


**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

Sonoma-Lake-Napa Unit  
 1199 Big Tree Road  
 St. Helena CA 94574-9711  
 Napa County  
 (707) 967-1400  
 Website: www.fire.ca.gov



April 30, 2026

PATRICK HOVLAND  
 PO Box 2920  
 Ukiah, CA 95482

### PREHARVEST INSPECTION REPORT

Harvest Document: **1-26-00021-SON**  
 Plan Name: **Card THP**  
 Preharvest Inspection Date(s): **04/23/2026**  
 Preharvest Inspection Number: **1**  
 CAL FIRE Inspector Name: **Kim Sone**

CAL FIRE Field Hours: **12**  
 CAL FIRE Office Hours: **25**

Previous Inspection Dates: **04/23/2026**

Additional Inspector notes (weather factors, access issues, incidents on PHI, etc.):

**A preharvest inspection (PHI) was made on the site of the proposed harvest area. Provisions of the proposed Timber Harvesting Plan (THP) have been evaluated for their compliance with the Rules and Regulations of the California Board of Forestry and Fire Protection, Title 14 of the California Code of Regulation (14 CCR) and Public Resources Code (PRC), pursuant to the Z'Berg-Nejedly Forest Practice Act of 1973. The following is a summary of the observations, evaluations and recommendations made during the inspection.**

#### Field Attendees

Agency or Affiliation	Representative	Provide PHI Report	Provide Recommendations	Notes
CDFW	Kristin Garrison			
WQ	James Burke			
Other	Maxwell Hovland			RPF designee
Other	Mark Pugsley			GRT
Other	Patrick Hovland			RPF

#### NOTICING

1. Did PHI scheduling require a mutually agreeable extension from the initial 10-day period from filing? [ref. 14 CCR § 1037 & PRC 4604] **Yes**

Inspector Observations / Comments: **Due to agency schedules, a mutually agreed upon**

**PHI date was past the 10-day filing period**

2. List any mutually agreeable representatives who did not attend the PHI: **CGS was notify only and did not attend the PHI**

3. Was the Notice of Intent posted at a conspicuous location on the public road nearest the Plan on colored paper or identified with colored flagging? [ref. 14 CCR § 1032.7(h)] **Yes**

Inspector Observations / Comments: **The NOI was obviously posted and observed at a public location. The NOI was observed during the PHI.**

4 Does the Notice of Intent accurately describe the responsible parties of the Plan, legal description, nearest community or landmark, nearest perennial watercourse, acres to harvest, proposed silviculture and the requirements of 14 CCR § 1032.7(d)(1)-(10) and in accordance with County Rules under 14 CCR § 924.1, 925.2, & 926.3? **Yes**

Inspector Observations / Comments:

5. Is the proposed Plan outside of the boundaries of any active Plan for any part of the plan area for which a Report of Satisfactory Stocking has not been issued? [ref. 14 CCR § 1034(j)] **Yes**

Inspector Observations / Comments:

---

**PROJECT AND TIMBER STAND DESCRIPTION**

6. Does the Plan accurately disclose the responsible parties of the Plan and their contact information? [ref. 14 CCR § 1034(a)-(f)] **Yes**

Inspector Observations / Comments:

7. Is the location and acres of proposed Timber Operations accurately described? [ref. 14 CCR § 1034(g)] **Yes**

Inspector Observations / Comments:

8. Has the Plan accurately described the physical conditions at the Plan site including soils and topography information, vegetation and stand conditions, and watershed and Stream conditions? [ref. 14 CCR § 1034(gg)] **Yes**

Inspector Observations / Comments:

9. Was the Plan and timber stand information visually verified by the Inspector? **Yes**

Inspector Observations / Comments:

10. Have timber site classes been accurately identified and located for the determination of stocking standards to be applied, down to at least a 20-acre minimum or as specified in the district Rules (considering regeneration method limitations and differences in minimum stocking requirements)? [ref. 14 CCR § 1034(x)(12)] **Yes**

Inspector Observations / Comments:

11. Has the Erosion Hazard Rating (EHR) been correctly calculated and mapped to ensure proper waterbreak spacing? [ref. 14 CCR § 914.6 [934.6, 954.6](e)] **Yes**

Inspector Observations / Comments:

12. Are the Plan maps and associated diagrams accurate and sufficiently clear to allow for review and implementation of the proposed Timber Operations? **Yes**

Inspector Observations / Comments:

### SILVICULTURE AND REGENERATION METHODS

13. Are the proposed silvicultural methods appropriate for existing timber stand conditions? **Yes**

Inspector Observations / Comments: **Selection silviculture is proposed for 103 acres. Group selection (areas outside the flood prone area) is proposed for 60 acres. A STA (wild and scenic river section of the mainstem of the Gualala River) is also proposed for 4 acres which increases the post-harvest basal area retention standards**

