JACOBSZOON & ASSOCIATES, INC.
natural resource planning & management

October 8, 2026

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

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

RPF Response to CAL FIRE 1:

1. The plan states that drafting from shallow watercourses where that water level is lowered is a concern for FYLF and states that there is no habitat at risk of this within the plan area. The plan proposes propose drafting from existing Class I. Please clarify the habitat within water drafting locations regarding suitability for FYLF. If FYLF is not at risk due to drafting practices, please clarify the mechanism by which those drafting operations avoid impact for the species. Additionally, the plan states that protection will be provided by WLPZ requirements and ASP zones. Please clarify how the proposed operations within WLPZs have been designed to avoid impact of the species. Finally, the plan states that red-legged frog protection measures will provide protection for the FYLF. Please clarify the biological suitability of the red legged frog protection measures for foothill yellow legged frog. Please clarify if the red legged frog observation measures are to be implemented for fylf.

RPF response: The plan proposes indirect water drafting from a gravel pit no closer than 10 feet from the wetted channel of the SF Gualala River. FYLFs require perennial water during the summer and fall months for foraging, preferring flowing water. The gravel pit drafting site offers poor FYLF habitat compared to the adjacent SF Gualala River and other suitable habitat in the THP area. THP Item 26 includes language to avoid accidental take of fish and other aquatic species, including prohibiting drafting from the wetted channel and requiring fine-meshed intake screens (3/32" round or 1/16" horizontal slotted openings). These measures have been adequate at protecting FYLF and CRLF during previous drafting operations at this site. Protection measures for CRLF provided in THP Item 32 will provide adequate protection for FYLF as FYLF has stricter habitat requirements than CRLF and will rarely leave perennial water sources. The Gualala Watershed supports an abundant population of FYLF. The proposed drafting at Map Point 1248 will not result in a significant impact to FYLF habitat or the population. For these reasons, no impact to FYLF is anticipated. See revised THP pages 67 and 68.1.

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ITEM #19 TRACTOR OPERATIONS IN AREAS DESIGNATED FOR CABLE YARDING

[ref. 14 CCR § 914.2 [934.2, 954.2]]	
a. [☐]Yes [**X**]No	Will Non-Tethered Tractor Operations occur in areas designated for Cable Yarding on slopes over 50%? **If "Yes" provide site specific instructions to the LTO in SECTION II, including operation measures necessary to avoid or minimize significant effects.** **NOTE: Regardless of slope, boundaries of all areas where Tractor Operations are proposed in areas designated for Cable Yarding shall be mapped per 14 CCR § 1034(x)(17). In addition, provide an explanation and justification for any Tractor Operations in areas designated for Cable yarding in SECTION III.**

ITEM #20 ALTERNATIVE PRACTICES TO STANDARD RULES

[ref. 14 CCR § 914.9 [934.9, 954.9](a)]	
a. [☐]Yes [**X**]No	Is the RPF proposing any Alternative Practices to the standard rule on a site-specific basis? **If "Yes" provide instruction to the LTO in SECTION II on how the Alternative shall be implemented to maintain equal protection of the standard rule. In SECTION III, explain how the Alternative Practice proposed achieves environmental protection at least equal to that which would result from using measures stated in 14 CCR §§ 914.1-914.8, & 934.1-934.8, & 954.1-954.8.**

