August 5th, 2026

CAL FIRE
Resource Management
135 Ridgway Avenue
Santa Rosa, CA 95401
santarosareviewteam@fire.ca.gov

RE: Return Responses to 1-26-00099-MEN

Below are responses to the Return questions for 1-26-00099-MEN. The RPF responses are highlighted in **Bold text**.

CAL FIRE Questions:

1. Section I, Item 7.c. (page 6): The note at the bottom of page 260 indicates that a small portion of the proposed Timber Operations are within the South Fork Gualala Planning Watershed. Please revise Item 7.c. for compliance with 14 CCR § 1034(g)(4).
Please see revised Section I, Item 7.c.

2. Section II: The proposed fuelbreak silviculture does not include specific vegetation and fuel treatment beyond the treatment of Slash created by Timber Operations [ref. Plan Section II, pages 63 & 78]. Please revise Section II of the Plan to include enforceable treatments (including timing) to reduce the existing fuels to meet the proposed objectives of the fuelbreak silviculture per 14 CCR § 913.4(c).
The vegetation and fuelbreak treatments were stated in Item 14 under the stocking standards. Please see Item 14. Item 38 has been changed to reference Item 14 and Item 30.

3. Section II, Item 14.i. (page 17): The Site Preparation Addendum states that the Site Preparation areas is the same as the Logging Area; however, the Focused Engineering Geologic Assessment recommends various limitations to the proposed operations on Unstable Areas. Please revise the Site Preparation Addendum to clarify the proposed Site Preparation activities on Unstable Areas for consistency with the Professional Geologist's recommendations; and please revise Section II to include a map identifying the boundaries of Site Preparation areas, if different from Logging Area boundaries, and distinguishing areas by type of Site Preparation activity for compliance with 14 CCR § 915.4(f).
Please see revised Section II, Item 14.i.

4. Section II, Item FF (pages 34-37): On page 32, the Plan states that Logging Roads and Landings will be constructed during the Winter Period. Please revise the Winter Period operating plan (WPOP) to specifically address the proposed Seasonal Road construction (which includes exceptions to 14 CCR §§ 923.1(b), 923.1(d), & 923.2(a)(7)) and Landing construction during the Winter Period pursuant to 14 CCR § 923.4(l).
The WPOP specifically addresses the proposed road construction R1 multiple times on pages 33, 35 and 37.

5. Section II, Item FF.10. (pages 36 & 37): The WPOP prohibits Tractor Operations on slopes steeper than 50% with high Erosion Hazard Rating (EHR) but then states that this prohibition is not applicable to this THP. However, Item 21.c. indicates that Tractor Operations are proposed on slopes steeper than 50% with a high EHR. Please revise the Plan for clarity and consistency.
Please see revised Section II, Item FF.10.

6. Section III, Analysis of Project Alternatives (page 124): The first sentence of the fourth paragraph indicates that the Plan includes flood prone areas; however, Section II, Item 26 does not include Watercourse protection measures for flood prone areas. Please revise the Plan for clarity and consistency.
Please see revised Section III, Analysis of Project Alternatives.

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7. Section III, No Project Alternative (page 126): The proposed Plan includes treatments for SEPES [ref. 14 CCR § 895.1: Significant Existing or Potential Erosion Site] as well as the treatment of a Logging Road Watercourse crossing that "is currently a barrier to some life stages of fish" [ref. Plan Section II, Map Point 13, page 84]. Please revise the "No Project" alternative to disclose and discuss the potential significant adverse Effects of this alternative [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].
Please see revised Section III, No Project Alternative.

8. Section III, Alternative Yarding Methods (page 128): Please revise the analysis to specifically discuss the Feasibility of cable yarding areas where Logging Road construction and Tractor Operations are proposed on slopes steeper than 65%.
Please see revised Section III, Alternative Yarding Methods.

9. Section III, Reduced Scale Alternative (pages 128 & 129): The reduced-acreage alternative is dismissed because fuelbreak benefits would be reduced and compliance with ASP Rules should prevent measurable effects, but it does not examine the most obvious reduced-Impact alternative: treating the ridge-top fuelbreak while omitting R1 and the steep northern selection area. If this alternative was considered but rejected during scoping, please briefly explain the reasons underlying these determinations [ref. 14 CCR § 15126.6(c)]. Among the factors that may be used to eliminate alternatives from detailed consideration are (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental Impacts.
The discussion states "The project is topographically advantageous for creating fire resilient stands and fuel/fire breaks, and the road area, while steeper, has limited yarding and allows for the correction of 3 SEPES and the construction of R1. R1 is proposed based on the landowners' objective of creating connectivity of safe mainline roads within the property to conduct forest management activities as well as allow for emergency access for firefighting or for planned prescribed burns that would benefit from additional access for fire engines. MP 13 is also located in this steeper area, and is proposed for removal to create an improved low water ford with restored fish passage." Please explain how this is would not qualify as factor (1) stated above, that is being used to eliminate alternatives from detailed consideration or is a brief explanation of the reason underlying the determination.

