JACOBSZOON & ASSOCIATES, INC.
natural resource planning & management

July 7, 2026

DEPARTMENT OF FORESTRY & FIRE PROTECTION
135 Ridgway Avenue
Santa Rosa, CA 95401
Attn: Review Team

Re: THP 1-26-00076-SON "Little Pepperwood"

Dear Director,

Please consider the following to be RPF responses to First Review Questions for the above-mentioned THP as required by the Department.

CAL FIRE	1. Section II, Item 14.b. – Group Selection (page 12): 14 CCR § 913.2(a)(2) requires post-harvest stocking levels to be stated in the plan, not a range of all possible post-harvest stocking levels. Please revise the plan to indicate the percentage of the stand that will be harvested by Small Groups for compliance with 14 CCR § 913.2(a)(2). Please also consider including a statement that the Plan will be amended if this percentage changes. **RPF Response: 14 CCR 913.2(a)(2)(A) minimum stocking for Site III timberland is 75 sq ft/acre, as stated on page 12 for Selection and as implied in the rule citation provided for Group Selection. Page 12 has been revised to clarify the minimum stocking for Group Selection. As already stated on page 12, not more than one third (33.33%) of the stand shall be harvested as small group clearings. The RPF does not know exactly what percentage of the stand will be harvested as groups, if any, but it will not exceed 33.33%. See revised THP page 12.**
CAL FIRE	2. Section II, Item 24 (pages 36 & 37): The Plan proposes Deactivation of Temporary Roads, but it does not indicate that there will be any Temporary Road construction or reconstruction [ref. 14 CCR § 895.1: Reconstructed Roads & Reconstructed]. Please confirm that the existing Temporary Roads do not require substantial change in the original prism of the road or revise the Plan to disclose any proposed Logging Road reconstruction. **RPF Response: As indicated on pages 36 and 37 of the THP no road reconstruction is proposed. Existing temporary roads do not require reconstruction. See THP Item 24(j) and (k) and the map points table for more information.**
CAL FIRE	3. Section II & III, Item 27.j. (pages 56, & 116): The proposed in-lieu practice is not in compliance with 14 CCR § 913.2(a)(1), which requires trees to be Marked prior to felling operations. Please revise the Plan for compliance with 14 CCR § 913.2(a)(1). **RPF Response: Trees have been marked by the RPF or designee prior to felling operations. 14 CCR 916.6(a): Alternative prescriptions for the protection of Watercourses**

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	and lakes may be developed by the RPF or proposed by the Director on a site-specific basis provided the following conditions are complied with and the alternative prescriptions will achieve compliance with the standards set forth in 14 CCR §§ 916.3, 936.3, 956.3 and 916.4(b), 936.4(b), 956.4(b). The proposed in-lieu practice would allow the LTO to harvest unmarked trees in the WLPZ for safety reasons. See THP pages 116-117 for explanation and justification of this proposed practice. No revisions provided.
CAL FIRE	4. Section II, Geologic Features Map (page 82): Please revise the legend to indicate the meaning of the symbols used per 14 CCR § 1034(x). **RPF Response: Please see revised THP page 82.**
CAL FIRE	5. Section III, Alternatives Analysis (page 101): The alternatives analysis does not state the objectives that are referenced within the remaining alternatives. The project includes the Needs and Purpose but does not include the objectives in which the alternatives are analyzed against analysis. For example the plan states within the No Project Alternative, "it would not fulfill the purposes, needs, or objective". Please revise the plan to state the basic objectives of the project to allow for review of the alternatives considered. **RPF Response: See revised THP page 102 and new THP page 102.1.**
CAL FIRE	6. Section III, Alternative Silviculture – Clearcutting (page 103): Please revise the analysis to includes the reasoning to which Clearcutting may result in higher potential for significant impacts resulting from the Unstable Areas and the EHR. Also includes the reasoning for why Clearcutting is unfeasible and undesirable for the management detailing the basic objectives that would not be met from this alternative. **RPF Response: 14 CCR 913.1(a) precludes the evenaged regeneration of stands not meeting certain minimum ages unless the RPF demonstrates MSP pursuant to 14 CCR 913.11(a) or (b). THP stands evaluated for clearcutting do not meet the minimum stand age for Site III timberland (60 years). This THP is using 913.11(c) to demonstrate MSP, therefore clearcutting was rejected as an alternative silviculture. See revised THP page 103.**
CAL FIRE	7. Section III, Alternative Yarding (page 103): Please revise the analysis to includes which of the "previously listed factors" listed don't meet the objectives of the landowners and why these factors don't meet these objectives. Furthermore the analysis states that more landings would have to be created in order to Helicopter yard the proposed project. Please provide a brief analysis comparing the potential impacts for the current landings and yarding methods present to the potential impacts of creating a new landing. **RPF Response: See revised THP page 103 and new THP page 103.1.**
CAL FIRE	8. Section III, Plan Addendum to Item 14 – Variable Retention (pages 111 & 112): Within Item 14.b. the plan states that "No harvesting of trees located within retention aggregates is proposed.". However, the tables provided of pre/post-harvest composition do not appear to consider the proposed retention of aggregates. Please revise the plan to include the pre/ post-harvest composition for the entire unit for compliance or provide separate tables, pursuant to 14 CCR Section 1034(m)(1) for aggregate retention pre and post-harvest levels in consideration of proposed cable corridor harvesting. **RPF Response: 14 CCR 1034(m)(1) applies to THPs without an approved SYP and not utilizing 913.11(c) to demonstrate MSP. This THP demonstrates MSP through 913.11(c). Section III Item 14 Addendum has been revised to provide a more accurate estimation of post-harvest VR stand stocking including aggregate areas. See revised pages 111-113.**

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CAL FIRE	9. Section IV, Past Projects (page 123): One approved THP within the assessment area (1 -19-00050-MEN) and one proposed THP (01-26-00021-SON) does not appear to be included in the Cumulative Impacts Assessment. To support a complete evaluation consistent with TRA #2.D.1, please revise the Plan to identify and briefly describe all past projects and reasonably foreseeable probable future projects within the assessment area. In addition, please consider whether inclusion of these projects affects the cumulative impacts analysis and revise the assessment accordingly. **RPF Response: THP 1-19-00050-MEN is located within the Big Pepperwood Creek PWS and was included in the Cumulative Impacts Assessment on THP page 124. THP 1-26-00021-SON is not a current or past project and has only just been recommended for approval on June 25, 2026. THP Section IV has been revised to include 1-26-00021-SON as a future project. See revised THP pages 124 and 125.**
CAL FIRE	10. Section IV, Assessment Areas (page 128). Please briefly explain the rationale for the establishment of the Recreational and Visual Resources Assessment Area [ref. 14 CCR § TRA #2.B.]. **RPF Response: The rationale for these assessment areas follows the recommendations of Technical Rule Addendum No. 2 as stated in the THP. No revisions provided.**
CAL FIRE	11. Section IV, Watershed Impacts Assessment – Sediment Effects – Past Activities (pages 134-136): This discussion (as well as the first sentence of the conclusion on page 140) confuses the Impacts of Past Projects with the baseline physical conditions shaped by past land uses that are not Past Projects. Please revise the assessment to differentiate the Impacts associated with Past Projects from the existing conditions shaped by past land uses (e.g., logging prior to the passage of the FPA). **RPF Response: Sediment Effects – Past Activities, on pages 134-136, describes activities that have shaped the baseline environmental conditions of the assessment area which do not qualify as "Past Projects". The Sediment Effects - Past Projects (projects within the last 10 years) analysis begins on page 137. Please clarify how Past Activities have been confused with Past Projects in the Sediment Effects analysis and justify and support this request with relevant documentation [TRA #2].**
CAL FIRE	12. Section IV, Watershed Impacts Assessment – Sediment Effects – Quantitative Analysis of Past Projects (page 137): The assessment does not discuss the sediment Impacts of Past Projects. Please revise the assessment to describe the relevant Impacts of Past Projects within the assessment area (i.e., explain how Past Projects have changed the physical environmental conditions related to sediment [ref. TRA #2.A.1.a.]). Additionally, if there are any continuing significant adverse sediment Impacts from Past Projects within the assessment area, which may add to the sediment Impacts of the proposed Timber Operations, identify and describe the Past Projects' Impacts as well as the rates of recovery [ref. 14 CCR § 912.9(b) [932.9(b), 952.9(b)] & TRA #2.D.2.]. **RPF Response: There have been no reported, observable, significant sediment impacts resulting from Past Projects within the assessment area. To the contrary, Past Projects within the assessment area have resulted in cumulative net sediment saving (ref. completed road work reports in Sec V). See revised THP page 137.**
CAL FIRE	13. Section IV, Watershed Impacts Assessment – Sediment Effects – Reasonably Foreseeable Probable Future Projects (pages 137-139): The assessment describes Projects that are not described on pages 123 & 124 (e.g., road rehabilitation and fish habitat improvement). Considering that Reasonably Foreseeable Probable Future Projects are not speculative [ref. 14

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	CCR § 895.1], please revise the Cumulative Impacts assessment for clarity and consistency, and, as necessary, for compliance with TRA #2.D.1. **RPF Response: Future projects which may be viewed as speculative have been removed from the analysis. See revised THP pages 137-139.**
CAL FIRE	14. Section IV, Watershed Assessment Sediment Effect – Proposed THP – Road Improvements (page 140): The plan states that no new road construction is proposed, however Item 24.a. in Section II identifies new seasonal road construction. Please revise the plan for consistency. Additionally, please revise this subsection to further substantiate the broad claims within the analysis with site specific instances and clear descriptions on why these site-specific instances support the claim. For example, "Maintenance, like adding rock armoring or cleaning the existing infrastructure secures bare mineral soil to the site and allows for proper functioning of facilities" How was the bare mineral soil secured? Why was this practice effective enough to control soil erosion? What do does proper function mean and why is that function effective enough to control soil erosion? **RPF Response: See revised THP page 139.**
CAL FIRE	15. Section IV, Watershed Assessment Sediment Effect – Proposed THP – Yarding Effects & Unstable Features (page 139 & 140): The plan states that "Section III of the THP explains why this exception practice has been proposed and why it will provide equal or greater protection to the environment than the standard rule." Please revise the plan to include this in the Cumulative Impacts Assessment. **RPF Response: The information requested is already stated in the final four sentences of the paragraph quoted from above. 14 CCR 914.2(d) provides that the RPF may develop measures to minimize the effects of ground-based yarding on slope instability with an explanation and justification of the proposed practice. This discussion belongs in the Addendum to Section II Items (Section III). It is unclear how repeating a Section III discussion in Section IV has any material effect on CAL FIRE's ability to review the Cumulative Impacts Assessment. Please justify and support this request with relevant documentation [TRA #2].**
CAL FIRE	16. Section IV, Watershed Assessment Sediment Effect – Proposed THP – Yarding Effects & Unstable Features (page 139 & 140): The assessment is conclusory and does not disclose or discuss the potential Effects (direct or indirect physical Environmental changes caused by the proposed Project) [ref. 14 CCR §§ 15358 & 15360] from the proposed Tractor Operations on unstable areas or the proposed Tractor Operations within slopes greater than 65%, nor does it explain why these Effects are less than significant [ref. 14 CCR § 895.1: Significant Adverse Impact on the Environment]. Please revise the assessment to provide site-specific analysis of the potential Effects from the proposed Tractor Operations on unstable areas and the proposed Tractor Operations within the WLPZ, and substantiate the conclusion of the assessment (i.e., explain how site-specific measures proposed under the Plan and application of the Rules will prevent significant sedimentation and instability from the proposed Tractor Operations on unstable area and the proposed Tractor Operations within slope greater 65%). **RPF Response: There are no tractor operations proposed in the WLPZ. See revised THP page 140 and new THP page 140.1.**
CAL FIRE	17. Section IV, Watershed Impacts Assessment – Sediment Effects Conclusion (page 140): The conclusion is not supported by Substantial Evidence. Please revise the conclusion to describe the relevant potential Cumulative Impacts of the proposed Project, Past Projects and Reasonably

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	Foreseeable Probable Future Projects within the assessment area (i.e., explain how the potential Impacts of the proposed Timber Operations could combine with the Impacts of Past Projects and Reasonably Foreseeable Probable Future Projects to change the physical environmental conditions related to each resource subject), and explain why these Cumulative Impacts are less than significant (i.e., explain how the potential Impacts do not have a reasonable potential to join with the Impacts of any other Project to cause, add to, or constitute any significant adverse Cumulative Impacts related to each resource subject). **RPF Response: See revised THP page 140 and new THP page 140.1.**
CAL FIRE	18. Section IV, Watershed Assessment Water Temperature Effect – Proposed THP (page 143): The assessment for the proposed Water Temperature Effects doesn't address the proposed exception of removing unmarked trees within the WLPZ. Removing trees within the WLPZ can increase solar radiation exposure to the surface of a watercourse and increase water temperature. Please revise the assessment to analysis for the potential impacts of the proposed exception and how the effects of removing unmarked trees is not significant to cause cumulative impacts. **RPF Response: See revised THP pages 143 and 144 and new THP page 144.1.**
CAL FIRE	19. Section IV, Watershed Resources and Soil Productivity Impacts Assessments: The assessments discuss the proposed exceptions and measures intended to avoid Significant Adverse Impacts. However, to further support the analysis, please provide additional discussion of the potential Impacts (direct or indirect physical changes in the Environment caused by the proposed Timber Operations [ref. 14 CCR § 15358]) from the proposed exceptions: Tractor Operations on Unstable Areas, slopes steeper than 65%, and slopes steeper than 50% with high EHR. Please revise the assessments to provide a more thorough description of the potential Effects from these Timber Operations, and substantiate the conclusions of each assessment (i.e., explain how site-specific measures proposed under the Plan and application of the Rules will prevent reasonably potential Significant Adverse Impacts on the Environment) [ref. 14 CCR §§ 897(b)(3), 914.2(d) & (f); TRA #2.A.1.a. & B.2.]. For example, please revise both assessments to explicitly identify and describe the following: • The potential direct/primary Impacts (e.g., soil disturbance, displacement of organic matter, altered local surface drainage patterns, exposure of bare soil, etc.), • the potential indirect/secondary Impacts (e.g., concentrated surface runoff resulting in accelerated surface erosion, mass wasting, reductions in site productivity, sediment transport, etc.), • the applicable requirements of the Rules, and • the site-specific treatments to implement these requirements; and explain • how these required treatments will minimize and/or prevent potentially significant secondary Effects, and • why these required treatments are sufficient to avoid Significant Adverse Impact on the Environment. **RPF Response: See RPF responses above. Please justify and support this request with relevant documentation [TRA #2].**
CAL FIRE	20. Section IV, Soil Productivity Assessment (pages 178-184) The assessments currently provide a vague overview of the proposed timber operations where additional site-specific analysis would clarify and support the conclusions reached. While adherence to the Forest Practice Rules is an important consideration, it does not by itself establish that potential impacts would be less than significant. We respectfully request that the assessments be revised to more clearly describe the analytical link between the baseline conditions, how past project have shifting those baseline conditions and how the proposed timber operations such as harvesting within Unstable area, including the proposed in lieu practice of heavy equipment within the