14. Are the proposed Alternative Prescriptions appropriate and do they meet the requirements of 14 CCR § 913.6 [933.6, 956.6](a)-(b)? **NA**

Inspector Observations / Comments: **No Alternative Prescription is proposed**

15. Is even-aged management proposed? **No**

a. 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] be met? **NA**

b. If oversized units are proposed for the THP per 14 CCR § 913.1 [933.1, 953.1] (a)(2), are they appropriate? **NA**

c. Does the plan propose evenaged management units, within an ownership, contiguous to or within 300 feet of another plan with evenaged management units without an approved report of stocking and/or that are not on average at least five feet tall or meet the required time frame for time of establishment, three years [Coast] or five years [Northern and Southern]? [ref 14 CCR § 933.1 (a)(4)] **Yes**

Inspector Observations / Comments: **Even aged management is not proposed**

16. Will the proposed uneven-aged management prescription establish or maintain an uneven-aged stand structure, with a multi-aged balanced stand to promote the growth of leave trees throughout a broad range of Diameter classes, and encourage natural Reproduction? [ref. 14 CCR § 913.2 [933.2, 953.2]] **Yes**

Inspector Observations / Comments:

17. Should the postharvest stand comply with the following:

a. Satisfy minimum stocking requirements with Countable trees? [ref. PRC § 4528(b)] **Yes**

b. Meet the minimum basal area retention standards of 14 CCR § 913.1 [933.1, 953.1]? **Yes**

- c. Contain seed trees of full crown, capable of seed production and representative of the best phenotypes available in the preharvest stand for Seed Tree Seed Step Regeneration? [ref. 14 CCR § 913.1 [933.1, 953.1](c)(1)(A)(2)] **Yes**
- d. Contain well distributed seed trees of desired species which are left singly or in groups to restock the harvested area? [14 CCR § 913.1 [933.1, 953.1](c)] **Yes**
- e. Maintain and improve retained tree species diversity, genetic material and seed production with trees of each native commercial species present at the time of harvest? (in the absences of an MSP plan) [14 CCR § 913.1 [933.1, 953.1](c)(1)(F)] **Yes**
- f. Maintain or increase average stand diameter of the residual crop trees, promote timber growth, and/or improve forest health, with the residual stand consisting primarily of healthy and vigorous dominant and codominant trees from the preharvest stand for Commercial thinning treatments? [ref. 14 CCR § 913.3 [933.3, 953.3] (a)] **Yes**

If "No" or proposed regeneration method is for stand health, explain:

Inspector Observations / Comments:

18. If a regeneration and/or site preparation plan has been proposed, should it be sufficient to ensure the following per 14 CCR § 913.4 [933.4, 953.4]:

- a. The regeneration of the site? **NA**
- b. Protection of retention elements and maintain ground cover to the extent practicable? **NA**
- c. Provide seedling establishment on the site to encourage long term site occupancy of the regenerated trees? **NA**

Inspector Observations / Comments:

19. Was a sample area Marked prior to the PHI? **Yes**  
[ref. 14 CCR §§ 913.1 [933.1, 953.1](a)(5), & 913.2 [933.2, 953.2](a)(1), 913.3 [933.3, 953.3] (a)(3) & (b)(3)], & 913.4 [933.4](d)(9) & (f)(4), & 913.6 [933.6, 953.6](d)]

Inspector Observations / Comments: **Much of the plan is located within the WLPZ (flood prone area) of the Gualala River. This area was evaluated throughout the PHI. All of the harvest mark was evaluated during the PHI and the harvest mark complies with the Forest Practice Rules.**

20. Stands have been Marked as follows:

Cut Tree  Leave Tree  Whole Area  Marking Waiver

Inspector Observations: **As observed during the PHI, harvest trees are marked with blue paint and the trees marked with orange paint are retention trees and not to be harvested.**

21. Was the Mark representative and sufficient to evaluate the proposed prescription(s)? **Yes**

Inspector Observations / Comments: **The portion of the plan located within the Class I WLPZ is a full harvest mark that was 100% marked prior to the PHI. The portion outside of the WLPZ area was sample marked. The harvest mark complies with the Forest Practice Rules (14CCR 913.2)**

22. Does the proposed prescription of Group B species management maintain relative site occupancy between Group A and Group B species? [ref. 14 CCR § 912.7 [932.7, 952.7](d)] **Yes**

Inspector Observations / Comments:

23. Does the Plan propose Aspen, and Meadows and Wet Areas restoration? [ref. 14 CCR 913.4 [933.4, 953.4](e)] **NA**

a. Have each of the project types proposed for treatment been correctly stated? **NA**

b. Are each of the project types being proposed shown on the Plan map, consistent with 14 CCR § 1034(x), and at a scale that shows the locations of planned operations? **NA**

c. Are the descriptions of the extent of the area proposed for harvesting or treatment accurate and consistent with the Plan? **NA**

d. Have the conditions of the treatment been adequately described per the standards of 14 CCR 913.4 [933.4, 953.4](e)(4)(A)-(B)? **NA**

e. Does the Plan state the project goals and measures of success for the treatment? **NA**