10. Section III, Plan Addendum to Item 24.d. (pages 136 & 137): Logging Road construction on Unstable Areas is only allowed when Unstable Areas are unavoidable [ref. 14 CCR § 923.1(d)]. Please revise the addendum to explain why avoidance of the Unstable Areas is not Feasible.
Please see revised Section III, Plan Addendum to Item 24.d.

11. Section III, Plan Addendum to Item 24.g. (not included): The Plan proposes exceptions to the requirements of 14 CCR § 923.2(a)(7). Although the specific measures to minimize movement of soil and the discharge of concentrated surface runoff are incorporated in the plan, the proposed exceptions must also be explained and justified pursuant to 14 CCR § 923(c). Please revise the Plan to include a Plan Addendum to Item 24.g. accordingly.
Please see revised Section III, Plan Addendum to Item 24.g.

12. Section IV, Statutory and Regulatory Framework Discussion (page 149 & 150): This discussion includes multiple inapplicable Northern District rule references. Please revise this discussion to refer to the applicable Coast District rules.
Please see revised Section IV, Statutory and Regulatory Framework Discussion.

13. Section IV, Watershed Impacts Assessment Area Description (page 154): The Planning Watershed number provided is incorrect, and so is the acreage. Please revise the watershed Impacts assessment area description for accuracy. Additionally, pages 157 & 167 also indicate the incorrect acreage for the WAA. Please revise.
Please see the revised Planning Watershed number. The acres provided are the correct acres using planar (not geodesic) calculations.

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14. Section IV, Fire Hazard Severity Zoning (pages 155 & 256): The assessment-area description indicates that the entire THP is in a Moderate Fire Hazard Severity Zone, but the assessment itself states that the plan is in Moderate and High zones. Please revise the Plan for consistency and accuracy
Please see revised Section IV, Wildfire Risk and Hazard Assessment.

15. Section IV, Past activities vs Past Projects (pages 165-257): Many of the assessments confuse the influence of past land use activities on the Environmental setting (baseline conditions) with the Effects of Past Projects [ref. 14 CCR §§ 895.1, 15358 & 15360]. Please revise the Cumulative Impacts Assessment to clearly distinguish between the Effects of Past Projects and the influence of past land use activities on the existing Environmental setting. Additionally, the most comprehensive list of Past Projects is described within the Sediment Effects subsection of the watershed Impacts assessment. Please consider establishing one list of Past Projects prior to and separate from the discussions of the Effects of Past Projects by resources subject for clarity.
Please see revised Section IV.

16. Section IV, Watershed Impacts Assessment – Sediment Effects – Quantitative Analysis of Past Projects – 10 Year (page 168): Please revise the assessment to identify and briefly describe the locations of the "several prescribed burn projects conducted by SRL in the last 3 years" [ref. Plan Section III, page 123] for compliance with TRA #2.D.1. Additionally, considering that "Data collected before and after the burn helps our science team understand and quantify impacts of the treatment work" [ref. https://www.savetheredwoods.org/our-work/initiatives/harold-richardson-redwoods-reserve/], please re-evaluate the Cumulative Impacts assessment (including the Impacts assessments for watershed resources, soil productivity, biological, GHG, wildfire risk & hazard, etc.) to consider the Impacts of these Past Projects, and discuss how these Impacts could compound or increase the Environmental Impacts of the proposed THP.
Please see revised Section IV.

17. Section IV, Watershed Impacts Assessment – Sediment Effects – Reasonably Foreseeable Probable Future Projects (pages 168 & 169): The discussion of Reasonably Foreseeable Probable Future Projects is speculative. Please curtail this discussion to disclose and discuss Reasonably Foreseeable Probable Future Projects [ref. 14 CCR § 895.1] and their potential Effects; and please clearly identify and describe the location of Reasonably Foreseeable Probable Future Projects within the assessment area per TRA #2.D.1., or state that there are none. Please also revise the other Reasonably-Foreseeable-Probable-Future-Projects subsections throughout the Cumulative Impacts assessment accordingly. Additionally, please revise the Cumulative Impacts assessment to identify and briefly describe the locations of the "planned prescribed burns" [ref. Plan Section III, page 128] for compliance with TRA #2.D.1.; and please reevaluate the Cumulative Impacts assessment (including the Impacts assessments for watershed resources, soil productivity, biological, GHG, wildfire risk & hazard, etc.) to consider the potential Impacts of these Reasonably Foreseeable Probable Future Projects, and discuss how these Impacts could compound or increase the Environmental Impacts of the proposed THP.
Please see revised Section IV.