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	WLPZ will not have significant adverse impacts to the baseline conditions [ref. 14 CCR § 897(b)(3)]. **RPF Response: There is no in-lieu practice proposing heavy equipment in the WLPZ in this THP. Please justify and support this request with relevant documentation [TRA #2]. No revisions provided.**
CAL FIRE	21. Section IV, Visual Resource Assessment – Proposed THP (page 216): The assessment for the impacts of visual resources states that uneven aged silviculture was chosen to reflect the concerns of the public. However this assessment does not includes the analysis to the proposed use of the alternative prescription aggregate variable retention where the majority of basal area will be removed creating larger openings that described within this assessment. Please revise the visual resources assessment to accurately describe all proposed silviculture and the effects to the visual aesthetics of the proposed silviculture, and why these effects will be not significantly impactful to the public and the visual resources in the area. **RPF Response: See revised THP page 216.**
CAL FIRE	22. Section V, Past, Present and Future Projects in the Big Pepperwood Creek PWS (page 233): On page 124, the Cumulative Impacts assessment identifies a Reasonably Foreseeable Probable Future Project on land owned/controlled by the Timberland owner; however, its location and boundaries are not mapped. Please revise the Plan for compliance with TRA #2.D.1. **RPF Response: As stated on page 125 the size, location, and silvicultural/yarding methods of this future project are unknown. No revisions provided.**
ARCH	23. A confidential ARCH RTQ report has been prepared based on review of THP Section VI: CAA. **RPF Response: See RPF responses to Arch questions in a separate confidential letter.**
CDFW	24. Please describe how the Watercourse Transition Line was established on Big Pepperwood Creek where it is adjacent to THP Units: GSEL2, VR3 and VR2. Please clarify the following: - Are there any Channel Migration Zones or Flood prone Areas present between the Creek and base of the hillslope? - If so, where? - What is the site class (1, 2 or 3) in the WLPZs? - Are there any unconfined watercourse channel area present adjacent to these units, where there's a watercourse with a valley to channel width ratio at bankfull stage of 4 or greater. **RPF Response: Big Pepperwood Creek is a confined channel in all instances where it runs adjacent to the THP. The WTL was established per 14 CCR 895.1. In all cases there was a clearly defined bank.**
CDFW	25. Please describe how the Watercourse Transition Line was established on Big Pepperwood Creek where it is adjacent to THP Units: VR4, VR5 and VR6? Please clarify the following: - Are there any Channel Migration Zones or Flood prone Areas present between the Creek and base of the hillslope? - If so, where? - What is the site class (1, 2 or 3) in the WLPZs? - Are there any unconfined watercourse channel area present adjacent to these units, where there's a watercourse with a valley to channel width ratio at bankfull stage of 4 or greater.

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	RPF Response: Big Pepperwood Creek is not adjacent to the referenced THP units. As noted in Section II, Item 26, the THP includes an approximately 1-acre flood-prone area along Little Pepperwood Creek (see attached map). No channel migration zone is present within the floodplain. The outer edge of the flood-prone area was established at the break in slope between the hillslope and floodplain and coincides with the presence of hydric vegetation, including horsetail. The remainder of Little Pepperwood Creek exhibits a confined channel.
CDFW	26. Please describe what prevents the watercourse adjacent to Unit VR1 from being a Class I watercourse from the unit down to the confluence with Big Pepperwood Creek? Is there a barrier present? If so, please characterize the barrier and why it is a barrier to fish migration for all life stages of fish. If based on stream gradient starting at the confluence with Big Pepperwood Creek, what is the approximate stream gradient from the confluence and approximatly1,000 feet upstream. **RPF Response: The watercourse classification of Class II is consistent with the intrinsic potential model for Northern California steelhead. There are no known fish barriers downstream of the THP. Stream gradient from the confluence with Big Pepperwood Creek to a point 1,000 feet upstream is approximately 16% mean continuous slope. No suitable habitat for any life stages of fish was observed within VR Unit 1 of the THP.**
CDFW	27. Regarding the MAMU habitat near the 'Green Bridge' at the confluence of North Fork Gualala: Please revise the plan to include protection measures, such as those in the MAMU consultation 16-R1-CTP-041-MAMU in Section II, Item 32, to avoid potential impacts to the Marbled Murrelet (MAMU). Currently, the THP does not appear to include approved surveys indicating probable absence of MAMU at the Green Bridge Habitat Area, or MAMU protection measures. According to 14 CCR 919.11, the THP requires consultation with CDFW to determine, in short, if the THP might result in potential "take" of MAMU. While earlier survey efforts resulted in no MAMU detections, the 2003 Pacific Seabird Group protocols suggest re-surveying potential habitat after 5 years, or more, to support probable absence. Multiple offshore MAMU survey detections at the mouth of the Gualala (including potential juveniles) within the nesting season infer potential nesting may be occurring in suitable inland habitats within 28 km of the coast. In order to provide the appropriate protection measures for MAMU nesting habitat adjacent to the THP operations (including appurtenant road(s)), CDFW recommends the THP include protection measures such as those in CDFW consultation 16-R1-CTP-041-MAMU, entitled: California Department of Fish and Wildlife (CDFW) Pre-Harvest Inspection (PHI) Report for Timber Harvest Plan (THP) 1-16-094 MEN "Plum". **RPF Response: See revised THP pages 66 and 68. To preserve page sequencing pages 67 has also been revised, and a new THP page, 68.1, has been added. A copy of the MAMU consultation 16-R1-CTP-041-MAMU has been added to the end of Section V as new THP pages 537.1-537.5.**
CDFW	28. Section II of the THP (page 68) states that botanical surveys are forthcoming; however, Section V discloses that a focused survey was completed on May 20, 2026. Please revise the THP to clarify whether additional surveys are anticipated. If so, revise the THP to include a commitment that all survey details (including surveyor name and qualifications, survey dates, maps of survey routes, and a resultant floristic list) will be amended into the THP prior to operations. **RPF Response: See revised THP page 68.**
CDFW	29. The rare plant assessment in Section V (page 386) identifies species for which timber operation impacts were ruled out, either because suitable habitat does not occur within the THP

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	area or because the species are assumed to be protected by virtue of occurring within a WLPZ. Prior to PHI, please revise the table on page 387 to include the habitat basis for each species' regarding this determination. **RPF Response: See revised THP pages 386 and 387 and new THP page 387.1.**
GIS	30. Section II, Item 24j, page 26: 2188 feet of temporary road are proposed to be deactivated, but no temporary roads are proposed for construction in 24a. Per the definition in 14 CCR 895.1, temporary roads must be deactivated or abandoned upon completion of use, and as such, temporary roads should not exist prior to the start of a THP unless they are already abandoned or deactivated. Please clarify the current and planned status of this road. **RPF Response: The existing temporary road was deactivated after the last entry. It will now be reactivated and used for timber operations and deactivated again following use. No revisions provided.**
GIS	31. Both springs and seeps are marked in Item 26a, but only springs are shown on the Section II maps. Please adjust for clarity and consistency. **RPF Response: Seeps do not require mapping therefore they have not been shown on Section II maps. No revisions provided.**
WQ	32. North Coast RWQCB Waste Discharge Information for RPF: Discharges, or potential discharges of waste from timber harvesting on private lands within the North Coast Region must be permitted under either Waste Discharge Requirements. Following plan approval by CAL FIRE, and prior to beginning timber harvest activities, landowners must apply for coverage under the General WDRs (Order No. R1-2004-0030) or an individual WDR, or in some cases a Watershed-wide WDR. Copies of the GWDR, as well as other timber related information, can be found at the following web address: http://www.waterboards.ca.gov/northcoast/water_issues/programs/forest_activities/ **RPF Response: Noted.**
N/A	**It has come to my attention that a map point was omitted from the submission copy of the THP. Map Point 14.1 has been added to the Map Points table and THP maps in Section II. The ECP table in Section V has also been revised accordingly. Please see revised THP pages 85 and 238, and new THP page 81.1.**

Sincerely,

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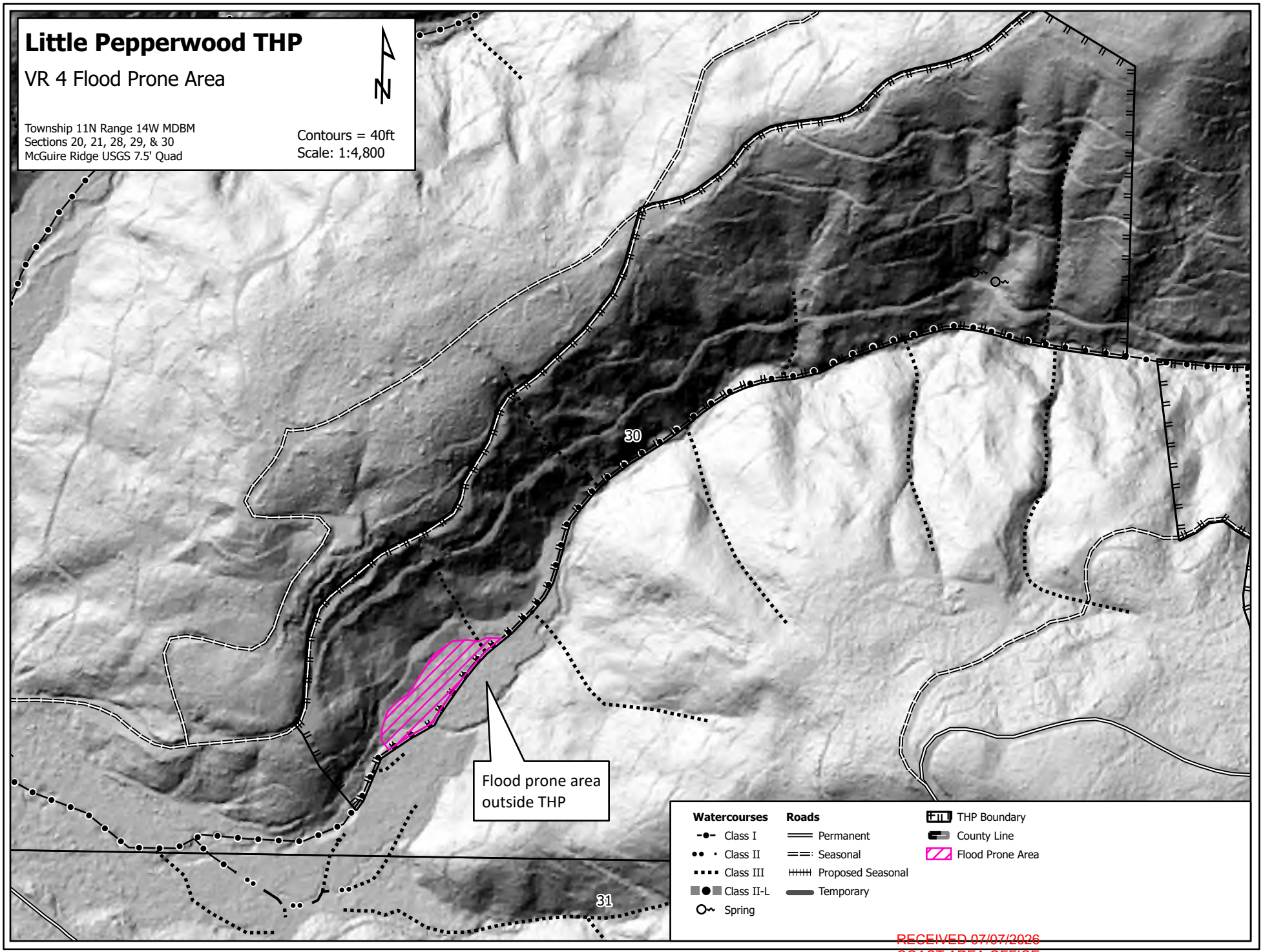

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Provide all proposed post-harvest stocking levels. If Site Class varies, then state the post-harvest stocking standard to be met by each applicable Site Class.
NOTE: Location of boundaries of timber-site classes needed for the determination of stocking standards to be applied, down to 20-acres minimum or as specified in district rules shall be mapped per 14 CCR § 1034(x)(12).

b. Post-Harvest Stocking to be Met at the Completion of Operations
[ref. 14 CCR §§ 913.2 [933.2, 953.2](a)(2) & 913.3 [933.3, 953.3](a)(1)]

Silvicultural Prescription	Site Class (I, II, III, IV, V)	Post-harvest stocking standard
Selection (including WLPZ)	III	On Site III lands at least 75 square feet per acre of basal area shall be retained consisting of the best phenotypes available on site.
Group Selection	III	1. At least two thirds of the stocked plots must meet the Basal Area Stocking Standards of 14 CCR § 913.2(a)(2)(A), 75 sq ft/acre. 2. Not more than one third of the stocked plots may meet Stocking Standards utilizing the standards of 14 CCR § 912.7(b)(1), [932.7(b)(1); 952.7(b)(1)]. The minimum required age of the trees utilized under these standards shall be ten (10) years old, and shall be based on the percentage of the Plan area harvested by this method in Small Group clearings as described in the table below:

Percentage of stand harvested as small group clearings	Minimum age of trees utilizing the standards of 14 CCR § 912.7(b)(1)
20.0% or less	10
20.1-22%	11
22.1-24%	12
24.1-26%	13
26.1-28%	14
28.1-30%	15
30.1-32%	16
32.1-33.33%	17

3. An RPF or Supervised Designee may offset a certain number of plots per forty (40) plots where those plot centers are initially placed within Small Group clearings created during the current harvest. The maximum number of offset plots shall be based on the percentage of the Plan area harvested by this method in Small Group clearings as described in the table below. Unless substantially damaged by fire, the RPF or supervised designee shall not exclude Small Group clearings created by previous timber harvesting from the stocking survey.