Inspector Observations / Comments:

24. Additional comments or general observations regarding silviculture or the timber stand: **Single tree selection harvest mark was evaluated during the PHI. These areas are located within the Class I WLPZ (flood prone areas). Group selection sample mark was also observed outside of the WLPZ area. The STA harvest mark was also evaluated during the PHI. It was also discussed how the RPF identified and retained the 13 largest trees per acre within the WLPZ area pursuant to 14CCR 916.9. This was evaluated during the PHI and the retention standards comply with the Forest Practice Rules. A wild and scenic river (recreation) occurs within a 200 feet portion of the watercourse transition line of the mainstem of the Gualala River. The landward edge of this STA is 50 feet inside the outer edge of Inner Zone B. This area was also evaluated during the PHI and the harvest mark complies with the Forest Practice Rules.**

**MAXIMUM SUSTAINED PRODUCTION OF HIGH QUALITY TIMBER PRODUCTS (MSP)**

25. Does the Plan comply with the goals of 14 CCR § 913.10 [933.10, 953.10] to restore, enhance, and maintain the productivity of California timberlands? **Yes**

Inspector Observations / Comments:

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

Inspector Observations / Comments:

27. How does the Plan propose to comply with the MSP requirements of 14 CCR § 913.11 [933.11, 953.11]?

Option A  Option B  Option C  Does not comply

Inspector Observations / Comments:

28. Are the timber stands accurately described and consistent with those proposed in the Plan, before and after harvesting, including: volume, growth projection, stocking, and species composition for THPs that do not reference an approved Sustained Yield Plan, or do not demonstrate achievement of MSP pursuant to 913.11(c)? [ref. 14 CCR §1034(m)(1)] **Yes**

Inspector Observations / Comments:

29. Additional comments or general observations regarding MSP:

---

### HARVESTING OPERATIONS

30. Is the proposed yarding type appropriate and has the logging system and equipment to be used been adequately described? [ref. 14 CCR § 1034(n)] **Yes**

Inspector Observations / Comments: **The plan proposes ground based yarding only and this is appropriate for the conditions observed during the PHI**

31. Are the Alternative Practices proposed by the RPF appropriate on a site-specific basis, and do they achieve environmental protection at least equal to that of the standards of 14 CCR § 914.9 [934.9, 954.9], and have they been fully explained and justified? **NA**

Inspector Observations / Comments:

32. Are the proposed tractor operations and heavy equipment use:

a. Appropriate on slopes >65%, slopes >50% with high or extreme EHR, or slopes >50% that lead without flattening to sufficiently dissipate waterflow and trap sediment before reaching a Watercourse or Lake? [ref. 14 CCR § 914.2 [934.2, 954.2](f)(1)-(2)] **NA**

b. Adequately mapped and disclosed if proposed on unstable areas, or on areas for which tractor use is proposed beyond the limitations of the standard forest practice Rules? [ref. 14 CCR 1034 (x)(15)] **NA**

Inspector Observations / Comments:

33. Are the proposed tractor operations appropriate on slopes between 50% - 65% with moderate EHR and are they limited to existing tractor roads that do not require reconstruction, or to new tractor roads which have been mapped and flagged by an RPF or supervised designed prior to the PHI? [ref. 14 CCR § 914.2 [934.2, 954.2](f)(3)(A)-(B)] **NA**

Inspector Observations / Comments:

34. Are the proposed exceptions to limitations of Tractor Operations appropriate and has the RPF met the standards of 14 CCR § 914.2 [934.2, 954.2](f)(5) with a clear explanation and justification as to why the application of the standard rule is either not feasible, or would otherwise not comply with 14 CCR § 914 [934, 954]? **NA**

Inspector Observations / Comments:

35. Have Special Treatment Areas (STAs) been adequately disclosed and do the specific silvicultural and logging practices assure the integrity of any designated historical and archaeological sites and ecological reserves? [ref. 14 CCR § 895.1 and 14 CCR § 913.4 [933.4, 953.4](a)] (STA prescriptions are considered a silviculture to be included in Item #14 of the THP). **Yes**

Inspector Observations / Comments:

36. Is ground-based equipment proposed for use in areas designated for Cable Yarding adequately disclosed and documented? [ref. 14 CCR §§ 914.2 [934.2, 954.2](f)(4), & 1034(x) (17)] **NA**

Inspector Observations / Comments:

37. Additional comments or general observations regarding harvesting operations: **No alternative practices are proposed. The plan does not propose ground based equipment under any Items identified in THP Section II Item 21, i.e. no exceptions are proposed.**

---

### ROADS AND LANDINGS

38. Have all Logging Roads and Landings (including Appurtenant Roads) to be used for, or potentially Impacted by, Timber Operations been adequately located and classified per 14 CCR § 1034(x)(4)? **Yes**