18. RETURN – Section IV, Watershed Impacts Assessment – Sediment Effects – Proposed THP – Proposed Seasonal Road Construction (page 170): The assessment does not clearly disclose and discuss the potential Impacts (direct and/or indirect physical changes in the Environment caused by the proposed Timber Operations [ref. 14 CCR § 15358]) from the proposed exceptions: Seasonal Road Construction on Unstable Areas, steep slopes, and within the WLPZ. Please revise the assessment to provide a more thorough description of the potential Effects from these proposed exceptions, and substantiate the conclusion of 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), 916.1 & 923(c); TRA #2.A.1.a. & B.2.].For example, regarding the proposed exception to 14 CCR § 923.2(a)(7)—Seasonal Road Reconstruction across slopes exceeding 65 percent—please revise the assessment to explicitly identify and describe the following:• the direct/primary Impacts (e.g., displacement of organic surface matter, bare soil, Sidecast, soil compaction, etc.),• the potential indirect/secondary Impacts (e.g., concentrated surface runoff resulting in accelerated surface erosion and sediment transport),• the

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applicable requirements of the Rules (e.g., 14 CCR §§ 923.2(a)(4)-(7) & 923.5(b), (h), (j), etc.), and• the site-specific treatments to implement these requirements; and explain• how these required treatments will minimize and/or prevent secondary Effects, and• why these required treatments are sufficient to avoid Significant Adverse Impacts on the Environment.
Please see revised Section IV, Watershed Impacts Assessment – Sediment Effects – Proposed THP – Proposed Seasonal Road Construction.

19. Section IV, Watershed Impacts Assessment – Sediment Effects – Proposed THP – Proposed Seasonal Road Construction (page 170): The assessment states "Use during the dry season will eliminate the potential sediment effects from road construction." However, the Plan Section II, Item 23.c. and the Winter Period operating plan indicate that Seasonal Road construction and use are proposed during the Winter Period. Please revise the assessment for accuracy.
Please see revised Section IV, Watershed Impacts Assessment – Sediment Effects – Proposed THP – Proposed Seasonal Road Construction.

20. Section IV, Watershed Impacts Assessment – Water Temperature – Past Activities (pages 174 & 175): The cumulative water temperature Impacts assessment thoroughly describes the Environmental setting and explains the influence of past land use activities (including logging prior to the Forest Practice Act); however, it does not explicitly disclose or discuss the Effects of Past Projects. Please revise the assessment to describe the Effects of Past Projects; explain how the potential Effects of proposed Timber Operations could combine with the Effects of Past Projects and Reasonably Foreseeable Probable Future Projects to change the physical environmental conditions related to water temperature; and explain why these potential Cumulative Impacts are less than significant.
Please see revised Section IV, Watershed Impacts Assessment – Water Temperature – Past Activities.

21. Section IV, Watershed Impacts Assessment – Peak Flow – Past Projects (pages 182 & 183): This discussion (particularly the title) confuses the Environmental setting, as influenced by past land use activities, with the Effects of Past Projects [ref. 14 CCR §§ 895.1, 15358 & 15360]. Please revise the discussion for clarity.
Please see revised Section IV, Watershed Impacts Assessment – Peak Flow – Past Projects.

22. Section IV, Soil Productivity Impacts Assessment – Organic Matter Loss – Proposed THP – Silviculture (page 190): The assessment states that the proposed "…silvicultures overall will retain and maintain a high degree of overstory and understory cover throughout the Plan area…". Conversely, the proposed fuelbreak silviculture proposes to reduce Stocking to the minimum as well as Broadcast Burning. Please revise the assessment for accuracy.
Please see revised Section IV, Soil Productivity Impacts Assessment – Organic Matter Loss – Proposed THP – Silviculture. The plan does not propose to reduce stocking "to the minimum" and as stated in the plan, in most cases will be well above the minimum as the stands contain many large trees that are to be retained that would exceed 50 ft^2 ba/acre.

23. Section IV, Biological Impacts Assessment (page 199): The list of the nine quadrangle maps is incomplete—only eight are listed. Please revise the assessment for accuracy and completeness.
Please see revised Section IV, Biological Impacts Assessment.