Percentage of stand harvested as small group clearings	Maximum number of allowable offset plots
20.0% or less	8
20.1-22.9%	9
23.0-24.9%	10
25.0-27.9%	11
28.0-29.9%	12
30.0-33.3%	13

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				If golden eagles are observed nesting in the THP area halt all operations, other than standard logging road use for egress, within 333 feet of the suspected nesting site and notify the Plan Submitter. Do not recommence operations until appropriate measures have been taken by the Plan Submitter and approved by The Department of Fish and Wildlife and Department of Forestry and Fire Protection.
Marbled Murrelet (Brachyramphus marmoratus)	**Threatened**	**Endangered**	**Yes**	**The nearest known occurrence of marbled murrelet is approximately 9 miles southeast of the plan area. Potential nesting habitat exists within the BAA but not the THP. <u>There is a small patch of potentially suitable mamu nesting habitat approximately 1.8 miles northwest of the THP (Green Bridge Habitat Area). See protection measures for this site below. See also Sec. V for a copy of the original CDFW Consultation 16-R1-CTP-041-MAMU.</u> Should marbled murrelets be observed nesting within the THP area during the period of March 24th through September 15th, halt operations within 825 feet of the suspected nest site (other than one time logging road use for egress) and notify the Plan Submitter. Operations within 825 feet shall not recommence until appropriate measures have been incorporated into the THP by the Plan Submitter, such measures shall be determined through consultation with DFG and approved by The Department of Fish and Wildlife and Department of Forestry and Fire Protection.**
Coho Salmon – Central California Coast ESU (Oncorhynchus kisutch pop. 4)	**Endangered**	**Endangered**		**Suitable habitat exists within the BAA. There are two Class I watercourses adjacent to the THP area. Protection measures for aquatic wildlife species have been incorporated into the silvicultural methods in Item #14, soil stabilization measures in Item #18, watercourse protection measures included in Item #26, and other provisions of the THP.**
Steelhead – Northern California DPS (Oncorhynchus mykiss irideus pop. 49)	**Threatened**	**CDFW: SSC**		**Suitable habitat exists within the BAA. There are two Class I watercourses adjacent to the THP area. Protection measures for aquatic wildlife species have been incorporated into the silvicultural methods in Item #14, soil stabilization measures in Item #18, watercourse protection measures included in Item #26, and other provisions of the THP.**
California Red-Legged Frog (Rana draytonii)	**Threatened**	**CDFW: SSC**		**There are no known occurrences of this species within the THP or BAA. The nearest occurrence is approximately 2.3 miles northeast of the THP boundary in Stewart Creek. See protection measures below. These protection measures also afford adequate protection to non-listed amphibians with potential to occur within the project area.**
Crotch's Bumble Bee		**Candidate**		**There is potential habitat for Crotch's bumble bee within the THP area. There are no known occurrences of this species within the THP, and none were observed during THP layout. If a nest is observed, stop operations around the nest and contact the Plan Submitter who shall contact CDFW to develop protection measures which will be amended into the plan.**
Western Bumble Bee		**Candidate**		**There is potential habitat for western bumble bee within the THP area. There are no known occurrences of this species within the THP, and none were observed during THP layout. If a nest is observed, stop operations around the nest and contact the Plan Submitter who shall contact CDFW to develop protection measures which will be amended into the plan.**

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Suckley's Cuckoo Bumble Bee		**Candidate**		**There is potential habitat for Suckley's cuckoo bumble bee within the THP area. There are no known occurrences of this species within the THP, and none were observed during THP layout. If a nest is observed, stop operations around the nest and contact the Plan Submitter who shall contact CDFW to develop protection measures which will be amended into the plan.**
Behren's Silverspot Butterfly (Speyeria zerene behrensii)	**Endangered**			**No known occurrences of this species within the THP area. If observed within the THP area the Plan Submitter shall contact CDFW to develop protection measures which will be amended into the plan.**
Monarch – California overwintering population (Danaus plexippus plexippus pop. 1)	**Candidate**			**No known occurrences of this species within the THP area. If observed within the THP area the Plan Submitter shall contact CDFW to develop protection measures which will be amended into the plan.**

<u>California Red-legged Frog (CRLF) Protection Measures:</u>
CRLF will be protected by adhering to USF&WS Scenario III and Scenario IV for the wet and dry weather periods respectively (see below for specifics). The wet weather period is defined as starting with the first frontal rain system depositing a minimum of 0.25 inches of rain after October 15 and ends on April 15. (Note to LTO - These wet and dry periods very slightly from the wet weather periods described elsewhere in the plan so make sure that you understand the differences and the restrictions involved.) The dry weather period starts April 16 and ends with the first frontal rain system which deposits a minimum of 0.25 inches of rain.

Scenario III mitigations apply during the CRLF wet weather period as defined above.
Scenario III: Suitable habitat within 2 miles of harvest units or in units and harvest activities planned within 300 feet of suitable habitat during the wet season (applies to winter period falling and to any other activities that are allowed elsewhere in the plan between April 1 and April 15th and between the first ¼ inch rain after October 15th and before Nov 15th).

No take is estimated only under the following conditions:
i. During the wet weather period for Class III watercourse, when dry, maintain a 30-foot no cut buffer, trees felled away from watercourse
ii. During the wet weather period for Class II watercourse and intermittent ponds/wetlands that meet the definition of suitable habitat, where water is present, 300 foot no cut buffer; where dry, 30-foot no cut buffer, no equipment within 75 feet of annual high water mark, trees felled away from suitable habitat.
iii. During the wet weather period for Class I watercourse and permanent ponds/wetlands that meet the definition of suitable habitat - no cutting and no equipment within 300 feet of this suitable habitat.

Scenario IV mitigations that apply during the CRLF dry weather period as defined above.
Scenario IV: Suitable habitat within 2 miles of harvest units or in units and harvest activities planned within 300 feet of suitable habitat during the dry season.
i. All suitable habitats must maintain a 30-foot no-cut buffer; no equipment within the no-cut buffer; trees felled away from suitable habitat.

Under both of the above scenarios, the following operational conditions must also be included:
1) Pile burning must be outside the 300-foot buffer of suitable habitat
2) No herbicide use allowed within 300 feet of suitable habitat except for direct application to stumps
3) Roads and landings, if constructed, must be at least 300 feet from suitable habitat, and construction must occur in the dry season.
4) Water drafting from suitable habitat (for dust abatement) must be done with a hose placed in a bucket in a deep pool. The bucket must be covered by < 1 inch mesh, and the mouth of the hose must be covered by 1/4 inch mesh.

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No known occurrences of this species occur within the project area or assessment area. If a CRLF is observed operations shall cease within 200 feet (with the exception of road utilization) and CDFW shall be contacted as soon as possible to develop further protection measures.

Green Bridge MAMU Habitat Protection Measures:

1. No vegetation modification shall occur within 300 feet of the Green Bridge Habitat Area (see Figure A-1).

2. Based on the ambient noise level Moderate7, during the MAMU breeding season (March 23 through September 15) take avoidance shall include the following measures:

a. Anticipated project generated sounds exceeding 90 dBs or a "Very High"9 sound level shall not occur within 330 feet of the Green Bridge Habitat Area during the MAMU breeding season (March 24 through September 15);

b. Anticipated project generated sounds exceeding 90 dBs or a "Very High"9 sound level shall not occur within 825 feet of the Green Bridge Habitat Area during the Dawn Period (between 2 hours before sun rise and 2 hours after sunrise) and Dusk Period (between 2 hours before sunset and 2 hours after sunset) within the MAMU breeding season (March 24 through September 15);

c. Anticipated project generated sounds exceeding 100 dBs or a "Extreme" 9 sound level shall not occur within 825 feet of the Green Bridge Habitat Area during the MAMU breeding season (March 24 through September 15);

d. Anticipated project generated sounds exceeding 100 dBs or a "Extreme" sound level shall not occur within1 ,320 feet of the Green Bridge Habitat Area during the Dawn Period (between 2 hours before sun rise and 2 hours after sunrise) and Dusk Period (between 2 hours before sunset and 2 hours after sunset) within the MAMU breeding season (March 24 through September 15).

3. Along the public road and all appurtenant roads within 825 feet of the Green Bridge Habitat Area (see Figure A-2), THP related vehicles shall adhere to the following during the MAMU nesting season (March 24 to September 15):

a. Do not exceed 15 miles per hour within 2 hours prior to dawn and 2 hours after dusk;

b. Restrict stopping to the minimum required in order to safely use public and connecting appurtenant roads; and

c. rohibit log load band tightening.

Year-round protection measures:

4. Workers shall not leave food waste or personal trash within 1,320 feet of the Green Bridge Habitat Area.

5. In the event that a marbled murrelet is found grounded during any activity associated with the THP, CDFW shall be contacted immediately.

Plants:

A rare plant survey report can be found in Section V of the THP. No rare or listed plants were observed within the THP area. If a listed plant is found during timber operations CDFW will be contacted verbally or in writing and given 10 working days to respond to the contact. If there is no response from CDFW, then the following default protection measures shall be enforced:

- **A 50-foot no-operations buffer, (except for vehicles traversing existing roads), shall be established around the perimeter of the rare plant(s) until a site-specific alternative buffer is established, if needed, after consultation with CDFW.**
- **If a consultation occurs within the 10-working day period with CDFW, then mitigation measures will be amended into the plan as enforceable provisions of the THP. The mitigation measures may be amended into the plan as a minor amendment.**

Non-Listed Species Impacts	
b.[X]Yes [☐]No	Are there any non-listed species which may be significantly impacted by the Plan? [ref. 14 CCR § 1034(w)] **If "Yes" identify the species and the provisions for the protection of the species.**

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Species	Protection measures
Townsend's Big-eared Bat (Corynorhinus townsendii) (CDFW SSC)	Suitable maternity and/or hibernaculum colony roost habitats include abandoned mines, caves, abandoned anthropogenic structures, and large (42" dbh) residual trees (conifer or hardwood) with a basal hollow opening of 2 square feet (with a minimum dimension opening of 2 feet); hereinafter referred to as a "legacy tree". Suitable habitat was not observed during THP layout. If any legacy trees are observed during timber operations the LTO shall retain the tree and surrounding screen trees.
American Badger (Taxidea taxus) (CDFW SSC)	None. There are no known occurrences with the THP or BAA. Timber operations are not anticipated to result in an adverse impact to this species.
Sonoma Tree Vole (Arborimus pomo) (CDFW SSC)	There is one known occurrence within the BAA adjacent to the THP. To protect potential tree vole nests the faller shall look up the tree prior to felling to look for nests. If a suspected tree vole nest structure is observed, the LTO shall retain the nest tree and surrounding screen trees.
Foothill Yellow-Legged Frog – North Coast DPS (CDFW SSC)	There are no known occurrences of this species within the THP or BAA. The nearest positive observation is 1 mile east of the THP. See CRLF protection measures above.
Pacific Tailed Frog (Ascaphus truei) (CDFW SSC)	There are no known occurrences of this species within the THP or BAA. WLPZ protection measures incorporated into Item 26 of the THP will adequately protect this species and its habitat.
Northwestern Pond Turtle (Actinemys marmorata) (CDFW SSC)	There are no known occurrences of this species within the THP or BAA. WLPZ protection measures incorporated into Item 26 of the THP will adequately protect this species and its habitat.
California Giant Salamander (Dicamptodon ensatus) (CDFW SSC)	There are no known occurrences of this species within the THP or BAA. WLPZ protection measures incorporated into Item 26 of the THP will adequately protect this species and its habitat.
Red-Bellied Newt (Taricha rivularis) (CDFW SSC)	There are no known occurrences of this species within the THP or BAA. WLPZ protection measures incorporated into Item 26 of the THP will adequately protect this species and its habitat.

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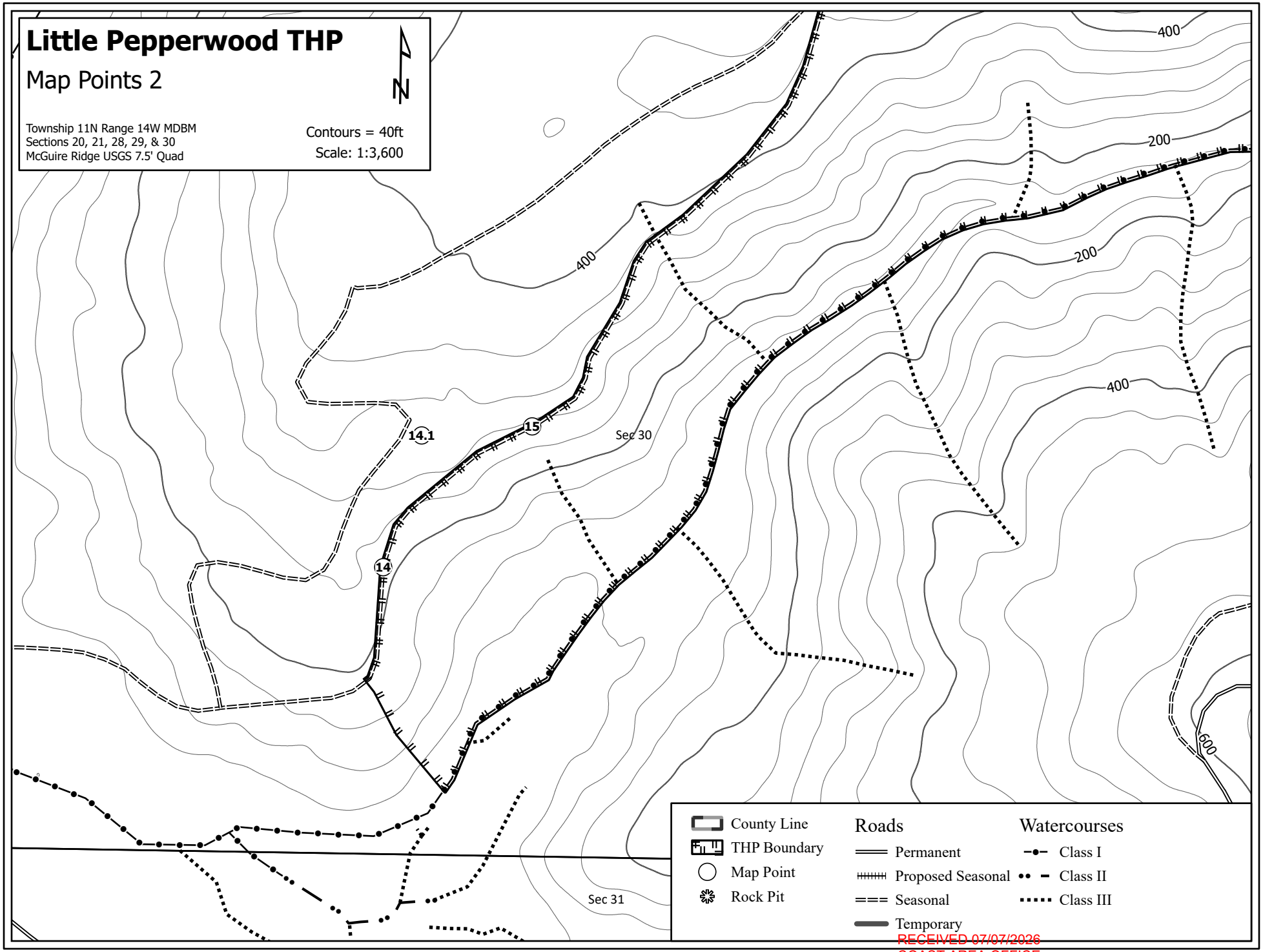

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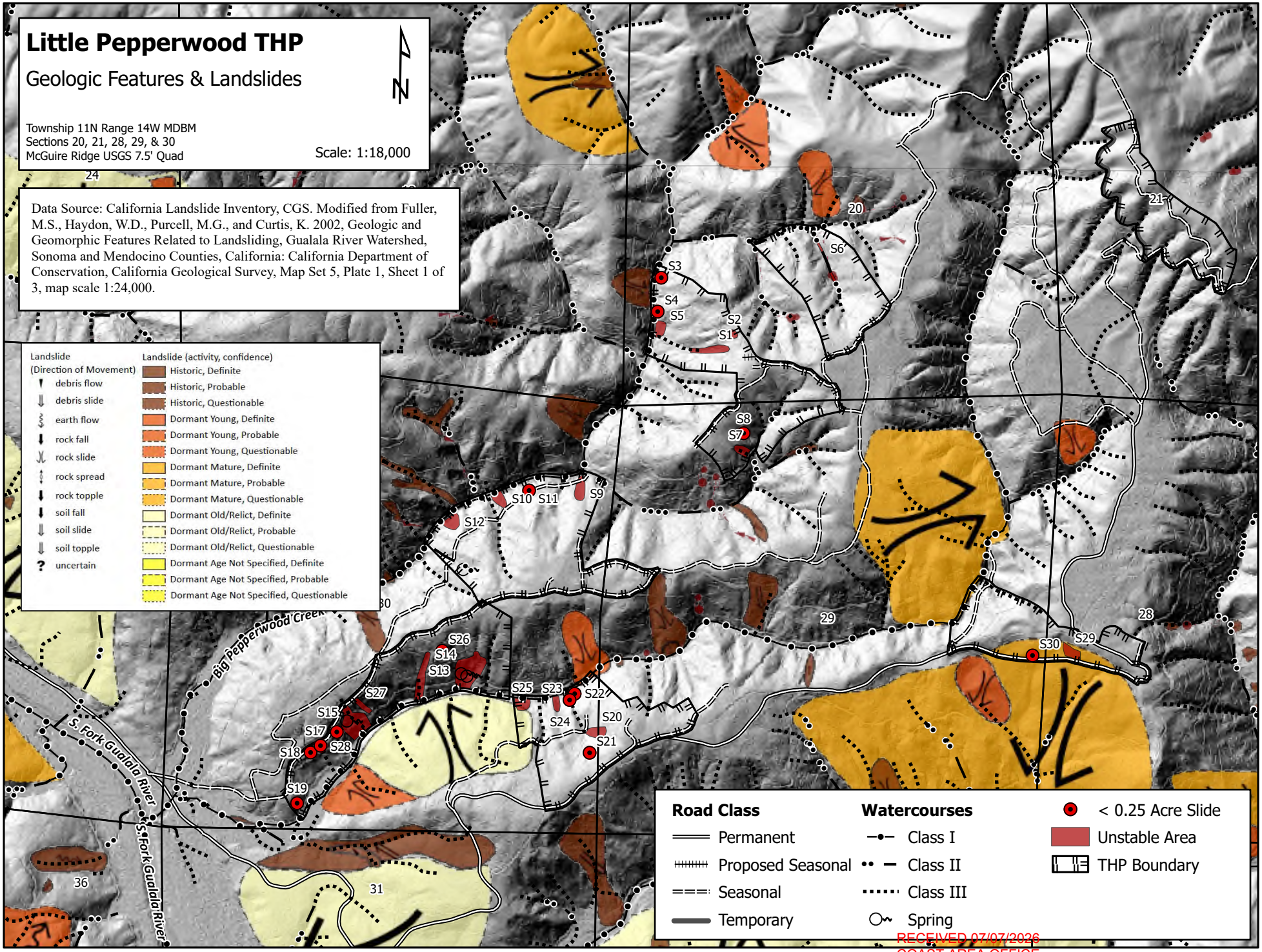

