

**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

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January 11, 2024

Madeline Green
2501 N. State St
Ukiah, CA 95482

PREHARVEST INSPECTION REPORT

Harvest Document: **1-23-00099-SON**

Inspection Date: **12/15/2023**

Inspection Number: **1**

Inspector Name: **Kim Sone**

PHI/DIRECTORS DETERMINATION DATE EXTENDED BY MUTUAL CONSENT: **Yes**
(If yes, please include documentation provided by the RPF as an attachment to the report)

Reviewed On Previous Visit:

Field Hours: 16

Office Hours: 30

Agencies that Attended the Preharvest Inspection

Agency	Notes
Other	Jesse Weaver, Redwood Empire (day 1)
Other	John Bennett, GRT (day 1)
CGS	Morgan Renner (day 1)
CGS	Dave Longstreth (day 1)
Other	Clint Doucette, Redwood Empire (day 2)
CDFW	Jack Henry (day 1)
Other	Jamie Pusich, NCRM (day 1 and 2)
WQ	James Burke (day 1 and 2)
CGS	Kevin Doherty (day 1 and 2)
Other	Stephen Borcich, GRT (day 1 and 2)
CDFW	Aaron Longstreth (day 1 and 2)
Other	Madeline Green RPF, NCRM (day 1 and 2)
CGS	Patrick Brand (day 1 and 2)

DETAILS OF PREHARVEST INSPECTION

1. Was the PHI able to be started within the initial 10 day period?

No

Inspector Observations: **A mutually agreeable date for the PHI was set beyond the 10 day period**

2. List any personnel who were contacted but could not attend the PHI: **Julie Coombes and Katanja Walder from CDFW could not attend the PHI but other CDFW representatives attended on their behalf. Cale Lopez from CAL FIRE region office was notify only and was not able to attend the PHI.**
3. a. Was the Notice of Intent properly posted at the timber harvesting site? Yes
 If "NO", Describe: **The NOI was clearly posted on an entrance road to the GRT property near Sea Ranch (end of Deer Trail)**
 b. Does the Notice of Intent accurately describe the proposed silviculture, Plan area, nearest perennial watercourse, legal description, and timberland owners? Yes
 If "NO", Describe: **The NOI was observed on both PHI days**
4. Is the proposed plan:
 - a. Outside of the boundaries of any active Plan? Yes
 - b. If "No", does the overlap area have an approved completion and stocking report? NA
 If "NO", Describe:

PROJECT AND TIMBER STAND DESCRIPTION

5. Has the Plan accurately described the physical conditions at the plan site (soils & topography information, vegetation & stand conditions, watershed & stream conditions?)[14 CCR §1034(gg)] Yes
 If "NO", describe: **The vegetation and stand conditions identified and discussed on THP page 135 accurately reflect the field conditions evaluated during both days of the PHI**
6. What is the zoning for the proposed harvest area [Government Code § 51104(g)]? TPZ
7. Are timber stands correctly described in the Timber Harvest Plan? Yes
 Inspector Observations: **All of the land within the proposed plan are classified as TPZ. The Timberland Productivity Act 1982 restricts the use of lands zoned TPZ exclusively to the growing and harvesting of timber and compatible uses. It also establishes a presumption that timber harvesting is expected and will occur on such lands.**
The plan area consists of areas heavy to Bishop Pine with lower stocking overall. This is present on the upper slopes of the THP near flat ridges. The lower slopes are dominated by redwood with some areas heavy to Douglas-fir. Timber quality and form are highly variable depending on microsite.
8. Have timber site classes been correctly identified and accurately depicted [14 CCR §1034(x) (12)]? Consider even-aged regeneration method limitations, and differences in minimum stocking requirements. Yes
 Inspector Observations: **The plan consists of Site Class III and IV.**
9. Are the Plan maps and associated diagrams accurate and sufficiently clear to allow for review/implementation of the Plan? Yes
 Inspector Observations: **See CGS PHI report for further information**

SILVICULTURE

10. Are the silvicultural methods appropriate for existing stand conditions? Yes
 Inspector Observations: **The plan consists of selection silviculture and variable retention. Both methods were sample marked prior to the PHI and both were evaluated during the inspection.**

11. For even-aged management: If a "regeneration step" harvest is proposed (Clearcut, Seed Tree Seed Step, Shelterwood Seed Step), will the provisions of 14 CCR § 913.1, 933.1, 953.1(a) (1-7) be met?

NA

Inspector Observations:

12. For uneven-aged management: Will the prescription ensure the the establishment and/or maintenance of a balanced stand structure, and establishment of new reproduction?

Yes

Inspector Observations: **Single tree selection mark was evaluated within the WLPZ areas, outside the WLPZ areas and within the STAs. The sample mark of variable retention-aggregate was also evaluated. The mark was in conformance with the Forest Practice Rules.**

13. If Group B species are proposed for management [14 CCR § 912.7, 932.7, 952.7(d)]: Does the proposed prescription maintain relative site occupancy between Group A and Group B species?