Inspector Observations / Comments: **During the PHI, the review team made recommendations regarding road points. See agency PHI reports for the respective recommendations.**

39. Are proposed Logging Road and Landing construction, reconstruction, and/or abandonment methods, as described in the Plan, flagged or otherwise identified on the ground, and meet the standards of 14 CCR § 923.3 [943.3, 963.3](b)-(c)? **NA**

Inspector Observations / Comments: **The plan does not propose any new logging road construction**

40. Have Logging Road and Landing construction and reconstruction been proposed to hydrologically disconnect from Watercourses and lakes to the extent feasible to minimize sediment delivery from road runoff, and meet the standards of 14 CCR § 923.4 [943.4, 963.4] (a)? **Yes**

Inspector Observations / Comments: **Map points were observed and evaluated during the PHI**

41. Additional comments or general observations regarding Logging Roads and Landings: **The PHI began by evaluating the furthest harvest unit and road points and then the review team evaluated each road point ending with the last harvest unit, as well as evaluating the appurtenant road. Recommendations were made by all agencies present. See recommendations and Geology and Erosion Section in this report.**

---

### WATERCOURSE PROTECTION

42. Have Watercourses and lakes been adequately located, described and classified within the Plan? [ref. 1034(x)(9)] **Yes**

Inspector Observations / Comments: **Several wet areas are located within the plan. These are identified within the THP (see THP maps in Section II). THP page 60 also states:**  
**"Springs which are identified and mapped will have a 25-foot Equipment Limitation Zone (ELZ) within a 50 percent overstory canopy retention standard within the 25-foot ELZ. Within the WLZ, equipment is allowed only at designated crossings and existing truck roads unless otherwise noted. Any additional wet areas discovered during timber operations will be protected as described above."**  
**During the PHI, it was observed that the wet areas were not flagged with an ELZ. See CAL FIRE PHI recommendations.**

43. Are proposed Watercourse and lake protection measures adequate for the following? **Yes**

a. Maintenance, protection, and contribution towards the restoration of the quality and beneficial uses of water during the planning, review, and proposed Timber Operations? [ref. 14 CCR § 916 [936, 956](b)] **Yes**

b. To protect and restore native aquatic and Riparian-associated species, the beneficial functions of Riparian zones, and the quality and beneficial uses of water? [ref. 14 CCR § 916 [936, 956](c)] **Yes**

c. Areas near and areas with the potential to directly impact Watercourses and lakes for sensitive conditions as described in 14 CCR § 916.4 [936.4, 956.4](a)(1)? **Yes**

Inspector Observations / Comments:

44. Are the proposed in-lieu or alternative prescriptions appropriate and do they meet the standards of 14 CCR § 916.1 [936.1, 956.1] and 14 CCR § 916.6 [936.6, 956.6]? **Yes**

Inspector Observations / Comments: **Existing skid trails are proposed for use within the Class I WLPZ. This is considered an in-lieu practice. This is addressed under Item 27 Section II of the THP. These skid trails also need to be mapped pursuant to 14CCR 1034(x)(15) as existing in-lieu skid trails on the THP maps in Section II. See CAL FIRE PHI recommendations.**

45. Does the Plan sufficiently provide the following for Logging Road crossings? [ref. 14 CCR § 923.9 [943.9, 963.9]] **Yes**

a. Description, design, and correct location? **Yes**

b. Stabilized with treatment to avoid downstream impacts? **Yes**

c. Prescription 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 / Comments:

46. Are locations of the areas of heavy equipment use in any ELZ clearly described in the plan, or flagged or marked on the ground before the preharvest inspection (including Class III crossings)? [ref. 14 CCR § 916.4 [936.4, 956.4](c)(1)] **Yes**

Inspector Observations / Comments:

47. Have all domestic water supplies been accurately identified and sufficiently protected per 14 CCR § 1032.10? **NA**

Inspector Observations / Comments: **The THP states that no landowners are located within 1000 feet downstream of the plan boundary whose ownership adjoins or includes a Class I, II, or IV watercourse which received surface drainage from the proposed timber operations.**

48. Additional comments or general observations regarding watercourse protection:

### WINTER OPERATIONS

49. If winter operations are proposed, are they appropriate and consistent with the standards of 14 § CCR 914.7 [934.7, 954.7]? **NA**

Inspector Observations / Comments: **Timber operations are not proposed during the winter period**

50. Will the specific measures taken in the winter operating period avoid or substantially lessen erosion, soil movement into Watercourses and soil compaction from Timber Operations? [ref. 14 CCR § 914.7 [934.7, 954.7](b)] **NA**

Inspector Observations / Comments:

51. Additional comments or general observations regarding winter operations: **Timber operations are proposed during the extended wet weather period. Section II of the THP Item 23 includes a Winter Period Operating Plan pursuant to 14CCR 914.7.**