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Section II Map Point Table

Map Point #	Type	Diameter	Material	Description	Treatment	SES	ECP	1600	Trt Order
1	Road Point	N/A	N/A	Deactivated temporary road crosses a swale at this location. The fillslope is failing and has downdropped for approximately 100', narrowing road by 2-3'. A small bank slump north of the swale has choked the road prism.	Cut into the bank to regain adequate road width. Treat the bank slump per Item 24 standards and do not sidecast or remove vegetation from fillslope. Construct a dip thru the swale to drain road and install a waterbar south of the swale crossing as indicated with orange flagging.	Y	Y	N	H
2	Temp Crossing	N/A	N/A	Existing temporary road crosses a Class III watercourse at this location. The prior crossing structure has been removed and banks pulled back after the last entry.	Install a temporary 24" culvert or Spittler crossing with flex pipe, to be removed and stabilized prior to the first winter period following use per THP Items 18 & 23-26 and typical diagrams.	Y	Y	Y	H
3	Perm Crossing	N/A	N/A	Existing seasonal road crosses a Class III watercourse at this location. The existing crossing structure is an unimproved dip (unrocked). Minor gullying has occurred in the fillslope which will worsen if untreated.	Construct a rock armored fill apron according to typical diagrams using 12"+ d50 riprap between the redwood clump and small tanoak growing in the fillslope, approximately 20' (H) by 15' (SD). Begin keying in rock at the orange flag in the channel.	Y	Y	Y	M
4	Perm Crossing	18"	CMP	Existing seasonal road crosses a Class III with spring. The existing crossing structure is a 18" CMP with a 15' downspout. The culvert and downspout have rusted thru and are no longer functioning properly.	Remove the existing crossing structure and replace with a minimum 30" culvert set to stream grade per typical diagrams and armor outfall with 12"+ d50 riprap. Install a waterbar approx. 100' up grade west of the crossing as indicated with orange flagging.	Y	Y	Y	M
4.1	Road Point	N/A	N/A	Gully erosion forming in fillslope of permanent road due to concentrated runoff at existing rolling dip. The road segment is underlain by landslide feature D1.	Construct a waterbar or rolling dip approx 100' east of gully at the flagged location.	Y	N	N	M
5	DRC	18"	CMP	Existing 18" DRC drains inside ditch run on existing permanent road. The CMP is rusted thru and partially plugged.	Either remove the existing culvert and replace with another 18" DRC and enhance the ditch or remove the DRC and ditch and replace with a rolling dip.	N	N	N	L
6	DRC	18"	CMP	Existing 18” DRC drains inside ditch run on existing permanent road. The CMP outlet is damaged and starting to plug with sediment.	Replace damaged segment if salveagable or entire pipe.	N	N	N	L
6.1	Road Point	N/A	N/A	Undrained segment of existing permanent road.	Install either a rolling dip or waterbar at the flagged location.	N	N	N	L
7	DRC	18"	CMP	Existing 18” DRC which drained old ditch run is plugged and nonfunctional and the ditch has filled in. A bank slump has exposed soil pipes has concentrated runoff down road resulting in approx 130' of rilling before reaching down-grade dip.	Remove existing CMP and install a rolling dip in its place. Treat bank slump per Item 24 standard and ensure new dip captures winter bank seepage.	Y	N	N	H
8	DRC	18"	CMP	Existing 18” DRC draining inside ditch run on existing permanent road is plugged and outlet buried.	Remove and replace with new 18" DRC.	N	N	N	L
8.1	Road Point	N/A	N/A	Existing dip drains permanent road segment.	Improve existing dip at flagged location to prevent overtopping.	N	N	N	L
9	Perm Crossing	36"	CMP	Existing seasonal road crosses a Class III watercourse at this location. The existing crossing structure is a 36” CMP. The culvert outlet is completely plugged & buried.	Either remove and replace with new 36" pipe or clean outlet to regain function if culvert is salvageable.	Y	Y	Y	M
10	Road Point	N/A	N/A	Minor rilling in thru cut segment of existing permanent road prism.	Establish inside ditch to direct runoff towards existing kick-out ditch on north side of road or install a waterbar/rolling dip at kickout location.	N	N	N	M
11	Class I Crossing	N/A	Railcar	Class I crossing of Big Pepperwood Creek via permanent railcar bridge.	None proposed.	N	N	N	N/A
12	Class I Crossing	N/A	Railcar	Class I crossing of Big Pepperwood Creek below confluence via permanent railcar bridge.	None proposed.	N	N	N	N/A
12.1	Class I Crossing	N/A	Steel	Class I crossing of Groshong Gulch via permanent fabricated steel bridge.	None proposed.	N	N	N	N/A
13	Perm Crossing	24"	CMP	Existing WLPZ road crosses a Class III watercourse at this location. The existing structure is a 24” CMP which is significantly degraded from rust.	Remove the CMP and replace with a 30" pipe per typical diagram. Stabilize soils per THP Item 18.	N	Y	Y	M
14	Unstable Area	N/A	N/A	Active debris slide on existing seasonal truck road. The slide appears to have moved during the 2024/25 winter period blocking the road and toeing out on a seasonal road less than 50' below. The road was cleared prior to initial vetting of the THP area, probably spring/summer of 2024, with spoils spread and compacted on a landing 250' to the south. A 50' inside ditch runs to a dip which drains runoff from the slide plane. There is evidence of heavy flow from soil pipes in the scarp which has channelized thru the slide and across the dip, transporting sediment downslope approximately 300' downslope. The existing dip directs runoff onto slide toe material which will continue to erode and risk delivery to the Class I approx 400' below if left untreated. The lower road is not proposed for use.	Relocate the dip 10' to the west and align the outlet towards the redwood clump immediately west of the single 24" redwood tree. Construct a waterbar on the skid trail approx 250' to the southeast at the flagged location to mitigate potential diversion of runoff down trail.	Y	Y	N	H
14.1	Unstable Area	N/A	N/A	Existing waterbar draining large landing has failed conveying runoff approximately 120' down a seasonal road to a kickout directly above the slide described in MP14.	Repair the waterbar draining the landing and install an additional waterbar at the flagged location approximately 75' West. Remove ineffective thru cut waterbar. Treat exposed soil on landing and seasonal road with straw mulch per Item 18.	Y	Y	N	H
15	Unstable Area	N/A	N/A	Existing seasonal road crosses an unstable area which narrowed the road prior to last use and was treated under THP 1-17-104-SON. Action was taken to reestablish adequate road width by cutting into the bank and pulling back cracking fillslope. There is adequate road width for hauling, however	Treat the site by establishing an inside ditch to drain seep runoff approx 75' down grade where a dip will be constructed at the flagged location to disharge into a redwood clump. Remove additional slumped material as necessary to accommodate the new ditch and minimum 12'	Y	Y	Y	H
16	Temp Crossing	N/A	N/A	Existing seasonal road crosses a Class III watercourse at this location. The prior crossing structure has been removed and banks pulled back following last entry.	If road is used beyond this point install a temporary 24" culvert or Spittler crossing with flex pipe, to be removed and stabilized prior to the first winter period following use per THP Items 18 & 23-26 and typical diagrams.	N	Y	Y	N/A

"SES" - Significant Existing or Potential Sediment Source? Y/N
"ECP" - Erosion Control Plan point? Y/N
"1600" - CDFW 1600 point? Y/N
"Trt Order" - H = treat within first year, M = treat after first year, L = treat prior to completion

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area is part of a land holding owned by Gualala Redwood Timber, LLC. Gualala Redwood Timber, LLC 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. Gualala Redwood Timber, LLC and Redwood Empire Sawmills 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 Redwood Empire 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 Sonoma 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.

(2) To manage overstocked and hardwood dominated stands for the promotion of conifer growth while maximizing timber stand growth and production over time for forest products -- i.e., maintain or increase Maximum Sustained Production (MSP).

(3) To plan and implement the timber operation to contribute to restoration of properly functioning salmonid habitat. This entails using the individual tree silviculture as prescribed by the Anadromous Salmonid Protection (ASP) Rules within WLPZ areas in ASP watersheds 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).

(4) In addition, it is an objective of this THP to upgrade existing forest roads and watercourse crossings which will in turn reduce soil erosion and reduce the amount of sediment being introduced into the watershed. By upgrading watercourse crossings, waterbarring, sloping and correctly draining roads and skid trails overall sediment yields will be reduced.

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 specifically identified are mitigated to less-than-significant levels by additional measures other than what is prescribed in the Forest Practice Rules.

a. Describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant Effects of the Project, and evaluate the comparative merits of the alternatives [ref. 14 CCR §§ 15126.6(a) & 15252(a)(2)(A)].

- Every conceivable alternative to the Project does not need to be considered [ref. 14 CCR § 15126.6(a)].

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- The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant Effects of the Project [ref. 14 CCR § 15126.6(f)].
- The discussion of alternatives shall focus on alternatives to the Project, or its location, which are capable of avoiding or substantially lessening any significant Effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives or would be more costly [ref. 14 CCR § 15126.6(b)].
- The range of potential alternatives to the proposed Project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant Effects [ref. 14 CCR § 15126.6(c)].
- Include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project [ref. 14 CCR § 15126.6(d)].
- If an alternative would cause one or more significant Effects in addition to those that would be caused by the Project as proposed, the significant Effects of the alternative shall be discussed, but in less detail than the significant Effects of the Project as proposed [ref. 14 CCR § 15126.6(d)].

No Project [ref. 14 CCR § 15126.6(e)]:
CEQA Guidelines require all projects to consider the no-project alternative. The No Project alternative is feasible. This alternative would avoid any potential impact that directly results from the timber operations proposed being conducted. Although the No Project is feasible, it would not fulfill the purposes, needs, or objectives set forth by the landowner. This alternative does not improve stocking, nor does it enable the landowner achieve maximum sustained production of forest products. The decision not to proceed with the harvest would not alter the need to convert raw timber into lumber to meet statewide demand. This makes it highly likely that leakage would occur, and that the need for raw materials would have to come from somewhere, be it another local forest or a source farther away. The decision not to proceed would likely result in reduced yield tax revenue to the county. The no-project alternative does not alter the landowner's need to generate revenue to pay for the land or to create feedstock for the sawmill, meaning that any supplementary

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acreage within the ownership would need to be assessed for timber harvesting. Finally, by engaging in this project as proposed, the landowner is compelled by regulation to allocate revenues generated by the project to road improvements to reduce potential road sediment sources. In this project, 20 road points are identified as needing upgrades to reduce the potential for sediment delivery to watercourses. In addition to these drainage structures, by engaging in operations at this location the landowner will take additional steps including but not limited to grading, installation of waterbars/critical dips, and other road maintenance activities, that will reduce the road's hydrologic connectivity. In conclusion, this alternative is feasible and may avoid some impact, but in the absence of the project the landowner's objectives are not met and sediment issues may not be addressed.

Alternative Timber Operations†:

Alternative Silviculture:

Evenaged Regeneration Methods

Evenaged regeneration methods, such as clearcuts and shelterwood/seed tree silvicultural systems were considered for this project but were ultimately determined to not meet the landowner's objectives for management in this THP nor for future management of the property after this THP.

Clearcutting is an alternative silviculture that was considered for this harvest plan. Clearcuts create opportunity for the replacement of an entire stand, allowing the regeneration and tending of a new cohort. Clearcuts have some similarities with stand replacing natural disturbances and provide areas with high availability of resources such as sunlight and soil nutrients to support a new young stand. Clearcutting typically involves the removal of the entire merchantable overstory of a stand, significantly reducing overstory canopy which results in reduced rainfall interception and may result in reduced root strength, both factors affecting slope stability and surface soil erosion potential. Due to the presence of unstable areas and areas of high erosion hazard rating (EHR) within THP units and the fact that the RPF is not qualified to make determinations regarding project impacts on slope stability and landsliding potential, in addition to age-related restrictions imposed by the Forest Practice Rules [ref. 14 CCR 913.1(a)], clearcutting was deemed to be unfeasible and undesirable for the management of the project area.

Shelterwood/seed tree systems are generally prescribed for mature stands that contain healthy overstory conifers that will act as good seed sources for a new cohort in the understory. Overstory trees provide soil stability and protection for young trees that establish after the harvest. The forester has control over what seed trees are left after the harvest, giving them the opportunity to engineer a vigorous forest in the long term. This system was applied during the last entry in the 1990s to most of the proposed project area. Due to the current species composition, lack of suitable overstory seed trees, current stand structure and overall understocking of conifers within the plan area means that this silviculture would not fit with the long-term management objectives of the property.

Alternative Yarding Methods:

Yarding Methods Not Chosen:

Helicopter - This method would fulfill many of the project objectives and could avoid some of the impacts associated with ground-based yarding. However, to utilize this yarding method, the landowner would need to create at least one large landing that is sufficient in size to facilitate a log deck, a helicopter landing zone, YUM piles, and a refueling zone. No landings currently meet the size requirement, so the landowner would need to clear and level at least one large area of forest to accommodate helicopter yarding, resulting in new impacts including noise impacts, loss of top soil, loss of growing space, habitat loss, and increased erosion potential. Additionally, helicopter yarding is extremely expensive to the point of being cost prohibitive for the volume and quality of timber in the THP. Helicopter logging operations present unique safety concerns and complex logistical considerations. No local contractors currently have the expertise or capacity for helicopter logging, and the landowner is committed to supporting local businesses when feasible. For these reasons helicopter yarding has been rejected as an alternative yarding method.