Yes

Inspector Observations: **Hardwoods may be managed in accordance with 14CCR 912.7(d). Manual treatment is described under Group B species management on THP page 14 and site preparation is identified on THP pages 15 and 16.**

14. Comments or general observations regarding silviculture: **Single tree selection is proposed on 604 acres, in addition, there is 169 acres considered to be STA where selection is also prescribed. Outside of this, variable retention is proposed for 35 acres. The proposed silviculture conforms to the Forest Practice Rules.**

MAXIMUM SUSTAINED PRODUCTION OF HIGH QUALITY WOOD PRODUCTS

15. Does the Plan comply with goals of 14 CCR § 913.10, 933.10, 953.10 to restore, enhance, and maintain the productivity of the state's timberlands?

Yes

Inspector Observations:

16. Does the plan assure that growing stock will be harvested in a manner which prevents significant delays in reaching or maintaining MSP? [14 CCR § 913, 933, 953(a)]

Yes

Inspector Observations:

17. Does the Plan comply with the MSP requirements of 14 CCR § 913.11, 933.11, 953.11? (Check Appropriate Option)

Option A ☐ Option B ☐ Option C ☒ Does not comply ☐

Notes :

Will the post-harvest stand:

- Obviously satisfy minimum stocking requirements (countable trees only)? [PRC § 4528(b)] Yes
- Contain the required number of seed trees? (if required) Yes
- Contain seed trees of full crown, capable of seed production and representative of the best phenotypes available in the preharvest stand? [14 CCR § 913.1, 933.1, 953.1(c)(1)(A)] Yes
- Contain leave trees that are uniformly distributed across the treatment areas? Yes
- Contain a species mixture similar to the pre-harvest stand? (A "no" answer may be used to indicate high-grading or species conversion). Yes
- Have average stand diameters that are larger than the pre-harvest stand or improve stand health (for thinning operations)? [14 CCR § 913.3, 933.3, 953.3(a)] Yes

If "No" or proposed thinning operation is for stand health, explain:

18. If a regeneration and/or site preparation plan has been submitted, is it sufficient to ensure prompt regeneration of the site?

Yes

Inspector Observations:

19. Stand Information was verified by:

Ocular

Notes:

20. a. Stands have been marked as follows:

Cut Tree _ Leave Tree _ Whole Area _ Marking Waiver _

Inspectors Observations: **For variable retention areas, all aggregates are flagged in pink. Any other trees to be retained are marked with orange paint prior to operations. All other merchantable trees outside of aggregate patches and without orange paint are to be harvested.**

b. Was the mark representative and sufficient to evaluate the prescription(s)?

Yes

Inspector Observations: **For the STA's, it was discussed during the PHI, that the CAL FIRE inspector is requesting notification of the harvest mark within the Gualala STA and within the Coastal Commission STA adjacent to the property line of the Sea Ranch subdivision and adjacent houses prior to timber operations. See PHI recommendations.**

21 a. If the plan contains Aspen, Meadow and Wet Area Restoration, are the measurable standards contained in the plan sufficient to document success?

NA

Notes:

b. Are pictures of the pre-harvest Aspen, Meadow and Wet Area Restoration included in your report?

NA

If no, how will monitoring data for the Board be provided?

22. Comments or general observations regarding MSP:

HARVESTING OPERATIONS

23. Have exceptions or alternative practices been fully explained and justified?

Yes

Inspector Observations:

24. If tractor operations proposed on: [14 CCR § 914.2, 934.2, 954.2(f)(1)]

- Slopes >65%
- Slopes >50% with HIGH or EXTREME EHR
- Slopes >50% that lead without flattening to sufficiently trap sediment before reaching a watercourse or lake

a. Is such use appropriate?

Yes

Inspector Observations:

b. In your opinion, has the RPF met the standards of 14 CCR § 914.2, 934.2, 954.2(f)(3) with a clear explanation, and justification as to why the application of the standard rule is either not feasible, or would not comply with 14 CCR § 914, 934, 954?

Yes

Inspector Observations:

25. If tractor operations are proposed on slopes between 50 & 65% with MODERATE EHR but are not limited as specified in the rules (limited to existing tractor roads that do not require reconstruction OR to new tractor roads that have been flagged by the RPF prior to use [14 CCR § 914.2, 934.2, 954.2(f)(2)(i) & (ii)]), answer "a" & "b" below:

a. Is such use appropriate?

Yes

Inspector Observations:

b. In your opinion, has the RPF met the standards of 14 CCR § 914.2, 934.2, 954.2(f)(3) with a clear explanation, and justification as to why the application of the standard rule is either not feasible, or would not comply with 14 CCR § 914, 934, 954?

