

## **SECTION III**

## General Description of Physical Conditions at Plan Site

The harvest area is located in Mendocino County in the Gualala River watershed. The Gualala River flows into the Pacific Ocean at the town of Gualala near the Sonoma and Mendocino County border. The THP covers 251 acres (of which 46 acres are no-cut zones and 6 acres of non-timber) adjacent to the Little North Fork of the Gualala River. Elevations within the plan range from approximately 40 feet to 440 feet. Aspect is mostly flat or east and west facing. Yarding will be ground based. Soils for the THP area is mostly Big River Loamy Sand but there are areas of Irmulco Tramway complex, DeHaven Hotel complex and Cottaneva Loam complex. Topography is mostly flat in Units #1 and #2 and fairly steep in Unit #3. EHR is moderate and high. The moderate rating is for the gentle THP area almost entirely because of the detachability rating which is high for Big River Sandy loam. Unstable areas are rare in units 1 and 2 but there are a few unstable areas in Unit 3.

The units are numbered to #1 to #3.

Unit # acres (includes no-cut acres)

Unit #1- 211 acres

Unit #2- 5 acres

Unit #3- 35 acres

### Species composition-

The deep soils and water availability in Units #1 and #2 make for GRT's most productive timber land. Unit #3 is lower site class. Site class is rated as site I in the flatter areas and site II and III on the side slopes. Only the southern end of unit #1 contains some areas that are flood prone. The plan contains almost exclusively 90-100 year old redwood except for some areas of alder. The upslope areas in Unit #1 and Unit #3 have a mix of redwood and Douglas Fir. The understory throughout the THP is notably absent because of the high canopy closure which ranges between 80 and 100%. Stocking levels are approximately 200-350 square feet of conifers per acre and less than 25 square feet of hardwoods per acre. Post harvest stocking will be approximately 150-200 square feet of redwood per acre in the site one areas and 75-125 square feet per acre of redwood and fir in the site three areas. Minimum standards for site one is 125 square feet of conifer per acre and in site two and three it is 75 square feet of conifer per acre but because of the higher WLPZ canopy standards throughout much of the plan the basal area will be considerably higher than the minimums. Because of the numerous WLPZs hardwoods will essentially remain near the same level.

Silviculture and History- The last entry into these areas was in between 1987 and 1992 (26 years or more) and the silviculture was selection or alternative prescription similar to selection. The present silviculture will be selection but modified by the ASP rules (see table under item 14 for specifics). Because of the ASP rules' high standards and other biological considerations 52 acres out of the 251 acres in the THP will be no-cut zones. The rest of the THP will be an extremely light harvest.

In 2019 a post-harvest inventory was conducted in a flood prone area THP located on the North Fork Gualala River. The conifer stocking levels of the pre-harvest stands in the North Fork THP were very similar to the stands of conifer in the Little THP. The silviculture utilized was the same for both THPs, single tree selection as constrained by the ASP Rules for Flood Prone Areas. The results of this inventory show that basal area retention was very high in the North Fork THP. Similar results can be expected from the harvest proposed in the Little THP. The inventory report is included in THP section V, page 366.24.

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### Water Drafting Item 26 Section III

The following information is added in order to comply with the ASP rules under 923.7(l)(2)

- (A) Provide a general description of the conditions and proposed water drafting;

Four drafting sites will be used for this plan. The 1600 agreement for this THP will have similar water drafting instructions to 1600-2011-0423-R3. The following information will satisfy the ASP rule requirements regarding water drafting activities. GRT will use approximately 10,000 gallons per day from these water holes (holes A, B, C and D). One drafting site (site A) is a previously dug off channel hole in the Doty Creek (little north fork of the Gualala river) watershed, one site (site B) is a previously dug off channel hole in the Pepperwood Creek (south fork of the Gualala river) watershed, one site (site C) is a hole that will be dug in the gravel bar adjacent to the South Fork of the Gualala in the Pepperwood Creek watershed and one site (site D) is a hole that will be dug in the gravel bar adjacent to the North Fork of the Gualala River in the Robinson Creek watershed.

The South Fork of the Gualala is contained in the San Andreas Fault in a 100-200 foot wide very low gradient alluvial channel. The alluvium has been estimated to be up to 175 feet deep in the center and tapering toward the edges. The summer wetted channel is approximately 25 feet wide. The substrate is composed exclusively of cobbles, small gravel, sand and silt. The stream banks have a 50% slope and transition onto the alluvial flats that can be up to 1000 feet wide and are 20 or 30 feet higher in elevation. The North Fork of the Gualala also contains alluvium and the wetted channel is 15 feet wide or less in the summer. The banks transition into the alluvial flats with less elevation rise than on the south fork. The adjacent gentle areas are narrower and are usually between 150 and 800 feet wide.

Operational instructions for the LTO regarding active channel water drafting are summarized below.

- (B) Provide a map showing proposed water drafting locations;  
See 1600 points map in Section III.
- (C) What is the watercourse classification;  
Hole A and B are previously dug holes that are off channel but may be considered now as class II wet areas. Hole C and D will be dug adjacent to class I watercourses.
- (D) Describe the drafting parameters including the months the site is proposed for use;  
Water will be drafted between April 1 and November 15.
- (E) Describe estimated total volume needed per day  
In aggregate, GRT will use no more than 8,000 gallons per day from active channel water holes on the North Fork of the Gualala (hole D) or 25,000 gallons per day on the South Fork of the Gualala (hole C), normally far less is needed. For instance, in 2015 drafting from the channel for all operations occurred over 85 days, and average usage was 2,447 gallons per day. The most water pumped in a day was 12,000 gallons.
- (F) Describe estimated maximum instantaneous drafting rate and filling time;

Water drafting would be at a rate of less than 300 gallons per minute, a 4,000 gallon truck will take about 15 minutes to fill.

(G) Disclose other water drafting activities in the same watershed;  
Gualala Redwood Timber drafts from three locations that lie between the confluence of the Wheatfield branch and the south fork of the Gualala and the confluence of the south fork and the north fork. North Gualala Water Company and Sea Ranch Water Co. get water from the Gualala River watershed via wells. The North Gualala Water Company wells are in the North Fork Gualala River. The Sea Ranch wells are one mile below Twin Bridges in the South Fork of the Gualala River.

(H) Estimate the drainage area (acres) above the point of diversion;

These dug holes (A and B) do not have drainage areas but are intercepting rain and ground water. Hole C will have a drainage area of approximately 165,000 acres. Hole D will have a drainage area of approximately 25,000 acres.

(I) Describe the estimated unimpeded stream flow, pumping rate, and drafting duration. (The following applies to Site C and D. Sites A and B are not connected to watercourses)

1. Bypass flows for Class I watercourses shall be provided in volume sufficient to avoid dewatering the watercourse and maintain aquatic life downstream, and shall conform to the following standard unless modified in the 1600 agreement for this THP:
  - a) Diversion rate shall not exceed 10 percent of the surface flow, unless modified by the 1600 agreement
  - b) Pool volume reduction shall not exceed 10 percent.
  - c) Drafting will occur between April 1 and November 15.
2. The likely drafting requirements in the 1600 being drafted for this THP are;
  - a) To avoid take of fish, Permittee shall not draft water from the flowing stream channel; instead, all water shall be drafted from pits dug in gravel bars or upland locations. The gravel bar hole shall be no less than 10 feet from the wetted channel. Excavation of the gravel bar hole shall be conducted in isolation from the flowing stream.
  - b) Before commencing any water drafting operation, the RPF and the drafting operator shall conduct a pre-operations field review to discuss the water drafting measures in the plan and in the 1600 agreement.
  - c) Each of the drafting sites shall have a downstream pool designated within the wetted channel that is easily observable from the drafting site but as far away as possible. This pool shall be used to determine any flow changes from drafting activities. A water level gauge with at least 0.05 foot increments shall be installed in this pool. An additional riffle

crest monitoring station shall be placed downstream of each drafting monitoring site in August and September.