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Alternative Location:
This alternative would involve carrying out the harvesting proposed in the THP at a different location on the landowner's property. This alternative is feasible and would fulfill many of the project objectives. The landowner purchased the timberland for the sole purpose of managing the property for timber production, while at the same time

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Retention Standards:

Unit	Unit Size (ac.)	Retention Standard	Minimum Aggregated Retention Area (ac.)	Actual Aggregate Retention Area (ac.)
VR1	23	>10% of the preharvest area	2.3	3.0
VR2	22	>10% of the preharvest area	2.2	4.1
VR3	21	>10% of the preharvest area	2.1	4.3
VR4	33	>15% of the preharvest area	4.95	5.1
VR5	22	>10% of the preharvest area	2.2	2.5
VR6	25	>10% of the preharvest area	2.5	3.4
VR7	27	>10% of the preharvest area	2.7	3.8

Retention trees located within any standard width WLPZ will be excluded from calculating retention. Retention standards shall be met on each 20-acre maximum area within each harvest unit.

Future Harvest of Retention Trees

Aggregate retention trees and sub-commercial conifers left during this entry may be harvested during the next harvest entry. The harvesting of trees prior to 50 years following the establishment of retention trees is an exception to the standard rule 913.4 (d)(3)(K) which states: "Trees shall be retained for at least 50 years unless a shorter period of time is described in the plan, explained, and justified by the RPF and approved by the Director."

Explanation: The retained trees are intended to become part of a future stand managed by the selection regeneration method. Due to site productivity, the future selection entry may occur prior to the end of the 50-year period. The landowner at that time would like the opportunity to harvest some of the retained trees in an effort to establish a new age class under the areas occupied by the larger retention trees or to release thrifty third growth timber that has become established following the variable retention entry.

Justification: Although this exception will allow for harvesting of retained trees prior to the end of the 50-year period, the majority of the retained trees will be required to be retained in the future entry as well. This exception would allow trees retained solely for the purpose of meeting minimum retention standards for variable retention to be free to harvest in association with an intermediate treatment of the regenerated portion of the stand. The intermediate treatment will require that no more than 50% of the retained shall be harvested and a minimum of 100 square feet of conifer basal area per acre will be retained. Retained trees in a future harvest will include at a minimum, wildlife trees and snags retained during the variable retention entry. The future selective entry will further enhance the structure of the stand that was established following the variable retention entry and many of the elements retained during the variable retention entry will be maintained or enhanced.

The following tables depict estimated average preharvest and postharvest basal area stocking by species and diameter class for VR Units pursuant to 913.4(d)(7):

VR1 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Sugar pine Pre/post	Hardwood Pre/Post
2-6"	5/5	5/5	0/0	5/1
7-12"	15/5	10/5	0/0	20/2
13-18"	20/2	10/1	0/0	25/3
19-24"	15/2	15/2	0/0	20/2
25-30"	3/0	5/1	3/3	5/5
31-36"	2/0	2/0	3/3	5/5
37-42"	2/0	1/0	2/2	5/5
Total	62/14	48/14	8/8	85/23

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VR2 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Sugar pine Pre/post	Hardwood Pre/Post
2-6”	2/2	2/2	0/0	5/1
7-12”	10/5	5/5	0/0	25/3
13-18”	15/2	10/3	0/0	25/3
19-24”	20/2	10/1	0/0	20/2
25-30”	5/1	5/1	1/1	10/10
31-36”	4/0	3/0	2/2	5/5
37-42”	2/0	2/0	2/2	0/0
Total	58/12	37/12	5/5	90/24

VR3 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Other Conifer Pre/post	Hardwood Pre/Post
2-6”	5/5	5/5	1/1	5/1
7-12”	10/5	5/5	2/2	20/2
13-18”	10/1	5/1	2/2	25/3
19-24”	15/2	10/1	1/1	20/2
25-30”	10/1	10/1	1/1	5/5
31-36”	3/0	3/0	2/2	5/5
37-42”	2/0	2/0	1/1	0/0
Total	55/14	40/13	10/10	80/18

VR4 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Other Conifer Pre/post	Hardwood Pre/Post
2-6”	5/5	5/5	1/1	5/1
7-12”	5/5	5/5	0/0	20/2
13-18”	10/1	5/1	0/0	25/3
19-24”	15/2	10/1	1/1	25/3
25-30”	10/1	5/1	1/1	10/10
31-36”	3/0	3/0	2/2	0/0
37-42”	2/0	2/0	0/0	0/0
Total	50/14	35/13	5/5	85/19

VR5 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Other Conifer Pre/post	Hardwood Pre/Post
2-6”	5/5	5/5	1/1	5/1
7-12”	3/3	5/5	0/0	20/2
13-18”	10/1	5/1	0/0	20/2
19-24”	15/2	10/1	1/1	20/2
25-30”	10/1	5/1	1/1	10/10
31-36”	2/0	3/0	2/2	0/0

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37-42”	2/0	2/0	0/0	0/0
Total	47/12	35/13	5/5	75/17

VR6 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Sugar pine Pre/post	Hardwood Pre/Post
2-6”	3/3	3/3	2/2	5/1
7-12”	5/3	5/5	1/1	20/2
13-18”	5/1	7/1	3/3	25/3
19-24”	12/1	5/1	2/2	7/5
25-30”	10/1	5/1	5/5	3/3
31-36”	5/1	2/0	2/2	0/0
37-42”	0/0	0/0	0/0	0/0
Total	40/12	27/11	15/15	60/14

VR7 Estimated Stocking (sq. ft. BA/acre)

Diameter Class	Redwood Pre/Post	Douglas-fir Pre/Post	Sugar pine Pre/post	Hardwood Pre/Post
2-6”	3/3	3/3	2/2	5/1
7-12”	5/2	3/3	1/1	30/3
13-18”	10/1	5/1	3/3	22/2
19-24”	10/1	5/1	2/2	8/5
25-30”	5/1	3/0	5/5	5/5
31-36”	2/0	1/0	2/2	0/0
37-42”	0/0	0/0	0/0	0/0
Total	35/8	20/8	15/15	70/16

ITEM 19-21(g) USE OF GROUND BASED EQUIPMENT ON UNSTABLE AREAS:

The Standard Rule: *14 CCR 914.2(d) Heavy equipment shall not operate on unstable areas. If such areas are unavoidable, the RPF shall develop specific measures to minimize the effects of operations on slope instability. These measures shall be explained and justified in the plan and must meet the requirements of 14 CCR 914.*

Explain and describe each proposed practice: Ground-based equipment use is proposed on a feature that is mapped as a probable dormant mature rock slide on the publication Geologic and Geomorphic Features Related to Landsliding, Gualala River Watershed by Fuller and others. The exception area is approximately 6.3 acres in size, however only two tractor roads are proposed to be reused. The area was last harvested using ground-based equipment and the existing infrastructure supporting ground-based systems is in good condition.

How the proposed practice differs from the standard practice: The proposed practice would allow for ground-based operations on a known unstable area.

The specific locations where it shall be applied: The proposed practice will occur in designated tractor ground in Variable Retention Unit #7 within the feature identified as D1 on THP maps. See THP maps in Section II for precise location.

Explanation and justification as to how the protection provided by the proposed practice is at least equal to the protection provided by the standard rule: Per 14 CCR 914.2(f)(5): The RPF may propose exceptions to the limitations on tractor operations described above, if the proposed exception will comply with 14 CCR 914, and if the Plan both clearly explains the proposed exception and justifies how the proposed exception will comply with 14 CCR §

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Big Pepperwood Creek PWS (Cal Water #1113.850201, 6,532 acres) Past Projects 2016 -2026

Project #	PWS Acres	Landowner	THP/NTO Year	Silviculture	Yarding	Legal Description
1-17-104-SON	199	GRT	2017	SEL, CC, STR, STA	T	T11N, R14W, Sec. 30, 31
1-19-00050-MEN	10	Rick Hautala, Dawn Aksamit	2019	SEL	T	T11N, R15W, Sec. 27
1-19-00197-MEN	2	GRT	2019	VR, TRAN	C, T	T11N, R14W, Sec. 18, 19; T11N, R15W, Sec. 24
1-20-00003-SON	1	GRT	2020	TRAN, CC	T	T11N, R14W, Sec. 29
1-22-00042-SON	41	GRT	2022	GSEL	T	T11N, R14W, Sec. 31
1-22-00043-SON	8	GRT	2022	SEL	T	T11N, R14W, Sec. 31
1-23-00073-MEN	283*	GRT	2023	VR, SEL, NH	C, T	T11N, R14W, Sec. 17, 18, 19, 20
1-23-00099-SON	175*	GRT	2023	SEL, NH	T	T11N, R15W, Sec. 25, 26, 35, 36
1-24-00103-MEN	169*	GRT	2024	SEL, NH, STA	T	T11N, R15W, Sec. 22, 23, 26, 27
1-25-00114-MEN	3	GRT	2025	TRAN	T	T11N, R14W, Sec. 18
Subtotal	891					
This THP	245					
Grand Total	**1,136**					

*16 acres of No Harvest Area in the PWS

Big Pepperwood Creek PWS (Cal Water #1113.850201, 6,532 acres) Reasonably Foreseeable Future Projects

THP Number	PWS Acres	Landowner	THP/NTO Year	Silviculture	Yarding	Legal Description
1-08NTMP-009-MEN	58	Bower Limited Partnership	2008*	GSEL	T	T11N, R15W, Sec. 22, 23, 27
1-26-00021-SON	98	GRT	2026	SEL, GSEL, STA	T	T11N, R15W, Sec. 25, 26, 36 T11N, R14W, Sec. 31
Not assigned, "Cabin THP"	Unknown	GRT	2027	SEL, VR	C, T	T11N, R14W, Sec. 18, 19, 20, 30; T11N, R15W, Sec. 24, 25

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STATE OF CALIFORNIA BOARD OF FORESTRY
CUMULATIVE IMPACTS ASSESSMENT

(a) Do the assessment area(s) of resources that may be affected by the proposed project contain any past, present, or reasonably foreseeable probable future projects?

Yes **X** **No** ____

If the answer is yes, identify the project(s) and affected resource subject(s).

The Watershed Assessment Area (WAA) and Biological Assessment Area (BAA) contain past, present and future projects which have been evaluated for potential continued adverse impacts to watershed and biological resources. Notably, past projects include logging, ranching, and rural residential development within the assessment areas. Reasonably foreseeable future projects within these large-scale assessment areas include ongoing THP and NTMP related timber harvesting, ranching and grazing activities, forest fire prevention work, maintenance of recreation areas, road improvement and maintenance, rural residential development and land improvement, and possible commercial development with the town of Gualala.

A portion of the THP footprint was harvested in the last 10 years. The THP area was most recently harvested under THP 1-17-104-SON which utilized Selection silviculture and tractor yarding operations. Prior to this entry the THP area was harvested in the early 1990s using evenaged regeneration methods and special prescriptions.

Current, ongoing projects within the WAA include the following THPs: 1-22-00042-SON, 1-22-00043-SON, 1-23-00073-MEN, 1-23-00099-SON, 1-24-00103-MEN, and 1-25-00114-MEN. Proposed future projects within the Plan Submitter's ownership include THP 1-26-00021-SON "Card", a 167-acre THP with 98 acres located within the assessment area proposing Selection, Group Selection, and Special Treatment Area Selection utilizing ground-based equipment, and "Cabin THP" within Big Pepperwood Creek PWS. The exact size, location, and regeneration methods for Cabin THP are presently unknown, but it is expected to use a combination of unevenaged regeneration methods and special prescriptions as well as both tractor and cable yarding methods.

(b) Are there any continuing, significant adverse impacts from past land use activities that may add to the impacts of the proposed project?

Yes **X** **No** ____

If the answer is yes, identify the project(s) and affected resource subject(s).

Pre-harvest adverse cumulative watershed effects on the populations & habitat of anadromous salmonids have been considered. Presently, there are some continuing adverse effects from past timber operations. Some of the past damage is still contributing sediment to the stream systems. The significance of the ongoing impacts is difficult to quantify. The WAA has been impacted by historic logging activities which took place prior to the 1973 Forest Practice Act. Pre-regulation logging activities have included tractor skidding of logs down watercourse channels, landing construction on unstable areas and creek bottoms, past cut/fill road construction practices and tractor logging on slopes >65%. This resulted in sedimentation and accumulation of organic debris in the channels. Basic erosion control measures were not taken or minimally employed to prevent road and trail washouts and bank erosion.

Grazing also has had an impact on the watershed through soil compaction, road building, and the common burning practices of the past. These activities have affected the Watershed, Soil Productivity, and

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Sediment Effects – Quantitative Analysis of Past Projects (last 10 years)

A list of approved and/or active past projects within the WAA is included in the Past Projects Tables. In brief, these include 10 THPs in the Big Pepperwood Creek PWS totaling approximately 891 acres cumulatively, or 13.6% of the watershed area, and 3 THPs in the Lower Rockpile Creek PWS totaling approximately 263 acres cumulatively, or 8.9% of the watershed area. The total cumulative acreage subject to some form of timber harvesting in the last 10 years as of this analysis is 1,154 acres, or 12% of the WAA. It should be noted that of the 1,154 acres reported 34 acres were No-Harvest zones. This analysis does not account for the additional no-harvest acreages associated with WLPZ core zones, no-cut VR aggregates, or unstable areas (unless mapped as No-Harvest silviculture).

**The acreages reported above represent approximate plan acreages within the WAA planning watersheds and not total THP acreages. Several of the THPs filed in the last 10 years overlap more than one planning watershed. This data is supplied by CDF through their online GIS portal. GIS data is sourced from approved THPs. The RPF makes no guarantees as to the accuracy of this data.*

There have been no reported, observable, significant sediment impacts resulting from Past Projects within the assessment area. To the contrary, Past Projects within the assessment area have resulted in cumulative net sediment savings (ref. completed road work reports in Sec V).

Sediment Effects - Reasonably Foreseeable Probable Future Projects

Timber production is the principal land use within the WAA, and this is not expected to change in the foreseeable future. GRT's portion of the assessment area will continue to be managed for sustained timber production and the enrichment of all forest resource attributes. Reasonably foreseeable future projects in the WAA include THP 1-26-00021-SON "Card", proposing 167 acres of Selection, Group Selection, and STA Selection with tractor yarding, "Cabin" THP, which is in the early stages of planning and does not yet have an exact location, size, or regeneration methods, and one NTMP: 1-08NTMP-009-MEN, which has not had an NTO filed in the last 10 years. It is reasonable to expect that an NTMP property may conduct timber operations in the foreseeable future, though it is impossible to predict the exact timing or acreage of harvest.

The GRT property is managed under the California Forest Practice Rules Option C. Additional plans are currently being prepared under Option C, located throughout the property. Those THPs will be submitted in the future and it should be assumed that additional plans will be filed over the next 10 years within the assessment area. Until THP field work and layout begins, GRT is not able to predict with any degree of certainty that an actual THP for a specific area will be written, submitted and approved. Future harvesting projects are often contemplated or appear to be feasible based on assumed ground conditions, stand age and composition, and other information, including information from the landowners Geographic Information System (GIS). Until actual field work begins, the location of the THP on the ground, its area layout (including its size and shape), its foreseeable impacts or associated protection measures are unknown. At this time, the RPF knows of no additional THP's where fieldwork has begun on Gualala Redwood ownership within the planning watershed.

While most of this acreage will be in the form of THPs, other projects will likely include road construction, reconstruction and maintenance. Appurtenant roadwork, such as road upgrades, installing rolling dips and out sloping, will be done concurrent with THP work. Also, given the history of land use in the assessment area, it is safe to assume that agricultural uses and timber harvesting will continue to occur in other parts of the assessment area that are not under Gualala Redwood ownership. The timing and nature of any additional future projects is difficult to predict, due to constantly changing economic conditions.