Yes

Inspector Observations:

26. Did the RPF flag tractor roads prior to the PHI as required by 14 CCR § 914.2, 934.2, 954.2(f) (3)?

Yes

Inspector Observations:

27. Have Special Treatment Areas been adequately disclosed and mitigated in the Plan? [ref. 14 CCR §895.1] *Note: Special Treatment Area Prescriptions are considered a specific silviculture which must be included under item #14 (Nest buffers for non T&E species do not require a special treatment area)

Yes

Inspector Observations:

28. Comments or general observations regarding harvesting operations: **During PHI #1, there was a discussion between WQ and CAL FIRE, with the RPF, regarding the use of road points A, L1, 3, 4, and 5 (THP page 117). During the evaluation, it was determined that the use of these road points should be omitted from the THP. Please see WQ PHI report and recommendation to remove these road points from the THP (road points A, L1, 3, 4, and 5). In addition, the CGS PHI report includes an inner gorge discussion. See CGS PHI recommendation #2.**

ROADS AND LANDINGS

29. Have all Plan roads and landings (including appurtenant roads) been correctly located and classified on Plan maps?

Yes

Inspector Observations:

30. Do all exceptions or alternative practices meet the standards outlined in the rules for exceptions or alternative practices?

Yes

Inspector Observations:

31. Are proposed construction, reconstruction, and/or abandonment methods and mitigations as described in the Plan sufficient to protect resource values?

Yes

Inspector Observations:

32. Comments or general observations regarding roads and landings: **For the exception skid trails, for LTO reference, please provide an enlarged area of the map for the areas that propose exception skid trails. See CAL FIRE PHI recommendations. Additionally, the CGS PHI report includes an inner gorge discussion, please see CGS PHI recommendation #2.**

WATERCOURSE PROTECTION

33. Have watercourses been correctly described and classified within the Plan? [Include Class II-S (standard) and Class II-L (large) for watersheds with anadromous salmonids.]

Yes

Inspector Observations: **There are no Class I watercourses within the plan area. The THP boundary has been adjusted to exclude the Class I watercourse/WLPZ.**

34. Do all in-lieu or alternative practices proposed meet the standards outlined in the rules for in-lieu or alternative practices?

Yes

Inspector Observations:

35. a. Are proposed protection measures for watercourses, lakes and wet areas adequate to protect the beneficial uses of water, native aquatic and riparian species, and the beneficial functions of the riparian zone?

Yes

b. Are proposed protection measures adequate for areas near and areas with the potential to directly impact watercourses and lakes for sensitive conditions? Yes

c. Will the objectives and provisions of 14 CCR § 916, 936, 956 (a-d) be met? Yes

Inspector Observations:

36. a. Are the identified truck road crossings properly designed and correctly located? Yes

Inspector Observations:

b. Is the stabilization treatment sufficient to avoid downstream impacts? Yes

Inspector Observations:

37. Have all crossings been accurately described and have appropriate mitigations been prescribed to protect the integrity of the crossing (e.g. installation of critical dips where diversion potential exists, armoring inlet, outlet and/or fill material etc.) Yes

Inspector Observations:

38. Were locations of proposed heavy equipment use in any WLPZ/ELZ clearly described in the plan or flagged and marked on the ground prior to the PHI (including crossings of class III watercourses)? [14 CCR § 916.4, 936.4, 956.4(c)(1)] Yes

Inspector Observations:

39. Are winter operations appropriate? Yes

Inspector Observations:

40. If winter operations are proposed, do the mitigation measures proposed adequately protect the beneficial uses of water? Yes

Inspector Observations:

41. Have all domestic water supplies been accurately identified and adequately protected? Yes

Inspector Observations:

42. Comments or general observations regarding watercourse protection: **Single tree selection mark was evaluated during the PHI and the mark conforms to the Forest Practice Rules. To further protect the beneficial uses of water, road points identified as A, L1, 3, 4, and 5 shall be removed from the plan.**

GEOLOGY AND EROSION HAZARD RATING

43. Have soils within the Plan area been correctly classified? Yes

Inspector Observations:

44. a. Has the erosion hazard rating for soils within the operating area been correctly calculated, as per Technical Rule Addendum #1? Yes

Inspector Observationse:

b. Have erosion hazard ratings been correctly shown on the Plan map, as per 14 CCR § 1034 (x) (8)? Yes

Inspector Observations:

45. Are the proposed erosion control methods (e.g. waterbreak spacing and/or treatments for exposed soil) adequate to reduce soil loss? Yes

Inspector Observations:

46. Have unstable areas been properly identified? Yes

Inspector Observations: **During the first day of the PHI, CGS requested additional information regarding unstable areas identified within past THPs but not addressed within the proposed THP. The RPF provided additional information that was evaluated on the second day of the PHI. As stated in the CGS PHI report, "these mapped unstable areas appear adequate to minimize the potential for adverse impacts to slope stability of the unstable areas." See CGS PHI report and CGS general observation #4.**

47. If operations are proposed on unstable areas, are the proposed operations appropriate and properly mitigated? Yes

Inspector Observations: See below

48. Comments or general observations regarding watercourse protection: The PHI extended into a second day largely in part in response to concerns identified by CGS. Much of the PHI was focused on inner gorge discussions and interpretation. The Forest Practice Rules define inner gorge as: "a geomorphic feature formed by coalescing scars originating from landsliding and erosional processes caused by active stream erosion. The feature is identified as that area beginning immediately adjacent to the stream channel below the first break in slope." (14CCR 895.1) The RPF identified in the plan unstable areas where no harvest is proposed. Exception and in-lieu skid trails were flagged in the field prior to the PHI and were evaluated during the two-day PHI. During both PHI days, CGS believes inner gorge areas are present within the plan area that was not previously identified in the proposed THP.