- d) A pump test shall be conducted by an RPF at each site prior to commencement of any drafting activities and monthly thereafter. The purpose of this test is to establish if enough flow is present to allow for water drafting without significantly altering flow as measured by the wetted width of the channel. The test shall provide an estimate of the maximum change in water surface elevation as measured at the pool water level gauge that would result in a change of less than 0.10 foot to the wetted width at each monitoring site (the first downstream riffle crest).
  - e) The diversion rate shall not exceed 300 gallons per minute.
  - f) In aggregate, for GRT operations (including water drafting for Bedrock's gravel mining operations), GRT will use less than 25,000 gallons per day from active channel water holes.
  - g) Water truck operators shall be in possession of log books that shall contain the following information, kept current during operations: 1) drafting site location, 2) date, 3) time, 4) pump rate, 5) filling time 6) screen cleaning/inspection notes, 7) pre and post drafting pool water elevation as recorded from the water level gauge. Drafting logbook data shall be submitted to CDFW monthly for each year that drafting operations occur, or sooner upon request.
  - h) If, during any drafting activity, the water level as read on the pool water gauge drops by more than 0.05, or the amount determined by the pump test (see item D above) to cause a change greater than 0.10 foot to the wetted width at the riffle downstream, pumping shall immediately cease.
- (J) Discuss the effects on aquatic habitat downstream from the drafting site(s) of single pumping operations, or multiple pumping operations at the same location, and at other locations in the same watershed; A hydrological study by O'Connor Inc. dated June 11, 2010 (previously submitted to CDFW) indicates that even at the rate of 25,000 gallons of water per day GRT would be using between .3% and .5% of the available daily flow on the South Fork of the Gualala. Any downstream effects would be insignificant on fish and wildlife. Drafting logs show that virtually no reduction of pool volume occurs even during periods of low bypass flows because of the large subsurface flow that is available.
- Sea Ranch Water Co. pumps from wells during periods of high flows and stores the water in reservoirs.
- (K) Discuss proposed alternatives and measures to prevent adverse effects to fish and wildlife resources, such as reducing hose diameter; using gravity-fed tanks instead of truck pumping; reducing the instantaneous or daily intake at one location; describing allowances for recharge time; using other dust palliatives; and drafting water at alternative sites;
1. GRT has used magnesium chloride in the past as a dust palliative and may do so again.
  2. Drafting takes place at sites closest to the roads needing dust abatement, which spreads out the

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impacts at the 4 separate gravel pits along the South Fork of the Gualala River. However, as the O'Connor Report (2010, and response to public comments 2015) indicates, this is not really a concern.

3. Water holes were previously dug, at the request of CDFW and with their approval, far from existing watercourses in order to provide an alternate source for water drafting. These water holes will be used again, and effectively cause less need for water uptake from the gravel pits.
- (L) The methods that will be used to measure source stream flow prior to the water drafting operation and the conditions that will trigger stream flow to be measured during the operation.
4. See section (I) 2. Above:
  5. Relying on the O'Connor hydrological study and past experience, drafting 25,000 gals per day from the South Fork will not have a significant effect on downstream flow.

## Item #27a and f Part 1 - WLPZ Road and landings

**Description of proposed operation-**There are several locations where the haul roads enter the WLPZ of Class I and Class II watercourses or wet areas. Virtually none of the road system enters the flood prone areas of the Little North Fork of the Gualala river except at crossings. See the WLPZ facilities map. In order to keep the number of WLPZ skid trails to a minimum much of the plan will be long lined which means that logs will have to be skidded down the road to the nearest landing. In order to keep this skidding to a minimum, wide areas along the road may be used to load logs with a heel boom loader or front end loader even when not designated as a landing. These areas do not constitute new construction as significant amounts of dirt will not be displaced. Two landings that exist at the edge of or inside the WLPZs will also be utilized in order to minimize skidding.

**Standard Rule-** The standard rule is 916.4 (d) Heavy equipment shall not be used in timber falling, yarding, or site preparation within the WLPZ unless such use is explained and justified in the THP and approved by the Director.

**Explanation and Justification-** Some portions of the haul road for this plan falls within class I and class II WLPZs. This is the main haul road system for the Little North Fork of the Gualala River and the entire north end of Gualala Redwood Timber's property. The road has been built as far from the major watercourses as is feasible without beginning to enter steeper slopes. Any attempts to relocate the road system on these slopes would potentially cause mass movements and would involve the creation of many new class I, II and III crossings that would have the potential of creating major erosion problems. The road is out of the flood prone areas except at crossings. Wide spots in the road that are used to load logs may also be used in order to minimize skidding as long as the road is not widened and significant amounts of dirt are not displaced. The buffer between the road system, the landings and the watercourses are usually flat and will remain heavily vegetated post harvest. Most of the landings that will be used are out of the adjacent WLPZs with two exceptions. The Landings and road segments have been numbered on the WLPZ facilities maps. Specific mitigations are described below when necessary for each.

Because of the existence of a flat heavily vegetated buffer between the road and the watercourses the chance of migration of soil into any fish bearing watercourse is insignificant.

**Mitigation-** Mitigation will consist of maintaining a well watered road surface so that the dust levels on the road and landings are kept to a minimum. Landings that intrude on a WLPZ will be seeded and mulched per item 18 standards.

Road segments-

R1 and R2 are segments of the main rocked haul road. These segments are on steep slopes above a class II and a class I respectively and are 400 to 600 feet long. There are at the extreme edge of a 100 foot wide WLPZ with a heavy tree buffer.

R3-This rocked segment is on gentle ground adjacent to a class I, is approximately 400 feet long and is near the outside edge of the WLPZ.

R4-This segment of road runs between a small pond and a wet area that is being given class II



protection. The northern 200 foot spur is not rocked, the southern 500 foot portion is rocked.

R5- Main rocked haul road runs near a class II wet area and class II watercourse. Approximately 300 feet.

R6- Main rocked haul road segment that runs within the WLPZ of class I for about 250 feet.

R7- Main rocked haul road segment that runs within the WLPZ of class I for about 300 feet.

R8-Un-rocked segment of road runs parallel to a class I and class II but has a thick vegetative buffer and gentle ground in the WLPZ. Length is approximately 1000 feet and is near the outside edge of WLPZ for much of this distance.

R9-Unrocked segment of road that runs within the WLPZ of a class II wet area for about 450 feet.

R10-Unrocked segment of road that runs within the WLPZ of a class II and class II wet area for about 300 feet.

R11-Main rocked haul road that runs adjacent to class II wet area that is in a back tilted flat area so is not likely to contribute sediment to a class I. The WLPZ buffer varies from poor to good and the length is approximately 1000 feet.

R12-Unrocked segment of road that runs within the WLPZ of a class II for about 500 feet.

#### Landings-

L1-This landing is at the intersection of two roads so the area will already be disturbed. Seed and mulch at close of operations.