### GEOLOGY AND EROSION

52. Has the erosion hazard rating for soils within the harvest area been correctly calculated, as outlined in Technical Rule Addendum No. 1? **Yes**

Inspector Observations/Comments:

53. Have erosion hazard rating areas been adequately described and located, per 14 CCR § 1034(x)(8)? **Yes**

Inspector Observations/Comments:

54. Are the proposed erosion control methods (e.g. waterbreak spacing and/or treatments for exposed soil) adequate to reduce soil loss? [ref. 14 CCR § 923.5 [943.5, 963.5]] **Yes**

Inspector Observations/Comments:

55. Have any known Unstable Areas or slides been adequately described and located? [ref. 14 CCR § 1034(x)(10)] **Yes**

Inspector Observations/Comments: **One unstable area located on the appurtenant road**

**(haul route) was observed during the PHI. This feature is not disclosed and mitigated for in the THP. See CAL FIRE PHI recommendations.**

56. If operations on proposed Unstable Areas are unavoidable, has the RPF developed appropriate specific measures to minimize the effect of operations on slope instability? [ref. 14 CCR § 914.2 [934.2, 954.2](d)] **NA**

Inspector Observations/Comments:

57. Additional comments or general observations regarding geology or erosion: **No timber operations are proposed on any unstable areas within the THP boundary. A minimum 30-foot no harvest buffer is delineated around all unstable areas within the plan. Boundary will be flagged with pink Do Not Cut.**

---

### HAZARD REDUCTION

58. Does the Plan accurately disclose any current forest insect or disease problems? [ref. 14 CCR § 1034 (v)] **Yes**

Inspector Observations/Comments:

59. Are the proposed Timber Operations planned so as to minimize the build-up of destructive insect populations or the spread of forest diseases with feasible measures to mitigate adverse Impacts from the timber operation.? [ref. 14 CCR § 917.9 [937.9, 957.9]] **Yes**

Inspector Observations/Comments:

60. Will the proposed treatments be sufficient to reduce fire hazard and provide increased protection around structures and along roads considering the areas fire hazard severity rating, fire history, expected fire behavior, and resources at risk? [ref. 14 CCR § 917 [937, 957]] **Yes**

Inspector Observations/Comments:

61. If Timber Operations are proposed for the purposes of specifically reducing fire hazard or risk of ignition (fuelbreaks, biomass removal, Modified THP for Fuel Hazard Reduction), do the proposed hazard reduction methods: [ref. 14 CCR §§ 913.4 [933.4, 953.4(c)], & 917.2 [937.2, 957.2] - 917.7 [937.7, 957.7], & 1051.3-1051.7]

a. Include an appropriate description of vegetation, fuel treatment and timing? **Yes**

b. Support the creation of fire resilient conditions? **Yes**

c. Reduce the threat of wildfire by the reduction or spatial rearrangement of surface and ladder fuels? **Yes**

d. Provide thinning to reduce stocking levels and increase vertical and horizontal spacing? **Yes**

Inspector Observations/Comments:

62. Have snags over 20 ft. in height and 16 in. dbh, in the logging area identified to be felled, been evaluated that require felling per 14 CCR § 919.1 [939.1, 959.1](a)? **No**

Inspector Observations/Comments:

63. Additional comments or general observations regarding hazard reduction:

---

**ARCHAEOLOGY**

**NOTE: Archaeological information is confidential and not available to the public or other review agencies. This information is included in the Confidential Archaeological Addendum (CAA) in Section VI of the Plan for CAL FIRE review.**

64. Does the archaeological survey appear to be adequate and appropriate for the area to be harvested? [ref. 14 CCR § 1034(s)] **Yes**

Non-confidential Inspector Observations / Comments: **A separate archaeological PHI was conducted on April 22, 2026.**

---

**LISTED SPECIES**

65. Is the information and description on the presence and protection of known habitat or individuals of any listed or non-listed species which may be significantly impacted by the timber operation appropriate? [ref. 14 CCR § 1034(w)]: **Yes**

Inspector Observations/Comments:

66. Have any required CESA or FESA consultations occurred or have any been planned? **Yes**

Inspector Observations / Comments: **The plan includes MAMU consultation for THP 1-16-094 MEN. The consultation is in regard to protection measures for MAMU "Green Bridge" habitat area located near the proposed plan. This was observed during the PHI in which CDFW was present (see CDFW PHI report).**

67. Is the Plan located within the range of the Northern Spotted Owl (NSO)? [ref. 14 CCR § 919.9 [939.9]] **Yes**

Take avoidance option: "a" \_ "b" \_ "c" \_ "d" **x**

a. Do the NSO habitat definitions (USFWS or FPR) used in the Plan accurately reflect vegetation conditions? **Yes**

b. Are the Plan maps accurately depicting the proposed retained NSO habitat quantities? **Yes**

c. Do the protection measures for the NSO activity center(s) appear adequate and in conformance? **Yes**

d. Is the distribution and location information for the proposed or current NSO call point(s) adequate? **Yes**