HAZARD REDUCTION

49. a. Does the plan accurately disclose any current forest insect or disease problems? Yes
 b. Do the mitigation measures contained in the plan limit the spread of forest insects or disease? Yes

Inspector Observations:

50. Consider the areas fire hazard severity rating, fire history, expected fire behavior, and resources at risk: Yes
 Will proposed treatments be sufficient to reduce fire hazard and provide defensible space around buildings and along roads?

Inspector Observations:

51. If operations are proposed for the purposes of specifically reducing fire hazard or risk of ignition (fuelbreaks, biomass removal), will the proposed hazard reduction methods be effective for the purposes of reducing damage to the natural environment, or to other resources? NA

Inspector Observations:

52. Comments or general observations regarding hazard reduction: Item 38 THP page 101 states: "Slash created through logging shall be treated by lop & scatter, crushing or mastication within 100' of the property line, within 300' of a public road within the Coastal Commission Zone STAs, within 100' of CA SR 1, and within 50' of Deer Trail at a minimum. If a residential home is within 100' of the property line, slash created shall be completely removed. The general silvicultural prescription along this property line is Single-Tree Selection. The LTO shall treat all logging related/produced slash within 100 feet of the entire property line by reducing slash height to less than 30" using the above stated methods (as well as the additional listed buffers which mostly fall into this 100' property buffer). Where there is a WLPZ portion, lop and scatter only shall be used (no heavy equipment)." Additionally, the RPF stated during the PHI that the entire property line along the Sea Ranch has been professionally surveyed within the last month.

ARCHAEOLOGY

NOTE: IF CONFIDENTIALITY IS REQUIRED OF YOUR RESPONSE, PLEASE PROVIDE THE RESPONSE ON A SEPARATE PAGE MARKED "CONFIDENTIAL".

53. Does the RPF's archeological survey appear adequate based upon spot checks of potentially sensitive areas? Yes

Inspector Observations:

Yes

54. If sites are present, are the archeological site descriptions and/or site records accurate with regard to site size, content, and mapped location?

Inspector Observations:

55. If sites are present, is the proposed archeological site protection adequate to prevent significant adverse impacts? Yes

Inspector Observations:

56. Comments or general observations regarding archeology: The CAL FIRE Archeologist conducted a separate PHI focused on archaeology. See CAL FIRE Archeology report.

WILDLIFE

57. Have all state or federal (T&E) listed species present in the Plan area been accurately disclosed and mitigated (excluding Northern Spotted Owl and anadromous salmonids)? Yes

Inspector Observations:

58. Have any required CESA or FESA consultation occurred? NA

Inspector Observations:

59. Have impacts to wildlife and plants (including listed and non-listed species), been correctly assessed within the Plan and appropriate protection provided? Yes

Inspector Observations: See DFW PHI report regarding plant species. The proposed THP incorporates the same language as in recent past approved plans regarding swamp harebell, coast lily, and harlequin lotus species populations. DFW representatives attended both days of the PHI. After the PHI, the CAL FIRE inspector requested Julie Coombes to review the species protection language in the plan as well as the recommendations made by DFW staff in their PHI report. Based on a phone conversation with Julie Coombes, such review was conducted.

60. Have all Late Successional Forest Stands been disclosed? [14 CCR § 919.16, 939.16, 959.16] NA

Inspector Observations:

61. If Late Successional Forest Stands are present and proposed for harvesting, do your observations support a conclusion that such harvesting would not significantly reduce the amount and distribution of late succession forest stands, or their functional wildlife habitat value such that it constitutes a significant adverse impact of the environment as defined in 14 CCR §895.1? NA

Inspector Observations:

62. Does the plan accurately disclose any components that would be associated with Late Successional Forest Stands (e.g. large living and/or dead trees, large downed woody debris, decadent and/or deformed trees) that require disclosure and analysis in the cumulative impacts discussion? [Ref: Shintaku 2005 "Large Old Trees Memo"] NA

Inspector Observations:

63. Is the proposed plan within a watershed(s) with listed anadromous salmonids? Yes

Inspector Observations:

If "Yes", does the entire "ASP" rules package apply, or only the "Road Rules"
Full ASP Rules X Upstream ASP only

64. Estimate percentage of canopy cover:

Class I inner zone	Preharvest	<u>100</u>	Post Harvest	<u>100</u>
Class I outer zone	Preharvest	<u>100</u>	Post Harvest	<u>100</u>
Class II inner zone	Preharvest	<u>80</u>	Post Harvest	<u>70</u>
Class II outerzone	Preharvest	<u>800</u>	Post Harvest	<u>50</u>

65. Will the post-harvest stand in the WLPZ provide for large wood recruitment that improves or maintains salmonid habitat on Class I and Class II large watercourses? Yes

Inspector Observations:

66. Will the post-harvest stand in the WLPZ retain the 13 largest conifer trees per acre (7 outside the coastal anadromy zone), live or dead, on each acre that encompasses the core and inner zones? Yes

Inspector Observations:

67. Are proposed erosion control and soil stabilization measures for sediment control adequate to protect salmonid habitat in the following areas?