ITEM #21 GROUND BASED EQUIPMENT

[ref. 14 CCR 14 CCR § 914.2 [934.2, 954.2](a)-(i)]	
ASP NOTE: per 14 CCR § 916.9 (k)(1) – Year-around tractor road limitations, Tractor roads shall not be used when operations may result in significant sediment discharge and (m) Tractor Road Drainage Facility Installation - All tractor roads shall have drainage and/or drainage collection and storage facilities installed as soon as practical following yarding and prior to either (1) the start of any rain which causes overland flow across or along the disturbed surface within a WLPZ or within any ELZ or EEZ designated for watercourse or lake protection, or (2) any day with a National Weather Service forecast of a chance of rain of 30 percent or more, a flash flood warning, or a flash flood watch.	
Will ground-based equipment be used on:	
a. [**X**]Yes [☐]No	Unstable areas? (Only allowed if unavoidable) **If "Yes" the RPF shall develop specific measures to minimize the effect of operations on slope stability. Provide site specific instructions to the LTO in SECTION II and provide the required explanation and justification in SECTION III.** **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. This exception practice will occur in designated tractor ground in Variable Retention unit #6 within the feature identified as D1 on THP maps. The exception area is approximately 6.2 acres in size. Heavy equipment use within this feature shall be limited to existing, stable skid trails that have been flagged by the RPF. Water bars shall be installed on exception skid trails at Extreme EHR intervals. See Section III for an explanation and justification of the proposed practice.**

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ITEM # 23 – WINTER OPERATIONS

Per 14 CCR § 895.1:
"Winter Period" means the period between November 15 and April 1, Except under special County Rules per 14 CCR §: 925.1 (Santa Clara), 926.18 (Santa Cruz), 927.1 (Marin), 965.5 (Monterey)

"Extended wet weather period" means the period from October 15 to May 1.

- **Tractor roads (except as otherwise provided in the rules):**
  - All waterbreaks shall be installed no later than the beginning of the winter period of the current year of timber operations.
  - Installation of drainage facilities and structures is required from October 15 to November 15 and April 1 to May 1 on all constructed skid trails and tractor roads prior to sunset if the National Weather Service forecast is a "chance" (30% or more) of rain within the next 24 hours per 14 CCR § 914.6 [934.6, 954.6](a).
- **Logging roads and landings used for timber operations shall have adequate drainage**:
  - Upon completion of use for the year or by October 15, whichever is earlier.
  - An exception is that drainage facilities and drainage structures do not need to be constructed on logging roads and landings in use during the extended wet weather period provided that all such drainage facilities and drainage structures are installed prior to the start of rain that generates overland flow per 14 CCR § 923.5 [943.5, 963.5](j).
- When the term Winter Period Operating Plan (WPOP) is used below, all the requirements per 14 CCR § 914.7 [934.7, 954.7](b) must be addressed.

Winter Operations	
If timber operations are proposed within the winter period, the RPF may propose to operate under a: • WPOP [ref. 14 CCR § 914.7 [934.7, 954.7](b)] • In-lieu winter operating plan [ref. 14 CCR § 914.7 [934.7, 954.7]]	
a. [X]Yes [☐]No	Will timber operations occur during the winter period?
Winter Period Operating Plan (WPOP)	
A WPOP is required when winter operations will occur under the following conditions: • Site preparation, Road and landing construction • Temporary logging road watercourse crossings will not be removed • At tractor watercourse crossings • Temporary logging roads or landings • Roads to be abandoned or deactivated • Operations are proposed in an ASP watershed or immediately upstream **NOTE: When a WPOP is required, provide operational instructions for the LTO in SECTION II**	
b. [☐]Yes [X]No	Will mechanical site preparation be conducted during the winter period? **If "Yes" then a WPOP is required per 14 CCR § 914.7 [934.7, 954.7](a).**
c. [☐]Yes [X]No	Will roads be constructed during the winter period? **If "Yes" a WPOP is required per 14 CCR § 914.7 [934.7, 954.7] addressing logging road and landing construction and reconstruction per 14 CCR § 923.4 [943.4, 963.4](l).**
d. [☐]Yes [X]No	Will landings be constructed during the winter period? **If "Yes" a WPOP is required per 14 CCR § 914.7 [934.7, 954.7] addressing logging road and landing construction and reconstruction per 14 CCR §923.4 [943.4, 963.4](l).**

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ITEM FF (NOTE: If a WPOP is not being proposed then the table below is not required)