L2-This landing intrudes about twenty feet into a class I WLPZ. The topography of the area will prevent soil from migrating in the direction of the watercourse. Seed and mulch at close of operations.

## Item #27a and f Part 2 - W.L.P.Z skid trails

**Description of proposed operation-**It will be necessary to use skid trails that access the wider portions of the alluvial flats that are flood prone at the south end of Unit #1. Also it will be necessary to use a handful of skid trails that fall within the standard WLPZs of the class I and II watercourses.

**Standard Rule-** The standard rule is 916.3 (c) which states that "The timber operator shall not construct or use tractor roads in Class I, II, III or IV watercourses, in the WLPZ, marshes, wet meadows, and other wet areas unless explained and justified in the plan by the RPF, and approved by the Director."

**Explanation and Justification-** During the last entry into this area the Class I WLPZ was 75 feet wide. This time the Class I WLPZ in the southern end of Unit #1 it is up to 600 feet wide as this area is in a flood prone zone. Also, class II watercourses emptying into gentle ground have created numerous spread out wet areas in other parts of the plan that are being protected with class II wet area WLPZs instead of EEZs. This added protection has created in lieu practices in areas where they might not actually be an in-lieu practice if the protection zone was a narrower EEZ. It was felt that the areas would benefit from the added protection of canopy retention and other WLPZ protections. Since all but two of these skid trails are on flat ground soil movement off of them will be minimal and will not travel any significant distance beyond the edges of the skid trails. Earth berms or back tilted topography exists between some of these skid trails and the class I watercourse and the chance of sediment entering a class I watercourse as a result of the usage of these trails is insignificant. The number of flagged skid trails has been kept to a minimum, but by limiting access too much it becomes difficult to skid trees without damaging the residual stand and preserving the canopy is an important concern in these areas. The flagged skid trails were located so as to take advantage of existing skid trails, to stay on higher ground and to avoid disrupting the hydrologic function of the flood plain. These avoidance measures will greatly reduce the impact of heavy equipment. The skid trails have been numbered on the WLPZ facilities maps.

S1 and S2 both of these skid trails provide access between adjacent watercourses where access is limited but the ground is flat and soil movement off of the skid trails will be minimal.  
S3 and S4-These two short skid trails on flat ground are near the edge of the WLPZ of the class II and by using them it was possible to avoid installing a class II crossing on a CII large which greatly reduces impacts.  
S5- This long skid trail gives access around a wet area. The wet area is given added protection and the skid trail system allows access between the wet area and the class I on an area that is dry and flat.  
S6-Is a skid trail at the far edge of a 100 foot wide class II WLPZ but is on steeper ground. There is a flat but narrow buffer between the slopes and the water course.  
S7-This skid trail parallels a class II and has a flat vegetative buffer.  
S8 and S9- These are the complete skid trail systems on the east and west sides of the Little

North Fork that are within the flood prone areas. The number of skid trails has been limited as much as possible and an attempt to lay out skid trails on higher ground and perpendicular to class III flow patterns has been made.

**Mitigation-** All of the skid trails will be flagged in the plan area prior to operations even if they do not fall in the WLPZ. Heavy equipment will be restricted to these flagged skid trails. This will help insure that the LTO doesn't accidentally encounter soft ground or a wet area since some of these areas are not obvious. Any skid trail that is within a WLPZ and traverses a slope greater than 30% will be slash packed or straw mulched and seeded to the standards in item 18 and waterbarred. **In flood prone areas in order to ensure minimal ground disturbance from ground based yarding, tractors may not drive with their blade lowered, except as needed to move debris. No excavation shall occur on flood prone areas except at watercourse crossings described in section II or as needed to improve drainage or resolve access problems resulting from previous logging operations.**

Map point #35 (Ref. 14CCR 914.8(c))

Map point #35 is a Class I skid trail crossing. This crossing is expected to be dry at the time of operations. The watercourse at this crossing is on a flat gradient on the alluvial plain and the stream substrate is a mixed gravel/cobble. The channel is 15' to 20' wide. There is currently a gravel berm on the North side of the crossing. A minimum 18" culvert will be placed in the channel and covered with existing channel material borrowed from the gravel bar downstream of the crossing. The crossing will be pulled prior to October 15. When pulled, remove any debris or dirt on the gravel and reshape back to original channel. Reestablish the berm along the North side of the channel to match existing berm that is already there. As discussed, this crossing is typically dry during the summer months. Should an uncharacteristic rain of sufficient magnitude occur to cause the channel to flow during the summer, an 18" culvert should be suitably large enough to allow unrestricted passage of all life stages of fish that may be present and unrestricted flow of water.

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ANALYSIS OF ALTERNATIVES

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As a Certified Regulatory Program under CEQA, CalFire's THP process is exempt from the requirement to prepare Environmental Impact Reports (EIRs) and related provisions of CEQA. However, a THP must include "a description of the proposed activity with alternatives to the activity, and mitigation measures to minimize any significant adverse effect on the environment of the activity." PRC § 21080.5(d)(3)(A); 14 CCR §§ 15250-15253.

Cal Fire has informed RPFs that they must submit an alternative analysis with proposed THPs and has given RPFs guidance in preparing that analysis, based on the CEQA guidelines that control the alternatives analysis in EIRs. 14 CCR § 15126.6.

The THP process functions to ensure a THP will be designed to avoid significant environmental effects or to mitigate such effects to the point where no significant effects will occur. The THP process is based on the Forest Practice Rules (promulgated by the Board of Forestry), which require a layer and level of analysis not utilized in the typical EIR process, and the requirements of CEQA. 14 Cal. Code Regs. 895 et seq. (The Board of Forestry's rulemaking program – pursuant to which the Forest Practice Rules are promulgated -- is itself a CEQA functional equivalent program, so that the rulemaking file serves as the functional equivalent of an EIR, and ensures that those Rules, if properly implemented, will not result in significant environmental impacts.) The Forest Practice Rules are programmatic prescriptions and best management practices designed to avoid or mitigate significant impacts of timber harvesting, road building and other timber operations that are applied by the Registered Professional Forester (RPF) in preparing a THP. In addition to requiring RPFs to apply these prescriptions in preparing THPs, the Forest Practice Rules require plan submitters to conduct a site-specific analysis of potentially significant individual and cumulative effects that may not have been avoided or mitigated to less-than-significant by application of the prescriptions contained in the Forest Practice Rules alone. The RPF must incorporate feasible measures in the THP to avoid such effects or mitigate to a less-than-significant level. In only the rarest of cases will CalFire adopt a statement of overriding considerations to approve a THP that has any impacts that have not been mitigated to a less-than-significant level.

In preparing this THP, the RPF has applied the highly prescriptive standards of the Forest Practice Rules, including those applicable to flood prone areas in watersheds with salmonids. These include the Watercourse and Lake Protection Zone (WLPZ) Rules, special regulations designed to "maintain, protect, and contribute towards the restoration of" water quality and beneficial uses and aquatic and riparian habitat. 14 Cal. Code Regs. 916.2(a). In addition, the THP is subject to the Anadromous Salmonid Protection (ASP) Rules, an even more specialized subset of regulations applicable to logging in watersheds with listed anadromous salmonids to ensure that timber operations are "planned and conducted to protect, maintain, and contribute to restoration of Properly Functioning Salmonid Habitat and listed salmonid Species." 14 Cal. Code Regs. 916.9. In addition, the RPF has adopted additional measures in the plan as necessary to avoid or mitigate to a less-than-significant level potentially significant site-specific individual and cumulative effects identified during THP preparation. Accordingly, the RPF has submitted a THP that already serves CEQA's objective of avoiding environmental effects or reducing them to a less-than-significant level.