- a. Operations in the WLPZ (roads, landings, or tractor operations)? Yes

Inspector Observations:

- b. Watercourse crossings (permanent and temporary)? Yes

Inspector Observations:

- c. Winter operations? Yes

Inspector Observations:

- d. Site preparation Yes

Inspector Observations:

68. Are protection measures adequate to deal with adverse impacts from significant rain events, even during the non-winter period? Yes

Inspector Observations:

69. Are protection measures adequate to prevent significant adverse impacts on downstream flows from water drafting operations? Yes

Inspector Observations: See DFW PHI report

70. Is the Plan located within the range of the Northern Spotted Owl? Yes
If "N/A", skip to question 71

Take avoidance option: "a/f" (SORP) _ "b" _ "c" _
"d" (HCP/ITP) _ "e" (TA) X "g" _

- a. Does the NSO habitat definitions (USFWS or FPR) used in the plan accurately reflect vegetation conditions? Yes

Inspector Observations:

- b. Are the retained habitat quantities depicted on the Plan maps accurate? Yes

Inspector Observations:

- c. Do the protection measures for the activity center(s) appear adequate and in conformance with the rules? Yes

Inspector Observations: There is one activity center within 0.07 miles of the THP (SON0082). This activity center is over 0.40 miles from the plan boundary. SON0082 is not within 0.25 miles of the plan boundary or the appurtenant road system.

- d. Evaluate the proposed NSO call points. Are call point(s) distribution and Location adequate? Yes

Inspector Observations:

71. Comments or general observations regarding wildlife and fisheries:

CUMULATIVE IMPACTS

72. Are the defined resource assessment areas appropriate? [Ref Technical Rule Addendum #2] Yes
[N/A for Modified THP]
Inspectors Observations:
73. Has the RPF correctly assessed the potential for significant cumulative impacts upon resource values within the defined assessment areas? Yes
Inspectors Observations:
74. Has the RPF accurately listed all known past/present/future projects within the assessment area? [Including other CEQA projects that have a similar effect on the environment] Yes
If "No", explain:

Inspectors Observations:
75. If there are waterbodies within or downstream of the proposed Plan that are listed as water quality limited under Section 303(d) of the Federal Clean Water Act, has the RPF assessed for impacts that may combine with existing listed stressors to impair beneficial uses of the waterbody? Yes
Inspectors Observations: There are no Class I watercourses or WLPZs within the plan area.
76. Comments or general observations regarding Cumulative Impacts: As discussed in the plan, THP page 176 states:
"The total WAA acreage is approximately 16,446 acres. Over the past 10 years the WAA has been managed (harvested or has an approved document) on 1,912.83 acres (approximately 11.6% of the WAA). This management has been through 1,241.32 acres of uneven aged management (approximately 7.5 % of the WAA) and 671.54 acres of even aged management (approximately 4% of the WAA). By watershed, the breakdown is as follows: Big Pepperwood Creek Watershed (~5% uneven aged management; ~8% even aged management); Mouth of Gualala Watershed (~14% uneven aged management; ~4% even aged management); and Black Point Watershed (~0.5% uneven aged management; ~3% even aged management."
77. Other comments or concerns not covered elsewhere in the report: When discussing noise impacts, THP page 300 states that "To reduce noise duration throughout the day, log truck traffic will be limited to the hours of 7am to 4:30pm. Work on roads and landings within 200' of the property line shall also adhere to this schedule. Hauling and operations will be avoided during weekends and holidays. Log truck shall not use jake brakes within 200' of the property line." Please ensure that this exact language is within Item 38 section II of the THP for enforcement purposes and LTO awareness. See CAL FIRE PHI recommendations.
78. Response to any Public Comment received prior to the conclusion of the PHI, if any: See answer to agency questions within this report. The agency questions to the Inspector identify public concerns.
79. a. Are other agency recommendations in agreement with those in your report? Yes
If "No", explain: See Geology and Erosion Section in this report for CGS inner gorge discussion.
80. Comments or general observations to other and public concerns: See answers to agency questions

CAL FIRE PHI RECOMMENDATIONS

- Conformance Determination: In conformance if recommendations are agreed upon
- PHI map attached as part of the recommendation? No
- Supplemental materials provided (CD's, aerial photos, etc) Yes

RPF: Please respond to each recommendation provided below and indicate: (1) Whether or not you concur with the recommendation and (2) Provide any necessary revisions or documentation.

