-19-00076-HUM-REVIEW	THP Multi Agency Review	Related	06/05/2019	Actions ▼
CALFIRE_FPGIS_RTQ-02.PNG	First Review Attachment	1-19-00076-HUM-REVIEW	THP Multi Agency Review	Related	06/05/2019	Actions ▼
CALFIRE_FPGIS_RTQ-03.PNG	First Review Attachment	1-19-00076-HUM-REVIEW	THP Multi Agency Review	Related	06/05/2019	Actions ▼

# Contents of a Timber Harvest Plan

**Section I: Legal description and information**

**Section II: Operational Provisions of Plan**

**Section III: Supporting materials, explanations**

**Section IV: Cumulative Impacts Assessment**

**Section V: Attachments, e.g. plant surveys, NSO documentation, EHR calculations**

**Section VI: Confidential Archeological Information**

# Important Operational Items in Section 2

Item #14(a) Silviculture

Item #16 Yarding methods

Item #17 Erosion Hazard Rating

Item #23 Winter operations

Item #24 Roads and landings

Item #26 Watercourse and lake protections

Item #27(a) Alternative watercourse and lake protections in lieu of standard rules

Item #32 Wildlife observances and enforceable provisions

# THP Section 2 Item 14 Silviculture

## SECTION II - PLAN OF TIMBER OPERATIONS

NOTES: (1) Specific LTO operational information should be provided in Section II. (2) If a provision of this THP is proposed that is different than the standard rule, the explanation and justification should normally be included in Section III. (3) Mapping requirements are identified under 1034(x). Additional maps may be used to provide the information required, to show specific details, or to improve map clarity.

**Note to Reviewer:** For purposes of this THP, the term "(RMZ)" (Riparian Management Zone) is listed along with WLPZ in the plan to show the relationship to Green Diamond's Aquatic Habitat Conservation Plan. The (RMZ) serves the same function as a WLPZ.

### SILVICULTURE

14. a. Check the Silvicultural methods or treatments allowed by the rules that are to be applied under this THP. Specify the option chosen to demonstrate Maximum Sustained Production (MSP) according to 14 CCR 913.11. If more than one method or treatment will be used show boundaries on map and list approximate acreage for each.

<input checked="" type="checkbox"/> Clearcutting	<u>147.5 ac.</u>	<input type="checkbox"/> Shelterwood Prep. Step	<u>ac.</u>	<input type="checkbox"/> Seedtree Seed Step	<u>ac.</u>
		<input type="checkbox"/> Shelterwood Seed Step	<u>ac.</u>	<input type="checkbox"/> Seedtree Removal Step	<u>ac.</u>
		<input type="checkbox"/> Shelterwood Removal Step	<u>ac.</u>		
<input checked="" type="checkbox"/> Selection (RMZ/SMZ/HRA/GEO)	<u>52 ac.</u>	<input type="checkbox"/> Group Selection	<u>ac.</u>	<input type="checkbox"/> Transition	<u>ac.</u>
<input type="checkbox"/> Commercial Thinning	<u>ac.</u>	<input type="checkbox"/> Sanitation Salvage	<u>ac.</u>	<input type="checkbox"/> Special Treatment Area	<u>ac.</u>
<input type="checkbox"/> Rehabilitation	<u>ac.</u>	<input type="checkbox"/> Fuelbreak	<u>ac.</u>	<input type="checkbox"/> Variable Retention	<u>ac.</u>
<input type="checkbox"/> Aspen Restoration	<u>ac.</u>	<input type="checkbox"/> Alternative Prescription	<u>ac.</u>	<input type="checkbox"/> Road Right of Way	<u>ac.</u>
<input type="checkbox"/> Conversion	<u>ac.</u>	<input checked="" type="checkbox"/> No Harvest Area (RSMZ/GEO)	<u>43 ac.</u>		

Total acreage: 242.5 ac. Explain if total is different from that in 8.

MSP option: (a)  (b)  (c)

\*Note: Additional discussion of silvicultural treatments is included in Section III Item #14.