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Although the THP has been designed through avoidance and mitigation to have less-than-significant environmental effects, the RPF has analyzed alternatives which could avoid or substantially lessen environmental effects that are typically identified in the preparation and review of THPs. The RPF has used the CEQA Guidelines as well as Cal Fire's guidance (dated June 10, 1997) for addressing alternatives in the THP process.

CEQA requires neither any fixed number of alternatives, nor inclusion of every conceivable alternative. 14 CCR 15126.6(a)(c). Further, CEQA does not require the consideration of alternatives whose effect cannot reasonably be ascertained and whose implementation is remote and speculative. Instead, the CEQA guidelines provide that a "reasonable range" of alternatives must be selected for discussion, applying a rule of reason. 14 CCR 15126.6(f). In accordance with CEQA and its guidelines, the alternatives selected for detailed examination in this THP are limited to ones that could avoid or substantially lessen significant effects of the project (if any) and that could feasibly attain most of the basic objectives of the project. Finally, under CEQA, the alternatives considered need only relate to the project as a whole, not to its various parts. This Analysis describes the rationale for selecting the alternatives to be discussed, including an explanation of why some alternatives were considered but not selected for detailed discussion in the THP.

#### **I. PROJECT DESCRIPTION, PURPOSE(S), NEED(S), AND OBJECTIVE(S)**

The project is described in Sections I, II, and III of the THP. The Timberland Productivity Act of 1982 restricts the use of lands zoned Timberland Production Zone (TPZ) exclusively to the growing and harvesting of timber and compatible uses; it also establishes a presumption that timber harvesting is expected to and will occur on such lands. All of the lands included in the THP are TPZ lands which have timber production as the primary use.

**Purpose(s).** The landowner's purposes in undertaking the project are:

- 1) Access, harvest and regenerate the forested area delineated in the THP.
- 2) Maximize sustained production of high quality timber products.
- 3) Maintain a forest products industry in the local community.
- 4) Maintain or improve existing wildlife habitat.
- 5) Maintain or improve existing cold water fisheries.
- 6) To earn an economic return by operating the property, including the plan area, as commercial timberland per its present zoning and intended land use.

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**Need(s).** The needs for the project from the perspective of the landowner are:

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- 1) To meet certain fixed costs of ownership including, but not limited to, taxes, insurance and debt service payments on loans, and meeting Maximum Sustained Production (MSP) as required by the Forest Practice Act and the Forest Practice Rules.
- 2) To maintain the flow of high quality timber products to the economy, sustain a forest products industry, and provide a source of employment in the local community.

Log deliveries to the landowner's own mills are being supported in part by transported logs from other counties, and in the past even from other countries (New Zealand), to enable local mills to continue to operate. Supplying logs from outside the local geographic area is undesirable for many reasons. Transportation impacts to the environment (including air pollution and Green House Gas (GHG) emissions) are greater. Moreover, other states and countries from which logs have to be imported may have far more lenient forestry regulations than California. Supplying local sawmills with logs from local timberlands is a far more efficient use of resources and has less environmental impacts than importing logs from other states and countries. The THP area is part of a 29,000-acre holding owned by Gualala Redwood Timber, LLC (GRT). GRT is part of an integrated group of companies affiliated with Pacific States Industries DBA Redwood Empire Sawmills that processes redwood logs into a variety of finished and landscape material products. GRT and Redwood Empire are owned by a family that has been doing business in Sonoma County for fifty years, and now is in its second generation of family members active in the operations. The founder of the company lives in Sonoma County. Logs generated from this THP create employment for foresters, loggers and truckers who deliver logs to the Redwood Empire Sawmills located in Cloverdale and Asti, California. These sawmills generate products that are sold into local retail yards or are sold to redwood remanufacturing plants in Sonoma County, and each step of this lumber production adds value to the products and creates economic revenue for the company, jobs for local workers and companies, and tax revenues for local communities and for Sonoma County. Businesses that use products generated from the GRT redwood timberlands include Reuser Inc. in Cloverdale (producers of landscape products from redwood bark and shavings), Friedman's Home Improvement, Mead Clark Lumber Company, Burgess Lumber, Healdsburg Lumber, Lowes, NuForest redwood remanufacturing plant, and other local lumber suppliers. Timber yield taxes from the THP go directly to Mendocino County for maintenance and improvement of infrastructure, roads, and public safety and security services. Additional tax revenues that benefit County residents are generated from sales tax, lumber products assessment tax, and property taxes. The logs harvested from the THP generate income for many ancillary local businesses where the timber and sawmill workers spend their earnings for food, gas, clothing, home maintenance and repairs, and other living necessities. The timber generated on a sustainable basis from this THP and from these lands significantly adds to the well-being of the residents of the Gualala area and to residents and businesses in Sonoma and Mendocino Counties.

**Objective(s).** The project objectives are:

- 1) To grow and harvest timber in a long-term sustainable manner and reduce dependence on purchasing logs from the open market. The landowner has made significant investments in its milling infrastructure, which needs to remain working in order to recover facility improvement and maintenance costs, while at the same time remain a viable business with the capacity to produce a reasonable profit.

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- 2) To plan and implement the timber operation to contribute to restoration of properly functioning salmonid habitat. This entails using the individual tree selection or commercial thinning (from below only) silviculture as prescribed by the Anadromous Salmonid Protection (ASP) Rules within flood prone areas with the goal of increasing the proportion of large trees for large wood recruitment to benefit salmonids. Additional requirements of the ASP Rules are to retain higher basal area of conifers, provide additional shading, develop vertical structural diversity, and support a diversity of plant, shrub, and tree species for nutrient input. The ASP Rules assure protection and enhancement of public trust resources (fisheries, water quality, wildlife).
- 3) To manage the flood prone areas to meet the intent of the ASP Rules, while also maximizing timber stand growth and production over time for forest products -- i.e., maintain or increase Maximum Sustained Production (MSP).

The project is to be carried out in accordance with the California Forest Practice Act, Forest Practice Rules, and other applicable agency Rules and regulations. Potential impacts are mitigated to less-than-significant levels by the methods prescribed in the Forest Practice Rules, and by inclusion of other site-specific measures identified by the RPF and recommended in the multi-agency, interdisciplinary, review team process.

## II. ALTERNATIVES CONSIDERED IN THE ANALYSIS

The RPF considered seven alternatives for inclusion in the THP:

- 1) The project as proposed.
- 2) No project.
- 3) Alternative harvest approaches.
- 4) Alternative project location.
- 5) Conservation easement or public land purchase.
- 6) Alternative land uses.
- 7) Alternative timing of project.

## III. ALTERNATIVES SELECTED FOR DETAILED EXAMINATION

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### 1) Project as Proposed:

The project as proposed, which includes 199 acres of selection logging and 52 acres of no-harvest or non-timber protected areas (within the THP footprint), meets the purposes, needs and objectives set forth above. Potentially significant impacts on the environment, including to wildlife habitat and cold water fisheries, which could result from harvest operations such as these have been analyzed and avoided or

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mitigated to insignificance by the practices and measures included in the plan. Forest roads, skid roads, and landings are located to minimize the amount of sediment generation that could impact watercourses. The harvest level in the selection areas is very "light" and operations will occur primarily on flat ground with moderate erosion hazard or gentle to moderately steep ground with high erosion hazard. The plan's silvicultural prescriptions are designed to improve forest stocking and health over time, while protecting and restoring salmonid habitat within the watercourse protection zones. The timber harvest will generate income for the company and supply raw materials to local mills. Operations in accordance with the provisions of THP will not result in significant effects to environmental resources.