No.	Review Agency	Recommendation
1	CAL FIRE	Under Map Point #19, THP page 45, please state the culvert size
2	CAL FIRE	For LTO reference, please include in the maps within Section II of the THP, a map showing an enlarged area of the exception and in-lieu skid trails proposed for use
3	CAL FIRE	Under Item 38, THP page 102, regarding noise and instruction to the LTO, please also include avoidance of hauling and operations during weekends and holidays as stated on THP page 300.
4	CAL FIRE	As discussed during the PHI, please revise THP Item 38 Section II, to state that the CAL FIRE Inspector shall be notified of the harvest mark within 10 days of the marking within the Gualala STA and within the STA along the property line associated with the Sea Ranch
5	CDFW	<p>The botanical survey maps in THP Section V depict numbers of coast lily (<i>Lilium maritimum</i>) individuals at each location; however, it is unclear how many individuals will potentially be disturbed by the proposed operations. Prior to plan approval, please revise the THP's botanical report to include the total number of coast lily individuals, per occurrence, that are proposed for disturbance versus protected (a close estimate will suffice). Include what percentage these disturbed individuals represent within the occurrence.</p> <p>See attached report for discussion.</p>

No.	Review Agency	Recommendation
6	CDFW	<p>THP Section II, Item 32 (page 94) states that coast lily populations will be flagged with native plant protection flagging, and that the LTO shall avoid excessive grading in the higher concentration areas, and as feasible, in other areas. This language is not enforceable because it lacks specificity. Prior to plan approval, please revise the coast lily plant protection measures in Section II of the THP (and within the botanical report) to further specify that:</p> <ul style="list-style-type: none"> a. The outer extent (footprint) of the coast lily populations will be flagged prior to operations; b. No harvest of trees will occur within the population flagging; c. Trees marked for harvest will be felled away from coast lily populations to the extent feasible; d. Heavy equipment will be limited to the running surface of the roads and skid trails, otherwise no heavy equipment will be used within 25' of the coast lily; e. There will be no blading of roadsides or ditches within 25' of the coast lily; f. If the running surfaces of roads are bladed, no material will be sidecast into coast lily populations; g. There will be no herbicide used within 25' of the coast lily; h. Within one year following operations, and while plants are dormant, any slash or debris that may have inadvertently fallen within the coast lily populations will be carefully removed using handwork; and i. Three to five years following operations, coast lily populations will be surveyed for the introduction of noxious weeds [e.g. jubata grass (<i>Cortaderia jubata</i>), French broom (<i>Genesta monspessulana</i>), which are reported to occur in the THP]. If found, they will be removed and disposed of in a method that isolates the seed and prevents the plant(s) from spreading. <p>Where the above measures (2a-2i) are not feasible, the plan will be updated to clearly disclose these locations, provide a justification clarifying the lack of feasibility, and provide alternative protection measures meeting the intent of measures 2a-2i to the highest degree feasible. If the measures are updated, the measures and justification will be sent to CDFW (R3Timber@wildlife.ca.gov) for concurrence prior to operations that would utilize the new alternate protection measures.</p> <p>See attached report for discussion.</p>
7	CDFW	<p>The botanical survey maps in THP Section V depict numbers of swamp harebell (<i>Eastwoodiella californica</i>) individuals at each location, however, it is unclear how many individuals will potentially be disturbed by proposed operations. Prior to plan approval, please revise the THP's botanical report to include the total number of swamp harebell individuals, per population, that are proposed for direct impacts versus protected (a close estimate will suffice). Include what percentage these disturbed individuals represent within its population occurrence.</p> <p>See attached report for discussion.</p>
8	CDFW	<p>Section II, Item 32 of the THP (page 94) states that some occurrences of swamp harebell are protected by EEZs, WLPZs, and/or within an STZ; however, it is unclear which occurrences will receive these protections. Prior to plan approval, please revise the botanical report and associated maps to disclose this information.</p> <p>See attached report for discussion.</p>

