

**Goss, Brandi@BOF**

---

**From:** Alan Levine <alevine@mcn.org>  
**Sent:** Friday, January 18, 2019 8:11 AM  
**To:** Public Comments@BOF  
**Subject:** Comments - Working Forest Management Plan - Rule Making SB 901  
**Attachments:** SB 901 Rule Making - comment #1 .rtf

This e-mail and 3 successive e-mails ( with attachments) contain:

Comments on Working Forest Management Plan Rule Making (SB 901) - with attachments on several successive e-mails ( including: Dunne Report, Maranto Paper, FAP, Regional Board comment letters, AG's opinion on Board of Forestry Authority regarding restoration - sediment control = restoration, CZARA - State Non-point Source responsibility).

Please distribute to the Board and Management Committee for Consideration.

This will allow time to review the comments and attachments - and present them (hopefully with some discussion) to the Mgmt. Committee and the Board.

Eventually, there will front loaded Erosion Control Planning. It would be more efficient, consistent with and based on the model of the NTMP, and (finally) work better for property owners and plan preparers to accomplish the task of determining sensitive erosion sites during the WFMP approval process. There is no reason why it can not or should not be done - as compliance with other State Code and Policy indicates that it should happen that way.

Alan

Note: Please be aware that any significant changes to the erosion control analysis that occurs incidental to the WMFP approval process, or at the time of the time of the WFMP Harvest Notice (at this juncture it would be a Major Amendment to the plan) is subject to Review Team assessment and must be noticed for public review - and - where findings must be appurtenant to any approval process (as a CEQA compliant action).

Alan Levine  
Coast Action Group  
Affiliate of Redwood Coast Watersheds Alliance  
126 Steiner Ct  
Santa Rosa, CA 95404

Phone: 707 542-4408