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Timber Harvest Scheduling: Harvesting, for practical reasons due to historical past harvest entries, access availability, equipment and manpower mobilization and staging, is often concentrated in one watershed for a period of time and reduced in another watershed. This varying harvest intensity must be addressed in a cumulative effects analysis. In the assessment of potential cumulative effects that may result from harvesting the percent watershed acres harvested is a poor indicator by itself because if all silviculture were even-aged then one would expect on a sixty-year rotation to only harvest 16.7% of a watershed area in a ten-year period due to adjacent harvest unit constraints imposed by the Forest Practice Rules. However, if the landowner were to fully engage in uneven-aged silviculture over the entire watershed one could expect to selectively harvest 50 to 100% of the acres over a ten to fifteen-year period. Since there is a mixed employment of silvicultural prescriptions within a watershed the areas harvested in a ten to fifteen-year period become more complicated to decipher. This also does not take into account the fact that these are not fully regulated stands but have been harvested in bursts of activity in the past which has resulted in the majority of these stands becoming harvestable at approximately the same time in many cases. This pattern results in decades with higher harvest rates over an area followed by decades in which little to no harvesting occurs, so potential impacts can be periodic in nature.

At the present rate of harvest and because of harvest unit adjacency rules it is likely that many of the stands on the landowner's property will not be harvested until they are many decades older than the rules require for minimum stand age using even-aged management. Much of the ownership will continue to be managed using unevenaged silviculture, and older stands of mature timber will continue to exist because of a number of restrictions and considerations including watercourse protection rules, geological hazard set-asides, northern spotted owl habitat protection, as well as other plant and animal retention areas being left across the ownership.

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Sediment Effects - Proposed THP

- Silviculture (14 CCR 913): THP Item #14 describes the silvicultural methods proposed in this THP, which are Single-Tree Selection, Group Selection, Commercial Thinning, and Variable Retention (VR). Portions of the WLPZ, unstable areas, and VR aggregates will not be harvested at all. Aggregate retention areas have been located to protect unstable areas, Class III watercourses, and potential headwall swales. Portions of the VR units not protected by aggregates will have most, if not all, of the merchantable conifers removed (besides retained wildlife trees). After the harvest of this unit, tanoak and brush species may be controlled to assist in redwood regeneration, but not all vegetation will be removed or treated. Slash and brush or tree species not creating competition for young redwoods will remain in the stand post-harvest. Runoff and sedimentation from this unit after harvest is expected to be minimal since there will still be canopy cover from uncut trees, canopy cover from the aggregate patches and streamside vegetation. Expected high levels of post-harvest vegetative cover throughout the plan area will help to reduce the potential for deleterious amounts of sediment entering into watercourses in the form of excessive surface runoff and rain drop impact.

- Road Improvements (14 CCR 923; 14 CCR 916.9): THP Section II describes road treatments that will be implemented to reduce the potential for generation of sediment near watercourses. Required road rules have been applied to this plan and include specific requirements for Anadromous Species Protection. Road upgrades proposed in this THP include redesigning crossings to meet a 100-year flood event, which controls and limits the amount of potential sediment that could discharge if the crossing fails. Maintenance, like adding rock armoring or cleaning the existing infrastructure secures bare mineral soil to the site and allows for proper functioning of facilities. Road drainage has also been assessed and includes upgrades to limit the amount of water that collects, drains on, and erodes the road prism. See Completed Road Work reports in Sec. V. This THP proposes the following activities aimed at road improvement:
  - -Existing watercourse crossing upgrades
  - -Road drainage facility improvements
  - -Hydrologic disconnection of logging roads

- Yarding Methods (14 CCR 914.2 & 914.6): THP Item #16 describes the yarding methods to be employed during harvest operations. The THP proposes ground-based and cable yarding systems. Existing skid trails exist throughout the THP, however new trails may be required in some of the flatter portions of the THP where old trails may be indistinguishable. After operations, skid trails will meet FPR waterbarring requirements to prevent and reduce the concentration, flow, and erosion of surface runoff down trails. A waterbar is required to be placed prior to a watercourse where they are crossed to hydrologically disconnect the trail or road from the watercourse. The reuse of these skid trails and reinstallation/addition of drainage facilities is expected to keep sedimentation to a level less than significant. Cable yarding is proposed on steeper slopes and within WLPZs. Cable roads will be laid out by the LTO to maximize deflection thereby minimizing log dragging. Cable road widths shall be kept to a minimum (typically 8-12') to maintain canopy and ground cover. Ground-based equipment use is proposed in an area where average slopes exceed 65%. This is considered an exception to the standard rule pursuant to 14 CCR 914.2(f). Section III of the THP explains why this exception practice has been proposed and why it will provide equal or greater protection to the environment than the standard rule. The proposed exception practice will allow the landowner to harvest a portion of the Group Selection Silviculture stand with ground-based equipment on preexisting, stable skid

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trails which have been evaluated and flagged by the RPF. Harvesting this area with ground-based equipment utilizes existing forest infrastructure, thereby minimizing potential adverse impacts to sediment effects by avoiding new road and landing construction which would otherwise be required to facilitate cable yarding or helicopter yarding. Potential adverse effects of this practice on sediment impacts include direct impacts such as exposure of bare soil, displacement of organic matter, perched fill along skid trails, concentration of stormwater runoff, and secondary effects on overall slope stability and mass wasting potential resulting from decreased rainfall interception and root strength from the removal of trees & brush. However, the potential for adverse sediment effects is expected to be less than significant with Forest Practice Rules compliance and the additional measures proposed in Sections II and III.

Unstable Features: Potentially active unstable areas identified by the RPF have been designated equipment exclusion zones (EEZ). Heavy equipment shall be limited to existing stable road surfaces within these features. Depending on the risk of reactivation, some unstable areas have been designated either no-harvest zones or special treatment zones (STZ). Ground-based equipment use is proposed on a geologic feature mapped by CGS as a probable dormant mature rock slide in a portion of the plan that was previously tractor logged. This practice is considered an exception to the standard rule pursuant to 14 CCR 914.2(d). Section III of the THP explains why this exception practice has been proposed and why it will provide equal or greater protection to the environment than the standard rule. The proposed exception practice will allow the landowner to harvest portions of the unit using only existing, stable skid trails which have been evaluated by the RPF. Harvesting this area with ground-based equipment utilizes existing forest infrastructure, thereby minimizing potential adverse impacts to sediment effects by avoiding new road and landing construction which might otherwise be required to facilitate cable yarding. Furthermore, the road and skid trail networks were designed for ground-based yarding systems due to the gently sloped topography. Yarding this ground with cable systems would result in excessive damage to residual timber and conifer regeneration and soil disturbance due to dragging logs across an area with poor deflection. Potential adverse effects of this practice on sediment impacts include direct impacts such as exposure of bare soil, displacement of organic matter, perched fill along skid trails, concentration of stormwater runoff, and secondary effects on overall slope stability and mass wasting potential resulting from decreased rainfall interception and root strength from the removal of trees & brush. However, the potential for adverse sediment effects is expected to be less than significant with Forest Practice Rules compliance and the additional measures proposed in Sections II and III.

- Soil Stabilization Measures (14 CCR 923.5 & 916.7): THP Item #18 includes soil stabilization measures for logging roads, tractor roads, and WLPZs/ELZs/EEZs, with specific requirements for Anadromous Species Protection special road use and maintenance provisions will be applied to wet weather conditions during the non-winter period; self-maintaining drainage features, such as rolling dips, will be used in appropriate places. Covering bare mineral soil disturbed by operations prior to winter storms prevents fine sediment from washing off-site and reaching a higher order stream.

- Winter Period Operating Plan (14 CCR 914.7): THP Item #23 includes numerous provisions that are proposed to minimize the mobilization of sediment during the winter period. This THP includes the following measures:
  -No ground-based equipment operations during saturated soil conditions.

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-No log hauling during saturated soil conditions.
-No watercourse crossing installation or proposed road construction during the Winter Period.
-No site preparation activities during the Winter Period.

Sediment Effects Conclusion

The existing conditions within the WAA regarding sediment effects have been impacted by pre-forest practice rules timber harvesting activity, and there may be a continuing impact from this historic activity (e.g., legacy near-stream road and skid trail failures, legacy instream landing failures, etc.). Future projects are not expected to have an adverse impact, individually or cumulatively, on sediment effects in the WAA by virtue of modern Forest Practice Rules compliance and additional measures described above. The proposed THP area is generally in good condition regarding sediment effects. An evaluation of interactions of the proposed project and incorporated impact avoidance measures with the impacts of Past Projects and Reasonably Foreseeable Probable Future Projects on sediment effects reveals that there are no significant cumulative adverse impacts, and that current conditions will be maintained or improved through implementation of the project.

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As described above, the main activities that have been conducted within the Watershed Assessment Area affecting water temperature are development, road building, timber harvesting, and to a lesser extent wildland burning, agriculture, and recreation. It is anticipated that these activities will continue into the future, as discussed above.

Road building is not expected to result in adverse impacts to the assessment area in the future as a majority of the assessment area is currently roaded and any new roads constructed will utilize proper planning, design and construction techniques. Road maintenance and repair will increase in the future as awareness of the impacts of roads are evaluated and landowners work to improve their roads, using the Handbook for Forest and Ranch Roads.

Wildland burning is expected to be conducted in the future, to a certain degree, to control fuel loads and vegetative cover and for site preparation activities. The amount of burning conducted is expected to be minimal and should not result in any adverse impacts to sediment, canopy or water temperature, and in fact should maintain the amount of overall canopy.

Livestock grazing and other agricultural uses are expected to continue at limited levels which is not expected to have significant impact.

Large, forested land holdings have been and will likely continue to be harvested and maintained as timberland, but some of this land could be sold and subdivided. Rural residential development will continue to have impacts upon the management of large tracts of industrial and small private timberland within the WAA.

Water Temperature - Proposed THP

- Silviculture (14 CCR 913): THP Item #14 describes the silvicultural methods proposed in this THP. The THP states that there shall be no salvage logging in WLPZ areas. Additionally, LWD shall be retained within riparian corridors. The unevenaged management proposed will retain a high level of overstory and understory cover throughout the Plan area, particularly within WLPZ corridors, Class III ELZs, and unstable areas. The high levels of post-harvest vegetative cover will shade the riparian areas which regulate water temperature, and maintain canopy and root strength within unstable areas which have a high risk of sediment delivery.
- All other previously mentioned proposed activities that could impact sedimentation: Sedimentation of streams contributes to elevated water temperatures. Sediment can fill pools and cause the width-to-depth ratio of a stream to increase, which can facilitate heat exchange. See above for a description of sediment effects with regards to potential impacts on water temperature.
- The in-lieu practice of harvesting unmarked trees in the WLPZ strictly for safety considerations is proposed in this THP. This practice would apply to aspects of 916.5(e)"A" through "I" which require residual or harvest trees to be marked within the WLPZ by the RPF or supervised designee. Potential adverse impacts of this practice on water temperature effects include direct impacts such as reduced shade canopy and indirect impacts on overall slope stability and mass wasting potential resulting from decreased rainfall interception and root strength from the removal of trees. However, the shade canopy retention, filter strip retention, large tree retention, and all other requirements of 916.5(e)"A" through "I" shall be met, therefore the potential for adverse water temperature effects is expected to be less than significant with Forest Practice Rules compliance.

Water Temperature Conclusion

The existing conditions within the WAA regarding water temperature effects indicate that there

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may have been an impact in the past, but since the adoption of Forest Practice Rules, especially WLPZ and ASP rules, the effects of timber harvesting on water temperature regulation have become less than significant. WLPZ stands in the assessment area have regrown since the historic logging activities of the 19th and 20th centuries and continue to achieve canopy closure along Class I and Class II channels. Future timber harvesting projects conducted in conformance with modern forest practice rules are not expected to have an adverse impact on water temperature effects. The proposed THP alone is not expected to have an adverse impact on water temperature due to the chosen silviculture, yarding, and other operational restrictions in accordance with the FPRs. An evaluation of interactions of the proposed project with the impacts of Past Projects and Reasonably Foreseeable Probable Future Projects on water temperature effects reveals that there are no significant cumulative impacts, and that current conditions will be maintained or improved through the implementation of this project.

c. Organic Debris Effects

Organic debris in a watercourse can have either positive or negative effects depending on the size and stability of the material. Large woody debris is an important component of a healthy functioning watershed, while an excessive amount of small fine organic debris will have a negative impact including increased acidity and decreased dissolved oxygen. A sudden large input of unstable organic debris, including logs, can have a detrimental effect on the watershed. Debris torrents, stream diversions, and barriers to fish migration can cause major impacts to the health and resilience of watershed ecosystems. LWD provides instream habitat for salmonid species as well as storage and metering of sediment within the stream itself. A lack of LWD in Class I watercourses has been identified as a limit on salmonid habitat function.

Large trees that fall into coastal streams play a dominant role in forming pools, metering sediment, trapping spawning gravels and creating a more complex stream environment. Redwoods are particularly valuable because a large tree may not decay for several hundred years (Kelly et al., 1995). Fir and spruce trees last for several decades while alder and hardwood species rot within a few years of being recruited into the stream (Cedarholm et al., 1997). In general, the larger the size of the woody debris the greater its stability in the stream channel. Heavier pieces require higher flows for mobilization and longer pieces are more likely to be caught by the stream bank and its vegetation. Reeves et al. (1993) found that “wood is a primary element influencing habitat diversity and complexity in streams. Consequences of decreased amounts of wood include loss of cover and structural complexity, decreased availability and abundance of habitat units, and reduced varieties of current velocities and other hydraulic features."

Within the WAA, GRT is involved in the facilitation of ongoing stream reach, stream cross sectional, and LWD placement monitoring being conducted annually by the Gualala River Watershed Council (GRWC) on GRT’s property. To date, GRT has placed 72 redwood logs in fish bearing streams within the Big Pepperwood Creek PWS, and 21 redwood logs in fish bearing streams within the Lower Rockpile Creek PWS with the goal of improving salmonid habitat through the creation of pool structure and refugia.

Organic Debris - Baseline Conditions

The THP area contains the following baseline conditions regarding organic debris:

- **Small Organic Debris** – The watercourses within the THP area have high levels of canopy cover which therefore introduces a natural amount of small organic debris into the watercourses. The RPF has observed a healthy degree of leaf litter and needle cast in the watercourses present in the Plan area. Currently, there is no evidence of the small organic debris that was input into watercourses during historic logging activities, and no adverse effects regarding small organic debris inputs from the 1990s harvests were observed. The WAA in general does not appear to

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have significantly adverse levels of small organic debris within its watercourses.

- **Large Woody Debris –** The watercourses within the Plan area contain a moderate to high amount of LWD that appears stable. Existing LWD is not causing diversions or damming. Existing LWD is mostly in the form of tree boles, redwood buckskins, root wads, and large branches that are contributing to bank stabilization and pool development. The WAA overall could use more of these structures to reach peak watershed health but there is no lack within the THP area. As mentioned before, buried LWD is becoming exposed over time as watercourses cut through and scour out the sediment that was deposited a result of logging activities of the mid-20th century. The high levels of stocking within WLPZs will contribute to the ongoing recruitment of instream LWD.

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resulted in an aesthetic alteration to the forest canopy by removing a substantial portion of trees disrupting the canopy intactness. Reforestation efforts and natural regeneration have since resulted in a canopy that is generally intact with some scattered gaps. These projects have had aesthetic impacts that are typical of industrial forestlands throughout the region. The temporary bridge mentioned above has been used numerous times for past harvest plans.