Winter Period Operating Plan (WPOP)	
Per 14 CCR § 914.7 [934.7, 954.7](b) the WPOP shall include the specific measures to be taken during the winter period to avoid or substantially lessen erosion, soil movement into watercourses and soil compaction from timber operations. The WPOP shall address the following:	
1) Erosion Hazard Rating:	**Low, Moderate and High**
2) Mechanical Site preparation methods:	**Mechanical site prep is not proposed during the winter period.**
3) Yarding system: ***(Constructed skid trails and tractor road watercourse crossings)***	**Ground based and cable yarding may occur during the Fall and Spring Operating Periods as allowed below under 'Equipment Limitations'. Shovel yarding and feller buncher operations may occur during the Winter Period. Cable yarding may occur during the Winter Period. Ground based yarding may occur during the Winter Period as allowed below under 'Equipment Use Limitations'.**
4) Operating Period:	**Timber falling: Timber falling may be conducted during the winter period. The felling of trees that have a chance of accidentally entering a Class I or II watercourse shall be deferred until such time when equipment is available on-site to remove such trees from the watercourse.** **Ground-based yarding: Ground-based yarding shall be done only during dry rainless periods and shall not be conducted when saturated soil conditions that may produce significant sediment discharge are present. Significant Sediment Discharge (14 CCR 895.1) means soil erosion that is currently, or may in the future, discharge to watercourses or lakes in quantities that violate Water Quality requirements or result in significant individual or cumulative adverse impacts to the beneficial uses of water. Ground-based operations that produce a Significant Sediment Discharge which causes a visible increase in turbidity to receiving Class I, II, III, or IV waters is prohibited.** **Saturated soil conditions (14 CCR 895.1) means: "soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. Indicators or saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing material during timber operations, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials." Use of tractor roads and watercourse crossings within any WLPZ/ELZ will be prohibited during the winter period.** **Cable yarding: No limitations specific to the winter period except those limitations pertaining to roads and landings.** **On LOGGING ROADS AND LANDING SURFACES, saturated soil conditions may be evidenced by:** **Reduced traction by equipment as indicated by spinning or churning of wheels or tracks in excess or normal performance,** **Inadequate traction without blading wet soil,** **Soil displacement in amounts that cause visible increase in turbidity of the downstream waters in receiving Class I, II, III, or IV waters, or in amounts sufficient to cause a turbidity increase in drainage facilities that discharge into Class I, II, III, or IV waters, or creation of**

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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 same measures will be effective at protecting FYLF. 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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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. Implementation of WLPZ rules, CRLF protection measures, and general drafting conditions of THP Item 26 will provide adequate protection for this species.
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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Determination of 100-Year Flood Flow

Location: Little Pepperwood THP

(Enter data in fields with red-colored headings. Other data fields will be calculated automatically.)

Magnitude and Frequency Method for 100-year flood flow (A > 50 acres)

No.	Crossing	Area (acres) A	Basin maximum elevation (ft)*	Crossing elevation (ft)*	Area (mi^2) A	Avg. Annual Precipitation (in/yr) P	Average Basin Elevation H	100-yr flood flow Q_{100} (cfs) North Coast[1] (NC)	Sierra[2] (S)	North-east[3] (NE)	Central Coast[4] (CC)
1	***3***	6.18	1560	1280	0.010	48.84	1420	***7.6***	***7.2***	***10.3***	***10.6***
2	***4***	8.93	1560	1160	0.014	48.84	1360	***10.4***	***10.1***	***13.5***	***14.5***
3	***9***	12.71	480	200	0.020	40.52	340	***12.8***	***15.4***	***13.1***	***16.2***
4	***13***	8.26	360	40	0.013	40.52	200	***8.8***	***12.0***	***9.6***	***11.3***
5	***6a***	2.5	680	560	0.004	40.52	620	***3.1***	***3.2***	***4.0***	***4.1***
6					0.000		0	***0.0***	***#DIV/0!***	***0.0***	***0.0***
7					0.000		0	***0.0***	***#DIV/0!***	***0.0***	***0.0***
8					0.000		0	***0.0***	***#DIV/0!***	***0.0***	***0.0***
9					0.000		0	***0.0***	***#DIV/0!***	***0.0***	***0.0***
10					0.000		0	***0.0***	***#DIV/0!***	***0.0***	***0.0***