Inspector Observations / Comments: **The THP includes pre and post-harvest habitat types for two activity centers (AC SON 0017 and AC SON 0082). The 2025 surveys state that no NSOs were detected. Specific to AC SON 0082, there was aggressive activity by barred owls when calling for NSOs during the survey.**

68. If Late Succession Forest Stands are present and proposed for harvesting, have they been adequately disclosed, and do observations support that harvesting would not significantly reduce the amount and distribution of these 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? [ref. 14 CCR § 919.16 [939.16, 959.16]] **NA**

Inspector Observations / Comments: **No late succession stands are proposed for harvesting**

69. Will the post-harvest Mark in the WLPZ create a stand that provides the following:

- a. Satisfy all the stocking and retention requirements outlined within 14 CCR § 916.9 [936.9, 956.9] for the protection and restoration of the beneficial functions of the Riparian Zone in watersheds with listed anadromous salmonids? **Yes**
- b. Encourage large wood recruitment that improves or maintains salmonid habitat? [14 CCR § 916.9, [936.9, 956.9](c)] **Yes**
- c. Retain the 13 largest conifer trees (live or dead) on each acre that encompasses the Core and Inner Zones? [14 CCR § 916.9, [936.9, 956.9](f)] **Yes**
- d. Maintain the minimum canopy retention requirements of 14 CCR § 916.9 [936.9, 956.9]? **Yes**

Inspector Observations / Comments: **During the PHI the retention of the 13 largest was observed and evaluated**

70. Estimated percentage of canopy cover in the Plan:

Zone	Pre-harvest	Post-harvest
Class I core zone	<b><u>100</u></b>	<b><u>80</u></b>
Class I inner zone	<b><u>100</u></b>	<b><u>80</u></b>
Class I outer zone	<b><u>100</u></b>	<b><u>80</u></b>
Class II core zone	<b><u>100</u></b>	<b><u>80</u></b>
Class II inner zone	<b><u>100</u></b>	<b><u>80</u></b>

71. Are protection measures adequate to prevent adverse effects to fish and wildlife resources on downstream flows from water drafting operations? [ref. 14 § CCR 923.7 [943.7, 963.7](l)] **Yes**

Inspector Observations / Comments: **Water drafting sites were evaluated during the PHI; see CDFW PHI report**

72. Are Timber Operations planned to protect, maintain, and contribute to the restoration of properly functioning salmonid habitat and listed salmonid species? [ref. 14 CCR § 916.9 [936.9, 956.9](a)] **Yes**

Inspector Observations / Comments:

73. Comments or general observations regarding listed species: **Swamp harebell was identified during the PHI on a skid trail within the Class I WLPZ. The RPF flagged around the harebell and it will be avoided during timber operations. See CAL FIRE PHI recommendations. Additionally, there are species discussed in Section IV of the THP whose habitat is present in the plan. These species need to be identified in Item 32 Section II of the plan. See CAL FIRE PHI recommendations.**

**CUMULATIVE IMPACTS  
(Optional for Modified THP)**

74. Does the Plan accurately list all known past, present, and reasonably foreseeable probable future projects within the assessment area, including other CEQA projects that have a similar effect on the environment? [ref. 14 CCR § 912.9 [932.9, 952.9](f) "Technical Rule Addendum No. 2"(d)] **Yes**
- Inspector Observations / Comments: **The previous past plan for portions of the proposed plan is THP 1-11-087 SON.**
75. Are the defined resource assessment areas appropriate and properly described? [ref. 14 CCR § 912.9(c) "Technical Rule Addendum No. 2 (b)"] **Yes**
- Inspector Observations / Comments:
76. Does the Plan adequately assess the potential for significant Cumulative Impacts upon resource values within the defined assessment areas? [ref. 14 CCR § 912.9(c) "Technical Rule Addendum No. 2 (c)"] **Yes**
- Inspector Observations / Comments:
77. How were the resource subjects evaluated and has a reasonable potential to cause or add to significant adverse Cumulative Impacts been adequately addressed ? [ref. 14 CCR § 912.9 "Appendix - Technical Rule Addendum No. 2 (c) Cumulative Impacts Assessment Guidelines"]
- (A) Watershed: **Cumulative watershed impacts appear to be appropriately assessed based upon the methodology described in Board Technical Rule Addendum Number 2.**
- (B) Soil Productivity: **Cumulative soil productivity impacts appear to be appropriately assessed based upon the methodology described in Board Technical Rule Addendum Number 2.**
- (C) Biological: **Cumulative biological impacts appear to be appropriately assessed based upon the methodology described in Board Technical Rule Addendum Number 2.**
- (D) Recreation: **Recreational impacts appear to be appropriately assessed based upon the methodology described in Board Technical Rule Addendum Number 2.**
- (E) Visual: **Visual impacts appear to be appropriately assessed based upon the methodology described in Board Technical Rule Addendum Number 2.**
- (F) Traffic: **Traffic impacts appear to be appropriately assessed based upon the methodology described in Board Technical Rule Addendum Number 2.**
- (G) Greenhouse Gases (GHG): **GHG impacts appear to be appropriately assessed based upon the methodology described in Board Technical Rule Addendum Number 2.**