Visual - Reasonably Foreseeable Probable Future Projects
Future projects within the assessment area will likely continue to have no effect on the visual resources due to the aspect and objectives of the landowner. The temporary bridge on the North Fork is expected to continue to be used as a summer crossing in the future.

Visual - Proposed THP
The THP area is not visible to the public per TRA #2 assessment area definition. The temporary bridge installation on the North Fork is not expected to have a significant adverse effect on visual resources because it is only seasonally present and does not detract from the aesthetic character of the area.

Visual Resource Conclusion
The existing conditions within the Visual Assessment Area indicate that there are no impacts to visual resources and that it has not been impacted in the past. Future projects likely will not impact visual quality. The proposed THP activities will not have a significant impact on visual resources. An evaluation of interactions of proposed project activities with the impacts of Past Projects and Reasonably Foreseeable Probable Future Projects on visual quality reveals that there are no significant cumulative impacts, and that current conditions will be maintained through the project implementation.

Identification of Information Sources: E. Visual Resources

California Dept. of Forestry and Fire Protection Guidelines for Assessment of Cumulative Impacts; CDF, August 13, 1991.

Cumulative Impacts Assessment Workshop Binder; CLFA, Redding, Ca., September 1991.

National Agriculture Imagery Program (NAIP). 2010, 2012 and 2014 Imagery

Personal Communication

Mark Pugsley, Forest Manager, Gualala Redwood Timber, LLC.

John Bennett, Retired Forest Manager, Gualala Redwood Timber, LLC.

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Map Point	Type	Diameter	Material	Description	Treatment	Delivery RISK	Delivery Potential	Total Site Volume	Deliverable Site Volume	Treatment Priority
Delivery Risk = how likely is it to fail? Will it take a large event to trigger, or will small events lead to failure. Delivery Potential = at what rate will it deliver? Will it all go at once, or will it meter over time. Deliverable site volume = of what material is present at site, what is the volume that has the potential to deliver. Treatment priority = when does site need to be treated. High priority sites should be treated first year of ground based operations at site. Moderate priortiy sites should be treated by end of 3rd year. Low priority sites should be treated by end of 5th year or completion of timber operations, whichever is first. Volumes are in cubic yards.										
1	Road Point	N/A	N/A	Deactivated temporary road crosses a swale at this location. The fillslope is failing and has downdropped for approximately 100', narrowing road by 2-3'. A small bank slump north of the swale has choked the road prism.	Cut into the bank to regain adequate road width. Treat the bank slump per Item 24 standards and do not sidecast or remove vegetation from fillslope. Construct a dip thru the swale to drain road and install a waterbar south of the swale crossing as indicated with orange flagging.	M	M	30	30	H
2	Temp Crossing	N/A	N/A	Existing temporary road crosses a Class III watercourse at this location. The prior crossing structure has been removed and banks pulled back after the last entry.	Install a temporary 24" culvert or Spittler crossing with flex pipe, to be removed and stabilized prior to the first winter period following use per THP Items 18 & 23-26 and typical diagrams.	L	L	100	100	H
3	Perm Crossing	N/A	N/A	Existing seasonal road crosses a Class III watercourse at this location. The existing crossing structure is an unimproved dip (unrocked). Minor gullying has occurred in the fillslope which will worsen if untreated.	Construct a rock armored fill apron according to typical diagrams using 12"+ d50 riprap between the redwood clump and small tanoak growing in the fillslope, approximately 20' (H) by 15' (SD). Begin keying in rock at the orange flag in the channel.	M	L	30	15	M
4	Perm Crossing	18"	CMP	Existing seasonal road crosses a Class III with spring. The existing crossing structure is a 18" CMP with a 15' downspout. The culvert and downspout have rusted thru and are no longer functioning properly.	Remove the existing crossing structure and replace with a minimum 30" culvert set to stream grade per typical diagrams and armor outfall with 12"+ d50 riprap. Install a waterbar approx. 100' up grade west of the crossing as indicated with orange flagging.	M	H	50	50	M
9	Perm Crossing	36"	CMP	Existing seasonal road crosses a Class III watercourse at this location. The existing crossing structure is a 36” CMP. The culvert outlet is completely plugged & buried.	Either remove and replace with new 36" pipe or clean outlet to regain function if culvert is salvageable.	M	H	35	35	M
13	Perm Crossing	24"	CMP	Existing WLPZ road crosses a Class III watercourse at this location. The existing structure is a 24” CMP which is significantly degraded from rust.	Remove the CMP and replace with a 30" pipe per typical diagram. Stabilize soils per THP Item 18.	M	H	30	30	M
14	Unstable Area	N/A	N/A	Active debris slide on existing seasonal truck road. The slide appears to have moved during the 2024/25 winter period blocking the road and toeing out on a seasonal road less than 50' below. The road was cleared prior to initial vetting of the THP area, probably spring/summer of 2024, with spoils spread and compacted on a landing 250' to the south. A 50' inside ditch runs to a dip which drains runoff from the slide plane. There is evidence of heavy flow from soil pipes in the scarp which has channelized thru the slide and across the dip, transporting sediment downslope approximately 300' downslope. The existing dip directs runoff onto slide toe material which will continue to erode and risk delivery to the Class I approx 400' below if left untreated. The lower road is not proposed for use.	Relocate the dip 10' to the west and align the outlet towards the redwood clump immediately west of the single 24" redwood tree. Construct a waterbar on the skid trail approx 250' to the southeast at the flagged location to mitigate potential diversion of runoff down trail.	H	H	200	200	H
14.1	Unstable Area	N/A	N/A	Existing waterbar draining large landing has failed conveying runoff approximately 120' down a seasonal road to a kickout directly above the slide described in MP14.	Repair the waterbar draining the landing and install an additional waterbar at the flagged location approximately 75' West. Remove ineffective thru cut waterbar. Treat exposed soil on landing and seasonal road with straw mulch per Item 18.	H	H	<50	20	H
15	Unstable Area	N/A	N/A	Existing seasonal road crosses an unstable area which narrowed the road prior to last use and was treated under THP 1-17-104-SON. Action was taken to reestablish adequate road width by cutting into the bank and pulling back cracking fillslope. There is adequate road width for hauling, however the bank cut exposed soil pipes which are causing undrained bank seepage onto the road.	Treat the site by establishing an inside ditch to drain seep runoff approx 75' down grade where a dip will be constructed at the flagged location to disharge into a redwood clump. Remove additional slumped material as necessary to accommodate the new ditch and minimum 12' road running width. Spoils may be used to berm outside road edge thru slide, but do not sidecast.	M	M	75	75	H
16	Temp Crossing	N/A	N/A	Existing seasonal road crosses a Class III watercourse at this location. The prior crossing structure has been removed and banks pulled back following last entry.	If road is used beyond this point install a temporary 24" culvert or Spittler crossing with flex pipe, to be removed and stabilized prior to the first winter period following use per THP Items 18 & 23-26 and typical diagrams.	L	L	115	115	H
670	Temp Crossing	N/A	Railcar	Proposed temporary bridge crossing of the North Fork Gualala River (Class I). GRT has installed a ~60 ft long temporary railcar bridge at this location to service several past harvesting operations under various THP related LSAAs, the latest being LSAA # EPIMS-MEN-59893-R1 which is attached for reference in Section V.	Install the temporary railcar bridge according to the following specifications: The bridge shall be long enough to span the wetted channel and placed on logs or preformed concrete block abutments set outside of the wetted channel. Native gravel will be placed behind these logs or blocks and ramped away from the channel if the ends of the bridge are within the channel zone. Wing walls will be placed on each side of the abutments to prevent backfilled gravels from spreading. Dirt will be used for ramps if/when the bridge ends are located outside the channel zone. Due to seasonal changes to the stream profile it is unknown how much volume of fill will be required behind the abutments.	L	L	50	25	M

Delivery Risk = likelihood of delivery. Does it need a big event, or will small event trigger.
Delivery Potential = will all material go at once or will it meter over time.

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Oak woodland, serpentine outcrops, coastal prairie, coastal bluff scrub, coastal dune, sphagnum bog, chaparral, valley/foothill grasslands, palustrine wetland, closed cone conifer forest, hardpan podzol terrace (pygmy forest), and/or upper montane conifer forest are considered excluded habitats and are not present in the THP area.

Species occurring in riparian habitats fall within designated WLPZs for watercourses and wet areas/springs. Harvest restrictions and mitigation measures designed primarily to protect water quality, aquatic wildlife, and terrestrial wildlife also provide adequate protection to riparian special status plant species. In addition to retention requirements for basal area, canopy cover, vertical diversity, and microclimate, vegetative surface cover is specifically protected by retaining at least 75% ground cover within the WLPZ. The restrictions placed on timber operations in riparian habitats provides that even if any of these species are present, timber operations may at most impact individuals but will not place survival and reproduction in immediate jeopardy, affect the species range, cause the species to become endangered within the foreseeable future throughout all or a significant portion of its range, or eliminate a plant community. As such, this THP will not cause a significant adverse impact on these species.

The table below identifies the **twenty-six (26)** special status plant species that are restricted to habitats not present in the THP area or are protected by WLPZs.

Special status species with excluded habitat and/or habitat protected by WLPZs

Scientific Name	Common Name	Habitat/microhabitat	CRPR	S Rank	CESA	FESA
Agrostis blasdalei	Blasdale's bent grass	Coastal dunes, coastal bluff scrub, coastal prairie.	1B.2	S2	None	None
Brasenia schreberi	watershield	Freshwater marshes and swamps.	2B.3	S3	None	None
Castilleja mendocinensis	Mendocino Coast paintbrush	Coastal dunes, coastal bluff scrub, coastal prairie, closed-cone coniferous forest, often found on coastal dunes.	1B.2	S2	None	None
Carex californica	California sedge	Bogs and fens, meadows and seeps, marshes and swamps.	2B.2	S2	None	None
Carex saliniformis	deceiving sedge	Coastal prairie, coastal scrub, meadows and seeps, marshes and swamps.	1B.2	S2	None	None
Calystegia purpurata ssp. saxicola	coastal bluff morning-glory	Coastal dunes, coastal scrub, coastal bluff scrub, North Coast coniferous forest*. ***No species occurrences with North Coast coniferous forest habitat.***	1B.2	S2S3	None	None
Cuscuta pacifica var. papillata	Mendocino dodder	Coastal dunes (interdune depressions). Host species include *Gnaphalium* sp., *Silene* sp., and *Lupinus* sp. In Mendocino County and on *Polycarpon tetraphyllum* and *Calystegia purpurata ssp. saxicola* with *Sanicula arctopoides* nearby in SON Co.	1B.2	S1	None	None
Erigeron biolettii	streamside daisy	Broadleaved upland forest, cismontane woodland, North Coast coniferous forest. ***Microhabitat: mesic, rocky areas, dry slopes, rocks, ledges along rivers.***	3	S3?	None	None
Erigeron supplex	supple daisy	Coastal bluff scrub, coastal prairie.	1B.2	S2	None	None
Erysimum concinnum	bluff wallflower	Coastal dunes, coastal bluff scrub, coastal prairie.	1B.2	S2	None	None

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Fritillaria roderickii	Roderick's fritillary	Coastal bluff scrub, coastal prairie, valley and foothill grassland.	1B.1	S1	CE	None
Gilia capitata ssp. pacifica	Pacific gilia	Coastal bluff scrub, chapparal (openings), coastal prairie, valley and foothill grassland.	1B.2	S3	None	None
Gilia capitata ssp. tomentosa	woolly-headed gilia	Coastal bluff scrub, valley and foothill grassland, often on rocky, serpentine outcrops.	1B.1	S2	None	None
Glyceria grandis	American manna grass	Bogs and fens, meadows and seeps, marshes and swamps (lake margins, stream banks).	2B.3	S3	None	None
Hesperevax sparsiflora var. brevifolia	short-leaved evax	Coastal dunes, coastal bluff scrub (sandy), coastal prairie.	1B.2	S3	None	None
Hesperocyparis pygmaea	pygmy cypress	Closed-cone coniferous forest, often on podzol-like soil.	1B.2	S1	None	None
Horkelia marinensis	Point Reyes horkelia	Coastal dunes, coastal scrub, coastal prairie, often on sand dunes near the coastline.	1B.2	S2	None	None
Horkelia tenuiloba	thin-lobed horkelia	Broadleaved upland forest, chapparal, valley foothill and grassland, often in opening on sandy soils or mesic areas.	1B.2	S2	None	None
Lasthenia californica ssp. bakeri	Baker's goldfields	Closed-cone coniferous forest (openings), coastal scrub, meadows and seeps, marshes and swamps.	1B.2	S1	None	None
Lasthenia californica ssp. macrantha	perennial goldfields	Coastal bluff scrub, coastal dunes, coastal scrub.	1B.2	S2	None	None
Lathyrus palustris	Marsh pea	Bogs and fens, lower montane coniferous forest, marshes and swamps, North Coast coniferous forest, coastal prairie, coastal scrub, (mesic). ***Occurs in wetlands.***	2B.3	S1S2	None	None
Piperia candida	white-flowered rein orchid	North Coast coniferous forest, lower montane coniferous forest, broadleaved upland forest, ultramafic, sometimes on serpentine soil.	1B.2	S3	None	None
Potamogeton epihydrus	Nuttall's ribbon-leaved pondweed	Marshes and swamps (shallow freshwater). Occurs in wetlands.	2B.2	S2S3	None	None
Sidalcea malviflora ssp. purpurea	Purple-stemmed checkerbloom	Broadleaved upland forest, coastal prairie. Occurs usually in wetlands.	1B.2	S1	None	None
Sidalcea calycosa ssp. rhizomata	Point Reyes checkerbloom	Marshes and swamps (freshwater near the coast). Occurs in wetlands.	1B.2	S2	None	None
Sulcaria spiralifera	twisted horsehair lichen	Coastal dunes, North Coast coniferous forest (immediate coast), usually on conifers.	1B.2	S2	None	None

RANGE ASSESSMENT

Of the **six (6)** remaining special-status flora**, one (1)** special status plant species have a range of such expanse that even if any of these species are present and timber operations impact individuals, those timber operations will not place survival and reproduction in immediate jeopardy, affect the species range, cause the species to become endangered within the foreseeable future throughout all or a significant portion of its range, or eliminate a plant community. As such, this THP will not cause a significant adverse impact on these species.

Scientific Name	Common Name	CRPR	State Rank	CESA	FESA
Lathyrus palustris	Marsh pea	2B.3	S1S2	None	None

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The **five (5)** special status plant species that remain are ranked (State Rank SX, SH, S1, S2, or S3 or CRPR rank of 1A, 1B, 2A, 2B or 3 and/or listed CESA or FESA) and express narrow distribution and/or occurrences that overlap the THP. Considerations are focused on the likelihood of species occurrence in the THP and scenarios where THP operations could significantly impact species populations as a whole if any such occurrences are present. If the proposed operations are deemed to have the potential to cause a significant adverse impact to a population as a whole, then botanical surveys are necessary to determine if avoidance measures are necessary.