No.	Review Agency	Recommendation
9	CDFW	<p>THP Section II, Item 32 (page 94) states that swamp harebell populations will be flagged with native plant protection flagging and that the LTO shall avoid excessive grading in the higher concentration areas, and as feasible, in other areas. This language is not enforceable because it lacks specificity. Prior to plan approval, please revise the swamp harebell plant protection measures in Section II of the THP (and within the botanical report) to further specify that:</p> <ul style="list-style-type: none"> a. The outer extent (footprint) of the swamp harebell populations will be flagged prior to operations; b. No harvest of trees will occur within the population flagging; c. Trees marked for harvest will be felled away from swamp harebell populations to the extent feasible; d. Heavy equipment will be limited to the running surface of the roads and skid trails; e. There will be no blading of roadsides or ditches within 10' of the swamp harebell; f. If the running surfaces of roads are bladed, no material will be sidecast into swamp harebell populations; g. There will be no herbicide used within 25' of the swamp harebell; h. Within one year following operations, and while plants are dormant, any slash or debris that may have inadvertently fallen within the swamp harebell populations will be carefully removed using handwork; and i. Three to five years following operations, swamp harebell populations will be surveyed for the introduction of noxious weeds [e.g. jubata grass (<i>Cortaderia jubata</i>), French broom (<i>Genesta monspessulana</i>), which are reported to occur in the THP]. If found, they will be removed and disposed of in a method that isolates the seed and prevents the plant(s) from spreading. <p>Where the above measures (6a-6i) are not feasible, please update the plan to clearly disclose these locations, provide a justification clarifying the lack of feasibility, and provide alternative protection measures meeting the intent of measures 6a-6i to the highest degree feasible. If the measures are updated, the measures and justification will be sent to CDFW (R3Timber@wildlife.ca.gov) for concurrence prior to operations that would utilize the new alternate protection measures.</p> <p>See attached report for discussion.</p>
10	CDFW	<p>CDFW recommends the botanical report and/or Section IV of the THP include an assessment of the proposed timber operations regarding any potentially significant direct, indirect, and cumulative impacts to bishop pine (<i>Pinus muricata</i>, a Sensitive Natural Community).</p> <p>See attached report for discussion.</p>
11	CDFW	<p>Revise the THP to specify that bishop pine (mature trees or seedlings) will not be targeted for herbicide.</p> <p>See attached report for discussion.</p>
12	CGS	<p>Prior to second review, Section V of the THP shall be updated to include published landslide mapping showing proposed THP boundaries. Additionally, Section V of the THP shall be updated to include the GRI unstable area database information for the THP area and to include, reference, and/or discuss the unstable area information from previous THP's. Any additional mitigations associated with this information shall be included in Section II of the THP.</p>

No.	Review Agency	Recommendation
13	CGS	Prior to second review, the THP shall be revised to include a geologic report with evaluation of the proposed operations on inner gorge slopes by a licensed Professional Geologist, or to show that operations are to be avoided at the identified inner gorge areas. CGS requests time to review the geologic report and additional field review may be necessary.
14	CGS	Prior to second review, Section II of the THP shall be revised to include the updated mapping of unstable areas as shown on THP maps that were provided to the review team prior on December 14, 2023 (Figures 5 and 6). Additionally, Item 38 shall be revised to discuss that some unstable areas extend outside of the WLPZ and are flagged with Do Not Cut flagging. Additionally, the RPF shall verify that all mapped unstable areas are flagged in accordance with Item 38 and that no trees are marked for harvest on mapped unstable areas prior to operations.
15	CGS	Prior to second review, the THP maps shall be updated to disclose the location of residential structures and developments that are located downslope of the THP.
16	CGS	Map Point 1. Prior to second review, the THP shall be revised to describe that a pipe-arch culvert that is adequately sized for the calculated 100-year flood flow shall be installed at this location. As well, the 100-year flood flow shown in the map point table (page 42) shall be updated to be consistent with the calculated value shown on page 72 of the THP.
17	CGS	Map Point 2. Prior to second review, the THP shall be updated to disclose the unstable area located downslope of Map Point 2 and to include any past documentation of the landslide. Additionally, Map Point 2 shall be updated to discuss the landslide and any potential impacts to the feature resulting from the proposed operations/mitigations.
18	CGS	Map Point 55. Prior to second review, Section II of the THP shall be updated to describe that the proposed culvert outlet will be located downslope of the fill failure deposit/debris where there is a well-defined watercourse channel (about 10 feet downslope of the existing metal flume outlet).
19	CGS	Map Point CGS-1. Prior to second review, the THP shall be revised to disclose the unstable area and describe that operations shall be avoided on the unstable area.
20	WQ	All culverted watercourse crossings shall be sized to accommodate the 100-year recurrence interval flow plus debris, but shall be no smaller than 24 inches in diameter.
21	WQ	The THP shall be revised to omit proposed WLPZ operations at map points A, 3, 4, 5, and L1 shall be removed from the THP.
22	WQ	The THP shall be revised to specify that operations shall not take place within 50 feet of the watercourse at Map Point L2.

The following questions were generated by the interagency review team to be answered on the PHI by agency staff.

CAL FIRE Inspector - evaluate the following questions:

No.	Review Agency	Question
1	CGS	Please evaluate the accuracy of mapped unstable areas and adequacy of proposed mitigations.
2	CGS	Please evaluate the adequacy of proposed watercourse crossing mitigations relative to the potential for sediment delivery.
3	CGS	Residential structures are downslope of portions of the plan area. Please evaluate the potential for adverse impacts to slope stability, landsliding, and public safety.