(H) Wildfire Risk and Hazard: **Wildfire risk and hazard impacts appear to be appropriately assessed based upon the methodology described in Board Technical Rule Addendum Number 2.**

(I) Other:

78. 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: [ref. 14 CCR § 898]

- a. Has the RPF adequately assessed the proposed Timber Operation impacts that may combine with existing listed stressors to impair beneficial uses of waterbodies? **Yes**
- b. Does the Plan provide feasible mitigation measures to reduce any Impacts from the plan to a level of insignificance, and provide measures, insofar as feasible, to help attain water quality standards? **Yes**

Inspector Observations / Comments:

79. Additional comments or general observations regarding Cumulative Impacts:

---

#### OTHER COMMENTS

80. Additional comments or concerns not covered elsewhere in the report: **The previous THP 1-11-087 SON was also reviewed prior to the conclusion of the PHI. As a result, some recommendations have been made to this THP for consistency. See CAL FIRE PHI recommendations.**

81. Response to any Public Comment received prior to the conclusion of the PHI, if any: **No public comment letters have been received prior to this PHI report**

82. Are other agency recommendations in agreement with this report? **Yes**

If "No", explain: :

83. Additional comments or general observations to other and public concerns:

---

#### CAL FIRE PHI RECOMMENDATIONS

84. Plan conformance determination with the provisions of PRC 4582.75 & 14 CCR § 898.1:

**In conformance if recommendations are agreed upon**

85. Is a PHI map attached as part of the recommendation? **No**

86. Are supplemental materials provided? **No**

If "Yes", describe:

**NOTE: Any additional documentation to be uploaded to CalTREES or attached to this report by the Inspector or in coordination with Region Review office.**

---

**The RPF shall respond to each recommendation provided below and indicate the following:**

- (1) Whether or not they concur with the recommendation.**
- (2) Provide any necessary revisions or documentation to the Plan.**

No.	Review Agency	Recommendation
1	CAL FIRE	CF 1: Swamp harebell was found during the PHI. Please flag for avoidance, disclose and address in the THP under Item 32 in Sections II and IV. Also please include the swamp harebell maps which show the locations within the previous plan (THP 1-11-087 SON pages 59-60) into Section II of the proposed plan.
2	CAL FIRE	CF 2: As discussed during the PHI, please remove Map Point 30 from the THP.
3	CAL FIRE	CF 3: For the map points that discuss temporary bridge removal or culvert and fill removal, please revise the removal date from November 1st to October 15th. (map points 4, 12, 13, 16)
4	CAL FIRE	CF 4: Regarding NSO, activity center SON 0045 is located on the 0.7-mile buffer (THP page 350). The previous plan (THP 1-11-087 SON) included pre and post-harvest habitat for this AC. Has this AC moved since the previous plan? Please provide additional information as to why pre and post-harvest information is not included in the proposed plan regarding AC SON 0045.
5	CAL FIRE	CF 5: Existing skid trails proposed for use within the WLPZ are considered in-lieu practices. Please map the in-lieu skid trails on the THP maps in Section II by clearly identifying on the maps and legend. Also ensure that all existing skid trails proposed for use in the WLPZ are flagged prior to timber operations.
6	CAL FIRE	CF 6: Please revise the plan to disclose and mitigate the unstable area feature which has caused the appurtenant road to narrow below the treatment facility. Please send this revision, with mitigation measures, discussion, and map point that includes a new road point addressing an unstable area to CGS for their review prior to second review. CGS contact email is: (kevin.doherty@conservation.ca.gov)
7	CAL FIRE	CF 7: THP page 60 states that wet areas are identified and mapped and will have a 25-foot ELZ with a 50 percent canopy overstory retention standard within the ELZ. Wet areas were not flagged as seen during the PHI. Please ensure that the wet areas are flagged for the 25-foot ELZ prior to timber operations.
8	CAL FIRE	CF 8: Section IV identifies several wildlife (listed and non-listed) species where habitat is present in the plan. For non-listed species where habitat is present within the plan, please include under Item 32 Section II THP page 84. Also revise Item 32 page 84 to state "yes." Include all listed species discussed within Section IV into Section II Item 32 where habitat is present in the THP area.
9	CAL FIRE	CF 9: For LTO awareness, please include the pile burning and equipment maintenance measures on THP page 171 into Section II Item 31 or Item 38.
10	CAL FIRE	CF 10: THP page 256 includes measures for occupied nests. Please include this language under Item 32 Section II of the THP for enforcement purposes.
11	CAL FIRE	CF 11: The previous plan (THP 1-11-087 SON) included special instructions to the LTO under Item 38 Section II for maintenance of the canopy. For consistency with both plans, please include this language: Maintenance of the canopy is very important in this plan and the LTO shall stress the point to all of this fallers that they must make a special effort (while remaining safe) to fall the timber through existing holes in the canopy. Falling should occur in stages, with the areas furthest from the class I watercourse being operated in first so that the trees closest to the watercourse can be felled through the resulting holes in the canopy. Trees may be felled in whatever direction preserves the canopy best as long as they do not enter a watercourse."
12	CAL FIRE	CF 12: Under Item 38 Section II, please include a statement indicating that the plan submitter will notify the Department of the commencement of timber operations: Telephone: (707) 576-2344 Mail: 135 Ridgway Ave Santa Rosa CA 95401 Email: santarosareviewteam@fire.ca.gov