# THP Section 2 Item 16-18 Harvesting Practices

## HARVESTING PRACTICES

16. Indicate type of yarding system and equipment to be used:

GROUND BASED*			CABLE			SPECIAL		
a)	<input checked="" type="checkbox"/>	Tractor, including end/long lining	d)	<input type="checkbox"/>	Cable, ground lead	g)	<input type="checkbox"/>	Animal
b)	<input checked="" type="checkbox"/>	Rubber tired skidder, Forwarder	e)	<input type="checkbox"/>	Cable, high lead	h)	<input type="checkbox"/>	Helicopter
c)	<input checked="" type="checkbox"/>	Feller buncher	f)	<input checked="" type="checkbox"/>	Cable, Skyline	i)	<input type="checkbox"/>	Other:
j)	<input checked="" type="checkbox"/>	Shovel Loader						
*(All tractor operations restrictions apply to ground based equipment)								

Within even-aged harvest units, tractor and rubber tired skidder use shall be limited to clearing and skidding of felled timber associated with road construction and reconstruction. Such use shall adhere to mitigations and restrictions associated with Road Construction and Road Reconstruction and Ground Based Yarding Operations as described throughout this THP. Such use is not proposed between October 15 and May 15, unless otherwise permitted in this THP. Also refer to ground based mitigations and time of year restrictions in Item 18 and time of year restrictions in Item 23.

17. Indicate Erosion Hazard Ratings present on THP.

Low     Moderate     High     Extreme

If the information above does not match the EHR worksheets, clarify why, below. If more than one rating is checked, areas must be delineated on map to 20 acres in size (10 acres for high and extreme EHRs in the Coast District).

**Refer to EHR worksheet in Section V and the Detailed THP maps in Section II.**

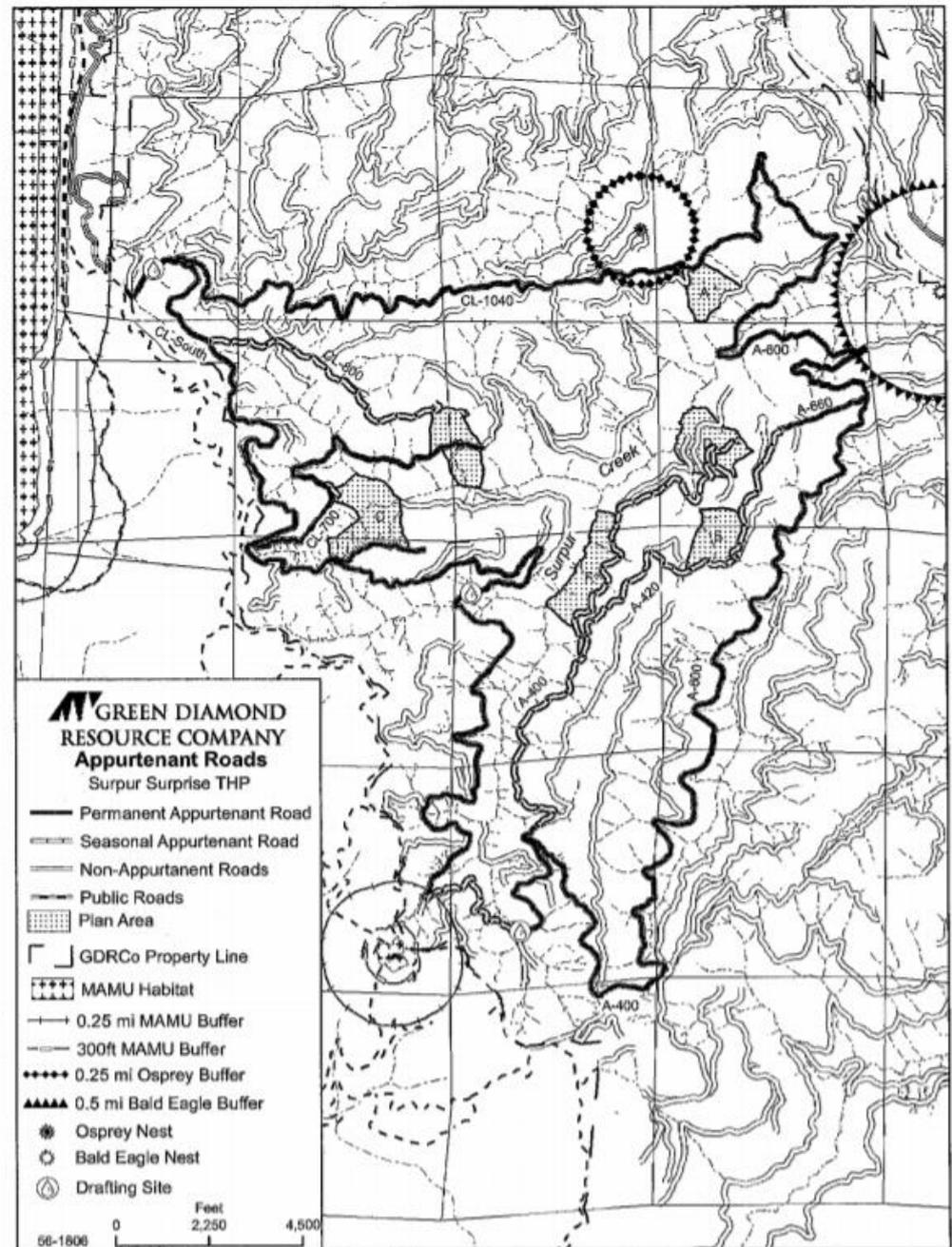
18. Soil Stabilization: Describe, as required, soil stabilization measures or additional erosion control measures to be implemented (including the location of application).