## 2) No Project Alternative:

The No Project Alternative on these timberlands, although feasible, would not achieve any of the purposes, needs or objectives set forth above. This alternative would indefinitely delay or preclude the landowner from improving forest growth and health in the THP area. It would neither improve stocking, nor achieve maximum sustained production of forest products. The No Project Alternative would reduce both the local employment base and revenues to the State and Mendocino County generated by the yield taxes. It would not decrease the need for forest products but could negatively impact the supply. This could potentially be offset by relying on timber harvest from areas outside of California, where significant environmental effects are not required to be mitigated. Although this alternative is clearly inconsistent with the project objectives, the CEQA guidelines nevertheless require that the No Project Alternative be evaluated. In accordance with the CEQA guidelines, the existing conditions have been considered, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans. 14 CCR § 15126.6 (e). The No Project Alternative would avoid potential environmental impacts that might occur in connection with the proposed timber operations. For example, any individual or cumulative impacts on fish and wildlife, water quality, or stand health and vigor would not occur if the THP were not carried out. The No Project Alternative would lead to non-operation on a portion of the ownership that is capable of producing long-term forest values. Because at least half of this plan is in areas that are the most productive areas (Timber Site Class I) on the landowner's holdings, the overall productivity of those holdings would be reduced. This would place additional pressure to harvest on steeper, potentially more erosive and less productive timberlands within the landowner's holdings.

The No Project Alternative is inconsistent with the purposes of the project and addresses neither its needs nor objectives. The No Project Alternative is not environmentally superior to the Project as Proposed in the THP. If implemented on this THP, the No Project Alternative would result in significant adverse economic impacts and would slow the recovery of the flood prone forest stands in reaching the ASP Rules' intended goal of a restored forest stand and structure that benefits anadromous salmonids.

## 3) Alternative Harvest Approaches:

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This alternative would involve harvesting the THP area in a manner different from that proposed in the THP. Alternatives here could include different silvicultural prescriptions, different yarding methods, and/or reduction in the project footprint/size.

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Per the objectives of the ASP Rules, "[a]ny timber operation or silvicultural prescription within any watercourse or lake protection zone shall have protection, maintenance, or restoration of the beneficial uses of water, and properly functioning salmonid habitat and listed aquatic or riparian-associated species as significant objectives." 14 CCR § 916.9(c). There is a prescribed 30-foot no cut zone from the top of the watercourse channel vegetation transition zone (top of bank onto the adjoining riparian flat). The ASP Rules specify that for the next 70 to 120 feet, "harvesting prescriptions in inner flood zones (Inner Zone A) should focus on practices that use 'thinning from below' and silvicultural systems for harvesting are limited to the use of commercial thinning or single tree selection." 80 percent canopy must be retained post-harvest. When commercial thinning is used, the QMD of conifer trees greater than 8 inches dbh in the preharvest project area shall be increased in the postharvest stand. 14 CCR § 916.9 (f)(3)(C). If an inner Zone B is present (from the end of Inner Zone A to the toe of the slope where it starts to rise off the floodplain) the silvicultural prescription is also limited to commercial thinning and selection. The thirteen (13) largest trees per acre must be retained in both Inner Zone A and Inner Zone B. With canopy retention of 80 percent or more in Inner Zone A and canopy retention of 50 percent or more in Inner Zone B, these requirements amount to leaving a majority of the trees in a dominant stand position that are present upon each harvest entry. The intent of these related requirements is to provide for the recruitment of large woody debris to streams and canopy cover to maintain cooler stream temperatures, over the long term. As those conditions become more prevalent, intermediate, smaller understory (suppressed trees) and brush will correspondingly decrease due to shading, thereby lessening fire risk.

Thus, there are no alternative silvicultural prescriptions for operations conducted in a flood prone area other than an even "lighter" harvest (decreasing harvest to less than 20% canopy retention in Inner Zone A and less than 50% canopy retention in Zone B), which would leave even more dominant, co-dominant, intermediate and suppressed trees per acre. However, the volumes removed in harvesting less would be so low that harvest would not be economically justifiable. Moreover, using an alternative that employs an even lighter harvest than provided for by the ASP Rules would hamper the large tree growth that thinning from below promotes. Several upslope areas of the plan are also being harvested using selection silviculture in consideration of the proximity to watercourses and because of the stand characteristics and density of mostly redwood and Douglas Fir that lend themselves to selection silviculture.

Other Yarding Methods:

Various yarding methods were considered by the RPF during preparation of the THP -- tractor/ground-based, cable (aerial), and helicopter. Tractor yarding was chosen as the least damaging alternative for removing logs. Tractor yarding within the flood prone area is an in-lieu practice to 14 CCR § 916.4(d) Watercourse and Lake Protection but is allowed by the FPR if explained and justified. Tractor yarding was chosen for this THP based on the flat topography of the flood prone areas and the existing stable access infrastructure (skid trail and roads), as surface erosion would be very minimal in this area. These operations also follow the Preferred Management Practices in the Inner Zones A and B of flood prone areas specified by the FPR (14 CCR § 916.9 (f)(3)(E)) and described in Section II, Item 38 of the THP, which states that skid trail, yarding corridors, falling activities and log yarding should not alter the natural drainage or flow patterns and restricts these skid trails to very limited, pre-flagged, pre-approved

skid trails. Skid trails that will be used in the flood prone area have been pre-flagged by the RPF, who has determined on a site specific basis that these trails are located on higher ground to the greatest extent possible, can be used without impacting the natural drainage and flow patterns, avoid areas of ponding, minimize risk of the trails becoming new secondary channels by flood flows, avoid skidding and crossing over, though, or along secondary channels, and minimize the need to turn the tracks which could result in increased depth of ground surface depressions. Equipment will operate on top of slash and will keep the blade raised during skidding to reduce soil movement. Tractor yarding will involve driving the tractor (or rubber-tired skidder) on pre-flagged stable skid trails to the downed log, lifting one end of the log off the ground, and skidding the log to the road or landing. Based on an assessment of a recent flood prone area THP, operations resulted in very little ground disturbance from tractor skidding, and two years after harvest the skid trails were difficult to differentiate from areas where no skid trails were placed.

The non-flood prone area portions of the plan will be harvested using tractors, as there is an existing network of stable skid trails that can be reused that feed into the existing road system. It is not feasible to cable log these steeper upslope areas without building a new road system in one location and also because of the lack of tailholds in the other location. Installation of a new road system would result in significant environmental impacts. Mitigations for ground-based yarding required by the FPRs, including the ASP Rules, have been incorporated into the plan and ensure no significant adverse or cumulative effect on watershed resources.