See below for M&F equations

Rational Method for 100-year flood flow (A < 200 acres, best < 100 acres)

No.	Crossing	$T_c = 60((11.9 \times L^3)/H)^{0.385}$ Channel length (to top of basin) (mi) L	Elevation difference (ft) H	Concentra-tion time (min) Tc	$Q_{100} = CIA$ Runoff coefficient C	100-year Return-Period Precipitation (in/hr) I*	Area (acres) A	100-yr flood flow (cfs) Q100
1	***3***	0.14	280	*2*	0.3	3.576	6.18	***6.6***
2	***4***	0.19	400	*2*	0.3	3.57	8.93	***9.6***
3	***9***	0.28	280	*4*	0.3	3.288	12.71	***12.5***
4	***13***	0.25	320	*3*	0.3	3.306	8.26	***8.2***
5	***6a***	0.04	120	*1*	0.3	3.36	2.5	***2.5***
6			0	*#DIV/0!*			0	***0.0***
7			0	*#DIV/0!*			0	***0.0***
8			0	*#DIV/0!*			0	***0.0***
9			0	*#DIV/0!*			0	***0.0***
10			0	*#DIV/0!*			0	***0.0***

Use 100-yr precipitation of duration similar to Tc or for 10 min, whichever is larger; convert to in/hr for input as "I"

Magnitude & Frequency Q_{100} equations

NC (1) $Q_{100} = 48.5(A)^{0.866}(P)^{0.556}$

S (2) $Q_{100} = 20.6\ (A)^{0.874}(P)^{1.24}(H)^{-0.250}$

NE (3) $Q_{100} = 0.713\ (A)^{0.731}(P)^{1.56}$

CC (4) $Q_{100} = 11.0\ (A)^{0.84}(P)^{0.994}$

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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 #6 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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914. The location of Tractor Roads, except for those used in Tethered Operations, to be used under such exceptions shall be flagged prior to the pre-harvest inspection or, when a pre-harvest inspection is not required, prior to the start of Timber Operations.

The area was assessed for cable yarding potential. The harvest unit was found to contain the following conditions: predominantly moderate slopes, short reaches, lack of adequate deflection for cable yarding, and/or lack of existing access roads for cable yarding equipment. Existing tractor roads that do not require reconstruction will be utilized, thereby minimizing the potential for concentrated soil displacement and excessive site disturbance. Tractors are restricted to existing skid trails in these areas. The existing tractor road network will provide adequate access for the proposed harvest and will allow for the reuse of an existing tractor landing on the permanent road.

The proposed practice will provide protection equal to that of the standard rule by using only pre-existing stable tractor roads where potential for sediment delivery to watercourses can be effectively avoided. The exception practice is proposed on upper slopes above an existing, stable permanent truck road approximately 2,000' from the nearest receiving Class I watercourse. Localized areas exhibiting signs of slope movement (scarps, hummocky ground, leaning or pistol-butt trees) within D1 have been identified by the RPF on the ground and have been designated equipment exclusion zones (EEZ). No skid trail use or timber operations of any kind will occur in these EEZs. See THP maps in Section II for EEZ locations.