24. Section IV, Biological Impacts Assessment – Baseline Conditions (4) Biological Habitat Conditions (page 200): The assessment states "There is a low presence of snags and special characteristic trees, a healthy multistory canopy, downed large woody material, low road density, moderate hardwood cover, no late seral forests or habitats, and no particularly interesting habitat elements." However, much of this statement contradicts the vegetation and stand description provided in Section III as well as the baseline conditions described elsewhere in Section IV. Please revise the assessment for clarity, consistency and accuracy.
Please see revised Section IV, Biological Impacts Assessment – Baseline Conditions (4) Biological Habitat Conditions.

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25. Section IV, Biological Resources Conclusion (page 232): The biological Impacts assessment concludes that "there is not a present significant adverse effect to soil productivity… Future projects are not anticipated to require extensive new road construction" and that "This THP should not result in additional growing space lost." Please revise.
That is section is the "Botanical" Resources conclusion.

26. Section IV, Recreation and Traffic Impacts Assessments – Reasonably Foreseeable Probable Future Projects (pages 242 & 245): The Save the Redwood League website states that "Planning is underway to design amenities that welcome people into the reserve…" [ref. https://www.savetheredwoods.org/our-work/initiatives/harold-richardson-redwoods-reserve/]. If this future Project meets the definition of a Reasonably Foreseeable Probable Future Project, please revise the assessments to disclose it, consider its potential Effects, and how its Effects could compound or increase the Environmental Effects of the proposed THP.
Please see revised Recreation Assessment. The information you are referencing represents the intention and potential ideas of SRL for the property, however, actual Projects beyond ideas, that have spatial and temporal information, are not "information that is reasonably available before submission of the Plan" (TRA #2) to the RPF, therefore it is not a part of the assessment, nor does it meet the definition of a Reasonably Foreseeable Probable Future Project. The League intends to and one day may choose to install amenities, however there is no actual project to identify, discuss, analyze or map, with no actual timeline, and it is unknown whether the planned activities would be considered Projects. In addition, public access improvements and amenities can be as simple as port-o-potties and portable sinks which are not Projects. Please see the revised section for a version of this explanation.

27. Section IV, Traffic Impacts Assessment – Past Projects (pages 245): This discussion (particularly the title) confuses the Environmental setting, as influenced by past land use activities, with the Effects of Past Projects [ref. 14 CCR §§ 895.1, 15358 & 15360]. Please revise the discussion for clarity.
Please see revised Section IV, Traffic Impacts Assessment – Past Projects.

28. Section IV, Traffic Impacts Assessment – Proposed THP (pages 245): The assessment states that "The RPF has determined that the addition of 1-4 trucks to traffic patterns during these times would have minimal effects to normal traffic." Please revise the assessment to establish a unit of time for the "1-4 trucks" (e.g., per hour, per day, per week). Additionally, please revise the assessment to indicate the meaning of "these times". Furthermore, the quantitative Effects of the proposed THP are meaningless without a quantitative baseline condition and the quantitative Effects of Past Projects and Reasonably Foreseeable Probable Future Projects. Please revise the assessment accordingly.
Please see revised Section IV, Traffic Impacts Assessment- Proposed THP.

29. Section IV, Traffic Impacts Assessment – Proposed THP (pages 245): The Plan proposes various Timber Operations, including broadcast burning, adjacent to Tin Barn Road. Please revise the assessment to disclose and discuss the Effects of Timber Operations adjacent to Tin Barn Road on traffic.
Please see revised Section IV, Traffic Impacts Assessment- Proposed THP.

30. Section IV, Traffic Impacts Assessment – Conclusion (pages 245): The assessment concludes that "The existing conditions within the Traffic Assessment Area indicate that there is no effect on traffic resources…"; however, this assertation is not substantiated. Please revise the conclusion of the assessment to explain how the potential Effects of proposed Timber Operations could combine with the Effects of Past Projects and Reasonably Foreseeable Probable Future Projects to change the amount of traffic on Public Roads.
Please see revised Section IV, Traffic Impacts Assessment – Conclusion.

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CDFW Questions

31. Section II, Items 24 and 25, page 45, Water Drafting for Dust Abatement –Items 24 and 25 and the Notification Information List Pursuant to Fish and Wildlife Code Section 1611 (1611 Addendum), page 142, does not provide details regarding water drafting. Please consider revising Item 24 and 25 and the 1611 Addendum to include a description of specific drafting methods (e.g., pump, water truck, other details), the maximum number of gallons that may be drafted per day, and the maximum number of gallons per minute.
Please see revised 1611 Addendum.