Scientific Name	Common Name	CRPR	State Rank	CESA	FESA
Astragalus agnicidus	Humboldt County milk-vetch	1B.1	S2	CE	None
Eastwoodiella californica	swamp harebell	1B.2	S3	None	None
Kopsiopsis hookeri	small groundcone	2B.3	S1S2	None	None
Lilium maritimum	Coast lily	1B.1	S2	None	None
Trifolium buckwestiorum	Santa Cruz clover	1B.1	S2	None	None

SENSITIVE NATURAL VEGETATION COMMUNITIES

The ***Sequoia sempervirens* Forest Alliance** is ranked as Sensitive (S3) by the CDFW. However, this community composed either a partial or primary composition throughout this THP. GRT company policy stipulates proper care of this vegetation community through the practices of retaining old growth trees for wildlife habitat and the planting of redwood seedlings where reforestation is appropriate.

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Attachment:

Marbled Murrelet (MAMU) Consultation **16-R1-CTP-041-MAMU** for
"Green Bridge" Habitat Area in Association with
Timber Harvesting Plan (THP) 1-16-094 MEN "Plum" in Mendocino County

The marbled murrelet is a small seabird that nests within multistoried canopies on platforms with surface areas at least 4 inches by 4 inches. MAMU are found in trees with large lateral limbs, epicormic branching, epiphytic growth and/or intertwined branching and are often associated with late seral (post-mature) forests and/or trees with late seral-like structural characteristics.

The marbled murrelet is listed as State endangered pursuant to Fish and Game Code Section (§)2050 *et seq.*, Federally threatened pursuant to Section 1531, Title 16, United States Code (16 U.S.C) *et seq.*, and is a sensitive species as defined by Title 14, California Code of Regulations (14 CCR), §895.1. This consultation is being conducted pursuant to 14 CCR §919.11, which requires consultation with CDFW.

This consultation is in response to potential MAMU nesting habitat observed during the October 17, 2016, pre-harvest inspection of the THP adjacent to the "Green Bridge Habitat Area". The Green Bridge Habitat Area is comprised of several late seral trees and/or tress with late seral characteristics displaying a multistory canopy with large re-iterating limbs and epicormic branching providing suitable platforms for MAMU nesting. This small stand of trees is on the Stillman property north of the Green Bridge and along the left (eastern) bank of the North Fork Gualala River (sees Figure A-1). United States Fish and Wildlife Service (USFWS) identified the Green Bridge Habitat Area as potential habitat requiring technical assistance for an earlier THP in the area (USFWS letter 1-14-2000-837 dated October 3, 2000).

While the nearest MAMU inland detection occurred along Skaggs Creek Road less than 12 air miles south, southeast of the Green Bridge Habitat Area, numerous observations groups of murrelets numbering as many as 12 have been observed toward the end of the breeding season at the mouth of the Gualala River, approximately 2 air miles west of the Green Bridge Habitat Area. Offshore surveys in 2001 detected up to 26 individual murrelets including at least 1 potential juvenile off the southern Gualala coastline (between the mouth of the Gualala and Sea Ranch less than 4 miles to the south, southeast of Gualala).

Proposed activities

The THP proposes timber operations (specifically associated with Unit 1) within 300 feet of the Green Bridge Habitat Area. Operations within Unit 1 include use and maintenance of existing permanent and seasonal appurtenant roads, timber harvesting, and tractor yarding on the existing skid trails. Proposed timber operations within 825 feet of the Green Bridge Habitat Area include use and maintenance of existing permanent and

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seasonal appurtenant roads, as well as a paved, public road; temporary Class I watercourse crossing installation and removal; timber falling; and tractor yarding on the existing skid trail network, as well as other THP related activities.

The RPF indicated the Green Bridge is not to be used because its structure is insufficient to pass large vehicles, such as logging trucks. Instead, the THP proposes to use a temporary crossing below the Green Bridge for heavy equipment ingress/egress for Unit 1.

For the purposes of consultation 16-R1-CTP-041-MAMU, the existing ambient sound level associated with the Green Bridge Habitat Area shall be *Moderate*[7] (71-80dB) based on the presence of residential traffic crossing the Green Bridge.

Until completed MAMU surveys[8] result in "no detection" CDFW concurrence is amended to the THP, CDFW recommends the THP include the following MAMU protection measures in Section II, Item 32 of the THP:

1. No vegetation modification shall occur within 300 feet of the Green Bridge Habitat Area (see Figure A-1).

2. Based on the ambient noise level *Moderate*[7], during the MAMU breeding season (March 23 through September 15) take avoidance shall include the following measures:

    a. Anticipated project generated sounds exceeding 90 dBs or a "Very High"[9] sound level shall not occur within 330 feet of the Green Bridge Habitat Area during the MAMU breeding season (March 24 through September 15);

    b. Anticipated project generated sounds exceeding 90 dBs or a "Very High"[9] sound level shall not occur within 825 feet of the Green Bridge Habitat Area during the Dawn Period (between 2 hours before sun rise and 2 hours after sunrise) and Dusk Period (between 2 hours before sunset and 2 hours after sunset) within the MAMU breeding season (March 24 through September 15);

    c. Anticipated project generated sounds exceeding 100 dBs or a "Extreme" [9] sound level shall not occur within 825 feet of the Green Bridge Habitat Area during the MAMU breeding season (March 24 through September 15);

---

[7]USFWS Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northern California – 8-14-2006-2887 dated July 31, 2006.

[8] Protocol survey consistent with Mack, D. E., W. P. Ritchie, S. K. Nelson, E. Kuo-Harrison, P. Harrison and T. E. Hamer. 2003. Method for surveying marbled murrelets in forests: a revised protocol for land management and research, Pacific Seabird Group Technical Publication Number 2.

[9] Anticipated sound levels may be assessed using USFWS Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northern California – 8-14-2006-2887 dated July 31, 2006, Table 2. Some Common Sound Levels for Equipment Activity.

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d. Anticipated project generated sounds exceeding 100 dBs or a "Extreme" [9] sound level shall not occur within1,320 feet of the Green Bridge Habitat Area during the Dawn Period (between 2 hours before sun rise and 2 hours after sunrise) and Dusk Period (between 2 hours before sunset and 2 hours after sunset) within the MAMU breeding season (March 24 through September 15).

3. Along the public road and all appurtenant roads within 825 feet of the Green Bridge Habitat Area (see Figure A-2), THP related vehicles shall adhere to the following during the MAMU nesting season (March 24 to September 15):

   a. Do not exceed 15 miles per hour within 2 hours prior to dawn and 2 hours after dusk;

   b. Restrict stopping to the minimum required in order to safely use public and connecting appurtenant roads;

      and

   c. Prohibit log load band tightening.

Year-round protection measures:

4. Workers shall not leave food waste or personal trash within 1,320 feet of the Green Bridge Habitat Area.

5. In the event that a marbled murrelet is found grounded during any activity associated with the THP, CDFW shall be contacted immediately.

Please direct questions or correspondence regarding consultation 16-R1-CTP-041-MAMU to Environmental Scientist Adam Hutchins at (707) 964-1980, or E-mail adam.hutchins@wildlife.ca.gov.

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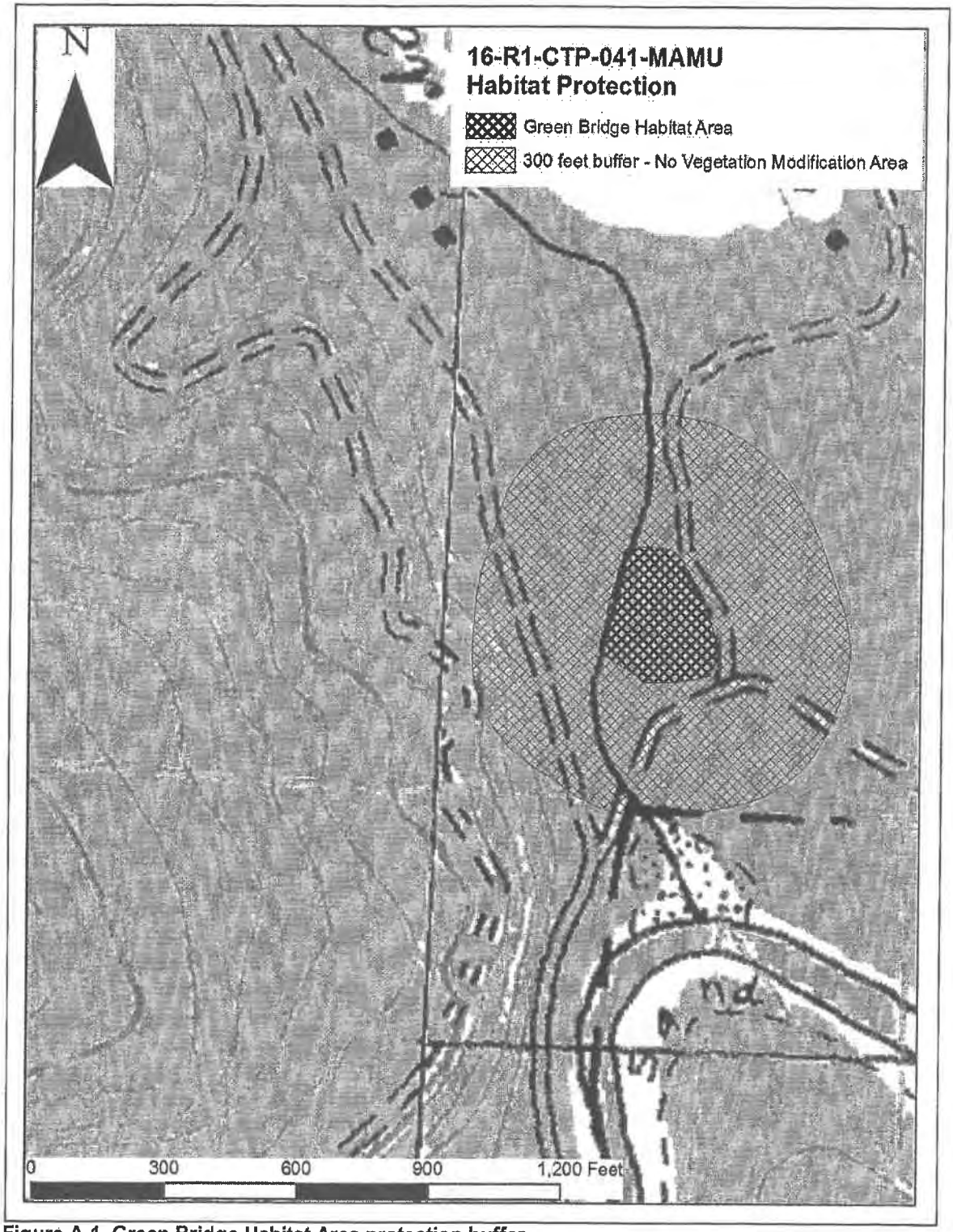

Figure A-1. Green Bridge Habitat Area protection buffer.

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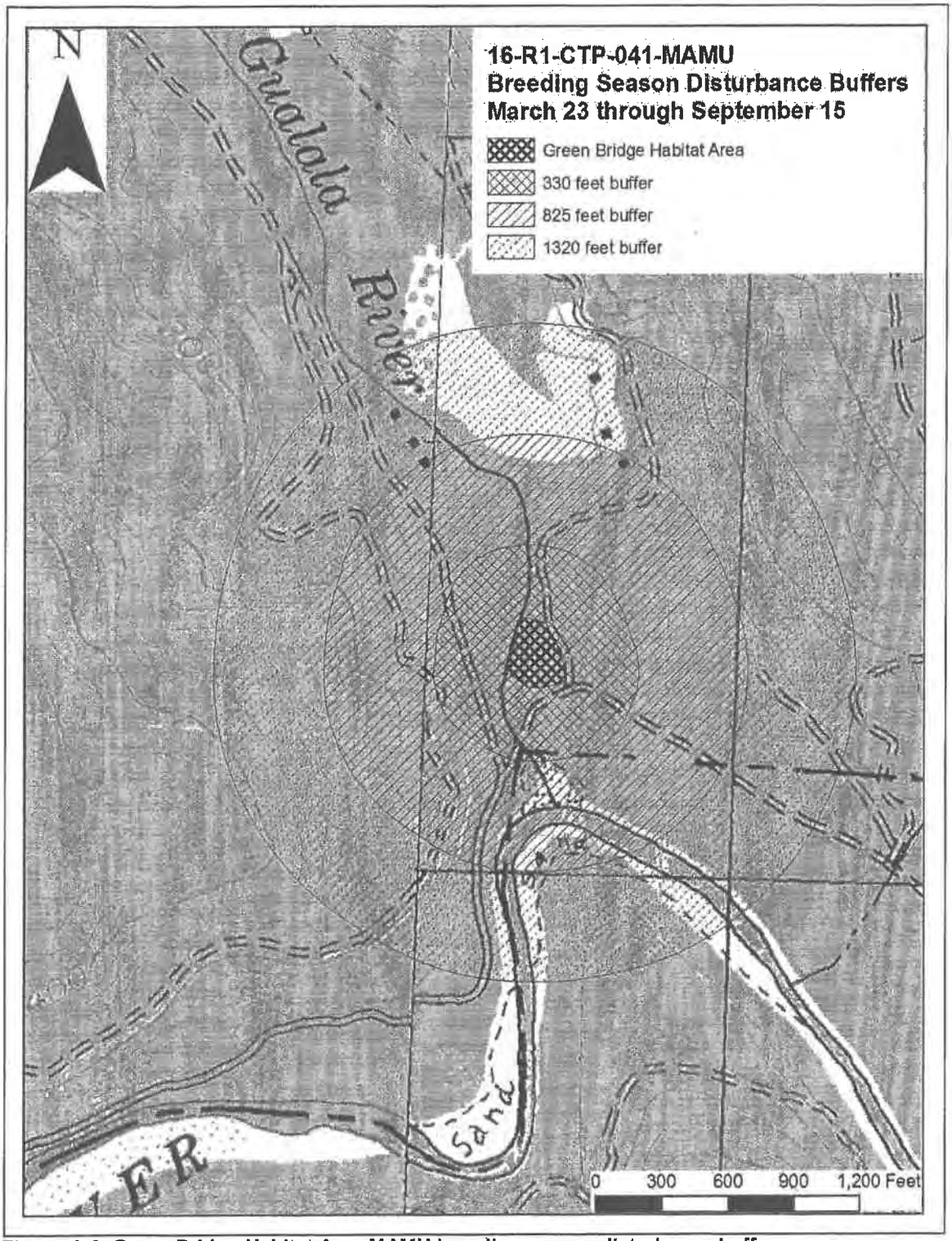

Figure A-2. Green Bridge Habitat Area MAMU breeding season disturbance buffers.

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Outlook

1-26-00076-SON 1st RTQ RPF Responses

From Seamus Morrison Fleming <seamus@jaforestry.com>
Date Tue 7/7/2026 12:22 PM
To CAL FIRE Santa Rosa Review Team <santarosareviewteam@fire.ca.gov>
Cc Sone, Kim@CALFIRE <Kim.Sone@fire.ca.gov>; Adam, Hillary@DOC <hillary.adam@conservation.ca.gov>; Fowler, David@Waterboards <David.Fowler@waterboards.ca.gov>; Garrison, Kristin@Wildlife <Kristin.Garrison@wildlife.ca.gov>; Mark Pugsley <mpugsley@pacificstates.com>

1 attachment (4 MB)
LP_1st Review_RPF Responses.pdf;

This Message Is From an External Sender
This message came from outside your organization.
Report Suspicious

Please see the attached RPF responses to first review questions with revised pages to THP 1-26-00076-SON "Little Pepperwood".

Thanks,

Seamus Fleming, RPF #3130
Jacobszoon & Associates, Inc.
Office: (707) 485-5544 ext. 105
Cell: (707) 485-2720
https://jaforestry.com/index.htm

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