This activity is not expected to have a significant adverse effect on the beneficial uses of water or soil productivity based on the following factors:

- No tractor road use during the winter period.
- Heavy equipment use is limited to ingress and egress on existing skid trails where slopes exceed 65% or where slopes exceed 50% with High EHR.
- Heavy equipment is restricted to existing tractor roads pre-flagged by the RPF.
- End lining into steep areas from existing skid trails is required where timber cannot be felled onto the trail.
- Concentrations of soil or debris crowded off the outside edge of a tractor road will be pulled back onto the tractor road at the completion of operations.
- Upon completion skid trails utilized shall be waterbarred to the Extreme EHR standard.

ITEM 21(b) & (c) USE OF GROUND BASED EQUIPMENT ON SLOPES STEEPER THAN 65% AND ON SLOPES STEEPER THAN 50% WHERE THE EHR IS HIGH OR EXTREME

The Standard Rule: CCR 914.2 (f) The following limitations shall apply:
(1) Except for Tethered Operations, heavy equipment shall be prohibited where any of the following conditions are present:
(A) Slopes steeper than 65%
(B) Slopes steeper than 50% where the erosion hazard rating is high or extreme.

Explain and describe each proposed practice: Ground-based equipment use is proposed in two areas where the average slope exceeds 50%, in places exceeding 65%, and EHR is High. The exception areas total approximately 6.3 acres in aggregate. The exception areas were last harvested using ground-based equipment and the existing infrastructure supporting ground-based systems is in good condition. Reuse of existing tractor roads will allow for the installation of modern erosion control facilities.

How the proposed practice differs from the standard practice: The proposed practice would allow for ground-based operations on slopes steeper than 65% and on slopes steeper than 50% where the EHR is high or extreme.

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The specific locations where it shall be applied: The exception practice is proposed in an area of VR Unit 3/GSEL Unit 2 and VR Unit 6. 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 § 914. The location of Tractor Roads, except for those used in Tethered Operations, to be used under such exceptions shall be flagged prior to the pre-harvest inspection or, when a pre-harvest inspection is not required, prior to the start of Timber Operations.

Each area was assessed for cable yarding potential. These units were found to contain the following conditions: predominantly moderate slopes, short reaches, lack of adequate deflection for cable yarding, and/or lack of existing access roads for cable yarding equipment. Existing tractor roads that do not require reconstruction will be utilized, thereby minimizing the potential for concentrated soil displacement and excessive site disturbance. Tractors are restricted to existing skid trails in these areas. The existing tractor road network will provide adequate access for the proposed harvest.

The proposed practice will provide protection equal to that of the standard rule by using only pre-existing stable tractor roads and potential for sediment delivery to watercourses can be avoided. This activity is not expected to have a significant adverse effect on the beneficial uses of water or soil productivity based on the following factors:

- No tractor road use during the winter period.
- Heavy equipment use is limited to ingress and egress on existing skid trails where slopes exceed 65% or where slopes exceed 50% with High EHR.
- Heavy equipment is restricted to existing tractor roads pre-flagged by the RPF.
- End lining into steep areas from existing skid trails is required where timber cannot be felled onto the trail.
- Concentrations of soil or debris crowded off the outside edge of a tractor road will be pulled back onto the tractor road at the completion of operations.
- Upon completion skid trails utilized shall be waterbarred to the Extreme EHR standard.

ITEM 25(b) PROPOSED ROAD AND LANDING CONSTRUCTION IN ASP WATERSHEDS

14 CCR 923.1(g): In watersheds with listed anadromous salmonids and in planning watersheds immediately upstream of, and contiguous to, any watershed with listed anadromous salmonids, where Logging Road or Landing construction or reconstruction is proposed, the plan shall identify:

(1) How the proposed operations will fit into the systematic layout pattern: **This THP proposes one short spur road totaling approximately 150 feet in length to access a control point for cable yarding operations such that blind leads are avoided and deflection is improved. This spur is necessary to facilitate contemporary cable yarding systems in a unit that was previously harvested with ground-based equipment. The alternative to building the proposed road spur would involve extensive exception skidding on slopes >65% and reopening a legacy road which requires extensive reconstruction across unstable areas and installation of five crossing structures.**