**NOTE:** Road related activities in this THP will comply with the requirements of the California Water Quality Control Board (CWQCB) Order R1-2010-0044 (*Waste Discharge Requirements for Discharges Related to Road Management and Maintenance Activities conducted pursuant to GDRCo's AHCP*). Forest management related activities in this THP will comply with the requirements of the CWQCB Order R1-2012-0087 (*Waste Discharge Requirements for Discharges Related to GDRCO's Forest Management Activities Conducted within the Area Covered by its AHCP*). A discussion of the orders is located in Section III, Item #25 of the THP, and a copy of the orders are on file at the Cal Fire Santa Rosa and Fortuna offices. Watercourse crossing related activities will be conducted under the procedures and standards described in the property wide Master Agreement for Timber Operations from Department of Fish and Wildlife (MATO No. 1600-2010-0114-R-1). A discussion of the agreement is located

# THP Maps – End of Section II

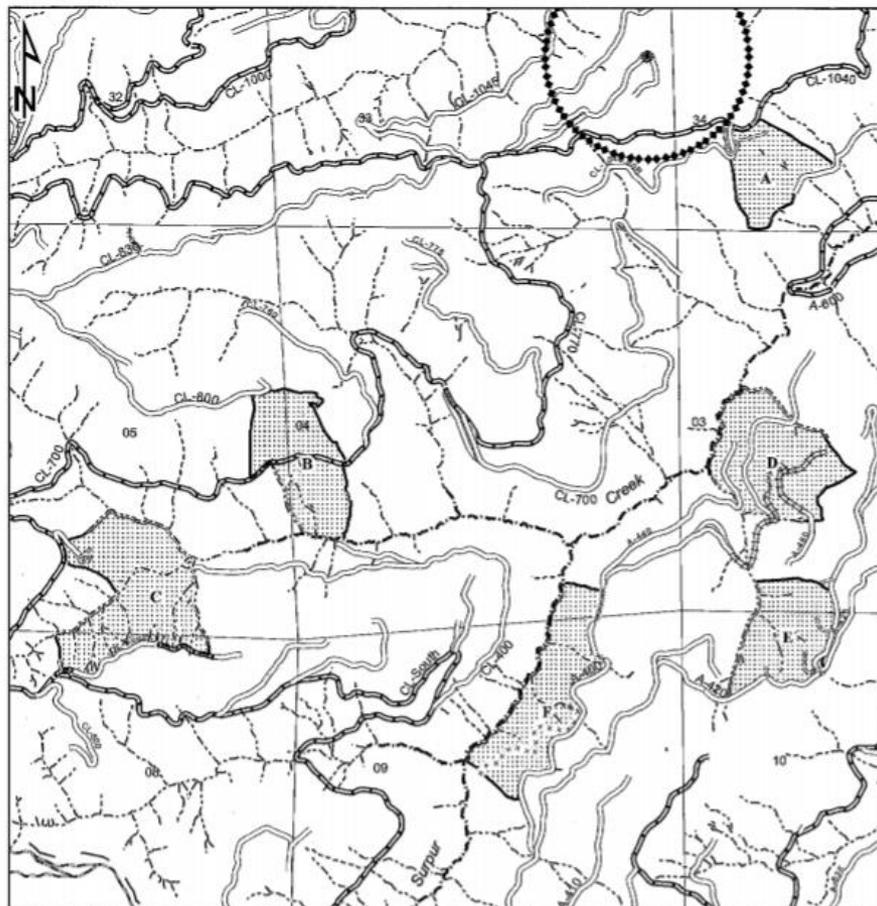
Map Types:

- ▶ Appurtenant Roads
- ▶ Overview Map
- ▶ Individual THP Unit/Silviculture Maps
- ▶ Others?