Skyline cable (aerial) yarding was also considered but was determined to be infeasible without significant new road building on steeper slopes above the flood plain to access the timber from higher elevation landings. Because there is an insufficient number of existing upslope roads on the GRT property that parallel the floodplain above and in close proximity to the harvest units, a cable yarder would have difficulty reaching a majority of the timber on the THP from landings located on the existing roads. Adequate tailholds are not present on the GRT property to allow lift of logs as they would need to be yarded across the North Fork of the Gualala River, and some of the timber would need to be flown full suspension over the Gualala Water Company infrastructure, which poses the risk of a log falling or cable slipping and hitting the pumps and buildings. Attempting to use this yarding method would require significant new road construction to gain additional access to all the yarding points that would allow logs to be lifted off the ground sufficiently with a cable yarder to prevent damage to the watercourses and flood prone area soils and would also require roads and landings be built on properties not owned by GRT (which is not feasible). This method could create more potential sources of sediment delivery (from the

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additional road building and soil disturbance) than would site-specifically-designed low impact tractor yarding. Additionally, aerial cable yarding requires corridors to be cut in a straight line through the residual stand to allow for stringing the yarding cables. These corridors could result in the creation of fairly large openings that could bring the residual canopy below the 80% retention level required in Inner Zone A of the ASP Rules. The ASP Rules also require retaining the thirteen (13) largest trees on each acre in Inner Zone A and Inner Zone B, which makes it nearly impossible to locate a cable corridor in a straight line from limited access points without hitting these large retention trees with a cable or knocking a suspended log against one of them and damaging it. Moreover, aerial cable yarding would be cost-prohibitive due to the excessively long reaches required and the requirement to build a new road and landing system to allow adequate lift of logs that would not significantly damage the residual stand or damage the soils in the flood prone area from dragging logs along the ground.

Helicopter yarding is a feasible option. However, it would greatly increase noise levels at the yarding and landing sites. Several residences exist adjacent to and directly southeast of the THP area, and numerous noise complaints would be expected to be received due to this type of operation. Helicopters require unusually large landings of up to one and a half acres for safely delivering and loading logs, which would increase the area affected by soil disturbance within the floodplain and reduce the shade canopy in the vicinity of the landings. Other impacts of helicopter yarding include those to safety of wildlife and their habitats. While most all timber harvesting operations present dangers to workers harvesting trees, as well as to workers yarding and loading logs, helicopter yarding presents a markedly greater risk to human health and safety due because of the high potential for falling debris. In addition, many of the dangers of helicopter yarding to workers – logs knocking into other trees and their branches while being picked up and carried, logs falling altogether while being carried, and the “blowdown” from helicopters taking off that disturbs the forest canopy and sends debris flying – potentially can harm birds and their nests, and displace birds. Moreover, and in any event, at present there are only a few known helicopter firms working in California or within the greater Pacific Northwest that would be available to log, and it is very difficult to find helicopter logging contractors that are willing to work on smaller total volume projects such as this one. The largest helicopters available would be needed to lift the larger second growth logs, and these contract helicopters are more difficult to find. In addition, many helicopter firms have stopped logging in favor of other more lucrative lift projects and fire suppression work. As a result, logger availability is becoming more of an issue with this harvest method.

Size Reduction of the Harvest Area:

This is a feasible alternative, but it would not further reduce potential adverse impacts or cumulative effects. With proper implementation of the ASP Rules in the flood prone areas, there should be no measurable project or cumulative impacts to watershed, biological, or soil resources, regardless of harvest area size. THPs are valid for five (5) years, with an available two-year extension. There is no measured difference in effects to resources of producing three 100-acre plans or one 300-acre plan over this time frame. Potential cumulative impacts are likely higher on numerous smaller plans because of the need to reopen the appurtenant haul roads every year for the smaller plans, rather than opening them once for the larger plans. In the meantime, the landowner, the agency, and the interested public benefits from the economy of scale afforded by a single plan versus three separate plans.

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Furthermore, any reduction in the harvest area would slow the recovery of the flood prone stands in reaching the ASP Rule goal of a restored forest stand and structure that benefits anadromous salmonids. Size reduction of upslope harvest areas could be made, but that would only result in different upslope areas being harvested sooner pursuant to other THPs. The sizes of upslope areas are determined mostly by the topography, the location of roads, and the location of watercourses.

**4) Alternative Project Location:**

This alternative would involve carrying out the harvesting proposed in the THP at a different location on the landowner's property.

Sustainable management of timberlands requires timing harvests to when it is most biologically and economically effective for stand development. Stands are chosen for harvest based on a variety of parameters including age, stocking levels, and current growth rate. Harvest entries are planned ahead of time and areas such as the proposed THP area have been selected for harvest because they are more suitable for harvest at this time, in comparison to other areas of the property which may have been harvested more recently and are re-growing to full site capacity. Adverse impacts of timber operations in this THP area are not greater than impacts that may occur should planned timber operations be carried out at some alternative location on the property. In fact, due to the very low impact nature of the harvest in terms of canopy removal and ground disturbance, flood plain harvests are most likely the lightest impact operations on the entire property. Obviously, the silvicultural prescriptions and operational impact avoidance and mitigation requirements are especially restrictive for timber harvesting in flood prone areas because of the WLPZ Rules and the ASP Rules, reflecting the relatively more ecologically sensitive character of those areas for impacts to water quality and salmonids. Nonetheless, the point remains that there would be no reduction or "savings" in environmental impacts by carrying out this long-planned harvest elsewhere on the timberlands; the environmental impacts of the THP are less than significant, both individually (i.e., as a "project") and cumulatively. Moreover, and in any event, continued dislocation and delay of timber harvesting not only frustrates proper (indeed, legally required) management of lands zoned exclusively for timber production, but delays and disrupts restoration of flood prone areas pursuant to the ASP Rules for the benefit of salmonids.

The timing of harvests on upslope areas is determined mostly by homogenous vegetation types and the age and/or health of the stands.

The landowner purchased the timberland for the sole purpose of managing the property for timber production, while at the same time giving full consideration to protection of other resources and the environment. Each stand is at different stages in growth and production, and each THP area and watershed present different challenges in terms of protecting the resources and the environment. Over the years, each THP involves a further investment in the long-term growth and productivity of the particular timber stands within the THP area, as well as producing timber products to generate income and finance initiatives to stabilize roads, improve conifer stocking, and enhance fish and wildlife habitat.

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Even if the landowner were able to generate income by harvesting elsewhere on the property, the primary objectives of this THP can no more be met under the Alternative Project Location alternative than under the No Project alternative. Commercial timber management needed to properly maintain production from these stands can only occur with a THP. Selection of the Alternative Project Location alternative would essentially mean that these lands and these timber stands would be taken out of production. For that reason, the Alternative Project Location is inconsistent with the primary objectives of this landowner in owning timber lands and is inconsistent with the project area land use zoning (Timberland Production Zone).

CEQA recognizes that, particularly with projects involving natural resources, alternative locations may not be feasible. 14 CCR § 15126.6 (f)(2)(A)(B). Further, the key question in analyzing alternative locations is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion. In this case, because much of the THP is on lands in a flood prone area adjacent to the North Fork of the Gualala River it has potential impacts that would not be potential impacts in areas that are not flood prone. However, because floodplains comprise a high percentage of the landowner's holdings and are the landowner's most productive timberlands, at some point harvesting will occur at these locations. The only way to avoid the potential impacts of harvesting in flood prone areas would be to forgo timber harvesting in any of them. However, as noted, the lands are zoned Timberland Production Zone. They were so zoned when the landowner purchased the timberlands on this THP area in 2015. As a result, the lands commanded a purchase price commensurate with that zoning designation and its highest and best use; viz., timber production. The landowner is not willing to refrain from lawful and responsible management of its timberlands, including flood prone areas. Indeed, the landowner must manage those timberlands for Maximum Sustained Production (MSP) (14 CCR § 913.11), as required by the Forest Practice Act and Forest Practice Rules, subject to the highly prescriptive constraints imposed by the Forest Practice Rules, and the WLPZ and ASP Rules in particular. Moreover, by harvesting elsewhere potential impacts associated with this THP would not be avoided, but rather would merely be shifted to another area of the timberlands. Some potential impacts would be exacerbated. Harvesting at other locations would require many of the same measures to avoid or substantially lessen such impacts to less-than-significant levels.