(2) What, if any, offsetting mitigation measures, including, but not limited to, Abandonment of Logging Roads and Landings, are needed to minimize potential adverse Impacts to watersheds from the road system: **The construction of the proposed road spur will allow for the passive abandonment of a legacy road which**

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metric tons of CO2. It is also estimated that the CO2 sequestration associated with this project will result in **64,270 metric tons of CO2 sequestered over the 100-year planning horizon**. *See GHG calculation worksheets in Section V for more information.* This sequestration total includes emissions from site preparation, non-biological emissions associated with harvesting and non-biological emissions associated with milling. GHG emissions associated with this project are insignificant relative to global CO2 emissions that are thought to affect climate. There is virtually no opportunity to reduce these emissions in a manner that would meaningfully benefit the climate because they are already miniscule. (U.S.E.P.A. 2005). An acre of managed forest may be entered with equipment once every 15-20 years with emissions measured in hours of equipment operation over that time period. Few if any other land uses can match the low intensity of CO2 emissions over space and time that are associated with commercial forestry. In urban areas of California, a typical California household will operate one or more vehicles every day and the demands of that household will induce a variety of additional CO2 emissions for other forms of commerce, power production, and consumption. In rural areas, even a typical farm acre in California will be subject to equipment operation for several hours or days every year over 20 years - not once every 20 years.

The insignificant GHG effects of the proposed project are further diminished by the effects of carbon stored in wood products produced from harvest and by the forest stewardship principals used by GRT, which strives to increase forest stocking over time.

On the project scale, the beneficial impacts on carbon sequestration and the project-related CO2 emissions related to global warming are negligible and undetectable at the global scale. The CO2 emissions from vehicles used to implement the project over several weeks or months are dwarfed by the CO2 emissions from other routine daily activities engaged in by all Californians such as a single morning commute for even one city. Also, the implementation of new standards for diesel engines recently adopted by the CARB (CARB 2022) will help to reduce emissions. When considering the impacts of this project on climate it is doubtful that a measurable change could be detected, even at the microclimate level.

Greenhouse Gas Conclusion

This plan, alone or in combination with other harvest plans in the past in the watershed, ownership, Mendocino & Sonoma County, or State of California is not expected to have an adverse impact on climate change. Carbon from trees harvested will be stored for decades or longer in the form of the wood products cut from the logs. Importantly, additional carbon will be sequestered in the future as newly planted, sprouting, and growing crop trees occupy and grow on the site. Therefore, in combination with the goals of the State, future projects likely will not impact Climate Resources. The proposed THP activities will not have a significant impact on GHG. The stands will take approximately 6 years for Selection, 11 years for Group Selection, 9 years for Commercial Thinning, and 44 years for Variable Retention to recoup carbon lost from initial harvesting and milling emissions. An evaluation of interactions of proposed project activities with the impacts of Past Projects and Reasonably Foreseeable Probable Future Projects on GHG reveals that there is no significant cumulative impact, and that current conditions will be maintained through the project implementation.

Identification of Information Sources - G. Greenhouse Gases

AB 1493, Pavley, Chapter 200, Statutes 2002, Findings and Declarations.

AB 32, Nunez, 2006, Air pollution, California Global Warming Solutions Act, 2006

Bast, J. and Taylor, J., 2007. Scientific Consensus on Global Warming. Results of an international survey

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2. Once following ten (10) inches of cumulative rainfall commencing on November 15 and prior to March 1, as worker safety and access allows; and
3. After April 1 and before June 15 to assess the effectiveness of management measures designed to address controllable sediment discharges and to determine if any new controllable sediment discharge sources have developed.

Winter operations proposed under this plan include timber falling, limited ground-based yarding, cable yarding, and limited road and landing use. See Item 23 WPOP in THP Section II for more information on conditions and limitations.