# Overview Map

# THP Unit Maps



**GREEN DIAMOND RESOURCE COMPANY** GDRCo 56-1806 Surpur Surprise '20 Overview Map

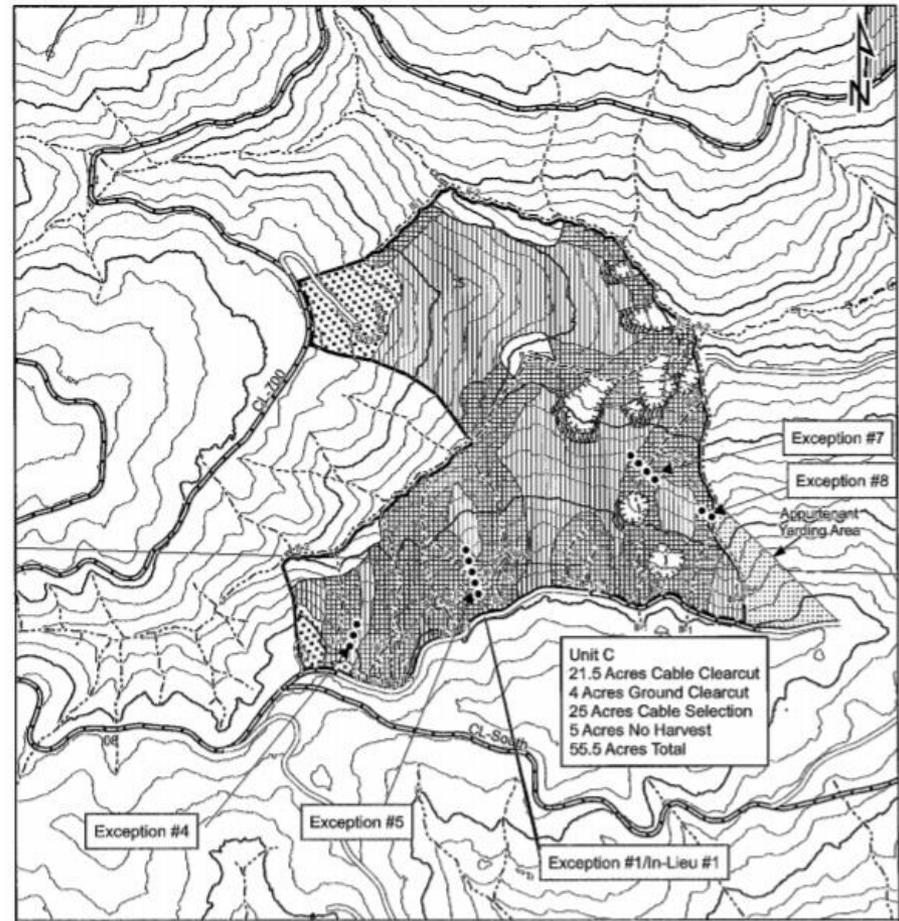
Scale: 1:18,000  
1 inch = 1,500 feet

T12N, R2E, Sec 33, 34 & T11N, R2E Sec 3, 4, 5, 8, 9, 10 H&M

<b>Harvest Units</b>	<b>Roads</b>	<b>Watercourse</b>
Harvest Unit	Public Road	Class I
GDRCo Ownership	Existing Permanent Road	Class II (B-1, B-2)
Harvest Unit Boundary	Existing Seasonal Road	Class III (BIA, BIB)
0.25 mi Osprey Buffer	Proposed Seasonal Road	
Osprey Nest	Existing Seasonal to be Reconstructed	
	Proposed Temporary Road (to be abandoned)	
	Seasonal Road (to be deactivated)	
	Legacy Road (Not to be used for this THP)	

**INTERNAL USE ONLY**

A 1223424  
B 1120426  
C 1120526  
D 1120324  
E 1120315  
F 1120918



**GREEN DIAMOND RESOURCE COMPANY** GDRCo 56-1806 Unit C Detail Map

Scale: 1:6,000  
1 inch = 500 feet

Sec. 5 & T11N, R2E, H&M Contour Interval = 40 ft.