32. Section II, Item 32(a), pages 69-71, Marbled Murrelet (MAMU) – The THP states "Surveys were conducted for 2025 and are planned for 2026.", discusses the CDFW MAMU Pre-Consultation letter, and includes the pre-consultation letter recommendations. However, Item 32(a) does not include discussion regarding the 2026 survey findings nor the subsequent CDFW MAMU Post-Survey Consultation letter. Please revise Item 32(a) to state that if MAMU are detected during the 2026 surveys, CDFW shall be contacted immediately (R3Timber@wildlife.ca.gov). Additionally, please include language in Item 32(a) stating 2026 surveys shall be submitted to CDFW for review and the MAMU Post-Survey Consultation letter shall be amended into the THP and the post-survey recommendations shall replace the current recommendations listed in Item 32.
Please see revised Section II, Item 32(a).

33. Section II, Item 32(a), page 72, Coho Salmon, Steelhead, Chinook Salmon – The THP states that coho salmon, steelhead, and chinook salmon may be present within the Class I watercourse in which Map Point 13 is located. The map point table on page 84 for Map Point 13 states, "A Class I watercourse crosses an existing seasonal road via a functional 72" CMP…" and "…Prior to completion of operations, remove the culvert and associated fills and install a low-water ford as per Diagram 7. Install a coffer dam to dewater at the site during crossing removal and installation." Section III, Notification Information List Pursuant to Fish and Wildlife Code Section 1611 (1611 Addendum), page 142, states that work will be conducted "April 1 through November 15". Item 32(a) and the 1611 Addendum do not include protective measures for listed fish species at Map Point 13. Please evaluate the impacts to listed fish species at Map Point 13 and revise Item 32(a) and the 1611 Addendum to include protection measures including a modified work period to avoid listed fish species that may be present at Map Point 13.
Please see revised 1611 Addendum and Item 32(a).

34**.** Section II, Item 26(e), page 51, Lake and Streambed Alteration Agreement (LSAA) – Item 26(e) is checked "Yes" indicating this THP is being used to satisfy as Notification to CDFW for a Streambed Alteration Agreement (Fish and Game Code Section §1611) for Map Points 1, 2, 3, 6, 7, 11, 12, 13, 13.1, 15, T4, WH-1, and WH-2 . The Map Point Table on page 86 and 87 for Map Points T1, T2, and T3, state, "…excavate the channels to watercourse grade where they cross the trail and lay back the banks 1.5H:1V." These crossings are listed as "No" for 1600, however, the work includes a modification of the stream bank which constitutes a significant impact. Please consider revising the Map Point Table to state "Yes" for 1600 for Map Points T1, T2, and T3.
The Notification is deemed received by CDFW as of the CAL FIRE filing date. CDFW will determine within 30 days (per Fish and Game Code Section §1602(a)(2)) of this filing date if the Notification is complete. CDFW is required to submit a draft LSAA to you within 60 calendar days from the date the notification is deemed complete. Unless you request otherwise, the notification will be deemed void if the THP is returned by CAL FIRE or withdrawn by the submitter. Please note that if it is determined at the PHI that the proposed timber operations may substantially alter the bed, bank, or channel of a watercourse at additional locations, those map points may require notification to CDFW for inclusion in the LSAA (Fish and Game Code §1600 et. seq.). Please be advised that on June 1, 2022, CDFW began processing LSAA notifications using the Electronic Permit Information System (EPIMS). This transition does not change the notification process for projects with an approved THP. CDFW encourages the applicant to visit https://epims.wildlife.ca.gov/index.do to register for an account so that CDFW can use this system to process the LSAA and transmit draft and final agreements in as timely a manner as possible. Additional information

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regarding the Lake and Streambed Alteration Program is available at https://wildlife.ca.gov/Conservation/LSA.
Please see the revised notification.

WQ Questions:

35. 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 or Waivers of 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), the NTMP General WDRs (Order No. R1-2013-0005), an individual waiver or WDR, or in some cases a Watershed-wide WDR. Please note, the Categorical Waiver (Order No. R1-2009-0038) is no longer active. All THPs must seek coverage under the General WDR or apply for an individual waiver or WDR. The RWB also adopted a Waiver, Order No. R1-2014-0011 (supersedes Order No. R1-2009-0038), which can provide coverage for low impact THPs, Modified THPs (MTHPs), Emergencies, Exemptions, and timber harvest projects in compliance with the Garcia River TMDL. Copies of the GWDR, as well as other timber related information, can be found at the following web address:https://www.waterboards.ca.gov/northcoast/water_issues/programs/forest_activities/private_forest_land/
The RPF agrees.

If you have any questions or concerns, please feel free to contact me.

Thank you,

Madeline V Pusich

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