No.	Review Agency	Question
4	CDFW	<p>CDFW would like to examine:</p> <ul style="list-style-type: none"> • 1600 Map Points: 1, 2, 3, 4, 5, 6, 7, 9, 11, 14, 15, 20, 20.1, 21, 22, 23, 24, 28, 29, 30, 31, 33, 34, 35, 37, 42, 43, 44, 46, 48, 49, 50, 52, 53, 54, 55, T1, T2, T3 • Water Drafting Map Points: 1248, 2061 • Unstable Area: Map Point A • WLPZ landings: L1, L2 • Exception skid trails • Wildlife trees, including scattered residual trees with old growth characteristics • Watercourse classifications & transitions • Bumble bee habitat
5	CAL FIRE	Special Treatment Area Prescription – Please evaluate the proposed silvicultural and logging practices in the Sea Ranch Area’s scenic view corridor and the Gualala River’s significant scenic value as well as its wetlands, lagoons, streams, estuaries, and marine environments [ref. 14 CCR §§ 895.1 (Coastal Commission Special Treatment Area (d)) & 913.4(a)].
6	CAL FIRE	Exceptions – Please evaluate the proposed use of ground based equipment on slopes steeper than 65% and on slopes greater than 50% with a high erosion hazard rating [see Item 19-21.h. & i. on pages 29, 30, & 151; ref. 14 CCR § 914.2(f)(1) & (4)].
7	CAL FIRE	In-Lieu Practices – Please evaluate the proposed use of existing WLPZ skid trails & landings [see Item 27.a. & f. on pages 75-77, 151, & 152; ref. 14 CCR §§ 916.1, 916.3(c), & 916.4(d)].
8	CAL FIRE	Roads – Please evaluate the temporary roads for watercourse connectivity. Do any of the drainage structures associated with these roads (e.g., ditch relief culverts, outsloping, critical dips) require additional maintenance?
9	CAL FIRE	Wildfire Risk & Hazard Impacts – Please evaluate whether the proposed hazard reduction mitigations are adequate to address the identified potential significant adverse impacts to wildfire risk and hazard [see Items 30 & 38 and the WFR&H assessment on pages 83, 84, 101, 158, 160, & 294-297; and ref. 14 CCR §§ 912.9, 917.2, & TRA #2].
10	CAL FIRE	Noise Impacts – Please evaluate whether the proposed noise mitigations are adequate to address the identified potential significant adverse impacts [see Item 38 and the noise assessment on pages 102, 158, 160, 161, 298 & 300; and ref. 14 CCR §§ 912.9 & TRA #2].
11	CAL FIRE	Visual Impacts – Please evaluate the potential for significant adverse visual impacts, specifically regarding the proposed timber operations adjacent to Highway 1, Deer Trail, and Sea Ranch, CA.

Inspector Answers:

No.	Answer
1	see CGS PHI report
2	see CGS PHI report
3	see CGS PHI report
4	see CDFW PHI report

No.	Answer
5	The STAs were evaluated during the two-day PHI. The sample mark provided was evaluated for the Coastal Commission STA. Both STAs are provided the same silvicultural prescription, conforming to the Forest Practice Rules. The average residual basal area shall be at least 100 square feet per acre. Due to topography, much of the plan area is not easily visible from many areas of the Gualala Point Regional Park (from the river and marine environments). The GRT property line along the Sea Ranch subdivision was recently surveyed. This area was evaluated during the second day of the PHI. The CAL FIRE Inspector has recommended notification be given to the Inspector to evaluate the harvest mark within this area. See CAL FIRE PHI recommendations.
6	Much discussion was had regarding inner gorge determination during both days of the PHI. CGS has provided information regarding their evaluation; please see CGS PHI report.
7	These areas were evaluated during both PHI days by the multi-agency review team. The CAL FIRE Inspector specifically recommended during the PHI that map points A, 3, 4, 5, and L1 be removed from the plan if another access point would be feasible in order to avoid the originally proposed WLPZ operations. An alternative was evaluated during the PHI and it was agreed that WQ would provide the recommendation. See WQ PHI report.
8	This is a standard practice of evaluation during a PHI. A few recommendations were made by WQ and CGS regarding specific road points; see CGS and WQ PHI reports.
9	The proposed measures in the THP are in compliance with the Forest Practice Rules. Specific language is included in THP Item 38 to address slash requirements.
10	The proposed measures in the THP are in compliance with the Forest Practice Rules. Specific language is included in THP Item 38 to address potential noise impacts even though the Forest Practice Rules do not require such mitigation. The CAL FIRE Inspector provided a PHI recommendation regarding noise mitigation measures for plan consistency (see CAL FIRE PHI recommendations).
11	The THP is in compliance with the Forest Practice Rules. The plan encompasses two STAs where timber harvesting is further limited. The Coastal Commission STA within the plan is located adjacent to the Sea Ranch subdivision. This is a residential area consisting of paved roads, access roads, and infrastructure facilities for maintaining the subdivision. Powerlines also run through this area as well. One of the access roads used to begin access towards the GRT property, begins at Deer Trail (within the Sea Ranch subdivision) and Hwy 1. Shortly after entering Deer Trail off of the highway, there is a small log yard area within the subdivision where felled timber logs are stored and/or further treated. Before entering the GRT property and the plan area, the Sea Ranch subdivision is comprised of facilities that typically are associated with rural residential development. The visual resource assessment discussed on THP page 281 appears consistent with the field conditions evaluated during the two-day PHI.

cc: RPF, PS

To view harvesting documents, please visit: <https://caltreesplans.resources.ca.gov/caltrees/>