If during any inspection or during the course of conducting timber harvest activities, a violation of an applicable water quality requirement or conditions of the General WDRs is discovered, the provisions of section III.B.3. shall be followed. For all other inspections conducted pursuant to section III.G. where violations are not discovered, the Discharger shall submit a summary report to the Executive Officer by June 30 for each year of coverage under the General WDRs or upon termination of coverage. The summary report shall at a minimum include the date of each inspection, the inspector's name, the location of each inspection, and the title and name of the person submitting the summary report. The inspection reports shall be signed by the Discharger or their duly authorized representative, pursuant to section IV.S.

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Outlook

Re: 1-26-00076-SON Required Corrections

From Seamus Morrison Fleming <seamus@jaforestry.com>
Date Thu 10/8/2026 3:24 PM
To Hedge, Eric@CALFIRE <eric.hedge@fire.ca.gov>; CAL FIRE Santa Rosa Review Team <santarosareviewteam@fire.ca.gov>
Cc Mark Pugsley <mpugsley@pacificstates.com>

2 attachments (2 MB)
LP_revised pages.pdf; RPF Response to CAL FIRE 1.docx;

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

See attached.

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

From: Hedge, Eric@CALFIRE <eric.hedge@fire.ca.gov>
Sent: Tuesday, September 29, 2026 7:02 AM
To: Seamus Morrison Fleming <seamus@jaforestry.com>; mpugsley@pacificstates.com <mpugsley@pacificstates.com>
Cc: CAL FIRE Santa Rosa Review Team <santarosareviewteam@fire.ca.gov>
Subject: 1-26-00076-SON Required Corrections

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In preparing responses to public comment, CAL FIRE has identified additional revisions which are necessary in order to bring the above-mentioned THP into conformance with the Forest Practice Act and Rules. I will call this morning to discuss

1. The plan states that drafting from shallow watercourses where that water level is lowered is a concern for FYLF and states that there is no habitat at risk of this within the plan area. The plan proposes propose drafting from existing Class I. Please clarify the habitat within water drafting locations regarding suitability for FYLF. If FYLF is not at risk due to drafting practices, please clarify the mechanism by which those drafting operations avoid impact for the species. Additionally, the plan states that protection will be provided by WLPZ requirements and ASP zones. Please clarify how the proposed operations within WLPZs have been designed to avoid impact of the species. Finally, the plan states that red-legged frog protection measures will provide protection for the FYLF. Please clarify the biological

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suitability of the red legged frog protection measures for foothill yellow legged frog. Please clarify if the red legged frog observation measures are to be implemented for fylf.

2. Unstable area D1: The references on Section II, page 28, and Section III, page 113, to "VR Unit 7," and the page 113 reference to approximately 6.3 acres, are inconsistent with the revised text and maps.
3. Winter operations: Section II, pages 30–34, checks yes for winter operations and mechanical site preparation and allows YUM treatment, cable yarding, specified ground-based operations during dry rainless periods, shovel and feller-buncher work, road or landing use on stable surfaces, and limited WLPZ falling, log-lining, cable yarding, and maintenance. Section IV, pages 140–140.1, says there will be no winter site preparation, while the Erosion Control Plan on Section V, page 237, says the only winter operations are potential falling on gentle ground away from watercourses and pickup travel during extended dry periods.
4. In Section III discussion of exception to 914.2(f)(2), revise justification to exception, eliminating discussion of 923, which is relevant only to logging roads and not tractor roads and provides no authority in evaluating exceptions to 14 CCR Section 914.2
5. In Section III discussion of exceptions to 914.2, remove the phrase "one or more" when describing site conditions and limit the list to the existing site conditions.
6. Please provide culvert sizing calculations for Map Point 6a
7. Please correct the summary statement in "Greenhouse Gas Conclusions" to reflect the silviculture and calculated values provided in the calculation worksheets.

Eric Hedge, RPF 3010
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