<b>Cable Yarding</b>	<b>Ground Based Yarding</b>	<b>Cable Corridor Partial Suspension</b>	<b>Watercourse</b>
Clearcutting	Clearcutting	Cable Corridor Partial Suspension	Class I
High EHR	Mod EHR	GDRCo Ownership	Class II (B-1, B-2)
Site Class II	Site Class II	Harvest Unit Boundary	Class III (BIA, BIB)
<b>Cable Yarding (WLPZ/HM2)</b>	<b>Cable Yarding (GEO)</b>	Unstable Area	
Site Class II	Site Class II	<b>Roads</b>	
Site Class II	Site Class II	Existing Permanent Road	
<b>No Harvest</b>	<b>Appurtenant Yarding Area (Outside Unit Boundary)</b>	Existing Seasonal Road	
No Harvest	Appurtenant Yarding Area (Outside Unit Boundary)	Proposed Seasonal Road	
		Proposed Temporary Road (to be abandoned)	

**INTERNAL USE ONLY**

1120626

# Issues of Concern

- *Maximum Sustained Production of High-Quality timber products*
- *Sequestration of carbon dioxide*
- *Recreation*
- *Watersheds*
- *Wildlife*
- *Fisheries*
- *Aesthetic enjoyment*



# Presenting a “fair argument” via “substantial evidence”

- ▶ Cite relevant rules
- ▶ Cite relevant State and Federal laws
- ▶ Cite items from THP
- ▶ Cite best available science
- ▶ Cite agency reports, including past statements
- ▶ Cite alternative resources (e.g. CNDDDB, CALWatershed Mapper, DPR database)



# COMMENT CONTENT

## General Structure Suggestions

**Use letterhead with date, means of transmission, agency contact address and email**

### Opening Paragraph

- **Whose behalf the comments are being submitted**
- **Agency proposed action**
- **summary position statement on the proposed project**

### Body Paragraphs

- **For each paragraph: Topic sentence for key issue/supporting evidence/conclusion**
  - Endangered Species
  - Watersheds
  - Cumulative Impacts, etc...

### Conclusion

- **Restate position/ summarize argument**
- Make an “ask”
- Request future updates on projects

**End letter with your name, title, contact info and signature**

# Effective Comment Content

- *Develop a Theme.*
- *Identify the specific factual and legal issues you will address.*
- *Research each issue to determine what supporting evidence you can present*
- *Very Important to tie arguments to evidence!!*



# Getting Your Comments Submitted

- *Create the letter in final format and sign it.*
- *Label all appendices and documents as referenced in the letter, and put them in the order referenced.*
- *Combine letter with attachments to create pdf file(s).*
- *Make a copy of letter and all attachments and place in your electronic folder or paper file.*
- *For North Coast Region THPs Submit comments to:  
[santarosapubliccomment@fire.ca.gov](mailto:santarosapubliccomment@fire.ca.gov)*



# Exhaustion of Administrative Remedies

*Why we comment*

- *Raise facts and issues with enough specificity.*
- *Requires full presentation of issues.*
- *As potential plaintiffs, to provide an impressive record in the event of litigation.*
- *While exceptions do exist, one should always presume that you must thoroughly exhaust all administrative remedies prior to litigation*



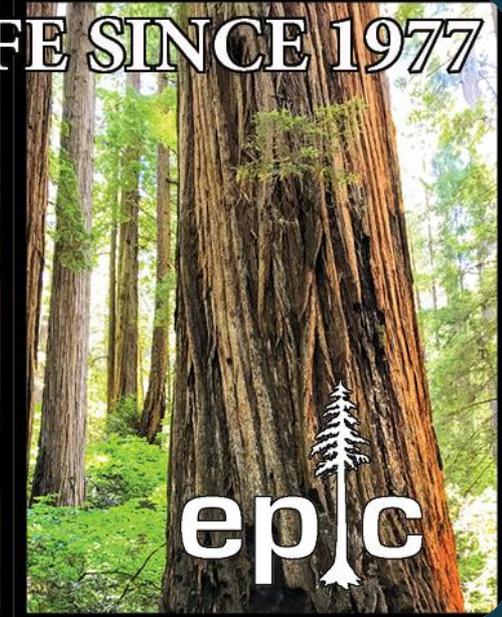
# Questions?



# Resources

- *Environmental Protection Information Center*  
[www.wildcalifornia.org](http://www.wildcalifornia.org)
- *CA Private Lands Timber Permit library (THPs, Salvage..)*  
<https://caltreesplans.resources.ca.gov/caltrees/>
- *Cal Watershed Mapper*  
<http://frap.fire.ca.gov/watersheds/mapper.html>
- *California Native Diversity Database*  
<http://www.dfg.ca.gov/biogeodata/cndddb/>
- *DFG IMAPS GIS*  
<http://www.dfg.ca.gov/biogeodata/gis/imaps.asp>

# PROTECTING FORESTS AND WILDLIFE SINCE 1977



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