



DEPARTMENT OF FORESTRY AND FIRE PROTECTION
NORTHERN REGION HEADQUARTERS - SANTA ROSA
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February 15, 2024

GUALALA REDWOOD TIMBER LLC
 P O BOX 197
 GUALALA, CA 95445

Re: 1-23-00099-SON

Your Timber Harvest Document went through second review on 2/15/2024. Before I can complete the review process, I will need your responses to the following;

1	CAL FIRE 1. Response to PHI #2: Revised page 111: The symbology for WLPZ Skid trail and Coastal Zone STA are not accurately reflected in the map and legend. Please revise for accuracy.
2	CAL FIRE 2. Response to PHI #2: Revised page 111: The WLPZ skid trails associated with T1 are not clear on the map. Please revise for accuracy and clarity.
3	CAL FIRE 3. Item 14.b. (page 13). Below the table in the item, the plan indicates that "Aggregates shall be retained for 80 years as per Site Class IV timberlands", however the addendum to item 14.b. proposes retaining aggregates for less than 60 years. Please revise the plan for accuracy. Please note that site class limitations exclusive to variable retention harvests within 14 CCR Section 913.4(d)(11) prohibit only the application of future VR harvests under certain timelines associated with site class.
4	CAL FIRE 4. Section II, Required Slash Treatment Map (page 126). Please include Approved and Legally Permitted Habitable Structures on the required Slash treatment map. Additionally, please delineate on the map the boundaries of Slash treatment around those structures as required by 14 CCR Section 917.2(c).
5	CAL FIRE 5. Section II, STA Maps (pgs 124 & 125). The inner gorge features obscure watercourse features. Please revise the maps such that both features are visible.
6	CAL FIRE 6. Section III, Addendum to Item 36 (page 152). Please revise the descriptions of survey methods under "survey strategy" to reflect the methodology of the various survey methods. (Please see attached example).
7	CAL FIRE 7. Please revise the Roads and Features Map on page 117 and the Gualala River STA Maps on pages 120, 121, 122 to show the unstable area downslope of Map point 2.
8	CAL FIRE 8. Please include the supplemental botanical information included with the PHI responses paginated within Section V of the plan.
9	CAL FIRE 9. Section IV "Botanical Protections"(page 267). Please revise the plan to disclose and analyze the potential for potentially significant cumulative effects to coast lily, swamp harebell, and fringed false hellebore resulting from substantial reduction in habitat or population across the entire range of . Additionally, to avoid confusion between the CNPS plant status and the requirements of CEQA, please refer to CNPS or listing status of species rather than using the term "rare" on pages 97, 98, 127, 128, and 267.
10	CGS General Recommendation 1. Section V was updated to include some of the published landslide mapping (pages 357.33-357.35); however, the geologic and landslide mapping from Blake and others (2002; Figure 1 in the CGS PHI Memo) was not included. This map shows the geology of portions of the plan area that are not covered on the other maps, as well as a large landslide at the eastern portion of the THP area. To be complete, please update Section V to also include the geologic and landslide map from Blake and others (2002).

11	CGS General Recommendation 2. The GRI unstable area database maps on pages 357.1 to 357.24 do not show the proposed THP boundaries. Page 357.22 appears to show boundaries of a THP that is not the proposed THP. For clarity, please show the proposed THP boundaries on the GRI unstable area database maps on page 357.1 to 357.24.
12	CGS General Recommendation 3. The RPF responses do not include response to the portion of the recommendation "to include, reference, and/or discuss the unstable area information from previous THP's". Please provide response to this recommendation. A brief discussion in Section V describing/referencing which previous THP's (by plan number) were reviewed and how they were evaluated should suffice.
13	CGS General Recommendation 4. Exception skid trails are still mapped within the inner gorge slopes that are outside of the THP area (revised pages 117-118). For clarity, please remove the exception skid trails that are mapped within inner gorge areas.
14	CGS General Recommendation 5. Item 38 - there is a discrepancy between the "Flagging" description on page 100 which states that Solid Pink "Do Not Cut" flagging is used for no harvest areas if outside the WLPZ and the "Unstable Areas" description on page 101 that describes that all unstable areas are either outside of the THP boundary or are flagged/incorporated within a WLPZ. During the PHI, we observed unstable areas outside of the WLPZ that were flagged with do not cut flagging. To be clear and consistent, please update the "Unstable Areas" description on page 101 to discuss that some unstable areas extend outside of the WLPZ and are flagged with Do Not Cut flagging.

I will withhold making a decision until I hear from you. When you respond to this information request, please grant an extension of the public comment period for 10 working days from the date CAL FIRE receives your response. CAL FIRE will assume the extension request has been granted, unless notified otherwise. I will withhold making a decision on whether your plan conforms with the rules of the Board until I hear from you. As per PRC 4582.7(a), the tentative close of public comment shall be no less than 10 days following the last day that the revised information is reviewed.

If you have any questions, please call me at the number above.

Sincerely,



Tim Holliday RPF-2831
Review Team Chair – Northern Region
135 Ridgway Ave., Santa Rosa, CA
(707) 576-2943 Office

cc: Unit, TLO/TO, RPF File

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