**5) Conservation Easement or Public Land Purchase:**

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This alternative would involve limitations on management activities through public purchase of the subject property or donation or sale of conservation easements. If the property were covered by a conservation easement such that no timber harvesting could be conducted, then any potential impacts associated with this THP could be avoided through this alternative. If the public purchased the property, it is possible that some management of the land for timber could continue, in which case any potential impacts may not be lessened or altogether avoided. Currently many Non-Governmental Organizations or NGOs (e.g. Sempervirens Fund, The Save the Redwoods League, The Conservation Fund, the Redwood Forest Foundation, The Nature Conservancy) own redwood forestlands in California and are managing those lands to restore them, which requires reducing stand density with commercial logging. Redwood National Park is engaged in similar management efforts under the Redwood Rising Initiative, where it is currently

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harvesting thousands of acres of second growth parklands to speed restoration of redwood forests to an old forest condition. The Conservation Fund has recently thinned 71 acres of its flood plain lands in the Big River drainage under THP 1-10-030 MEN (the Picolotti THP), pursuant to the same WLPZ and ASP Rules authorizing, and governing timber operations proposed in this THP. Given the missions and goals of such NGOs, their obligations to their donors and funders, and their current management approaches, it seems likely that an NGO (or a responsible state or federal agency) that succeeded to the land area covered by this THP would also manage it through restoration thinning, not unlike the management proposed in the THP.

The analysis of these two project alternatives (Conservation Easement or Public Land Purchase) is combined because each alternative presents the same basic issues. The landowner is unwilling at this time to consider selling or donating any part of the THP and, consistent with Mendocino County's zoning for the land, considers its highest and best use to be producing timber under the proposed THP. Land that is zoned Timberland Production Zone (TPZ) includes a significant part of the total value of the property in the timber value, as this zoning designation strictly limits residential, vineyard, commercial development, and other uses. The TPZ zoning also has significant regulatory and tax consequences under California law. Cal. Govt. Code 51110 et seq; Cal. Govt. Code 51140 et seq.; Cal. Rev. & Tax Code 434 et seq. Indeed, TPZ land is considered "enforceably restricted." All this makes a sale of the Little THP area as a non-timber producing use highly speculative. Although there is a local group called the Gualala River Park Coalition, it has identified only the South Fork of the Gualala River as the private land it has an interest in turning into a park, and this does not include the North Fork of the Gualala River where this THP is located (<http://gualalariverpark.org/>).

The landowner is optimistic about the future value of this project area as timberland and is presently unwilling to consider selling at current fair market value related only to the present stumpage value. The landowner has an economic interest in the affiliate Redwood Empire Sawmills which generates added revenue from the sale of lumber, and this added value must be added to the stumpage value to arrive at the actual total value of the THP area to the landowner. NGOs typically will use public funds to purchase conservation lands, and those funds are typically justified based on fair market values of land and timber that rely on stumpage values only and do not take into account added values of lumber sales. It would be unlikely for an NGO to obtain an appraised value for the THP area based on current stumpage that is as high as the value that the landowner can generate based on stumpage value plus the added sales value of the redwood lumber from the sawmill. Also, sales of land to NGOs can take years due to the need to conduct multiple appraisals and then access and get approvals for public funding sources, and that delayed timing is inconsistent with the landowner's need to service debt. Another factor affecting a possible conservation sale is that the parcel includes the main haul route on the property that logging trucks and equipment must use to access the remainder of the property. A sale of this area for public use would cause significant conflicts between recreationists and timber harvesting contractors, including issues from noise, dust impacts, tree falling hazards, and could also lead to significant traffic safety risks between fast-moving loaded logging trucks and users of the public area.

Given the fact that the majority of the area is Site Class I (the highest site possible) timber growing ground on the GRT property, and is zoned for timber production as its highest and best use, the

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landowner intends to implement the harvest of this area as planned and ensure this area remains in timber production.

Applying the "rule of reason," as set forth in 14 CCR §15126.6(f), project alternatives whose implementation is remote and speculative need not be given extensive consideration. Because the Conservation Easement and Public Land Purchase alternatives are remote and speculative, and would not meet any of the primary or most of the secondary project objectives, they were rejected for further consideration.

**6) Alternative Land Uses:**

The timberlands proposed for harvest are zoned Forest Land (FL) per Mendocino County General Plan and also carry a Timberland Production Zone (TPZ) designation. These zoning designations establish the presumption that timber harvesting is expected to and will occur on such lands as the primary use.

The following information was obtained from the Mendocino County General Plan

Intent: The Forest Lands classification is intended to be applied to lands which are suited for and are appropriately retained for the growing, harvesting and production of timber and timber related products. The classification includes lands eligible to be zoned Timberland Production (TPZ); intermixed smaller parcels and other contiguous lands, the inclusion of which is necessary for the protection and efficient management of timber resource lands.

Principal Permitted Use on Forest Lands Designated Timber Production Zone:

Forest production and processing and associated uses including: one single family dwelling and home occupations.

Conditional Permitted Uses on Forest Lands Designated Timber Production Zone:

Light agriculture; cottage industry; dwelling groups; campgrounds where designated by an \* on the Land Use Maps; major impact services and utilities (i.e. power generating facilities, sewage disposal facilities, sanitary landfills and water treatment plants); farm employee housing, farm labor camps; extraction of sand, shale and gravel. Uses determined to be related to and compatible with forestry; conservation, processing and development of natural resources; recreation and utility installations. No use permit shall be granted for areas designated FL in TPZ until a specific finding has been made that the proposed use is compatible with the growing and harvesting of timber and timber products.

While the number of possible uses for any parcel of land zoned FL is not insubstantial, the touchstone for any and all uses that are not strictly timber production is that they do not interfere with or derogate from sustainable management for commercial timber production. The landowner could apply to the Mendocino County Planning Commission for a rezone, initiate the process to subdivide the parcels, and attempt to market and sell individual lots. However, such a scenario is entirely speculative, not only because the landowner only recently purchased the timberlands for the purpose of supplying logs for its associated sawmills, but also because of the difficulty of obtaining the permits and approvals that would be required from County, State and Federal agencies, including the Planning Commission, to rezone and eventually

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convert the timberlands to a non-timber use. These include, but are not limited to, taking the land out of TPZ zoning, filing for a Timberland Conversion Permit, showing the requisite domestic water supply availability and leach field capacity for human uses, obtaining a Conditional Use Permit or Permits, and complying with CEQA. The County would not likely permit a development in a flood prone area due to the safety hazards associated with flooding. The new, authorized use/development would need to avoid and mitigate possible significant adverse environmental impacts as a condition of a zoning change and of the new use. However, this alternative would likely result in significant adverse environmental impacts when compared to the expected insignificant impacts of the THP. The infrastructure for such development would have to provide for the increased needs of the developed lands. This would likely entail much greater (and permanent) land disturbance than timber harvesting, limiting wildlife habitat and use, and hardening permanent road and parking surfaces that reduce stormwater infiltration and flood attenuation. Wastewater disposal would need to be engineered in the flood plain areas, and could lead to detrimental environmental effects, especially in the event of flooding. Land uses that would increase human population would most likely lead to a decrease in native animal populations within the THP area. For these reasons this alternative, although feasible, is highly unlikely to come to fruition unless economic, social, and environmental conditions in Mendocino County change radically.