<b>No.</b>	<b>Review Agency</b>	<b>Recommendation</b>
13	CDFW	CDFW 1: Prior to 2nd review, the Map Point Table (MPT) shall be revised to state the culvert at Map Point (MP) 9 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state "yes" for 1600 notification for MP 9.
14	CDFW	CDFW 2: Prior to 2nd review, the Map Point Table (MPT) shall be revised to state that the culvert at Map Point (MP) 14 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state "yes" for 1600 notification for MP 14.
15	CDFW	CDFW 3: Prior to 2nd review, the Map Point Table (MPT) shall be revised to state the culvert at Map Point (MP) 17 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state "yes" for 1600 notification for MP 17.
16	CDFW	CDFW 4: Prior to 2nd review, the Map Point Table (MPT) shall be revised to state the iron pipe at Map Point (MP) 19 will be removed and replaced with an appropriate watercourse crossing, to be determined prior to 2nd review. CDFW recommends the MPT be revised to state "yes" for 1600 notification for MP 19.
17	CDFW	CDFW 5: Prior to 2nd review, Item 32(a) shall be revised to disclose listed fish species (i.e. coho salmon, chinook salmon, steelhead) presence and spawning habitat present within the areas of temporary bridge installation. CDFW recommends revision of Item 32(a) to include spawning habitat and fish presence surveys, and work period restrictions to avoid impacts to listed fish species during temporary bridge construction within the flowing Class I watercourse. CDFW recommends the Map Point Table be revised to include up to 2 heavy equipment passes each during construction and deconstruction.
18	CDFW	CDFW 6: Prior to 2nd review, Item 32(a) shall be revised to add northwestern pond turtle habitat information and protective measures.
19	CDFW	CDFW 7: Prior to 2nd review, 32(a) and Item 14(g) shall be revised to include Townsend's big-eared bat habitat information, protective measures, and felling instructions.
20	CDFW	CDFW 8: Prior to 2nd review, CDFW recommends Item 32(a) be revised to state "If California red-legged frog (CRLF) is found during operations, halt all operations within 200 feet and allow the CRLF to leave the work area of its own volition. If CRLF cannot be avoided during operations, contact CDFW for consultation regarding additional protection measures."
21	CDFW	CDFW 9: Prior to 2nd review, CDFW recommends Item 32(a) be revised to state "If a foothill yellow-legged frog (FYLF) is found during operations, halt all operations within 200 feet and allow the FYLF to leave the work area of its own volition. If FYLF cannot be avoided during operations, contact CDFW for consultation regarding additional protection measures."
22	CDFW	CDFW 10: Prior to 2nd review, CDFW recommends Item 32(a) be revised to state "If a California giant salamander is found during operations, halt all operations within 200 feet and allow the salamander to leave the work area of its own volition. If California giant salamanders cannot be avoided during operations, contact CDFW for a consultation regarding additional protection measures."
23	WQ	RWB 1: ELZs for all springs and wet areas shall be flagged
24	WQ	RWB 2: The wetland adjacent to the seasonal road between Map Points 18 and 19 shall be mapped and flagged to ensure compliance with the protection measures from Item 26 of the THP. If the road between the wetland and Map Point 19 is wet during operation, that shall be addressed by measures such as rocking, draining, or avoidance if a stable operating surface cannot be achieved.
25	WQ	RWB 3: The RPF shall identify the four undisclosed watercourse crossings that require repair or replacement on the appurtenant midslope road above the Mainstem Gualala River leading to the community waste treatment facility and propose appropriate treatment for each one.

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	CDFW	CDFW would like to evaluate the following: <ul style="list-style-type: none"> <li>• MAMU habitat</li> <li>• Sample harvest mark</li> <li>• Wildlife trees and marking, if applicable</li> <li>• Watercourse classifications and transitions</li> <li>• Drafting sites</li> <li>• Map Points 3, 4, 5, 6, 7, 10, 11, 12, 13, 15, 16, 20, 22, 28, 29, 30, 32, 33, 670, A, B</li> </ul>

**Inspector Answers:**

No.	Answer
1	

cc: RPF, PS

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