#### **7) Alternative Timing of the Project:**

This alternative would involve carrying out the project as proposed, except at a future time. Delaying the project for a number of years, say 5 to 10 years, was examined as a potential alternative. This alternative would attain many of the landowner's objectives by allowing the landowner to manage the parcel for eventual timber production, even though postponing the operations would delay the Forest Manager/RPF from maximizing the productivity of the stands in the THP area, as required by the Forest Practice Act and Forest Practice Rules. Such postponement would also delay implementation of the management techniques that will lead to restoration of the flood prone areas for the benefit of salmonids, as mandated by the ASP Rules.

Altering the timing of operations such that some other area of the property is entered and harvested now, so that this area can be entered at a later point in time, would not have the effect of mitigating or avoiding potential significant adverse or cumulative impacts associated with harvesting the proposed stands. Rather, it might result in lowering the area's mean annual growth and reduce the property's overall growth to achieving MSP, contrary to the mandate of the Forest Practice Act and the Forest Practice Rules. Additionally, potential significant adverse impacts of proposed timber operations will not be eliminated, but merely deferred to a later point in time. Accordingly, this alternative was not considered further because it is inconsistent with the requirement to maximize sustained productivity of timber stands while complying with all applicable laws and regulations, and meeting the purposes, needs and objectives of the THP.

#### **IV.COMPARISON OF PROJECT ALTERNATIVES**

The project as described in the THP is preferred over the project alternatives for the following reasons:

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No Project:

The owner of Gualala Redwood Timber LLC (GRT) also owns and operates local sawmills inland from the GRT holdings, and has made significant investments in that milling infrastructure, which needs to remain working in order to recover facility improvement and maintenance costs. The landowner acquired the GRT timberlands for the exclusive purpose of growing and harvesting timber to achieve MSP (as required by the Forest Practice Act and Forest Practice Rules) and reducing dependence on purchasing logs in the open market; such purchases result not only in foregone economic benefits for the local community, but also greater environmental impacts. Such adverse impacts include, but are not limited to, the transportation/import externalities (e.g., increased GHG emissions from trucks) and the less stringent environmental regulation of timber harvesting in Oregon, Washington, and all states other than California. This project – which will “locally source” timber -- is one of many needed to allow the landowner to operate a viable business that benefits Mendocino and Sonoma Counties and their North Coast communities and, that, at the same time, provides the revenue needed to continually provide for the stewardship and maintenance of timberlands – and their sustained productivity -- as mandated by the Forest Practice Act and Forest Practice Rules, as well.

Alternative Harvest Approaches:

Other harvest approaches as discussed are neither feasible nor necessary given the THP’s robust impact avoidance and mitigation measures. The RPF has exercised professional judgment and has demonstrated proper justification for the silvicultural prescriptions chosen. The already highly-restrictive Selection silvicultural prescription governing the plan is made all the more so by the retention standards of the WLPZ and ASP Rules. An even lesser intensity of harvest would not be financially viable. A portion of the upslope area will also use Selection silviculture. Yarding methods other than tractor yarding were rejected as environmentally inferior. Aerial cable yarding would also likely be cost-prohibitive and reaching many parts of the THP with this method would be physically infeasible; helicopter yarding would also be very costly, present human safety concerns, and may not be possible, in any event, because of the limited availability and/or the willingness of such companies to take on the work. The THP review process allows the agencies charged with protecting fish and wildlife and water quality to make recommendations about the proposed silviculture, yarding method, and plan size. The THP review process also allows the public the opportunity to comment on those same aspects of the proposed plan. In addition to the financial impacts already noted, a lighter harvest than that proposed would not fulfill the intent of the ASP Rules to restore habitat for anadromous salmonids by creating a diverse forest structure and promoting the growth of the largest trees. Nor, for that matter, would it meet the requirements to manage timberlands for MSP. No other alternative harvest approaches than those chosen were shown to be superior or otherwise warranted and, therefore, the discussed alternative harvest approaches were rejected.

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Alternative Project Location:

Because this THP’s potential impacts are being avoided or mitigated to less-than-significant, relocating the project to an alternative location would not avoid possible significant adverse environmental impacts. Not operating on the THP area would require operations to occur elsewhere on the property where greater impacts would occur because of the reduced silvicultural and resource protection standards applicable outside of flood prone areas. In addition, operating on an alternative location would be less

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suitable for achieving MSP across the GRT property.

Public Acquisition (conservation easement or public purchase):

This would avoid any potential impacts of this THP (as noted above, any potential impacts of the THP have been mitigated to less-than-significant). However, it is not feasible because the likelihood of either occurring in the near or even distant future is remote and speculative. It is very unlikely that an agreement on purchase price could be reached. The landowner is not a willing seller at this time for the reasons provided in the discussion of the "No Project Alternative," above. Public acquisition is further complicated by the location of the THP area. The haul road associated with the THP adjacent to the North Fork is the mainline access route for the northern portion of the GRT timberlands. Opening this area to public access would be highly likely to present safety hazards associated with conflicts between public recreational use and operation of logging equipment and log truck traffic.

Alternative Land Uses:

Some of the alternative land uses described above are feasible, but not environmentally superior to the project as described in the THP; indeed, they are environmentally inferior. If implemented, these alternative uses would likely result in significant adverse environmental impacts that exceed any potential impacts of the proposed timber operations as described in the THP. Given the intended use of timberlands zoned TPZ, the proposed project best fits both the intended use for timber production and the landowner's objectives set forth in the THP.

Timber harvesting is the expected and required activity on the parcels that the THP overlays and is compatible with the surrounding land use zoning. The proposed THP is consistent with the Mendocino County General Plan and the current zoning. Because other allowed alternative land use(s) or change(s) in zoning would not meet any of the basic objectives of the landowner, and the environmental impacts from the development activities for those other land uses would exceed any potential impacts of the proposed timber operations as described in the THP, this alternative was rejected.

Alternative Timing:

Though this alternative is feasible, delaying implementation of the project to a later point in time would neither avoid nor mitigate potential significant adverse environmental impacts. Instead, delaying harvesting would simply push any potential environmental impacts into the future. Operations elsewhere, if outside of the flood prone areas, will result in further delays to the harvest and planned reentry sequence of these areas. Accordingly, this alternative is rejected because it is inconsistent with the project objectives of managing these areas on a periodic re-entry basis. It would also frustrate management of the GRT timberlands for MSP and restoration of stands in flood prone areas to benefit salmonids.

Finding

Because the majority of the THP as proposed follows the restrictive WLPZ and ASP Rules for timber harvesting within a flood prone area, it will not result in significant adverse environmental impacts, and it is selected as the preferred project alternative. For the reasons detailed above, selection of a different

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project alternative is not necessary to serve CEQA's core purpose of avoiding or substantially lessening significant environmental impacts to less-than-significant.

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